

## 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 Yes |

Persons with disabilities make up 6.57% of the Agency's total permanent workforce, or 39 employees. FHFA does not utilize the GS pay scale, but four employees (14.8% of this grade level cluster) at the EL 1-10 levels report having disabilities. At the EL-11 levels and above, 35 employees (6.2% of this grade level cluster) report having disabilities.

\*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 Yes |

Persons with targeted disabilities make up 0.84% of the Agency's total permanent workforce, or five employees. There is one employee (3.7% of this workforce cluster) at the EL 1-10 level who reports having a targeted disability. The remaining four employees (0.7% of this workforce cluster) are at the EL-11 level or above.

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.

The EEO Director gave a presentation on the affirmative action hiring goals during the Manager's Conference in June 2019. This conference included supervisors, managers, and HR officials. This information was also presented to the FHFA executive team during a barrier analysis presentation in December 2019.

## 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

- 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

- 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	
Processing applications from PWD and PWTD	0	0	1	Janice Obeido, Senior Human Resources Specialist, Office of Human Resources Management (OHRM),
Answering questions from the public about hiring authorities that take disability into account	0	0	1	Janice Obeido, Senior Human Resources Specialist OHRM
Processing reasonable accommodation requests from applicants and employees	0	0	1	Joyce Wilson, Senior Human Resources Specialist OHRM
Section 508 Compliance	1	0	1	Stuart Levy, Supervisory Information Technology Specialist, Stuart.Levy@fhfa.gov, and James Myers, Senior Information Technology Specialist, Information Management (OTIM)
Architectural Barriers Act Compliance	0	0	1	Specialist, DeWayne.Perry@fhfa.gov, Office of
Special Emphasis Program for PWD and PWTD	1	0	0	Gwen Jones, Program Analyst, Gwen.Jones@fhfa.gov, Office of Minority and

- 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

Yes. FHFA currently has six employees supporting various aspects of the Agency's disability program. These employees have received training in the areas of reasonable accommodation. Program staff members also attended the Federal Dispute Resolution (FDR) and the EEOC's Examining Conflicts in Employment Laws (EXCEL) training conferences. FHFA hosts webinars throughout the year related to managing individuals with disabilities. The topics include, but are not limited to: EEO Reprisal: Handle It, Don't Fear It, Combating Against Hostile Work Environment Harassment Claims, Disability Accommodation in 60 Minutes, and Applying EEO Law to Address Harassment and Incivility in the Federal Workplace.

## 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

## 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.

FHFA is a small organization and on average, we hire approximately 40 to 50 new employees each year. We strive to fill positions methodically and consider all hiring authorities when developing hiring plans. FHFA continues to maintain an open register of disabled veteran applicants who are 30 percent or more disabled. This register is shared with hiring managers when they are seeking to fill position vacancies. The Office of Human Resources Management (OHRM) informs managers and supervisors of the various appointment options available for employing disabled veterans, including the Veterans Recruitment Act (VRA) appointments, temporary appointments, Schedule A appointments, and non-competitive appointments. One of the main challenges FHFA continually works to address is finding applicants, including veterans and disabled veterans, who are specialized in our mission areas such as economic modeling and analysis, or who have knowledge of the housing industry. FHFA has identified several organizations where we believe we will be able to reach candidates with disabilities, including individuals with targeted disabilities. Some of the partnerships and organizations we are working with or plan to work with include: • Navy Wounded Warrior-Safe Harbor: We have begun partnering with the transition coordinator at Navy Wounded Warrior-Safe Harbor at Walter Reed National Military Medical Center in Bethesda, MD. We are hopeful that this partnership will assist us in finding disabled veterans experienced in our Agency's career fields. • Office of the Assistant Secretary for Veterans' Employment and Training (OASVET): We will continue to work with our contact at OASVET and discuss ways we can partner together to make their customers – disabled veterans – aware of the opportunities at FHFA. • DC Department of Employment Services (DOES): We connected with this organization through a DAV Military Recruit Job Fair in Landover, MD. We will continue to share job opportunities with them. • We are currently in the process of developing an in-house sign language class at FHFA to allow employees to become more capable of engaging with fellow employees who are deaf or hard-of-hearing. We want to spread disability awareness in the FHFA community so that everyone can create and maintain a work environment without barriers. We are also in the process of hiring an interpreter to work alongside our deaf and hard of hearing staff so that they have a more consistent support system to perform their jobs. We also feel it will provide opportunities for fellow staff to more fully engage with them and have more meaningful dialogue exchanges. FHFA also shares office compositions with each office once a year. The data is broken down by series, grade, veteran's preference, disability, race, national origin, and gender. It is shared for the purpose of educating the hiring managers on the areas where they may be lacking diversity. As the Agency matures, it will continue to employ initiatives that educate and encourage

managers to use the flexibilities in place for hiring individuals with disabilities and targeted disabilities. Each business unit within FHFA is assigned an HR Account Manager to help leadership execute human resource related actions. The Account Managers educate managers on hiring flexibilities and the benefits of using these flexibilities for the applicant and the Agency. As a result, all hiring managers are educated on the appropriate use of hiring flexibilities for hiring people with disabilities. FHFA also recently implemented a new applicant tracking system. The system will allow the Agency to more efficiently and effectively monitor the Agency's Schedule A program. It will also enable us to share employment information with applicants requesting to be considered under the Schedule A Hiring Authority, as well as share resumes with the hiring managers. This increase in communication and resume management should increase our opportunities to hire additional people with disabilities. In FY 2019, FHFA engaged the services of an outside contractor to evaluate the workplace to determine whether there are any barriers to employment for any particular group. The results of the barrier analysis were presented to leadership in December 2019, and the Agency has begun to use these results along with other Agency data to address the items raised by the process.

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

FHFA uses the Schedule A hiring authority to hire competitive and non-competitive employees, including interns. Our recently implemented applicant tracking system is intended to assist the Agency with monitoring its Schedule A Program and will enable FHFA to share employment information with applicants requesting to be considered under the Schedule A Hiring Authority, as well as share resumes with the 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.

A Human Resources Specialist verifies the applicant is a person with disability from the documentation provided and verifies that the applicable disability or disabilities fall within one of the following categories: intellectual disability, physical disability, or psychiatric disability. The Agency refers qualified Schedule A applicants to the hiring managers via the selection certificate if they applied to a specific vacancy announcement. Applicants may also be referred without applying to a specific job announcement and they are notified of the status of their application accordingly.

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

OHRM educates the hiring managers of the Schedule A hiring flexibilities at the onset of the recruitment process. Each business unit within FHFA is assigned an HR Account Manager to help leadership execute human resource related actions. The Account Managers educate managers on hiring flexibilities and the benefits of using these flexibilities for the applicant and the Agency. As a result, all managers are educated on the appropriate use of hiring flexibilities for hiring people with disabilities. FHFA also provided training in October 2019 on how employees can better communicate with colleagues who are deaf and hard-of-hearing in a session to celebrate National Disability Employment Awareness Month. The information shared during this session was extremely valuable and could assist managers during the hiring process for candidates who are deaf or hard-of-hearing.

**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.

In 2019, OMWI and OHRM staff members met throughout the year to collaborate on how the Agency can best advance the recruitment and hiring of diverse talent, including individuals with disabilities. The offices collaborated to develop a recruitment and outreach plan, which included the following events that targeted individuals with disabilities, including disabled veterans: •

11th Annual MBA Veterans Career Conference, Chicago, IL - October 2018 • Recruit Military All Veterans Career Fair, Washington, DC - March 2019 • The Equal Opportunity Publications - Careers & disABLED Career Expo, Washington, DC - November 2019

**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

FHFA’s FY 2019 data shows that the Agency hired 41 new permanent employees during the fiscal year. Data on the new hires shows that 14.6% of the Agency’s new hires reported a disability. This exceeds the EEOC’s 12% goal, and represents a significant increase from last year, where only 5.13% of new hires reported a disability. However, none of the Agency’s new hires reported a targeted disability, so FHFA did not meet the EEOC’s 2% benchmark for PWTD. FHFA will continue to use the methods described throughout this report, including Schedule A hiring and increasing awareness of hiring managers, in order to move towards the 2% hiring goal.

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 N/A

See below.

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

See below.

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 |

For questions 2-4, we are evaluating available data on mission critical applications in order to accurately assess and determine whether a trigger exists. Our current analysis is based on limited applicant flow data and relies on voluntary identification of disability status. Based on the current limited data where applicant flow data was collected for certain MCO position vacancies, 5.59% of qualified applicants self-identified as persons with disabilities, and 2.80% self-identified as persons with targeted disabilities. However, none of these qualified individuals were selected for these specific vacancies. While this might point to a potential barrier, it also only represents five vacancy announcements and not the Agency’s complete disability hiring efforts during the fiscal year. We will continue with our applicant flow tracking and data analysis efforts described throughout this report and evaluate any possible issues. We will also collaborate within the Agency to track further MCO hires and promotions.

## 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.

FHFA advertises training opportunities to all employees, including employees with disabilities, and encourages employees at all levels within the organization to enhance their knowledge through formal training, job rotation, details, and self-development opportunities. The Agency also provides funding, which allows employees to attend external training, conferences, certification courses, and management and leadership development training. All FHFA managers are encouraged to use developmental assignments or detailees from within the Agency as a tool for resourcing special projects. Doing so provides opportunities for employees to gain experience in other areas of the Agency. In addition, FHFA encourages all employees to maintain a competency-based Individual Development Plan (IDP). The IDP allows employees to identify competencies or technical skills to be gained/enhanced, and also enables the Agency to track progress made towards closing Agency-identified competency gaps. The Agency also employs a reasonable accommodation (RA) coordinator who is responsible for ensuring that RA requests are processed and approved (as appropriate) in a timely manner. FHFA’s Reasonable Accommodations Policy provides reasonable accommodations to qualified employees and job applicants with disabilities, including disabled veterans, in a prompt, fair, and cost-effective manner. Specific accommodations may include the purchase of specialized equipment and/or services, facility modifications, and adjustments to work schedules and/or job duties. The Agency also provides training to managers and employees about FHFA’s reasonable accommodation policy, procedures, and processes via on-line training and through the employee relations process. The Agency has a Section 508 coordinator who works closely with FHFA’s webmaster to ensure information that is communicated to internal and external audiences is 508 compliant. As part of its commitment to employing and advancing people with disabilities, FHFA will evaluate its progress annually and the Agency will adjust the plan as needed to include innovative initiatives. In addition to reporting our progress in the MD-715, FHFA will review other data sources such as its diversity and inclusion climate assessments. The Office of Minority and Women Inclusion (OMWI) and the Office of Equal Opportunity and Fairness (OEOF) will also collaborate with OHRM, as well as division and office leaders, to foster a culture that supports diversity and inclusion at all levels and throughout Agency-wide programs. During the barrier analysis we also held a focus group for individuals with disabilities and their allies so that we could gather data on their work experience. FHFA will encourage managers to allow their employees, including those with disabilities, to seek out leadership trainings, mentoring and coaching opportunities. Lastly, FHFA recently modified its Exit Survey to allow departing employees to provide feedback on ways FHFA can improve the recruitment,

hiring, inclusion, retention and advancement of individuals with disabilities, as well as feedback on whether FHFA has sufficient opportunities for the advancement and/or career development for people with disabilities and people with targeted disabilities. The Agency is hoping to use this feedback to improve our approach in the recruitment, hiring, and advancing of employees with disabilities and targeted disabilities.

**B. CAREER DEVELOPMENT OPPORTUNITIES**

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

FHFA provides career and professional development opportunities to all FHFA employees, regardless of grade and/or occupational series. Employees have the ability to access a blended approach to learning, including attending on-site/instructor led training courses, participating in online learning or technology-enabled learning events, and requesting approval to attend externally offered courses by public training vendors, associations, and academic institutions. Some programs offered to employees target specific populations based on grade level, such as: • Excellence in Government Fellows Program (for EL-13 and above); • Treasury Executive Institute Leadership Courses/Coaching (for EL-14 and above); and • Supervisory/Managerial Training Courses – for all FHFA supervisors, managers, and executives. FHFA’s blended learning program encourages employees, including veterans, at all levels within the organization to enhance their knowledge through formal in-house and external training, job rotations, details, one-on-one coaching, and self-development opportunities. These opportunities/programs include leadership training, Contracting Officers Representative training, professional skills training, and training relating to FHFA's mission critical positions in accounting, economics, financial analysis, and bank examination. In addition, at the beginning of each performance rating year, all employees are encouraged to complete an Individual Development Plan (IDP). Doing so provides opportunities for all employees to identify training they believe will hone their technical skills to effectively do their jobs and enhance their careers. The Agency allocates funding, which allows all employees to attend external training events, conferences, certification courses, and management and leadership development training with their manager's approval. Additionally, FHFA has an internal examiner commission program called the Housing Finance Examiner (HFE) Commission Program. The goal of the program is to equip FHFA examiners with a uniform set of technical and professional skills to conduct safety and soundness examinations of Fannie Mae, Freddie Mac, and the Federal Home Loan Bank System. To ensure maximum agency-wide exposure, learning and development opportunities are advertised through multiple channels, including: FHFA’s weekly newsletter, targeted emails, intranet sites, and monthly meetings with Agency training representatives from each FHFA division/office.

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	NA	22	NA	1	NA	NA
Fellowship Programs	5	2	0	0	0	0
Mentoring Programs	42	42	3	3	0	0
Coaching Programs	12	12	1	1	1	1
Training Programs	19	19	2	2	1	1
Detail Programs	0	0	0	0	0	0
Other Career Development 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 N/A
- b. Selections (PWD) Answer N/A

For the career development programs in which sufficient applicant data is available, there is no identifiable trigger. Although the percentage of participants with disabilities in the individual programs does not meet the 12% EEOC benchmark, all employees with disabilities who applied to the programs were accepted into them. Therefore, the low percentage arises due to the limited number of individuals with disabilities in the overall applicant pool. FHFA will work to support awareness of these career development programs and ensure that there are no barriers that would prevent employees with disabilities from applying.

4. Do triggers exist for PWTB 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 (PWTB) Answer No
- b. Selections (PWTB) Answer No

No. For the programs where there is applicable data to evaluate, the Agency is meeting the 2% benchmark set by the EEOC. For the remaining training programs where there either is no available applicant data or the applicant pool does not contain individuals with targeted disabilities, FHFA will continue to work to support awareness of these career development programs and ensure that there are no barriers that would prevent employees with targeted disabilities from applying.

**C. AWARDS**

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTB 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 (PWTB) Answer No

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 PWTB 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 (PWTB) 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 PWTB 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 No
- b. Other Types of Recognition (PWTB) Answer No

## 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

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

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 N/A
- b. New Hires to GS-15 (PWD) Answer N/A
- c. New Hires to GS-14 (PWD) Answer N/A
- d. New Hires to GS-13 (PWD) Answer N/A

FHFA has begun collecting and analyzing applicant flow data. Based on the available data, there may be a trigger for PWD among new hires. FHFA contracted with an outside company in late FY19 to conduct a barrier analysis. This analysis identified evidence of a potential barrier for PWD in advancing to higher levels. We will continue to collect applicant flow data over the next year and evaluate it to determine if there is a trigger. We will also continue with the actions described throughout Part J to increase the number of individuals with disabilities in the overall applicant pool and ensure that hiring managers are aware of the hiring flexibilities for individuals with disabilities. Further, we will offer structured interview training to FHFA managers.

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 N/A
- b. New Hires to GS-15 (PWTD) Answer N/A
- c. New Hires to GS-14 (PWTD) Answer N/A
- d. New Hires to GS-13 (PWTD) Answer N/A

See response to #3 above.

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 |

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 | No |
| ii. Internal Selections (PWTB)          | Answer | No |

## b. Managers

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

## c. Supervisors

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

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 |

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB 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 (PWTB)  | Answer | No |
| b. New Hires for Managers (PWTB)    | Answer | No |
| c. New Hires for Supervisors (PWTB) | Answer | No |

With regard to questions 1-8 above, we have assessed data through our USA Staffing applicant flow tracking tool. Based on the existing data we are not able to distinguish between internal and external applicants. In addition, we are not able to distinguish between applicants with disabilities and targeted disabilities, so we are conducting our review based on overall identified disability status. This data is somewhat limited because FHFA has direct hire authority, so a number of vacancies are not captured in this

system. Further, we are limited by whether the applicants identified themselves as having a disability. Therefore, we have not identified any triggers in the applicable fields. Using the available data, we observe that overall, the percentage of candidates with disabilities who are referred to the selecting officials is lower than the percentage of candidates without disabilities who are referred to the selecting officials. That data point alone may not be indicative of an issue, however, it appears that the percentage of candidates with disabilities who are referred to the selecting officials are selected at a significantly lower rate than their counterparts without disabilities. Since we cannot confirm the exact number of applicants with disabilities, we cannot definitively identify a trigger. However, we will continue to gather applicant flow data and analyze it to determine whether there are barriers in the period between referral to the selecting official and selection for the positions. OMWI, OEOF, and OHRM will collaborate over the coming months to ensure that we are continuing to expand our applicant pool and raising awareness among hiring managers of the hiring flexibilities involved in hiring applicants at all levels so that we can increase the numbers of individuals with disabilities in our Agency workforce. In addition, we are planning to offer structured interview training for all FHFA 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 N/A

There were no Schedule A employees eligible for conversion during the reporting period.

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 FY 2019, 33 employees voluntarily separated from FHFA. Five of these employees were individuals with disabilities. In FY 2019, there were 537 Agency employees without disabilities, so 5% of this group, or 27 employees, voluntarily separated during the fiscal year. However, in the same timeframe, the Agency had 40 total employees with disabilities, and five of them, or 12.5% of this group, voluntarily separated.

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

In FY 2019, 33 employees voluntarily separated from FHFA. Five of these employees were individuals with disabilities. Two of these five employees had targeted disabilities, which is 40% of the Agency’s total number of employees with targeted disabilities.

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.

In late FY 2019 and into FY 2020, the Agency updated its exit interview process to include questions involving retention and advancement of employees with disabilities. FHFA will work in FY 2020 to evaluate the data from the exit interviews to determine if there are specific reasons that can be addressed regarding employees' voluntary departures from the Agency.

**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.fhfa.gov/AboutUs/Policies/Pages/%E2%80%8BReasonable-Accommodation.aspx> <https://www.fhfa.gov/AboutUs/Policies/Pages/Equal-Employment-Opportunity.aspx>

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.fhfa.gov/AboutUs/Policies/Pages/%E2%80%8BReasonable-Accommodation.aspx>

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.

FHFA employs a full-time 508 compliance specialist. This employee works with the Office of Equal Opportunity and Fairness, the Office of Minority and Women Inclusion, the Office of General Counsel, and the Office of Congressional Affairs and Communications to ensure that all of the Agency's publicly posted documents are accessible.

**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.)

15 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's Reasonable Accommodation and Personal Assistance Services Policy and Procedures addresses handling delays in processing and delivery of accommodations. The coordinator will notify the employee or applicant of the reason for a delay, and to the extent possible, keep the employee or applicant informed of the date when the Agency expects to complete the process.

Additionally, FHFA will work with managers and supervisors to make sure that they understand the policy and procedures, and also review accommodations to ensure that they are effective.

**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 has updated the reasonable accommodation policy to include PAS. We have not received any requests for PAS, however, the updated policy should assist in avoiding delays in processing and delivery of services. Additionally, FHFA will work with managers and supervisors to make sure that they understand the policy and procedures when requests are received, and also review PAS to ensure that they are effective.

**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 Yes

- 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.

NA

**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 Yes

- 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.

NA

## 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 No

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>Persons with disabilities make up 6.57% of FHFA’s permanent workforce, which is less than the EEOC’s 12% benchmark but a slight increase from 6.36% in FY 2018, and persons with targeted disabilities make up 0.84% of FHFA’s permanent workforce, which is less than the EEOC’s 2% benchmark but a slight increase from 0.69% in FY 2018.</p>
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p>

<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>In FY 2019, there were no persons with targeted disabilities among FHFA’s permanent new hires. However, FHFA had a significant increase from FY 2018 in the overall number of new hires with disabilities (14.6% of FY 2019 new hires were PWD), so the Agency will work to maintain this trend in new hires and increase the numbers of employees with targeted disabilities hired.</p>
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p>

<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>B16 is not listed as an option in the menu. In FY 2019, 33 employees voluntarily separated from FHFA. Five of these employees were individuals with disabilities. In FY 2019, there were 537 Agency employees without disabilities, so 5% of this group, or 27 employees, voluntarily separated during the fiscal year. However, in the same timeframe, the Agency had 40 total employees with disabilities, and five of them, or 12.5% of this group, voluntarily separated. Additionally, two of these five employees had targeted disabilities, which is 40% of the Agency’s total number of employees with targeted disabilities.</p>
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p>

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

NA

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

NA

- 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.

NA