

Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 CFR §1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with targeted disabilities in the federal government

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

- | | | |
|--------------------------------|--------|----|
| a. Cluster GS-1 to GS-10 (PWD) | Answer | No |
| b. Cluster GS-11 to SES (PWD) | Answer | No |

*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

- | | | |
|---------------------------------|--------|----|
| a. Cluster GS-1 to GS-10 (PWTD) | Answer | No |
| b. Cluster GS-11 to SES (PWTD) | Answer | No |

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10					
Grades GS-11 to SES					

3. Describe how the agency has communicated the numerical goals to the hiring managers and/or recruiters.

N/A

Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If “no”, describe the agency’s plan to improve the staffing for the upcoming year.

Answer Yes

2. Identify all staff responsible for implementing the agency's disability employment program by the office, staff employment status, and responsible official.

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Architectural Barriers Act Compliance	4	0	0	George Betters Director george.bettters@eeoc.gov
Section 508 Compliance	2	0	0	terri.youngblood@eeoc.gov
Processing applications from PWD and PWTD	4	0	0	Shelita Aldrich Director, Operational Services Division Shelita.Aldrich@eeoc.gov
Processing reasonable accommodation requests from applicants and employees	1	0	0	Jackie Cumber Disability Program Manager jackie.cumber@eeoc.gov
Answering questions from the public about hiring authorities that take disability into account	8	0	0	Shelita Aldrich Branch Chief, Operational Services Division Shelita.Aldrich@eeoc.gov
Special Emphasis Program for PWD and PWTD	0	0	1	Stan Pietrusiak Director Stan.Pietrusiak@eeoc.gov

3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If “yes”, describe the training that disability program staff have received. If “no”, describe the training planned for the upcoming year.

Answer Yes

The Disability Program Manager is a certified Vocational Rehabilitation Counselor. She completed the following courses: Basic Labor Relations; Power, Influencing and Negotiations Skills; Briefing Techniques; CAP 2019 Joint Disability and Reasonable Accommodation Summit; and Cyberfeds research. Also, the DPM assisted the Office of Field Operations in conducting the DPM Basics Training course.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If “no”, describe the agency’s plan to ensure all aspects of the disability program have sufficient funding and other resources.

Answer Yes

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	B.4.a.4. to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.		
Objective	To improve EEO process through training and prevention.		
Target Date	Sep 30, 2020		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2018	September 30, 2018	Map EEO process
	Sep 30, 2019	September 30, 2019	Fill positions that have been authorized
	Dec 31, 2019		Perform Lean Six Sigma event to look for bottlenecks and gaps in process
	Dec 31, 2019	November 30, 2019	Develop biweekly Metrics report with status.
	May 30, 2020	February 7, 2020	Develop EEO Dashboard and quarterly reports
	Sep 30, 2020		Complete analysis of Responsible Management Official (RMO)
	Sep 30, 2020		Develop Agency wide training based on top 1 or 2 complaint basis
	Sep 30, 2020		Provide at least one mandatory EEO Training Agency wide annually
	Sep 30, 2021		Develop SharePoint site to allow reporting for leadership
Sep 30, 2021		Perform quarterly office/area audits based on greatest number of complaints	
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2018	Authorized to hire two Attorney Advisors, one counselor, one investigator, and one EO Assistant	
	2018	Given authorization and funding to use contractors for investigations	
	2018	Been approved to purchase Tableau Software to develop Dashboards	
	2018	Requested additional Attorney Advisor and Special Emphasis Program Manager	
	2019	<ul style="list-style-type: none"> Starting development of quarterly reports. Purchased Tableau software to develop Dashboards 	
	2019	<ul style="list-style-type: none"> OEO met with OIT to discuss SharePoint development 	
	2019	<ul style="list-style-type: none"> OEO hired two Attorney Advisors, one counselor, one investigator, and one EO Assistant. 	
	2019	<ul style="list-style-type: none"> OEO was given authorization and funding to use contractors to assist with investigations. 	
2019	<ul style="list-style-type: none"> OEO requested additional authorization for Special Emphasis Program Manager. 		

Brief Description of Program Deficiency	B.4.a.6. to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]		
Objective	Publish and distribute EEO materials		
Target Date	Sep 30, 2019		
Completion Date	Sep 30, 2019		
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	Purchased video material for distribution for Special Emphasis Months	
	2019	Purchased posters to distribute throughout the agency	

Brief Description of Program Deficiency	B.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]		
Objective	Hire a Special Emphasis Program Manager		
Target Date	Sep 30, 2020		
Completion Date	Apr 15, 2020		
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2020	April 2020 hired a Special Emphasis Program Manager	

Brief Description of Program Deficiency	C.2.a.6. Do the agency’s training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR §1614.203(d)(2)]
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Section IV: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency’s recruitment program plan for PWD and PWTDD

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

1. Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.

OPM’s Shared List of People with Disabilities for recruitment; Ticket-to-Work Program which provides people receiving Social Security disability benefits choices for receiving employment services; State Vocational Rehabilitation Agencies (SVRAs) and State Disability Service agencies to recruit potential applicants with disabilities; DOL’s Veterans’ Employment and Training Service (VETS) program; VA’s Vocational Rehabilitation and Employment (VR&E) Service, which fills workforce needs with trained, educated, and experienced disabled veterans; DOD’s Operation Warfighter and Hiring Heroes Programs.

2. Pursuant to 29 C.F.R. §1614.203(a)(3), describe the agency’s use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTDD for positions in the permanent workforce

Schedule A hiring authority is used when applicants apply and are selected based on being a PWD or PWTDD.

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority; and, (2) forwards the individual’s application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

A. Job advertisement for EEOC vacancy announcements are primarily posted on USAJOBS, where applicants with disabilities are directed to fax or email their completed application package directly to the DPM specifying the vacancy they wish to be considered, by vacancy identification number. Once received, the DPM determines if the applicant meets the Schedule A 213.23102(u) requirements and then forwards the application package to the appropriate Human Resource Specialist (HRS) for a qualification analysis. B. Applicants with disabilities may also provide their application directly to the hiring office at any time. The DRM or HRS must forward any medical documentation to the DPM to certify the candidate meets the Schedule A 213.3102(u) requirements and to insure the confidentiality of all medical information. The DRM or HRS may then certify that the applicant meets the qualifications for the position. C. Applicants with disabilities may also provide their application to an EEOC representative at hiring job fairs. These applications are then provided to the DPM who will then certify that the candidate meets the Schedule A 213.3102 (u) requirements before forwarding the application package to the appropriate DRM and/or HRS for a qualification analysis. D.

Applicants with disabilities may also provide their application directly to the DPM at any time. The DPM reviews the current recruitment inventory to identify potential position(s), determines that the applicant meets the Schedule A 213.3102(u) requirements and then forwards the application package onto the appropriate HRS for possible certification. E. As an additional recruitment source, EEOC vacancy announcements are provided to various stakeholder groups by the DPM. Applications received by the DPM are then forwarded to the appropriate HRS for a qualification analysis.

- 4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If “yes”, describe the type(s) of training and frequency. If “no”, describe the agency’s plan to provide this training.

Answer Yes

The agency provides annual training for new and mid-level supervisors on hiring, which includes Schedule A hiring for PWD/PWTD. EEOC has also developed the “ABCs of SCHEDULE A for the Hiring Manager and How to Hire Using the Schedule A Appointing Authority” for government-wide usage. The guidance is located on EEOC.gov and our intranet page.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

Describe the agency’s efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

The agency conducts annual training for new supervisors and mid-level supervisors on hiring, which includes Schedule A hiring for PWD/PWTD. EEOC also has developed for government-wide usage the “ABCs of SCHEDULE A for the Hiring Manager and How to Hire Using the Schedule A Appointing Authority”. The guidance is located on EEOC.gov and our intranet page.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

- 1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If “yes”, please describe the triggers below.

a. New Hires for Permanent Workforce (PWD) Answer No

b. New Hires for Permanent Workforce (PWTD) Answer No

New Hire PWD 27.38% PWTD 7.14%

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	0				
% of Qualified Applicants	0				
% of New Hires	0				

- 2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission- critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires for MCO (PWD) Answer No

b. New Hires for MCO (PWTD) Answer No

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Qualified Applicants for MCO (PWD) Answer No
- b. Qualified Applicants for MCO (PWTD) Answer No

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Promotions for MCO (PWD) Answer No
- b. Promotions for MCO (PWTD) Answer No

Selection rate is below the benchmark.

Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

A. ADVANCEMENT PROGRAM PLAN

Describe the agency’s plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

EEOC ensures that employees with disabilities are accommodated in all training and development opportunities, including the following: In FY 2019, EEOC provided various external opportunities for training and development for employees at all levels (entry, mid-level, supervisory, managerial, and executive). Most programs supported professional and technical training and developmental needs as part of each employee’s Individual Development Plan (IDP). During FY 2019, the Agency approved 292 employee training requests. Employees submit training requests quarterly. Also, EEOC provides technical training and development through its National Training Program. This Program is geared towards EEOC's mission-critical occupations. In FY 2019, EEOC continued its internal rotational (details) program aimed at developing leadership and cross-functional skills and capabilities. The EEOC Mentoring Program is focused on connecting employees across EEOC with leaders who have experience and passion in the development of others. The goal of the Program is to foster relationships between the leaders of EEOC with employees who might work in a separate area, and to create discussion and learning around a specific topic. This program is open to every EEOC employee, regardless of position, grade, or status.

B. CAREER DEVELOPMENT OPPORTUNITES

1. Please describe the career development opportunities that the agency provides to its employees.

See response to IV.A above.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/ approval to participate.

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	0	0	0	0	0	0
Fellowship Programs	0	0	0	0	0	0
Training Programs	0	0	0	0	0	0
Other Career Development Programs	0	0	0	0	0	0
Mentoring Programs	81	76	0	N/A	N/A	N/A
Coaching Programs	5	5	0	0	0	0
Detail Programs	0	0	0	0	0	0

3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWD) Answer No
- b. Selections (PWD) Answer No

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWTD) Answer No
- b. Selections (PWTD) Answer No

C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

- a. Awards, Bonuses, & Incentives (PWD) Answer No
- b. Awards, Bonuses, & Incentives (PWTD) Answer No

Category PWD Non-Disabled employees Cash Awards (\$500 or more) 62% 63.48% Time Off Awards (9 hours or more) 63.48% 67.37% All other awards to PWDs were within 1% of those received by non-disabled employees (or exceed the level of awards received by non-disabled employees). Category PWTD Non-Disabled employees Cash Awards (\$100 to \$500) 9.65% 19.06% Cash Awards (\$500 or more) 58.77% 64.95% Time Off Awards (9 hours or more) 56.14% 67.08% In FY 2018, the Agency did not identify any triggers for this category. The FY 2019 data indicates that there has been a change in the relative percentages of awards between PWD/PWTDs and non-disabled employees. During the Agency’s barrier analysis data review for FY 2019, we did not

Identify any specific policy, procedure, or practice that would constitute a barrier to PWD or PWTD receiving comparable awards. The Agency will continue to monitor this data in FY 2020.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If “yes”, please describe the trigger(s) in the text box.

- a. Pay Increases (PWD) Answer No
- b. Pay Increases (PWTD) Answer No

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Performance Based Pay Increase	0	0.00	0.00	0.00	0.00

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.

- a. Other Types of Recognition (PWD) Answer N/A
- b. Other Types of Recognition (PWTD) Answer N/A

D. PROMOTIONS

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. SES
 - i. Qualified Internal Applicants (PWD) Answer N/A
 - ii. Internal Selections (PWD) Answer N/A
- b. Grade GS-15
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer No
- c. Grade GS-14
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer No
- d. Grade GS-13

- i. Qualified Internal Applicants (PWD) Answer No
- ii. Internal Selections (PWD) Answer No

Note: An abnormally high percentage of applicants at the did not identify their disability status. This high rate of non-identification for applicants at these levels can cause problems in the barrier analysis where applicants did not report their status but internally selected candidates did so. Using a combination of identified disability and veterans with service connected disability to get total PWD numbers. At GS-15 this doubled the number of PWD. For selections used the personnel system which shows a much higher selection rate than the staffing system. Most people not found qualified was due to ineligibility for the position. Further analysis is difficult, seeing as no names in applicant flow data. Other items would be (1) ensuring that all individuals in the applicant pool are in fact eligible for promotions (i.e., have worked at least one year at the required grade level); and (2) analyzing vacancy announcements that require education or certification credentials (such as attorneys).

2. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. SES

- i. Qualified Internal Applicants (PWTD) Answer N/A
- ii. Internal Selections (PWTD) Answer N/A

b. Grade GS-15

- i. Qualified Internal Applicants (PWTD) Answer Yes
- ii. Internal Selections (PWTD) Answer No

c. Grade GS-14

- i. Qualified Internal Applicants (PWTD) Answer Yes
- ii. Internal Selections (PWTD) Answer No

d. Grade GS-13

- i. Qualified Internal Applicants (PWTD) Answer Yes
- ii. Internal Selections (PWTD) Answer No

No applicant identified as PWTD, Yet selection rate for PWTD at GS-13 is 22.22% and at GS-14 is 4%. Additionally, there is an abnormally high percentage of did not identify disability. This high rate of non-identification for applicants at these levels caused problems in the barrier analysis where applicants did not report their status but internally selected candidates did so.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires to SES (PWD) Answer No
- b. New Hires to GS-15 (PWD) Answer No
- c. New Hires to GS-14 (PWD) Answer No
- d. New Hires to GS-13 (PWD) Answer No

The data was insufficient to determine whether a barrier existed for this category. We note that the Agency received 4 qualified applicants for new hires at the SES level (of which one applicant was a PWD) and the Agency selected a non-disabled individual.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- | | | |
|------------------------------|--------|----|
| a. New Hires to SES (PWTB) | Answer | No |
| b. New Hires to GS-15 (PWTB) | Answer | No |
| c. New Hires to GS-14 (PWTB) | Answer | No |
| d. New Hires to GS-13 (PWTB) | Answer | No |

None selected. Majority selected were not identified.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- | | | |
|--|--------|-----|
| a. Executives | | |
| i. Qualified Internal Applicants (PWD) | Answer | N/A |
| ii. Internal Selections (PWD) | Answer | N/A |
| b. Managers | | |
| i. Qualified Internal Applicants (PWD) | Answer | N/A |
| ii. Internal Selections (PWD) | Answer | N/A |
| c. Supervisors | | |
| i. Qualified Internal Applicants (PWD) | Answer | No |
| ii. Internal Selections (PWD) | Answer | No |

There were no internal SES promotions in FY 2019. The Agency’s applicant flow data does not contain information regarding managers.

6. Does your agency have a trigger involving PWTB among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- | | | |
|---|--------|-----|
| a. Executives | | |
| i. Qualified Internal Applicants (PWTB) | Answer | N/A |
| ii. Internal Selections (PWTB) | Answer | N/A |
| b. Managers | | |

- i. Qualified Internal Applicants (PWTD) Answer N/A
- ii. Internal Selections (PWTD) Answer N/A
- c. Supervisors
 - i. Qualified Internal Applicants (PWTD) Answer No
 - ii. Internal Selections (PWTD) Answer No

There were no internal SES promotions in FY 2019. The Agency’s applicant flow data does not contain information regarding managers.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- a. New Hires for Executives (PWD) Answer Yes
 - b. New Hires for Managers (PWD) Answer N/A
 - c. New Hires for Supervisors (PWD) Answer No

The data was insufficient to determine whether a barrier existed for this category. We note that the Agency received 4 qualified applicants for new hires at the SES level (of which one applicant was a PWD) and the Agency selected a non-disabled individual. The Agency’s applicant flow data does not contain information regarding managers.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- a. New Hires for Executives (PWTD) Answer No
 - b. New Hires for Managers (PWTD) Answer N/A
 - c. New Hires for Supervisors (PWTD) Answer No

The Agency’s applicant flow data does not contain information regarding managers.

Section VI: Plan to Improve Retention of Persons with Disabilities

To be model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace assistance services.

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If “no”, please explain why the agency did not convert all eligible Schedule A employees.

Answer No

The Office of Personnel Management does not currently require the Agency to convert all eligible Schedule A employees with a

disability into the competitive service after two years of satisfactory service. The Agency does highly encourage supervisors to do so.

2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.

- a. Voluntary Separations (PWD) Answer Yes
- b. Involuntary Separations (PWD) Answer No

The percentage of PWD among voluntary separations was 14.23%, as compared to 7.36% for persons without disabilities.

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
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3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If “yes”, describe the trigger below.

- a. Voluntary Separations (PWTD) Answer Yes
- b. Involuntary Separations (PWTD) Answer No

The percentage of PWTD among voluntary separations was 10.53%, as compared to 8.85% for persons without disabilities. The percentage of PWTD among involuntary separations was 2.63%, as compared to .47% for persons without disabilities.

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
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4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

Voluntary-46% Retired, 17% moved to another agency, and 37% Resigned Involuntary-50% Removal, and 50% Termination during probationary period

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 CFR §1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the agency’s public website for its notice explaining employees’ and applicants’ rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

For the EEOC's Section 508 website <https://www.eeoc.gov/accessibility>

2. Please provide the internet address on the agency’s public website for its notice explaining employees’ and applicants’ rights under the Architectural Barriers Act, including a description of how to file a complaint.

The Architectural Barriers Act (ABA) website <https://www.eeoc.gov/accessibility>

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

The Agency is in process of modernizing and procuring a case management system. This year, the Agency plans to continue purchasing sit/stand desks, ergonomic chairs, and other ergonomic equipment as a reasonable accommodation to assist employees with disabilities. This equipment will not only be purchased for qualified individuals with disabilities, but also for employees without disabilities through the Agency's Ergonomics Program. We will continue to work with building leaseholders throughout the country to arrange parking accommodations for employees, to ensure facility compliance with ingress and egress, and to provide safe evacuations of persons with disabilities from buildings during emergencies.

C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

The average processing time frame for processing initial requests for reasonable accommodation during FY 2019 is 24 business days.

2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

The Agency updated and published its policies on Reasonable Accommodation and Personal Assistance Services during first quarter 2019. The Agency continues to provide training via in person and conference on the reasonable accommodation policies and process to supervisors and managers. Also, all reasonable accommodation requests are updated into a database for tracking, trend analysis and reporting.

D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

Pursuant to 29 CFR §1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

The Agency's policy and procedures on PAS are effective in aiding/guiding the EEOC workforce. All requests for PAS are handled as priority.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the governmentwide average?

Answer Yes

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Answer No

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.
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B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?

Answer Yes

2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?

Answer No

3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.
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Section VIII: Identification and Removal of Barriers

Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Answer No

2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?

Answer N/A

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments

4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.
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5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).
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6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.
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