

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 |

Cluster GS-1 to GS-10 contains 348 PWD (4.3%) Cluster GS-11 to SES contains 202 PWD (5%) Both well below the goal of 12%.

*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 |

Cluster GS-1 to GS-10 contains 35 PWTD (.43%) Cluster GS-11 to SESS contains 23 PWTD (.57%) Both well below the goal of 2%.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10					
Grades GS-11 to SES					

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

The IHS has not communicated the numerical goals to 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 No

Through its 2019 reorganization and restructuring effort, “Reimagining EEO”, IHS DMEEEO will work with senior leadership to identify and hire sufficient staff to implement its disability 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	0	7	0	Each IHS Human Resources Office has a Specialist that processes all employment applications through USAJobs
Special Emphasis Program for PWD and PWTD	0	7	0	Each Area EEO Manager (and HQ) is responsible for Special Emphasis Program Activities.
Answering questions from the public about hiring authorities that take disability into account	0	7	0	Each IHS Human Resources Office has an administrative assistant that fields all inquiries about the federal hiring process.
Processing reasonable accommodation requests from applicants and employees	0	0	0	Each IHS Manager is responsible for processing their own RA requests
Section 508 Compliance	0	1	0	Located in the Office of Technology, the 508 Coordinator is responsible for all aspects of 508 compliance.
Architectural Barriers Act Compliance	0	1	0	Located in the Office of Environmental Health and Engineering, Facilities Condition Assessment, the OEHE Facilities Coordinator is responsible for compliance with the Architectural Barriers Act.

- 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

Disability program staff have been provided with training on Reasonable Accommodation, Personal Assistant Services through EEOC and, in the case of field staff, other contract vendors.

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 No

Through its 2019 reorganization and restructuring effort, “Reimagining EEO”, IHS DMEEEO will work with senior leadership to identify funding sources and work to obtain other resources to fund the agency disability programs.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]		
Objective	Ensure IHS has a Reasonable Accommodation Plan that is communicated to all employees.		
Target Date	Dec 31, 2020		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Aug 31, 2020		Revise RA policy and procedures for dissemination to the IHS workforce and new employees. Once approved by IHS senior leadership, the policy and procedures will be posted on the EEO website and will be communicated to new employees at orientation.
	Sep 30, 2020		Request 1 FTE’s dedicated to coordinating the processing of RA requests (depending on approval of resources.)
	Sep 30, 2020		Make additional RA program materials available across all IHS facilities and offices.
	Dec 31, 2020		Ensure that all managers and supervisors receive training on their responsibilities with regard to IHS’s RA procedures. Develop a database warehouse for an RA system of records, thereby improving the timeframes to handle the RA request.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2018	Continued to provide training and support for all area offices and service units. Conducted audits of PHX, OKC, and GP offices to evaluate adherence to RA policies and procedures. Currently working with OHR to revise RA policy.	
	2017	Trained managers and supervisors, employees in Navajo, Portland, Great Plains, and Headquarters on Reasonable Accommodation procedures. Developed a video training module for use in training staff at remote locations.	

Brief Description of Program Deficiency	A.2.b.3. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.		
Objective	Ensure IHS has a Reasonable Accommodation Plan that is communicated to all employees.		
Target Date	Jun 1, 2020		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Aug 31, 2020		Upload digital version of the RA Policy to the IHS Policy website where all other policies can be found.
	Sep 30, 2020		Make additional RA program materials available across all IHS facilities and offices.
	Dec 31, 2020		Ensure that all managers and supervisors receive training on their responsibilities with regard to IHS's RA procedures.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2017	Trained managers and supervisors, employees in Navajo, Portland, Great Plains, and Headquarters on Reasonable Accommodation procedures. Developed a video training module for use in training staff at remote locations.	
	2018	Continued to provide training and support for all area offices and service units. Conducted audits of PHX, OKC, and GP offices to evaluate adherence to RA policies and procedures. Currently working with OHR to revise RA policy.	

Brief Description of Program Deficiency	B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]		
Objective	Ensure IHS has sufficient staff and funding to effectively manage the reasonable accommodation program of the agency.		
Target Date	Sep 30, 2021		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2020		Develop plan to assess needed staff and other resources to effectively administer the reasonable accommodation program.
	Jan 31, 2021		Obtain necessary funding for additional positions to support all reasonable accommodation activities.
	Sep 30, 2021		Fill any vacancies and obtain any necessary data collection and tracking systems to support a model reasonable accommodation program.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	DMEEEO Director and Reimagine EEO Team spent FY 2019 working to address the resource needs of IHS' EEO program including the reasonable accommodation program. Reasonable Accommodation (RA) tracking products and services developed to meet the specific needs of IHS and maintain confidentiality of employee's medical information were identified. IN FY 2020, DMEEEO and Reimagine EEO Team developed a plan to allocate sufficient budgetary resources for annual training of DMEEEO Area and Headquarters staff to ensure IHS is able to administer and evaluate all aspects of its reasonable accommodation program.	

Brief Description of Program Deficiency	B.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]		
Objective	Obtain sufficient resources to support the Special Emphasis Programs		
Target Date	Jan 1, 2021		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jan 31, 2021		Secure additional FTE to provide leadership and oversight for SEP
	Jun 30, 2021		Include additional fund in the budget of DMEEEO to support the SEPM efforts through contract services, purchases of materials.
	Jun 30, 2021		Initiate Employee Resource Groups (ERGs) to support agency SEP activities
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	Area EEO Managers disseminated (via email) the HHS/White House Proclamations marking all Special Emphasis Months. HQ DMEEEO partnered with HRSA to deliver a program celebrating Women's History Month.	

Brief Description of Program Deficiency	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]		
Objective	Work with OHR to develop and implement AAP for Individuals with Disabilities		
Target Date	Sep 30, 2021		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2020		Benchmark other operating divisions to identify best practices and incorporate into IHS policies and procedures.
	Sep 30, 2020		Clarify roles and responsibilities of HR and EEO staff
	Dec 31, 2020		Form a senior level working group of HR and EEO professionals to develop AAP, develop and administer training on AAP for all employees.
	Sep 30, 2021		Develop and maintain a quarterly reporting system to evaluate the success of initiatives and make adjustments as a result of any deficiencies.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2018	No progress has been made to date in this area.	

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	Initiate exit interviews to include questions on inclusion, recruitment, hiring, retention and advancement of PWD.		
Target Date	Sep 30, 2021		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2021		Work with OHR to initiate exit interviews to include questions on inclusion, recruitment, hiring, retention and advancement of PWD.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2018	No accomplishments on this item to date.	

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	Ensure the agency AAP is posted on its public-facing website.		
Target Date	Sep 30, 2020		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2020		Post AAP on IHS.gov
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	

Brief Description of Program Deficiency	D.4.d. Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR §1614.203(d)(7)(ii)]		
Objective	Take specific steps designed to increase the number of persons with disabilities employed by the agency		
Target Date	Feb 28, 2021		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Dec 31, 2020		Work with leadership to update and publish RA Policy
	Dec 31, 2020		DMEEEO will request resources for a full time RA Specialist for FY 2019.
	Feb 28, 2021		Work with OHR to increase level and visibility of recruitment for PWD/PWTD
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.

USA Staffing allows for the staffing specialists to filter applicants by those requesting consideration under Schedule A, individuals with disabilities and targeted disabilities. It is utilized when setting the certificates of eligible.

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

After applying Indian Preference, the remaining eligible and qualified candidate names are placed on the certificates of eligibles depending on their requested & eligible hiring authorities.

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.

The applicant must submit documentation of eligibility for employment under Schedule A which is usually from a licensed medical or rehab provider. The applicant’s name would be placed on a certificate of eligibles for consideration if they are qualified & eligible. Of course, Indian Preference is still the first preference given.

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

Supervisory Training on Hiring Authorities included overview of Schedule A in 2018 and will continue in 2019.

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 PWTB, in securing and maintaining employment.

The IHS must consider Indian Preference first when hiring. This drastically reduces the amount of opportunities for consideration that targets PWD & PWTB applicants.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. Using the goals of 12% for PWD and 2% for PWTB as the benchmarks, do triggers exist for PWD and/or PWTB 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 (PWTB) Answer Yes

Total new hires for permanent workforce = 52 PWD (3%), 12 PWTB (.7%)

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 PWTB 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 (PWTB) Answer No

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 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.

The Billings Area Office and Service Units initiated succession Plan in 2017. The IHS has a whole initiated a leadership program in 2014-2018.

B. CAREER DEVELOPMENT OPPORTUNITES

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

The Indian Health Service encourages supervisors to develop an Individual Development Plan with each of their employees.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	N/A					
Fellowship Programs	N/A					

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Mentoring Programs	N/A					
Coaching Programs	N/A					
Training Programs	N/A					
Detail Programs	N/A					
Other Career Development Programs	N/A					

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

IHS does not utilize career development programs at this time.

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

IHS does not utilize career development programs at this time.

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 FY2018, 4.26% PWD received a cash award of \$500 or less, while 5.16% PWD received a cash award of \$500 or more. In FY2018, PWTD represented .42% or those receiving a cash award of \$500 or less, while PWTD represented .67% of those receiving a cash award of \$500 or more.

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 Yes

b. Pay Increases (PWTD)

Answer Yes

In FY 2018, 3.46% PWD received a QSI. PWD represent approximately 4.61% of the total workforce. In FY2018, .44% of PWTD received a QSI. PWTD represent approximately .47% of the workforce.

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 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

At the current time, IHS does not have a reliable system to track internal applicants on the basis of disability. See Part H for discussion on this deficiency.

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

At the current time, IHS does not have a reliable system to track internal applicants on the basis of disability. See Part H for discussion on this deficiency.

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

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

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

At the current time, IHS does not have a reliable system to track internal applicants on the basis of disability. See Part H for discussion on this deficiency. See Part I for Barrier Analysis.

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

a. Executives

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

ii. Internal Selections (PWTD) Answer N/A

b. Managers

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

ii. Internal Selections (PWTD) Answer N/A

c. Supervisors

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

ii. Internal Selections (PWTD) Answer N/A

At the current time, IHS does not have a reliable system to track internal applicants on the basis of disability. See Part H for discussion on this deficiency.

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 N/A

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

- a. Voluntary Separations (PWD) Answer Yes
- b. Involuntary Separations (PWD) Answer Yes

Voluntary Separations for PWD = 4.92%, Involuntary Separations for PWD = 5.85%

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
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3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If “yes”, describe the trigger below.

- a. Voluntary Separations (PWTD) Answer Yes
- b. Involuntary Separations (PWTD) Answer Yes

Voluntary Separations for PWTD = .46%; Involuntary Separations for PWTD = .53%

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

IHS does not utilize exit interviews or other data sources to determine why employees voluntarily separated. See Part H for a plan to address this deficiency. Also see Part I for barrier analysis.

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.ihs.gov/ihtm/pc/part-8/p8c20/>

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.ihs.gov/oehe/includes/themes/responsive2017/display_objects/documents/handbook/07303.pdf

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.

N/A

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.)

<https://www.ihs.gov/ihtm/pc/part-1/chapter-14-reasonable-accommodation-is-under-revision-please-see-hhs-policy/> Also See part H and Part I that further address this deficiency.

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.

HQ DMEEEO manages the RA program and ensures timeliness, request, training and monitoring is handled accordance to guidance. All disapprovals are personally interviewed to ensure it is a legitimate undue hardship.

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

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

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

The agency has recently initiated the new PAS. No data currently exists to monitor request for trends or approving services.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

- 1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the governmentwide average?

Answer No

- 2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Answer Yes

- 3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

No cases had a finding of discrimination on the basis of disability harassment

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer No

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

Answer Yes

- 3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

No cases had a finding of discrimination on the basis of reasonable accommodation.

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?		Number of persons with targeted disabilities employed by IHS is below the participation rate goal of 2% (.5%). Additionally, number of persons with disabilities decreased from 658 to 621 (decrease of 7%)		
STATEMENT OF BARRIER GROUPS:		<i>Barrier Group</i> 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.		Agency (recruitment, hiring and retention) policies, procedures, practices and attitudes are a barriers for attracting and retaining qualified persons with disabilities.		
Objective				
Responsible Officials				
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
Fiscal Year	Accomplishments			
2018	The Reasonable Accommodation policy was completed in May 2017. Training was rolled out to all areas of the agency. However, in July 2017, senior leadership headed by Elizabeth Fowler, Deputy Director for Management Operations and Lisa Gyorda, Director of OHR, determined policy issued by HHS was sufficient for the agency, thus, there was no need for the agency to have a separate policy. Applicant data on persons with disability is now available through COGNOS. DMEEEO staff have met with and collaborated with HR staff to produce reports – FEORP and DVETS. Training DVD for Reasonable Accommodation has been completed and utilized throughout the agency.			

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

Agency funding is the biggest barrier to completing planned activities in a timely manner. Staff, IT,

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

Applicant data on persons with disability is now available through COGNOS. DMEEEO staff have met with and collaborated with HR staff to produce reports – FEORP and DVETS. Training DVD for Reasonable Accommodation has been completed and utilized throughout the agency.

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.
