

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

EEOC guidance specifies that non-GS pay plans should be compared to General Schedule salary cut-offs in the Washington DC locality. Of the 2,300 permanent employees who fall within the FR -24 to Officer pay cluster (GS-11 to SES equivalent), 6.4 (148) percent identified as having a disability, and of the 413 permanent employees who fall within the FR-17 to FR 23 pay cluster (GS 1 to GS-10 equivalent), 8.2 (34) percent identified as having a disability.

*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

Of the 2300 permanent employees who fall within the FR -24 and Officer pay cluster (GS-11 to SES equivalent), 1.0 (24) percent identified as having a targeted disability, and of the 413 permanent employees who fall within the FR-17 to FR 23 (GS 1 to GS-10 equivalent) pay cluster, 1.5 (6) percent identified as having a targeted disability

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.

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	
Section 508 Compliance	1	0	1	Marietta Murphy Deputy Associate Director marietta.murphy@frb.gov
Special Emphasis Program for PWD and PWTB	2	0	0	Sheila Clark Director sheila.clark@frb.gov
Answering questions from the public about hiring authorities that take disability into account	7	0	0	Tameika Pope Chief Human Capital Officer tameika.l.pope@frb.gov
Architectural Barriers Act Compliance	0	0	1	Stephen Pearson Assistant Director, Facilities stephen.pearson@frb.gov
Processing applications from PWD and PWTB	7	0	0	Tameika Pope Chief Human Capital Officer tameika.l.pope@frb.gov
Processing reasonable accommodation requests from applicants and employees	1	0	0	Tameika Pope Chief Human Capital Officer tameika.l.pope@frb.gov

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

Answer Yes

The Senior Integrated Disability Program Specialist attended the 2019 Society for Human Resources Management Conference and several workshops on the American With Disabilities Amendment Acts (ADAAA). Staff in the Office of Diversity and Inclusion attended several disability employment workshops in 2019 at the EEOC EXCEL Training Conference in Atlanta, GA and the 2019 Federal Dispute Resolution (FDR) Conference in Philadelphia, PA. In addition, the D&I/EEO Compliance Manager attends the Federal Exchange on Employment and Disability (FEED) working group meetings where information is regularly shared on best practices on the recruitment, hiring, retention, and advancement of persons with disabilities.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer Yes

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC’s regulations and guidance? [see 29 CFR §1614.203(d)(3)]		
Objective	Revise Board Reasonable Accommodation Policy and Procedures to establish compliance with 29 CFR §1614.203(d)(3).		
Target Date	Sep 30, 2020		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jul 2, 2020		Contact EEOC on the status of agency’s submission of revised Reasonable Accommodation Policy and procedures submitted in February 2020.
	Sep 30, 2020		ODI, in consultation and coordination with Legal and HR, will review EEOC feedback and modify the initial submission of Reasonable Accommodation Policy and procedures to the EEOC On February 2020.
	Dec 30, 2020		ODI, in consultation and coordination with Legal and ER, will ensure all input is considered prior to finalizing the RA Policy and procedures.
	Mar 30, 2021		ODI will issue the revised RA Policy and procedures to all employees; and post to the internal and external facing webpages.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	

Brief Description of Program Deficiency	D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.		
Objective	Post the Affirmative Action Plan for People with Disabilities on the Office of Diversity and Inclusion website.		
Target Date	Dec 30, 2020		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jul 30, 2020		ODI will consult Board Legal on posting the Part J Affirmative Action Plan to the ODI website.
	Aug 30, 2020		ODI, in consultation and coordination with Board Section 508 coordinator, will complete a Section 508 test of the plan and complete any 508 remediations.
	Dec 30, 2020		ODI will post the Affirmative Action Plan post to the ODI website.
Accomplishments	<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.

The Board continues to utilize a variety of sources to attract diverse pools of well-qualified candidates, including job applicants with disabilities. The agency’s HR recruiters network with several disability and veteran groups on LinkedIn. The Board also regularly attends the Rochester Institute of Technology/National Technical Institute for the Deaf Career Fair. Human Resources contract the services of eQuest Diversity Network to disseminate the Board job posting to various diversity associations, schools, organizations, and job boards. The contracting firm disseminates job vacancies to 8,000 disability recruitment sources in the Washington, DC metropolitan area

- 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

N/A

- 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.

N/A

- 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 N/A

N/A

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.

• Continued participation in the Rochester Institute of Technology/National Technical Institute for the Deaf Career fair. • Strengthen existing LinkedIn social networks with disability groups such as Student Veterans of American, Professional Diversity Network, and LinkedIn Veterans network. • Use the Workforce Recruitment Program (WRP) as a source for recruiting disabled students and veterans. ODI staff will promote the program as a tool to recruit students with disabilities.

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 Yes

The percentage of PWD among new hires is 6.48 percent and the 0.40 percent for PWTD. The percentage for each group is below their respective benchmark.

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

Data is not available to determine a trigger using Table B7 ,

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

Relevant applicant pool data is not available using Table B-9. Identifying which current Board employees would qualify for a occupation they are not currently in is a difficult undertaking. The Board does not adjudicate applicant qualifications until an applicant applies for a specific position, and the applicant may qualify based on experience obtained prior to entry into their current occupation.

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

Applicant data is not available to determine a trigger using Table B-9

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 Board is committed to providing opportunities for advancement among all employees, including people with disabilities and people with targeted disabilities. The Board ensures awareness of advancement and internal opportunities where all employees can increase knowledge and skill. Employees, at all levels, are made aware using various methods of marketing (e.g., email, office announcement, intranet, newsletters). Additionally, the Board offers a wide range of career development and training opportunities through classroom training on Board competencies, in-person/online training via FedLearn, an online learning platform, , Board staff have access to thousands of online courses, e-books, videos, and live-stream presentations in Skillsoft, an online learning application. Employees, at all levels, are encouraged to participate in skill building training that will expand their opportunities to advance. We currently offer such opportunities to help position all Board employees for advancement within their current positions and beyond. In addition, courses related to resume writing and improving interviewing skills are available.

B. CAREER DEVELOPMENT OPPORTUNITES

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

Employee training is encouraged and available through a variety of programs offered to all employees. Training promotes professional and personal development. Please see write-up below regarding Board programs/activities that the agency encourages and promotes for career development for all employees, including PWD/PWTD: • The Academic Assistance Program promotes employee effectiveness, enhance development opportunities, and support employee career potential. • Manager and Officer Quick Start leadership development programs provide opportunities for managers and Officers to acquire and strengthen the skills and tools needed to become successful leaders. • The Board regularly offers a cadre of courses supporting professional and leadership development in the Board competencies. • The Mentoring Program provides developmental opportunities for employees and leaders to ensure the Board’s talent can meet the strategic and operational goals of the Board. • The Board nominates employees to participate in the Federal Reserve System Annual System Leadership Institute. The Institute provides leadership development at three management levels – executives, senior and middle managers—designed to expose staff to the challenges of leading in the Federal Reserve System and further develop the capabilities needed to be successful leaders. • Board-only internal rotational assignments are offered to promote workforce and development efforts that improve the strength and diversity of the Board's talent pipeline to meet current and future business needs.

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 (%)
Coaching Programs						
Detail Programs						
Fellowship Programs						
Training Programs						
Internship Programs						
Other Career Development Programs						
Mentoring 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

The definition of career development program/opportunities is the same in Part J as in Table 12, requiring competition to participate in training that would qualify employees for a promotion. The Board has no career development programs as defined in the instructions to MD-715.

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

Please see response to question 3 above.

C. AWARDS

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

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

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

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

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

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

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

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

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

The Board does have other types of employee recognition programs, such as the Special Achievement Awards and the Chairman Award. These awards are inclusive of PWD and PWTD. The number of employees receiving these are small in comparison to the overall Board workforce that it is statistically insufficient to assess for potential triggers involving PWD and PWTD receiving these awards.

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

Agency data is not available to determine a trigger using Table B11 .

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 is not available to determine a trigger using Table B11 .

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

The Board could not identify any trigger using the existing Table B11

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

Qualified applicant data is not available to determine a trigger using Table B11.

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 |

The Board is unable to identify any trigger using Table B9.

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.

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|---|--------|-----|
| a. Executives | | |
| i. Qualified Internal Applicants (PWTB) | Answer | N/A |
| ii. Internal Selections (PWTB) | Answer | N/A |
| b. Managers | | |
| i. Qualified Internal Applicants (PWTB) | Answer | N/A |
| ii. Internal Selections (PWTB) | Answer | N/A |
| c. Supervisors | | |
| i. Qualified Internal Applicants (PWTB) | Answer | N/A |
| ii. Internal Selections (PWTB) | Answer | N/A |

The Board is unable to identify any trigger using Table B9.

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 |

The Board is unable to identify any trigger using Table B15.

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.

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|-------------------------------------|--------|-----|
| a. New Hires for Executives (PWTB) | Answer | N/A |
| b. New Hires for Managers (PWTB) | Answer | N/A |
| c. New Hires for Supervisors (PWTB) | Answer | N/A |

The Board is unable to identify any trigger using Table B15.

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

The Board operates an independent personnel system whereby Schedule A appointments are not administered.

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	No
b. Involuntary Separations (PWD)	Answer	No

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	No
b. Involuntary Separations (PWTD)	Answer	No

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

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.

The Board has a link to its accessibility statement available in the footer on Board public webpage about Section 508. The link takes viewers to the statement at this page: <https://www.federalreserve.gov/accessibility.htm>

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

The Board has a link to its accessibility statement available in the footer on Board public webpage about the ABA. The link takes viewers to the statement at this page: <https://www.federalreserve.gov/accessibility.htm>

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 following improvements of Board facilities have been undertaken : • We have adopted a new Board standard for sit to stand desks and all of our future furniture purchases will include this option. • We are completing a restroom renovation project at the NYA building. As part of that renovation, we are including automatic door openers as well as other restroom enhancements. • We completed some sidewalk repair and leveling projects around the Eccles Building. The Martin Building will open this coming year with a whole new suite of accessibility features in the restrooms, building approaches and furniture. The ongoing designs for both 1951 and Eccles buildings include accessibility features as well – including plans for making the south lawns of both buildings 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.)

The average decision time is 27 calendar 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 Board historically receives a relatively low amount of requests for formal reasonable accommodations. Most of the Board's accommodations are provided informally via constructive and interactive conversations between employees and their management. Since 2018, the Board's Sr. Integrated Disability Program Specialist proactively provides training for managers based on trends and discussions during reasonable accommodation request reviews.

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.

Employees with targeted disabilities may request PAS at any time through the Board's reasonable accommodation procedures, and

those requests are processed in accordance to the timeframes outlined in the procedures. In 2020, the Board will post an addendum to the reasonable accommodation procedures on the Board website to explain further how to request PAS. In 2019, the Board did not receive any request for 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 Board had no findings of discrimination alleging harassment based on disability status within 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.

N/A

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 Yes

- 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>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>Current Board human resource data system is limited in its ability to capture applicant tracking data required to identify triggers and complete a comprehensive barrier analysis.</p>							
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Disabilities</p>							
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>Insufficient EEO workforce tables that do not meet the new EEOC guidance on triggers and barrier analysis to collect applicant flow for all EEO groups, including persons with disabilities and targeted disabilities.</p>							
<p>Objective</p>	<p>Pursue alternative avenues to meet existing EEOC workforce data reporting requirements</p> <table border="1" data-bbox="483 953 1500 1092"> <tr> <td>Date Objective Initiated</td> <td>Jul 30, 2020</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Dec 30, 2020</td> </tr> </table>				Date Objective Initiated	Jul 30, 2020	Target Date For Completion Of Objective	Dec 30, 2020
Date Objective Initiated	Jul 30, 2020							
Target Date For Completion Of Objective	Dec 30, 2020							
<p>Responsible Officials</p>	<p>Andre Smith D&I/EEO Compliance Manager</p> <p>Sheila Clark Director, Office of Diversity and Inclusion</p>							
<p>Target Date (mm/dd/yyyy)</p>	<p>Planned Activities</p>	<p>Sufficient Staffing & Funding (Yes or No)</p>	<p>Modified Date (mm/dd/yyyy)</p>	<p>Completion Date (mm/dd/yyyy)</p>				
<p>12/30/2020</p>	<p>ODI and HR will explore reasonable options for collecting applicant flow data to complete EEOC workforce data tables.</p>	<p>Yes</p>						
<p>Fiscal Year</p>	<p>Accomplishments</p>							
<p>2019</p>	<p>The Board is committed to be a model employer of individuals with disabilities. Accordingly, during May – June 2019, ODI led an initiative to re-survey the Board workforce and encouraged all employees to self identify or update their information using the Board's Federal Reserve (FR) 1437-Self Identification of Disability. ODI posted announcements and issued reminders via the Board's intranet, email and digital television boards throughout regarding this initiative.</p>							

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

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

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.
