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

The rate of representation is 10.5%.

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

The rate of representation is 1.5%.

<table>
<thead>
<tr>
<th>Grade Level Cluster(GS or Alternate Pay Plan)</th>
<th>Total</th>
<th>Reportable Disability</th>
<th>Targeted Disability</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
<td>#</td>
<td>%</td>
</tr>
<tr>
<td>Numeral Goal</td>
<td>--</td>
<td>12%</td>
<td>2%</td>
</tr>
<tr>
<td>Grades GS-1 to GS-10</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grades GS-11 to SES</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

Managers and supervisors take a complement of required courses when they become new supervisors, and the hiring goals related to disability are in reference material thereafter.

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.

<table>
<thead>
<tr>
<th>Disability Program Task</th>
<th># of FTE Staff By Employment Status</th>
<th>Responsible Official (Name, Title, Office Email)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Full Time</td>
<td>Part Time</td>
</tr>
<tr>
<td>Processing applications from PWD and PWTD</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Answering questions from the public about hiring authorities that take disability into account</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Processing reasonable accommodation requests from applicants and employees</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Section 508 Compliance</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Architectural Barriers Act Compliance</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Special Emphasis Program for PWD and PWTD</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

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

All staff receives annual training in their fields of specialty, across program offices like human resources, information technology,

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 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.

GSA uses OPM’s Shared Register of Candidates with Disabilities, the Workforce Recruitment Program and targeted recruitment.

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

A Special Placement Program Coordinator to coordinate special placement, and when candidates are located this SPPC works with local human resources specialists to effect the hires and coordinate onboarding and accommodation coordination (when applicable).

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.

Applicants who apply under Schedule A via USAJobs have eligibility determined via the same evaluation process as other candidates, but are placed on a separate certificate for hiring managers’ 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.

Answer: Yes

Managers and supervisors take a complement of required courses when they become new supervisors, and the hiring goals related to disability are in reference material thereafter, in a course titled “Hiring, Retaining, and Including People with Disabilities,” which is required for managers to complete every two years.

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.

GSA maintains a disability SEP/affinity group with an SES champion to serve as an advocate at the senior level to act as catalyst for change and to advise. GSA will continue to engage executive champions by implementing a diversity and inclusion council. The council will focus on GSA’s internal policies and practices, talent recruitment and development, education and training, identifying barriers, building partnerships with rehab agencies, measuring the effectiveness of the diversity initiative process, and ensuring transparency of its operations.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

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

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

<table>
<thead>
<tr>
<th>New Hires</th>
<th>Total</th>
<th>Reportable Disability</th>
<th>Targeted Disability</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(#)</td>
<td>% of Total Applicants</td>
<td>% of Qualified Applicants</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(#)</td>
<td>(%)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

% of Total Applicants 0  
% of Qualified Applicants 0  
% of New Hires 0

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

a. New Hires for MCO (PWD)  
   Answer  No

b. New Hires for MCO (PWTD)  
   Answer  No

<table>
<thead>
<tr>
<th>New Hires to Mission-Critical Occupations</th>
<th>Total</th>
<th>Reportable Disability</th>
<th>Targetable Disability</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(#)</td>
<td>% of Total Applicants</td>
<td>% of Qualified Applicants</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(#)</td>
<td>(%)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

% of Total Applicants 0  
% of Qualified Applicants 0  
% of New Hires 0

Numerical Goal --  
12%  
2%

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

a. Qualified Applicants for MCO (PWD)  
   Answer  No

b. Qualified Applicants for MCO (PWTD)  
   Answer  No

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

a. Promotions for MCO (PWD)  
   Answer  No

b. Promotions for MCO (PWTD)  
   Answer  No
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.

GSA ensures its HR and OCR staff works in concert to produce FEORP and MD-715 analyses and evaluations related to hiring and promotion; EEO complaint information is promulgated among all GSA employees to describe remedies; hiring managers have required training related to civil rights and merit principles, and selecting officials are provided with reference tools to encourage neutral hiring and promotion practices.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

GSA ensures its HR staff works in concert to produce FEORP and MD-715 analyses and evaluations related to career development; EEO complaint information is promulgated.

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

<table>
<thead>
<tr>
<th>Career Development Opportunities</th>
<th>Total Participants</th>
<th>PWD</th>
<th>PWTD</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Applicants (#)</td>
<td>Selectees (#)</td>
<td>Applicants (%)</td>
</tr>
<tr>
<td>Internship Programs</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Fellowship Programs</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Mentoring Programs</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Coaching Programs</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Training Programs</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Detail Programs</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Other Career Development Programs</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

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

   N/A - no data exists.

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

No selections—but few applicants/nominees.

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

Cash awards for blind employees are slightly lower, but cash awards are tied to salary. Two of the recipients are below than the GSA average (GS-12), bringing the total down. Award policy reviewed by BAW in FY18; conclusion was that the policy of tying awards to salary isn’t a barrier; it’s the federal standard practice.

<table>
<thead>
<tr>
<th>Time-Off Awards</th>
<th>Total (#)</th>
<th>Reportable Disability %</th>
<th>Without Reportable Disability %</th>
<th>Targeted Disability %</th>
<th>Without Targeted Disability %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash Awards</td>
<td>Total (#)</td>
<td>Reportable Disability %</td>
<td>Without Reportable Disability %</td>
<td>Targeted Disability %</td>
<td>Without Targeted Disability %</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Other Awards</th>
<th>Total (#)</th>
<th>Reportable Disability %</th>
<th>Without Reportable Disability %</th>
<th>Targeted Disability %</th>
<th>Without Targeted Disability %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Performance Based Pay Increase</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

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

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

D. PROMOTIONS

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

<table>
<thead>
<tr>
<th>Grade</th>
<th>SES</th>
<th>Grade GS-15</th>
<th>Grade GS-14</th>
<th>Grade GS-13</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>a.</td>
<td>i. Qualified Internal Applicants (PWD)</td>
<td>Answer No</td>
<td></td>
</tr>
<tr>
<td></td>
<td>a.</td>
<td>ii. Internal Selections (PWD)</td>
<td>Answer No</td>
<td></td>
</tr>
<tr>
<td>b.</td>
<td>i.</td>
<td>Qualified Internal Applicants (PWD)</td>
<td>Answer Yes</td>
<td></td>
</tr>
<tr>
<td>b.</td>
<td>ii.</td>
<td>Internal Selections (PWD)</td>
<td>Answer Yes</td>
<td></td>
</tr>
<tr>
<td>c.</td>
<td>i.</td>
<td>Qualified Internal Applicants (PWD)</td>
<td>Answer Yes</td>
<td></td>
</tr>
<tr>
<td>c.</td>
<td>ii.</td>
<td>Internal Selections (PWD)</td>
<td>Answer Yes</td>
<td></td>
</tr>
<tr>
<td>d.</td>
<td>i.</td>
<td>Qualified Internal Applicants (PWD)</td>
<td>Answer Yes</td>
<td></td>
</tr>
<tr>
<td>d.</td>
<td>ii.</td>
<td>Internal Selections (PWD)</td>
<td>Answer Yes</td>
<td></td>
</tr>
</tbody>
</table>

GS-15, 5.4% qualified, 4.25 selected; pool is 6.9% GS-14, 3.5% qualified, 0.0% selected; pool is 8.3% GS-13, 6.7% qualified, 1.7% selected; pool is 12.4%

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.

<table>
<thead>
<tr>
<th>Grade</th>
<th>SES</th>
<th>Grade GS-15</th>
<th>Grade GS-14</th>
<th>Grade GS-13</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>a.</td>
<td>i. Qualified Internal Applicants (PWTD)</td>
<td>Answer No</td>
<td></td>
</tr>
<tr>
<td></td>
<td>a.</td>
<td>ii. Internal Selections (PWTD)</td>
<td>Answer No</td>
<td></td>
</tr>
<tr>
<td>b.</td>
<td>i.</td>
<td>Qualified Internal Applicants (PWTD)</td>
<td>Answer No</td>
<td></td>
</tr>
<tr>
<td>b.</td>
<td>ii.</td>
<td>Internal Selections (PWTD)</td>
<td>Answer No</td>
<td></td>
</tr>
<tr>
<td>c.</td>
<td>i.</td>
<td>Qualified Internal Applicants (PWTD)</td>
<td>Answer No</td>
<td></td>
</tr>
<tr>
<td>c.</td>
<td>ii.</td>
<td>Internal Selections (PWTD)</td>
<td>Answer No</td>
<td></td>
</tr>
<tr>
<td>d.</td>
<td>i.</td>
<td>Qualified Internal Applicants (PWTD)</td>
<td>Answer No</td>
<td></td>
</tr>
<tr>
<td>d.</td>
<td>ii.</td>
<td>Internal Selections (PWTD)</td>
<td>Answer No</td>
<td></td>
</tr>
</tbody>
</table>

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

GS-15, 7.4% qualified and 2.56% selected GS-13, 7.88% qualified and 5.58 selected

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

GS-15, 3.3% qualified and 0.0% selected GS-13, 3.6% qualified and 2.8% selected

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

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

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

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 PWTD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

   a. New Hires for Executives (PWTD) Answer No
   b. New Hires for Managers (PWTD) Answer No
   c. New Hires for Supervisors (PWTD) Answer No

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 Yes
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

<table>
<thead>
<tr>
<th>Separations</th>
<th>Total #</th>
<th>Reportable Disabilities %</th>
<th>Without Reportable Disabilities %</th>
</tr>
</thead>
</table>

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

15.5% PWTD separated; 6.2% inclusion rate

<table>
<thead>
<tr>
<th>Separations</th>
<th>Total #</th>
<th>Targeted Disabilities %</th>
<th>Without Targeted Disabilities %</th>
</tr>
</thead>
</table>

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.

N/A

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.


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.gsa.gov/real-estate/design-construction/accessible-facility-design

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.

GSA's Office of Administrative Services provides the Center for IT Access (CITA), a centrally funded program that provides assistive technology needs assessments and expertise for all employees with disabilities as well as their management. CITA also maintains an inter-agency agreement with the Department of Defense's Computer Accommodation Program, which provides many kinds of assistive technology and related training. In addition, there are centralized funds provided by the Office of Administrative Services...
Services (OAS) to cover these same items when CAP unable to for any reason. OAS also provides workplace modifications when needed from a centralized budget. There is no central funding for interpreters or CART services at this time, but OCR is undertaking a proposal to create an agency-level central fund for each of the separate funding streams the agency operates under. OCR’s External Programs Branch will partner with the Public Buildings Service to develop a system to assess GSA-owned, managed and leased space for accessibility purposes pursuant to applicable Federal civil rights laws. Development of this system will allow building management staff to assess their building to ensure access to persons with disabilities.

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.)

29.5 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.

GSA’s accommodation procedure was re-written and finalized June 6, 2018. The provision of a complete data set related to accommodation this year, after enhancements to the tracking mechanism, enabled the agency to make definitive statements about timeliness and approval rates, and determine how often requests are modified or denied, and what kinds of disability categories, and products and services, are requested. Training for managers and supervisors is required every other year. Complaint files and settlement-finding data indicates that issues related to RA management exist, but last year’s complaint and findings activities indicate the issue was far less prevalent this past year.

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

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

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

The PAS requirement is understood by the cohort of RACs, and OHRM coordinated with a program analyst from OCR to obtain a sample job description/PD from another agency (one that has provided PAS as RA before it was required) as an example of a PAS/administrative assistant contract person to use at GSA when the need arises, since it is typical for such persons to be hired as specialized, contract staff and to multitask for these functions. GSA has no requests for PAS at this time.

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?
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.

Three settlements for three cases; one case had disability as its only basis; two cases had disability as one basis of multiple claimed.

**B. EEO COMPLAINT DATA INVOLVING Reasonable ACCOMMODATION**

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

   Answer Yes

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

   Answer 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.

   One settlement for one case; disability was one basis of five claimed; complaint is one of the complaints from above with harassment allegation.

**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.

   N/A

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

   N/A

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.
N/A