

## 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 Yes
- b. Cluster GS-11 to SES (PWD) Answer Yes

PWD are underrepresented in Cluster GS-1 to GS-10 at 3.74% vs 12%.; PWD are underrepresented in Cluster GS-11 to SES at 6.80% vs 12%.

\*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 Yes
- b. Cluster GS-11 to SES (PWTD) Answer Yes

PWTD are underrepresented in Cluster GS-1 to GS-10 at 1.02% vs 2%;; PWTD are underrepresented in Cluster GS-11 to SES at 0.68% vs 2%.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical 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.

Due to the small size of the agency, it does not have recruiters and the main recruitment tools are posting positions on USAJOBS and on the FEC website where users can sign up for email notifications when new positions are posted. Managers can request particular recruitment methods other than USAJOBS when they submit their recruitment request for a particular vacancy. In FY 2020, the EEO Office communicated the numerical goals (and corresponding requirements) to the HR Director and staff. Additionally, the implementation and/or modification of current hiring policies requires approval of four or more Commissioners. The Commission lost its quorum in August 2019, and therefore the timing for the adoption of revised policies is contingent on when

the Commission regains a quorum.

## 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	
Answering questions from the public about hiring authorities that take disability into account	2	0	0	same as above
Processing reasonable accommodation requests from applicants and employees	1	0	0	Cheryl Painter (RAC) Disability Program Manager cpainter@fec.gov
Section 508 Compliance	1	0	0	Patchtree Phongsvirajati Webmaster & 508 Coordinator 508coordinator@fec.gov
Special Emphasis Program for PWD and PWTB	1	0	0	Cheryl Painter (RAC) Disability Program Manager cpainter@fec.gov
Processing applications from PWD and PWTB	2	0	0	Lauren Lien, Acting HR Director llien@fec.gov rthough@fec.gov
Architectural Barriers Act Compliance	1	0	0	India Robinson Physical Security Officer & Admin. Services Mgr.

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 agency's DPM remains current on disability-related law and federal sector training offered in the Washington, DC area. The DPM is an active member of the Federal Exchange on Employment & Disability (FEED) group and participates in other disability-related networks. At the beginning of the fiscal year, the FEC designated a new Selective Placement Coordinator and will be seeking similar supplemental training opportunities to enhance that position.

**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**

<b>Brief Description of Program Deficiency</b>	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]		
<b>Objective</b>	The EEO office and the HR office will collaborate to implement and further develop the agency's Affirmative Action Plan for Individuals with Disabilities. OPTIONAL H <500 employees		
<b>Target Date</b>	Sep 30, 2022		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2022		Collaborate with HR staff to develop and implement an agency affirmative employment plan that adopts EEOC hiring goals for PWD and PWTD.. Implementation may depend on reestablishment of the Commission's quorum.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]		
<b>Objective</b>	The agency will begin to conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities. OPTIONAL H <500 employees		
<b>Target Date</b>	Sep 30, 2022		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2022		Collaboration with HR staff to determine when this policy/ practice can be developed and implemented.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

**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 PWTD

**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.

Currently, the agency regularly advertises positions under the USAJOBS label “individuals with disabilities” to recruit Schedule A candidates and also advertises using various veterans preferences as appropriate. During FY ‘19, the HR and EEO Offices discussed

- and in FY '20 established - an ongoing agreement to enhance the agency's outreach efforts informally through the use of each office's respective resources, until an agency-wide recruitment program could be developed and approved by the Commission for implementation.

- 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 PWTD for positions in the permanent workforce

The agency regularly advertises positions under the USAJOBS label "individuals with disabilities" to recruit Schedule A candidates and as well as advertising under various veterans preferences as appropriate in order to recruit PWD and PWTD for positions in the permanent workforce. Additionally, OHR and HR Solutions are developing training and policies for hiring managers to instruct them regarding the rules and flexibilities available in the Schedule A hiring authority. That effort was temporarily interrupted by the COVID-19 pandemic; however, OHR continues to develop this training for hiring managers.

- 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.

In FY '19, the agency focused on seeking individuals who qualify under hiring authorities as a part of the merit promotion process, and less so on hiring off of a Schedule A list (for example). During minimum qualification review, applicants who qualify for status based on Schedule A or another preference are reviewed based on the vacancy announcement requirements to ensure necessary documentation is present. The specialist will walk the hiring officials through the hiring possibilities, if needed.

- 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

OHR provided introductory training regarding available hiring authorities during the three-year supervisory training requirement, most recently offered to all managers via OPM's Supervisory Development 1: Fundamentals - November 26-30, 2018 and to new managers as they were appointed. This training contains a module on Schedule A hiring and other hiring preferences. As previously mentioned, OHR plans to expand Schedule A training for hiring managers.

**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 DPM maintains informational contacts with the key members of the disability community (via ODEP, CAP, JAN, EARN etc.), in order to provide collaborative assistance to HR staff, hiring managers and other decision makers when vacancies needed to be filled. During FY'19, the DPM began coordinating efforts with the new Selective Placement Coordinator to improve agency responsiveness in this area.

**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 Yes

New Hires for Permanent Workforce (PWTD) are underrepresented at 0% vs 2%.

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 N/A
- b. New Hires for MCO (PWTD) Answer Yes

Complete applicant pool data was not available to make this analysis for PWD. A trigger exists for PWTD, as there were zero (0) PWTD applicants (0%). Please note that during FY’19, the FEC contracted Barrier Analysis (BA) services to properly address the various requirements of the MD-715 report. In the course of that process, it was determined that certain analyses could not be conducted due to lack of appropriate applicant pool data, which has affected the analysis for several sections of Part J. During FY’20, the EEO Office will collaborate further with the Office of Human Resources, Information Technology (and/or other offices as appropriate) to enhance the quality and quantity of data provided for analysis and examine any deficiencies in capturing the appropriate data.

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 N/A
- b. Qualified Applicants for MCO (PWTD) Answer N/A

Complete applicant pool data was not available to conduct this analysis. The EEO Office will collaborate with HR staff and/or IT staff to obtain appropriate applicant pool data by FY’22. In the course of the barrier analysis process, it was determined that certain analyses could not be conducted due to lack of appropriate applicant pool data. This has affected the analysis for several sections of Part J. During FY’20, the EEO Office will collaborate further with the Office of Human Resources, Information Technology (and/or other offices as appropriate) to enhance the quality and quantity of data provided for analysis and examine any deficiencies in capturing the appropriate data.

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 N/A
- b. Promotions for MCO (PWTD) Answer N/A

Complete applicant pool data was not available to conduct this analysis. The EEO Office will collaborate with HR staff and/or IT staff to obtain applicant pool data by FY'22. In the course of the barrier analysis process, it was determined that certain analyses could not be conducted due to lack of appropriate applicant pool data. This has affected the analysis for several sections of Part J. During FY' 20, the EEO Office will collaborate further with the Office of Human Resources, Information Technology (and/or other offices as appropriate) to enhance the quality and quantity of data provided for analysis and examine any deficiencies in capturing the appropriate data.

## 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.

Currently, an Advancement Program Plan has not been developed to ensure that PWD/PWTD have sufficient opportunities for advancement.

### B. CAREER DEVELOPMENT OPPORTUNITES

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

Each office is in charge of the training budget for their staff. Both position specific needs and professional development training needs are assessed and offered at the office level. The Office of Human Resources (OHR) assists managers by recommending trainings and vendors when requested. Supervisors are trained every three (3) years in the core competencies required by regulations.

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						
Fellowship Programs						
Mentoring Programs						
Coaching Programs						
Training Programs						
Detail Programs						
Other Career Development Programs						

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 N/A
- b. Selections (PWD) Answer N/A

Career development program data was not available to conduct this analysis.. The EEO Office will collaborate with HR staff and/or IT staff to obtain appropriate applicant data by FY'22.

4. Do triggers exist for PWTDD 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 (PWTDD) Answer N/A
- b. Selections (PWTDD) Answer N/A

Career development program applicant pool data was not available to conduct this analysis. The EEO Office will collaborate with HR staff and/or IT staff to obtain appropriate applicant data by FY'22.

**C. AWARDS**

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTDD 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 Yes
- b. Awards, Bonuses, & Incentives (PWTDD) Answer Yes

In the category of Time-Off Awards (1-9 hours), the PWD inclusion rate demonstrated underrepresentation at 34.38 % vs 36.26% for persons with no disability.. In the category of Cash Awards (\$500+), the PWD inclusion rate demonstrated underrepresentation at 71.86% % vs 90.46% for persons with no disability.. In the category of Cash Awards (\$500+), the PWTDD inclusion rate demonstrated underrepresentation at 80% vs 90.46% for persons with no disability.

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

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTDD 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 Yes
- b. Pay Increases (PWTDD) Answer Yes

In the category of QSIs, the PWD inclusion rate demonstrated underrepresentation at 3.13% % vs 5.34% for persons with no disability.. In the category of QSIs, the PWTDD inclusion rate demonstrated underrepresentation at 0% vs 5.34% for persons with no disability. .

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 No
  - ii. Internal Selections (PWD) Answer No
- 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

Complete applicant pool data was not available to conduct an analysis for PWD in these categories. In the course of the barrier analysis process, it was determined that certain analyses could not be conducted due to lack of appropriate applicant pool data. This has affected the analysis for several sections of Part J. During FY’20, the EEO Office will collaborate further with the Office of Human Resources, Information Technology (and/or other offices as appropriate) to enhance the quality and quantity of data provided for analysis and examine any deficiencies in capturing the appropriate data.

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 No
  - ii. Internal Selections (PWTD) Answer No

- b. Grade GS-15
  - i. Qualified Internal Applicants (PWTD) Answer No
  - ii. Internal Selections (PWTD) Answer No
- c. Grade GS-14
  - i. Qualified Internal Applicants (PWTD) Answer No
  - ii. Internal Selections (PWTD) Answer No
- d. Grade GS-13
  - i. Qualified Internal Applicants (PWTD) Answer No
  - ii. Internal Selections (PWTD) Answer No

Complete applicant pool data was not available to conduct an analysis for PWTD in these categories. In the course of the barrier analysis process, it was determined that certain analyses could not be conducted due to lack of appropriate applicant pool data. This has affected the analysis for several sections of Part J. During FY'20, the EEO Office will collaborate further with the Office of Human Resources, Information Technology (and/or other offices as appropriate) to enhance the quality and quantity of data provided for analysis and examine any deficiencies in capturing the appropriate data.

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

Complete applicant pool data was not available to conduct an analysis for PWD in these categories. In the course of the barrier analysis process, it was determined that certain analyses could not be conducted due to lack of appropriate applicant pool data. This has affected the analysis for several sections of Part J. During FY'20, the EEO Office will collaborate further with the Office of Human Resources, Information Technology (and/or other offices as appropriate) to enhance the quality and quantity of data provided for analysis and examine any deficiencies in capturing the appropriate data.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD 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 (PWTD) Answer No
- b. New Hires to GS-15 (PWTD) Answer No
- c. New Hires to GS-14 (PWTD) Answer No
- d. New Hires to GS-13 (PWTD) Answer No

Complete applicant pool data was not available to conduct an analysis for PWTD in these categories. In the course of the barrier

analysis process, it was determined that certain analyses could not be conducted due to lack of appropriate applicant pool data. This has affected the analysis for several sections of Part J. During FY'20, the EEO Office will collaborate further with the Office of Human Resources, Information Technology (and/or other offices as appropriate) to enhance the quality and quantity of data provided for analysis and examine any deficiencies in capturing the appropriate data.

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 No
- ii. Internal Selections (PWD) Answer No

b. Managers

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

c. Supervisors

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

Complete applicant pool data was not available to conduct an analysis for PWD in these categories. In the course of the barrier analysis process, it was determined that certain analyses could not be conducted due to lack of appropriate applicant pool data. This has affected the analysis for several sections of Part J. During FY'20, the EEO Office will collaborate further with the Office of Human Resources, Information Technology (and/or other offices as appropriate) to enhance the quality and quantity of data provided for analysis and examine any deficiencies in capturing the appropriate data.

6. Does your agency have a trigger involving PWTD 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 (PWTD) Answer No
- ii. Internal Selections (PWTD) Answer No

b. Managers

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

c. Supervisors

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

Complete applicant pool data was not available to conduct an analysis for PWD in these categories. In the course of the barrier analysis process, it was determined that certain analyses could not be conducted due to lack of appropriate applicant pool data. This has affected the analysis for several sections of Part J. During FY'20, the EEO Office will collaborate further with the Office of Human Resources, Information Technology (and/or other offices as appropriate) to enhance the quality and quantity of data provided for analysis and examine any deficiencies in capturing the appropriate data.

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 No
- b. New Hires for Managers (PWD) Answer No
- c. New Hires for Supervisors (PWD) Answer No

Complete applicant pool data was not available to conduct an analysis for PWD in these categories.

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 No
- c. New Hires for Supervisors (PWTD) Answer No

Complete applicant pool data was not available to conduct an analysis for PWTD in these categories. In the course of the barrier analysis process, it was determined that certain analyses could not be conducted due to lack of appropriate applicant pool data. This has affected the analysis for several sections of Part J. During FY'20, the EEO Office will collaborate further with the Office of Human Resources, Information Technology (and/or other offices as appropriate) to enhance the quality and quantity of data provided for analysis and examine any deficiencies in capturing the appropriate data.

## 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 agency does not currently have any employees that were hired under the Schedule A authority.

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

In the category of Voluntary Separations, the PWD inclusion rate (12.50%) exceeded the inclusion rate for persons with no disability (5.73%).

Seperations	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

In the category of Voluntary Separations, the PWTD inclusion rate (20%) exceeded the inclusion rate for persons with no disability (5.73%).

Seperations	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.

Exit interview data was not available for use in a causal analysis regarding PWD and PWTD separations.

**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.

<https://www.fec.gov/about/equal-employment-opportunity/>

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.

<https://www.fec.gov/about/equal-employment-opportunity/>

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 Office of the Chief Information Officer initiated an agency-wide program to train staff to make the documents they create in Microsoft Office accessible for the disabled. This was done to help the agency comply with federal laws requiring that all content posted in PDF format on the website be accessible to those using assistive technology.

**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.)

Within two (2) 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 FEC has maintains an effective accommodation program that processes accommodation requests and facilitates accommodation plan development in a timely manner. Disability awareness and accommodation-related training are offered at various times throughout the year; mandatory review of the Accommodation Policy is required of all staff biennially and new staff receive training during onboarding. Due, in part, to the agency's small size, we have not identified any current trends in accommodation requests. The agency’s Accommodation Policy was most recently approved by EEOC in April 2020.

**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 PAS notice was posted timely and the procedures for PAS have been incorporated in the agency’s Accommodation Policy. To date, no employee or applicant has requested PAS.

**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 No

- 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.

The agency had zero (0) findings of discrimination alleging harassment based on disability status during the last fiscal year.

**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 No

- 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.

The agency had zero (0) findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year.

### 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

<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p><b>LACK OF APPLICANT POOL DATA</b> -- In the course of the barrier analysis process, it was determined that certain analyses could not be conducted due to lack of appropriate applicant pool data. This has affected the analysis for the following sections of Part J: • Section III C. Progression towards Goals (Recruitment and Hiring) - items 3 &amp; 4 • Section IV B. Career Development Opportunities - items 2 &amp; 3 • Section IV D. Promotions - items 1-8 During FY'20, the EEO Office will collaborate further with the Office of Human Resources, Information Technology (and/or other offices as appropriate) to enhance the quality and quantity of data provided for analysis and examine any deficiencies in capturing the appropriate data. WORKFORCE DATA TABLES: B7, B9, B11, B12</p>
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>

- 4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

N/A

- 5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

N/A

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.

N/A