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

The percentage of PWD in the GS-1 to GS-10 cluster was 9.52%, which is below the goal of 12%. The percentage of PWD in the GS-11 to SES cluster was 6.93%, which is below the goal of 12%.

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*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

No triggers were identified in cluster GS-1 to GS-10 because there were no PWTD among that cluster. The percent of PWTD in the GS-11 to SES cluster was 1.49% which is below the goal of 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.

In FY19, the agency will issue a memorandum to HR staff and hiring managers, describing the agency's commitment to meeting the numerical goals set forth under Section 501. The memorandum will emphasize improving hiring efforts in the following occupation: 0241 – Mediation. Additionally, in FY19, the EEO Director will work with the Office of Human Resources to focus its efforts on surveying employees and educating them on the SF-82 (Self Identification of Disabilities) to encourage self-identification. In conjunction with the Office of Human Resources, the EEO Director will develop training on disabilities in the

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workplace for all employees. The Office of Human Resources will notify all employees via email about the SF-82 form with detailed instructions on how to update disability information in the online personnel system.

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.

<div align="right">Answer   Yes</div>

The FMCS Benefits Officer serves as the disability program coordinator, in addition, to managing the reasonable accommodation program.

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Architectural Barriers Act Compliance	0	0	1	Cynthia Washington Director of Procurement and Operational Services cwashington@fmcs.gov
Processing reasonable accommodation requests from applicants and employees	0	0	1	Natalie Samuels Benefits Officer nsamuels@fmcs.gov
Special Emphasis Program for PWD and PWTD	0	0	1	Denise McKenney Director of EEO dmckenney@fmcs.gov
Processing applications from PWD and PWTD	0	0	1	Natalie Samuels Benefits Officer nsamuels@fmcs.gov
Answering questions from the public about hiring authorities that take disability into account	0	0	1	Natalie Samuels Benefits Officer nsamuels@fmcs.gov
Section 508 Compliance	0	0	1	Kimberly Warren Digital Media Strategist kwarren@fmcs.gov

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

<div align="right">Answer   Yes</div>

The EEO Director collaborated with the Office of Human Resources to incorporate the following training classes that will be available both in-person or webinars through the agency learning management system: EEO Basics, Sexual Harassment Training, Reasonable Accommodations and Civility Workshop. The EEO Director also partnered with senior leadership and the Human Resource Office to identify mandatory training for staff responsible for recruiting and hiring.

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

The agency has provided sufficient funding and other resources to successfully implement the disability program.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	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)]

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.

In FY19, the Office of Human Resources identified the following goals for the recruitment of individuals with disabilities: • The EEO Director and the Office of Human Resources will develop the agency's strategic recruitment plan to ensure the incorporation of job applicants with disabilities; raise awareness and promote opportunities. • The Human Capital Manager will conduct outreach and increase awareness to Disability and Career Services Offices on college and university campus by educating students and recent graduates with disabilities regarding the employment opportunities and hiring flexibilities within the FMCS. • The Office of Human Resources will collaborate with national disability organizations and develop an agency talent database to increase the number of eligible Schedule A job-seekers. • The Office of Human Resource and the EEO Director will work with the Digital Media Strategist to develop a social media outreach program to promote opportunities for individuals with disabilities on the agency's Facebook page and website. • The Office of Human Resources will develop and maintain a talent database that includes individuals with disabilities who are eligible to be appointed under the hiring authority that takes disability into account. • The Office of Human Resources will encourage departments to use the talent database for qualified applicants with disabilities for vacant position and/or detail opportunities.

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 Office of Human Resources (OHR) encourages manages to use Schedule A to fill vacant positions, whenever possible. For further assistance with special hiring authorities, hiring officials are encouraged to contact the OHR. The OHR, also, encourages eligible applicants to make their resumes searchable in USAJOBS by selecting eligibility for special hiring authorities. Applicants who have questions or would like to receive technical assistance on how to apply under Schedule A are provided FMCS centralized email address: recruit@fmcs.gov.

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.

If an individual has applied for appointment to vacancy under a hiring authority that takes disability into account, the Human Resource Specialist determines whether the individual is eligible for appointment under such authority by reviewing the applicant's schedule A documentation. If the applicant is eligible, the Human Resource Specialist forwards the candidate's application to the Human Capital Manager with an explanation of how and when the individual may be appointed, consistent with all applicable laws. The Human Capital Manager will conduct the qualifications analysis to determine eligibility. If the candidate is minimally qualified, the Human Capital Manager will forward the application to the hiring manager for consideration.

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.

<div align="right">Answer   No</div>

In FY20, the OHR and the EEO Director will identify online trainings for all employees, including hiring managers, that increase awareness on the fundamentals of EEO/Diversity, Reasonable Accommodations, Harassments and Selective Placement and hiring authorities. In FY20, the OHR will provide a broad overview of the processes and procedures for requesting disability and reasonable accommodations as well as strategies for increasing the hiring and retention of persons with disabilities to all employees.

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 FY20, the OHR and the EEO Director will collaborate with colleges and universities nationwide to conduct information sessions with their students with disabilities. Additionally, the OHR and the EEO Director will establish contacts and partner with Vocational Rehabilitation Services to access how our Agency can reduce barriers and challenges in our hiring practices.

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   Yes

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

New hires for PWD was 3.85% which was below the 12% goal. No new hires for PWTD were identified.

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

Applicant data was not available. FMCS plans to collect applicant data in FY 2020.

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

Applicant data was not available for qualified internal applicants. Data is only available for those selected to participate. FMCS plans to collect applicant data in FY 2020.

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   Yes

        b. Promotions for MCO (PWTD)   Answer   No

Among the selected employees with disabilities who voluntarily identified their disability, triggers existed for PWD promoted in the following MCOs: 0241 – Mediation PWTD, 5.88%. No trigger for PWTD

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.

The EEO Director updated the agency's reason accommodation procedures and posted the updated procedures on our agency's website. The competitive opportunities were announced via USAJOBS and other internal opportunities were open to all employees. In FY 2020, the EEO Director, in collaboration with OHR, will conduct an agency-wide initiative to encourage employees to update their SF-256 form through EPP. The agency will take specific steps to ensure that current employees with disabilities have sufficient opportunities for advancement through continued education of employees and hiring managers via agency briefings, webinar series and training uploaded to the agency's learning management system. The EEO Director will meet with the Chief Human Capitol Officer to asses the agency's use of special hiring authorities.

B. CAREER DEVELOPMENT OPPORTUNITES

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

FMCS recognizes the critical importance of diversity and inclusion to the ultimate success of the Agency and is, therefore, committed to hiring from the most diverse, qualified applicant pool. To accomplish this, the agency continues to recruit and hire qualified developmental mediators. Developmental mediators may have relevant specialized experience and/or education, but who do not possess the experience or skills necessary to qualify for consideration as an entry level GS-13 mediator. Developmental mediators are recruited at GS-11 level and upon the individual's successful completion of the 2-year probationary period, the developmental mediator is promoted to GS-13. The agency also offers internal detail opportunities throughout the agency. In FY 2019, the agency conducted a skills inventory survey to identify employees that would qualify for special projects within the agency.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	0	0	0	0	0	0
Fellowship Programs	0	0	0	0	0	0
Mentoring Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	0	0
Training Programs	0	0	0	0	0	0
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

The agency does not have any formal development programs.

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

      a. Applicants (PWTD)   Answer   N/A

      b. Selections (PWTD)   Answer   N/A

The agency does not have any formal career development programs.

C. AWARDS

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

      a. Awards, Bonuses, & Incentives (PWD)   Answer   Yes

       b. Awards, Bonuses, & Incentives (PWTD)   Answer   Yes

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Using the inclusion rate, triggers were identified for the following awards: cash awards between $100 - $500 and cash awards $500 or more. The average award amount is lower for PWDs and PWTDs for cash awards between $100 - $500. The average award amount is lower for PWDs and higher for PWTDs for cash awards above $500.

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

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %

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

       a. Pay Increases (PWD)   Answer   No

       b. Pay Increases (PWTD)   Answer   No

No triggers identified.

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

Not applicable.

D. PROMOTIONS

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

       a. SES

          i. Qualified Internal Applicants (PWD)   Answer   N/A

          ii. Internal Selections (PWD)   Answer   N/A

       b. Grade GS-15

          i. Qualified Internal Applicants (PWD)   Answer   N/A

          ii. Internal Selections (PWD)   Answer   N/A

       c. Grade GS-14

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

d. Grade GS-13

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

Applicant data was not available for qualified internal applicants. Data is only available for internal selections. The EEO Office, in collaboration with the OHR, will develop a plan to address this deficiency in order fully respond to the MD-715 reporting requirement.

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

    a. SES

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

    b. Grade GS-15

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

    c. Grade GS-14

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

    d. Grade GS-13

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

Applicant data was not available for qualified internal applicants. Data is only available for internal selections. The EEO Office, in collaboration with the OHR, will develop a plan to address this deficiency, in order to fully respond to the MD-715 reporting requirements.

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

Applicant data was not available. The EEO Office, in collaboration with the OHR, will develop a plan to address this deficiency, in order to fully respond to the MD 715 reporting requirement.

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

Applicant data was not available. The EEO Office, in collaboration with the OHR, will develop a plan to address this deficiency, in order to fully respond to the MD 715 reporting requirement.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory
positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

     a. Executives

        i. Qualified Internal Applicants (PWD)   Answer   N/A

        ii. Internal Selections (PWD)   Answer   N/A

     b. Managers

        i. Qualified Internal Applicants (PWD)   Answer   N/A

        ii. Internal Selections (PWD)   Answer   N/A

     c. Supervisors

        i. Qualified Internal Applicants (PWD)   Answer   N/A

        ii. Internal Selections (PWD)   Answer   N/A

Applicant data was not available. The EEO Office, in collaboration with OHR, will develop a plan to address this deficiency, in order to fully respond to the MD 715 reporting requirement.

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   N/A

      ii. Internal Selections (PWTD)   Answer   N/A

   b. Managers

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

      ii. Internal Selections (PWTD)   Answer   N/A

   c. Supervisors

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

      ii. Internal Selections (PWTD)   Answer   N/A

Applicant data was not available in FY 2019. Data is only available for applicants selected pool. The EEO Office, in collaboration with the OHR, will develop a plan to address this deficiency, in order to fully respond to the MD 715 reporting requirements.

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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   N/A

      b. New Hires for Managers (PWD)   Answer   N/A

      c. New Hires for Supervisors (PWD)   Answer   N/A

Applicant data was not available in FY 2019. Data is only available for applicants selected pool. The EEO Office, in collaboration with the OHR, will develop a plan to address this deficiency, in order to fully respond to the MD 715 reporting requirements. .

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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   N/A

      b. New Hires for Managers (PWTD)   Answer   N/A

      c. New Hires for Supervisors (PWTD)   Answer   N/A

Applicant data was not available in FY 2019. Data is only available for selectees. The EEO Office, in collaboration with the OHR, will develop a plan to address this deficiency, in order to fully respond to the MD 715 reporting requirements.

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

In the FY 2019 reporting period, the agency did not have any eligible Schedule A employees with a disability to convert into the competitive service after two years of satisfactory services.

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

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

The % of voluntary involuntary separations for PWD exceeded those without disabilities. Inclusion (Separation) rate: 7.62% PWD Sep Rate: 9.52%. No involuntary separations for PWD reported.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %

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   No
>
> b.Involuntary Separations (PWTD)   Answer   No

The % of voluntary and involuntary separations for PWTD did not exceed those with disabilities. Inclusion (separation) rate 7.62%; PWTD Separation rate: 4.62

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %

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.

The agency does not conduct exit interviews nor are there any other data sources, which would provide this information. The EEO Director, in collaboration with the OHR, will develop a plan to integrate exit interviews and other data sources to assess this trigger.

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.fmcs.gov/section-508/ The EEO Director is developing a proposed notice describing how to file a complaint under Section 508 and it will be available in FY 2020.

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.fmcs.gov/section-508/ The EEO Director is developing a proposed notice describing how to file a complaint under the Architectural Barrier Act.

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.

In FY 2020, the Office of EEO will establish an Accessibility Working Group to monitor, update and provide guidance on web content and architecture barriers. The Accessibility Working Group will meet regularly to address specific regulatory requirements and implementation concerns.

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.)

For FY 2019, the average processing time for initial request was 7 days. The reasonable accommodation coordinator reported receiving and processing 6 requests for reasonable accommodations.

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 rarely receives reasonable accommodation requests. Requests that are received are approved or denied within 15 calendar days. To date, there has not been an EEO complaint filed for discriminatory violations for the reasonable accommodation program.

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.

For FY 2019, the agency was unable to assess the effectiveness of the policies, procedures, or practices to implement the PAS requirement because the agency did not receive any PAS requests.

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 did not have any 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 did not have any findings of discrimination alleging harassment based on disability status 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   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

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

#1 FY 2019 Planned Activity: Establish retention and possibly exit interview surveys to determine root cause for increased separation rates. #2 FY 2019 Planned Activity: Review the workforce data collection process and establish a plan to address deficiencies. #3 FY 2019 Planned Activity: Update and post the reasonable accommodation procedures to the agency's website. #4 FY 2019 Planned Activity: Post the agency's affirmative action plan to its website. #5 FY 2019 Planned Activity: Integrate EEO and diversity/inclusion principles to the Agency's strategic plan. Due to loss of key personnel and budgetary constraints, the EEO Office has not been able to sufficiently address activities #1 and #2.

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

In FY 2019, the EEO Director reviewed EEO policies and procedures and updated the agency's website to be in compliance with EEO regulations and laws. The EEO Office will continue to monitor the EEO program for compliance and establish and implement action plans to remove identified barriers.

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.

FMCS will continue implementing the strategies and addressing deficiencies identified in this year's Affirmative Action Plan.