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

> We noted that the permanent workforce as reported in Table B for Prior FY (1,268) is different from Table A (1,377), This analysis is based on the FY 19 data as submitted in Table B, when there is any discrepancies between data in Table A and Table B. At the end of FY 2019, ACF had a permanent workforce of 1,256 employees, including 76 PWD, which represents 6.05% of the permanent workforce -- below the Federal Goal of 12%. The PWD participation rate in the GS-01 to GS-10 cluster is 20% (7 of 35); thus it exceeds the 12% benchmark. In contrast, the PWD participation rate in the GS-11 to GS-15 cluster is 5.71% (69 of 1209), which is significantly below the 12% Federal Goal. PWD representation is absent from the 11 total permanent SES workforce.

*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

> We noted that the permanent workforce as reported in Table B for Prior FY (1,268) is different from Table A (1,377), This analysis is based on the FY 19 data as submitted in Table B, when there is any discrepancies between data in Table A and Table B. At the end of FY 2019, 9 (0.72%) of the 1,256 total employees in the permanent workforce were PWTD; which is below the 2% Federal Goal. The PWTD participation rate in the GS-01 to GS-10 cluster is 2.86% (1 of 35), slightly above the 2% benchmark. The PWTD participation rate in the GS-11 to GS-15 cluster is 0.66% (8 of 1,209), is below the 2% benchmark. PWTD representation is absent from the 11 total permanent SES workforce.

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.

The Office of Diversity Management and EEO (ODME) briefs senior leadership about the outcomes of the workforce data analyses and triggers found compared to the benchmark goals for persons with disabilities (PWD) and persons with targeted disabilities (PWTD). The Executive and Administrative Officers within the agency program areas discuss regularly workforce-related concerns with management, and the use of Schedule A appointments and conversions, detail opportunities, etc., to attract and retain PWD and PWTD. In addition, ODME shares information on PWD and PWTD hiring goals through its newsletter. ACF continues to convene listening sessions for employees with disabilities and their allies, and senior leadership has attended the sessions.

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

ODME has a GS-12 staff member serving as Special Emphasis Program (SEP) Coordinator. In FY 2019, ODME had a Collateral Duty Disability Program Manager (CD DPM), and is currently searching for a replacement. The SEP Coordinator and the CD DPM work closely with Differently Abled ACF Resources and Employees (D.A.A.R.E), the Employee Resource Group (ERG) for employees with disabilities. ODME also has a GS-13 Reasonable Accommodation Coordinator; and recently recruited a GS-11 EEO Specialist that will provide back-up services for the RA 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	
Processing applications from PWD and PWTD	2	0	0	Michael.Culpepper@HHS.
Processing reasonable accommodation requests from applicants and employees	1	3	0	Laura.irizarry@acf.hhs.gov
Section 508 Compliance	1	1	0	Janean.chambers@acf.hhs.
Special Emphasis Program for PWD and PWTD	1	1	0	Laura M. Irizarry, Acting Director, ODME Laura.irizarry@acf.hhs.gov

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	1	0	0	Roydon Pratt, Facility and Security, ACF Roydon.Pratt@acf.hhs.gov
Answering questions from the public about hiring authorities that take disability into account	2	0	0	Michael.Culpepper@HHS.g

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="center">Answer   Yes</div>

• Special Emphasis Program Management Training (2018)** • Mandatory Reasonable Accommodation Training for Managers and Supervisors (2019)*** • Diversity & Inclusion/Unconscious Bias Training for all ACF Staff (2019)*** • Accommodating and Managing Federal Employees with Mental and Intellectual Disabilities (2019)* • Accommodating Individuals with Disabilities (2019)* • Cancer as a Disability: Your Rights in the Workplace Webinar (2019)* • Reasonable Accommodations: The Foundation for a Disability-Inclusive Federal Workforce (2019)* • Nuts & Bolts of Disability Law & Reasonable Accommodation* (2020) • EEO Challenges in a COVID-19 World (2020)*** • Connecting Agency Practices to Federal Disability Discrimination Complaints (2020)*** *Reasonable Accommodation Coordinator **Collateral Duty Disability Programs Manager ***ODME Staff

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.

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

ACF has sufficient staff, funding and resources to implement the disability program.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.		
Objective	Ensure all RA requests are processed within the established timeframes		
Target Date	Sep 30, 2021		
Completion Date			
Planned Activities	*Target Date*	*Completion Date*	*Planned Activity*
	Aug 3, 2020	August 3, 2020	Recruit EEO Specialist that will serve as back up to the RAC
	Sep 30, 2020		Focus monthly monitoring on assessing timeliness of RA requests.
	Sep 30, 2020		Continue working with OA Budget and other internal stakeholders to ensure funding and inter-agency agreements are processed timely
	Dec 31, 2020	December 31, 2020	Streamline procedure to process Ergonomic Assessments
	Dec 31, 2020		Conduct annual RA training for managers and staff, which will include information about the RA Procedures and PAS
	Sep 30, 2021		Develop, implement and rollout an automated RA tracking system
Accomplishments	*Fiscal Year*	*Accomplishment*	
	2019	• On April 11, 2019, EEOC approved ACF's Reasonable Accommodation Procedures (RAP). The revised RAP has since been posted to all ACF. • In FY18, ODME requested—and was approved -- the hiring of an EEO Specialist who will serve as back up to the RAC, as needed. A selection has been made, and the new hire will start in August 2020. • ODME continues to offer RA training to supervisors and staff. PLEASE NOTE: The FY19 total inventory was 76 cases if we include 3 conflict of interest requests processed on behalf of another HHS OpDiv, and 6 cases in which the requester withdrew, failed to pursue the request and/or left the agency.	

Brief Description of Program Deficiency	C.3.b.6. Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]		
Objective	Develop and implement robust EEO/DI performance standards, in collaboration with EEODI and HHS EEO Offices. Please refer to HHS HQ's Part H for additional information.		
Target Date	Jan 31, 2021		
Completion Date	Jan 31, 2021		
Planned Activities	*Target Date*	*Completion Date*	*Planned Activity*
	Dec 31, 2020	January 30, 2021	Collaborate with HHS OHR and EEODI in the implementation of new performance plan standards, including new EEO/DI related standards
	Dec 31, 2020	May 31, 2021	Collaborate in the development and issuance of companion handbook on EEO/DI standards
	Jan 30, 2021		In collaboration with EEODI and OHR provide training and support to supervisors.
	Jan 31, 2021	January 31, 2021	Develop, get approval for and implement improved EEO/DI standards for mandatory inclusion in performance plans for supervisors/managers.
Accomplishments	*Fiscal Year*	*Accomplishment*	
	2019	• ACF conducted annual training for supervisors on issues such as EEO, Harassment Prevention and RA. In May 2020 provided first mandatory training to supervisors on Diversity/Unconscious Bias. •. In August, ACF will roll out its new scenario-driven workshop style training series, The ACF Supervisors' Role in EEO. • Implemented "Supervising for Success" training series. • In May 2020, ACF re-issued its Memo to Supervisors on ADR/Mediation	

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)]
Objective	Ensure ACF establish agency-wide exit interviews that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities
Target Date	Sep 30, 2020
Completion Date	

	Target Date	*Completion Date*	*Planned Activity*
Planned Activities	Dec 31, 2020	December 31, 2020	During annual listening session with employees with disabilities and allies, identify issues that impact retention and separation among PWD and PWTD.
	Dec 31, 2020	December 31, 2020	Recommend to OA/RMD and SROC exit interview questions to be implemented agency-wide.
	Dec 31, 2020	December 31, 2020	In collaboration with OA/RMD (ACF's HR liaison) and SROC, review ACF's current policies and procedures related to exit interviews; and provide recommendations on protocols for agency-wide exit interviews/ surveys

	Fiscal Year	*Accomplishment*
Accomplishments	2019	ODME has been conducting listening sessions with employees with disabilities and allies since 2018. As a direct result of the first listening session in 2018, D.A.A.R.E. , an ERG for employees with disabilities was established. This ERG has been sharing with ACF EEO and HR leadership their concerns and recommendations.

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.

ACF receives job applications through the WHRSC (servicing personnel office). In FY 2019, the CD DPM, in collaboration with D.A.A.R.E. explored strategies to enhance recruitment of individuals with disabilities. The ODME Acting Director, the SEP Coordinator, and the CD DPM will continue to seek D.A.A.R.E.'s collaboration to identify issues that concern PWD and PWTD and strengthen the agency's workforce diversity and inclusion as it relates to PWD and PWTD participations.

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

ACF utilized hiring authorities (for example, Schedule A, 5 CFR 213.3102(u) and Disabled Veterans).

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.

WHRSC evaluates the applications and submits qualified applicants to the hiring official for consideration under Schedule A

appointments.

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

ACF provides hiring flexibility guidance to hiring officials at least annually. The Executive and Administrative Officers within the agency program areas provide technical advice to managers on hiring matters, such as Schedule A appointments, and hiring Disabled Veterans. D.A.A.R.E. ERG has coordinated presentations on Schedule A and other topics of interests for its members.

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 FY 2019, the ODME Acting Director, SEP Coordinator and the RA Coordinator, continued to reach out (attending meetings, subscribing to listserves, etc.) to organizations such as Federal Exchange on Employment and Disability (FEED). As a result of the first listening session for employees with disabilities. D.A.A.R.E., an ERG for employees with disabilities and their allies was established. ODME, in collaboration with D.A.A.R.E., is developing a resource tool kit for employees with disabilities, which will include contact information on organizations like FEED, JAN, etc.

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

Table B shows that there were 136 new hires at ACF in FY19. There were 8 PWD new hires, representing 5.88% of total new hires, which is below the 12% benchmark. For PWTD, the total number for new hires in FY 19 was 3, representing 2.21% of the total new hire, which is slightly above 2%. Nevertheless, PWTD participation rate at ACF in FY 2019 is 0.72% which remains below the 2% benchmark.

New Hires	Total	Reportable Disability		Targeted Disability	
		Permanent Workforce	Temporary Workforce	Permanent Workforce	Temporary Workforce
	(#)	(%)	(%)	(%)	(%)
% of Total Applicants					
% of Qualified Applicants					
% of New Hires					

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   Yes

b. New Hires for MCO (PWTD)   Answer   Yes

For FY 2019, Table B shows that there were a total of 136 new hires. The FY 2019 applicant flow data shows that there were 6,572 external applications in the following 5 MCOs, which are 0101, 0301, 0343, 0501, and 0560. Among the 4,084 qualified candidates, 226 were PWD, and of these 226, 32 PWD were referred, and 4 were new hires, which the PWD new hires represents 2.94% of the total new hires in these 5 MCO categories. Of the 4 new hires, 3 were identified as PWTD, which represents 2.21% of the total new hires in the categories. Regardless, the total PWTD participation rate at ACF is still below the 2% goal.

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   Yes

    b. Qualified Applicants for MCO (PWTD)   Answer   Yes

In FY 2019, of the 5 MCOs, 0101, 0301, 0343, 0560, and1109, there were 2,241 applicants for internal competitive promotion, and among them 1,211 were rated qualified. Of the 1,211 qualified applicants, 82, or 6.77%, of the qualified applicants were PWD. Among the 1,211 of total applicants rated as qualified for internal competitive promotion, 46 of them were identified as PWTD, or 3.8% of the qualified applicant pool.

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   Yes

For FY 2019, a total of 119 selected for internal competitive promotions in the 5 MCOs (0101, 0301, 0343, 0560, 1109). There was a total of 2,241 applicants and 1,211 were rated qualified. Of the qualified applicants, 82 (6.77%) were PWDs, and 46 (3.8%) were PWTDs. Of the 82 PWD in the qualified applicant pool, 3 were selected, which represents 3.7% of the total qualified applicant pool. Of the 82 PWD in the qualified applicant pool, 1(1.2%) was 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.

ACF offers opportunities for advancement to all employees, including PWD/PWTD. ACF continues to encourage employees to

identify learning opportunities best fitting their professional goals, and develop an individual Action Learning Plan (LAP). Since late 2018, ACF and its ERGs have been collaborating in an initiative to, among other things, help ERGs identify core competencies aligned to their respective ERGs' mission and priorities. In August 2019, ACF sponsored "Purpose-Driven Leadership Workshop," a leadership program for HQ and regional ACF ERG leadership and members. These workshops helped representatives from ACF ERGs to better understand their leadership role when working with internal and external stakeholders, and provided them with tools and techniques to become more effective leaders and communicators. As a follow up, ACF provide a group coaching session to each ERG. Due to the workshop's success, a follow up session was conducted in November 2019. ACF alerts all agency staff of job openings and employee development programs announced. This is accomplished by email messages and online posting at the ACF Connect website. ODME also forwards a copy of the announcements to the ERGs.

B. CAREER DEVELOPMENT OPPORTUNITES

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

ACF Training and Development: o Supervisory Training - Supervising for Success: ACF Training Series. The courses in this series were a mix of technical knowledge on addressing performance management and conduct, and soft skills to promote effective leadership and management, all delivered by external experts. o Leadership Development - ACF continues to provide leadership opportunities through its 21st Century Leadership Development Programming. ACF also supports the growth of employee leadership capabilities for aspiring leaders at GS-7 to GS–12 leaders, and for employees in current formal leadership positions at the GS-13 – SES. o Coaching and Mentoring - ACF continues to strive towards a culture of continuous learning and professional discovery through its Coaching and Mentoring Program. The program focuses in increasing self-awareness; prioritizing professional goals; learning new knowledge or skills; and maximizing opportunities for self-development. o External Learning and Development Program (ELDP) - ACF promotes individual learning and development through the ELDP. The ELDP enabled employees to strengthen professional competencies, enhance technical expertise, and maintain professional certifications.

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 (%)
Mentoring Programs	24	24	17%	17%	4.2%	4.2%
Detail Programs	19	19	5%	5%	0	0
Other Career Development Programs	25	25	8%	8%	4%	4%
Training Programs	186	186	8%	8%	0.54%	0.54%
Internship Programs						
Fellowship Programs						
Coaching 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   Yes

        b. Selections (PWD)   Answer   No

There are no disproportions in selections as all applicants (whether PWD or not) participated in the career development program for which they applied. The following analyzes the programs where PWD were below the 12% benchmark: • Training programs: PWD participation was 8.1% (15 of 186 participants). The proportion of PWD from their group who participated in training programs was

6.6% (5 of the 76 PWD workforce). The proportion of those identified as non-PWD's was 15.9% (171 of the 1,075 non-PWD workforce). • Detail assignments: PWD participation was 5% (1 of 19 participants). The proportion of PWD from their workforce who participated was 1.3% (1 of the 76 PWD workforce). This proportion, while significantly below the 12% benchmark, is close to the 1.7% non-PWD group participation (18 of the 1,075 non-PWD workforce). • GS-13-14 career development program: PWD participation was 6.7% (1 of 15 participants). The PWD workforce participation was 1.3% (1 of 76 PWD workforce). It should be noted however that the non-PWD's participation was also 1.3% (14 of the 1,075 non-PWD workforce). • OPM Leadership Program: There was no PWD participation. The non-PWD group participation was 0.09% (1 of 1,075). • SES: There was no PWD participation. The non-PWD group participation was only 0.09% (1 of 1,075). Note: Some of the employees whose disability status self-identifications in SF-256 is non-PWD may have a disability based other records, such as disability reasonable accommodations, or disable veterans. Therefore, the PWD participation rates may be underestimated.

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	Yes
b. Selections (PWTD)	Answer	No

There are no disproportions in selections as all applicants (whether PWTD or not) participated in the career development program for which they applied. The following analyzes the programs where PWTD were below the 2% benchmark: • Training programs: Participation by those identified as PWTD was 0.54% (1 of 186 participants), below the 2% benchmark. The proportion of PWTDs who participated in training programs was 11.1% (1 of the 9 PTWD workforce), which is above the 2% benchmark. In addition, that proportion is not significantly lower than that of the remaining permanent workforce, that is, 14.8% (185 of 1,247)). • Detail programs: While none of the 19 participants were identified as PWTD, the remaining permanent workforce participation was only 1.5% (19 of 1,247). • GS-7-12 career development program: While none of the 8 participants were identified as PWTD, the remaining permanent workforce participation was only 0.64% (8 of 1,247). • OPM Leadership Program: There was no PWTD participation. However, participation in general was approximately 0.08% (1 of 1,256) of the permanent workforce. • SES: There was no PWTD participation. The remaining permanent workforce participation was 0.08% (1 of 1,247). Note: Some of the employees whose disability status self-identifications in SF-256 is non-PWTD may have a disability based other records, such as disability reasonable accommodations, or disable veterans. Therefore, the PWTD participation rates may be underestimated.

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

In FY 2019: there was a total of 76 PWD,,9 PWTD, in the ACF workforce. The available data in Table B as submitted shows : • A total of 1552 time-off awards were issued: by inclusion rate: 1 - 10 hours: PWD-18 (of 76 total PWD, 23.68%), PWTD - 2 (of 9 total PWTD, 22.22%); 11-20 hours: PWD-13 (17.11%), PWTD - 1 (11.11%); 21-30 hours: PWD - 7 (9.21%), PWTD: 0; 31-40 hours - PWD - 59 (77.63%), PWTD - 6 (66.67%). The data shows that total time off awards were issued to 86 (5.54% in participation rate) to employees not identified as having a disability; 97 (6.25% in participation rate) to PWD, and 9 (0.58% in participation rate) to PWTD. • A total of 1290 cash awards were issued: By inclusion rate: $500 or Less: PWD - 10 (13.16%), PWTD - 1 (11.11%); $501 - 999: PWD - 21 (27.63%), PWTD - 3 (33.33%); $1000-1999: PWD - 35 (46.05%), PWTD - 4 (44.44%); $2000 - 2999: PWD - 11 (14.47%), PWTD - 0; $3000 and above - none. The data also shows that the total cash awards were issued to a total of 64 (4.96%) employees not identified as having a disability; 77 PWD (5.97% in participation rate), 8 PWTD (0.62%, in participation rate). The overall award rates, including both time-off awards (combined all categories) and cash awards (combined all categories), is 6.12% for PWD and 0.60 % for PWTD.

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

In FY 2019, there was no performance based pay increase,

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

N/A

D. PROMOTIONS

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

      a. SES

           i. Qualified Internal Applicants (PWD)   Answer   Yes

           ii. Internal Selections (PWD)   Answer   Yes

      b. Grade GS-15

           i. Qualified Internal Applicants (PWD)   Answer   Yes

           ii. Internal Selections (PWD)   Answer   Yes

      c. Grade GS-14

           i. Qualified Internal Applicants (PWD)   Answer   Yes

           ii. Internal Selections (PWD)   Answer   Yes

      d. Grade GS-13

           i. Qualified Internal Applicants (PWD)   Answer   Yes

           ii. Internal Selections (PWD)   Answer   Yes

In FY 2019, there were 2,241 applicants for internal competitive promotions in the 6 MCOs. A total of 1,211 applicants were rated qualified, 716 referred for consideration, and 119 selected. There were 182 (8.12%) PWD among the 2,241 applicants; 82 (6.77%) PWD among the 1,211 qualified applicants; 67 (9.36%) PWD among the 716 referred for consideration; and 5 (4.20%) selected. There were 113 (5.04%) PWTD among the 2,241 applicants; 46 (3.8%) PWTD among the 1,211 qualified applicants; 41 (5.73%) PWTD among the 716 referred for consideration; and 4 (3.36%) selected. In FY 2019, 114 employees were selected for internal promotion in the GS 13 to GS15 level positions. Of those, 4 (3.51%) were PWD and PWTD. In FY 2019, there was an internal competitive selection (promotion) to SES, which was not PWD/PWTD.

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   Yes

        ii. Internal Selections (PWTD)   Answer   Yes

    b. Grade GS-15

        i. Qualified Internal Applicants (PWTD)   Answer   Yes

        ii. Internal Selections (PWTD)   Answer   Yes

    c. Grade GS-14

        i. Qualified Internal Applicants (PWTD)   Answer   Yes

        ii. Internal Selections (PWTD)   Answer   Yes

    d. Grade GS-13

        i. Qualified Internal Applicants (PWTD)   Answer   Yes

        ii. Internal Selections (PWTD)   Answer   Yes

In FY 2019, 114 employees were selected for internal promotion in GS 13 – GS 15 level positions. 4 (3.51%) were PWTD. In FY 2019, there was one internal competitive promotion in the SES selection and the selectee is not PWTD.

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   Yes

        b. New Hires to GS-15 (PWD)   Answer   Yes

        c. New Hires to GS-14 (PWD)   Answer   Yes

        d. New Hires to GS-13 (PWD)   Answer   Yes

In FY 2019, there were a total of 49 new hires in the senior grade levels, from GS-13 to GS-15 level positions; 3 (6.12%) of the new hires were PWDs. There was one SES new hire, not a PWD. .

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

In FY 2019, there were 49 new hires in the GS-13 to GS-15 levels, and there were 2 (4.08%) PWTD.

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	Yes
ii. Internal Selections (PWD)	Answer	Yes

b. Managers

i. Qualified Internal Applicants (PWD)	Answer	Yes
ii. Internal Selections (PWD)	Answer	Yes

c. Supervisors

i. Qualified Internal Applicants (PWD)	Answer	Yes
ii. Internal Selections (PWD)	Answer	Yes

The FY 2019 data shows: • 97 Executives (GS 15 and up): 3 (3.09.%) PWD; and 1 (1.03%) PWTD. • 118 Mid-level supervisors (GS 13 and 14): 7 (5.93 %) PWD; and 0 PWTD. There were 63 internal selections for promotion to supervisory positions, of which 3 (4.76%) were PWD.

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	Yes
ii. Internal Selections (PWTD)	Answer	Yes

b. Managers

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

    c. Supervisors

        i. Qualified Internal Applicants (PWTD)   Answer   Yes

        ii. Internal Selections (PWTD)   Answer   Yes

> There were 63 internal selections for promotion to the supervisory positions, of which 2 (3.17%) were PWTD.

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   Yes

    b. New Hires for Managers (PWD)   Answer   Yes

    c. New Hires for Supervisors (PWD)   Answer   No

> In FY 2019, there were 42 new hires to the supervisory positions 3 (7.14%) were PWD.

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   Yes

    c. New Hires for Supervisors (PWTD)   Answer   Yes

> In FY 2019, there were 42 new hires to the supervisory positions, of which 1 (2.38%) was PWTD.

Section VI: Plan to Improve Retention of Persons with Disabilities

To be model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace assistance services.

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If "no", please explain why the agency did not convert all eligible Schedule A employees.

                                      Answer   No

> A Schedule A employee was not converted within the two years period.

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

    a. Voluntary Separations (PWD)   Answer   No

    b. Involuntary Separations (PWD)   Answer   No

In FY 2019, there were a total of 98 separations. Of the 98 separation, 6 (6.12%) were PWD. There was 0 PWD identified as separation based on removal.

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

In FY 2019, there were a total of 98 separations. Of the 98 separation, 2 (2.04%) were PWTD. There was 1 PWTD (1.02% of the total separation in FY 2019) identified as separation based on removal.

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.

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.

https://www.hhs.gov/about/agencies/asa/ocio/index.html https://connect.acf.hhs.gov/rights-responsibilities/section-508

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.hhs.gov/civil-rights/filing-a-complaint/index.html https://connect.acf.hhs.gov/rights-responsibilities/eeo l

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.

ACF continues to ensure that all technology is accessible to people with disabilities: • Through its Reasonable Accommodation Program, the agency continues to provide software, laptops and other equipment to employees with disabilities to improve their accessibility to appropriate technology. • Will upgrade its FY21 Interpreting Services contract to increase internal 508 compliance capabilities. • Is implementing ACF Solution Delivery Life Cycle (SDLC), which incorporates 508 compliance when overseeing the development of technology

C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

In FY19, ACF processed 67 new RA requests. 1/ When an interim accommodation was approved, it was provided within an average of 1.5 business days. Decisions were issued in 65 RA cases. Average time to issue a decision and provide approved accommodation was 44 days, which in most cases include up to 30 days for medical expert review and recommendations. Accommodations requested included ergonomic assessments and the corresponding purchases and deliveries, as well as telework arrangements, changes in work schedule/tour of duty, reassignment, etc. In FY19, 21 (31.3%) requests were untimely processed. It must be noted that 17 out of the 21 (80.9%) untimely processed involved ergonomic assessments, and purchase and delivery of equipment. Due to circumstances beyond our control, budgetary and administrative delays in the transition from fiscal years have continued to have a negative impact in the timely processing of this type of RA requests. In addition, we continue to experience an increase in complex requests (e.g., internal reassignment, environmental testing, etc.) 1/ The FY19 total inventory was 76 cases if we include 3 conflict of interest requests processed on behalf of another HHS OpDiv, and 6 cases in which the requester withdrew, failed to pursue the request and/or left the agency

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.

ACF reasonable accommodation requests are coordinated by a full time Reasonable Accommodations Coordinator. By August 2020, we expect to hire an EEO Specialist to provide backup RA services. ACF conducts mandatory RA training for supervisors and managers on an annual basis. The agency also offered optional RA training to all staff in FY17 and FY18, and will be providing training to ACF staff in CY20. ODME also provides program-specific RA training upon request. In FY19, ACF processed 67 new RA requests. The FY19 total inventory was 76 cases, including 3 conflict of interest requests processed on behalf of another HHS OpDiv, and 6 cases in which the requester withdrew or failed to pursue the request and/or left the agency. This represents a 13% increase from FY18 (66 new requests). Accommodations requested included ergonomic assessments and the corresponding purchases and deliveries, as well as telework arrangements, changes in work schedule/tour of duty, reassignment, etc. On a monthly basis, ODME generates and analyzes an RA activity report, which is shared with ACF leadership.

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.

Since FY19, there is a HHS-wide contract vehicle for PAS. In FY 19, ACF successfully implemented the PAS policy. In addition to travel related PAS requests, ACF is providing, on an ongoing basis, full time PAS to one employee, both at the official duty station and while teleworking.

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.

N/A.

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   Yes

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

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	In FY 2019, the agency had a permanent workforce of 1,256 employees, of which 76 (6.05%) were PWD, which is below the 12% benchmark. • GS-1 to GS-10 -- PWD participation rate within these grades is 20.0% (7 PWDs out of 35 within GS1-GS10), which is above the 12% benchmark; and • GS-11 to SES -- PWD participation rate within these grades is 5.66% (69 PWDs out of 1220), which is below the benchmark. In FY 2019, PWTD participation rate in the total permanent workforce was 0.72% (9 PWTD); which is below the 2% benchmark. PWTD • GS-1 to GS-10 -- PWTD participation rate within these grades is 2.86% (1 PWTD out of 35), which is slightly above the 2% benchmark; and • GS-11 to SES -- PWTD participation rate within these grades is 0.66% (8 PWTDs out of 1220). None of the 16 SES positions is occupied by a PWD or a PWTD.
STATEMENT OF BARRIER GROUPS:	*Barrier Group*
	People with Disabilities
	People with Targeted Disabilities

BARRIER ANALYSIS: Provide a description of the steps taken and data analyzed to determine cause of the condition.	
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	Despite agency's efforts, the recruitment and retention of persons with disabilities continue to be below the established benchmarks.
Objective	Continue an effort to increase participation by PWD and PWTD in ACF's permanent workforce and close the gap between their actual participation rates and their benchmarks of 12% and 2%, respectively, at all levels of the organization.

Date Objective Initiated	Oct 1, 2019
Target Date For Completion Of Objective	Sep 30, 2020

Responsible Officials	Laura M. Irizarry Acting Director of ODME
	TBD Collateral Duty Disability Program Manager
	TBD OWPD Director;

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
10/01/2021	Promote mentoring and professional development opportunities among ACF employees with disabilities.	Yes		
10/01/2021	Provide Personal Assistance Service (PAS) as needed	Yes		
10/01/2020	Continue to provide adequate RA training	Yes		
10/01/2021	Conduct trigger and potential barrier analyses, and modify Plan if needed	Yes		
10/01/2021	ODME will collaborate with D.A.A.R.E (ERG for employees with disabilities) to develop outreach and recruitment and retention activities and strategies; and continue to convene listening sessions and other activities.	Yes		
10/01/2021	Continue to work with Agency senior leadership and OWPD to (1) create awareness of the need to increase PWDs and PWTDs at ACF, and (2) identify ways to continue promoting outreach and increase participation of PWDs and PWTDs in ACF.	Yes		
10/01/2020	Implement the HHS automated RA processing system to provide more efficient services to employees with disabilities.	Yes		12/31/2020

Fiscal Year	Accomplishments
2019	Continued to collaborate with the Employees Resource Group for ACF employees with disabilities and allies.
2019	ACF continued to process reasonable accommodation requests (ergonomic assessments, assistive technology, furniture, training, telework, among others.)
2019	Special emphasis has been given to training and education on issues relating to persons with disabilities
2019	ACF continues to educate hiring officials and Administrative/Executive Officers about Schedule A and other hiring flexibilities
2019	Manager and supervisors received mandatory training on reasonable accommodation, while staff receives optional training.
2019	ODME provides data about ACF employees with disabilities through its newsletter
2019	Revised RA procedures were approved by EEOC in April 2019, and were promptly rolled out.

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

Most of the planned activities are on-going activities. For FY 2019 there was an increase of new hires and the data shows that PWD in the new hires remained below the 12% benchmark (5.88%). Also, the total participation rate of PWD at ACF is 6.05%. It appears that hiring of PWD may be an issue. However, as previously noted, participation rates might be underestimated due to gaps in self-identification.

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

ODME continues to implement the approved revised RA procedures, (which included the PAS), which will increase the efficiency of RA request process. ODME continues to seek a designated collateral duty Disability Employment Manager who will assist ACF to address issues pertaining to ACF employees with disabilities, including recruitment effort. ODME will also continue to collaborate with the D.A.A.R.E. ERG,, which also provides significant input to addressing reasonable accommodation for ACF employees with needs to accommodations.

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.

ODME continues to utilize the newly established ERG for employees with disabilities to enhance barrier analysis. ODME and OA/RMD continue exploring strategies to address the need to increase participation rate of PWD and PWTD at ACF. ODME will collaborate in HHS-wide efforts to improve data collection and upgrade barrier analysis.