

## 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 |

As a Cluster, GS-11 to SES fell below the 12% benchmark (8.72% for GS11-15; 5.49% for SES). Only GS-11 was above the goal.

\*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 |

Generally speaking, SES is less than the 2% benchmark (1.22%). However, when SES is included with other non-SES Senior Level Pay Plans (e.g. Administrative Law Judges, et.al.) PWTD participation exceeds the 2% goal.

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.

This is communicated during the Annual State of the Agency briefings and during training 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 No

During FY 19 staffing changes and reorganization efforts have left key positions unstaffed. It is a priority over the next reporting period to fill positions to ensure program continuity. The Office of Human Resources underwent a major makeover during FY19.

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Section 508 Compliance	1	0	0	Kate Sweeney kate.sweeney@hhs.gov
Architectural Barriers Act Compliance	0	0	0	See notes in response to question 3
Processing reasonable accommodation requests from applicants and employees	1	0	0	Natalie Bell, Reasonable Accommodation Team Lead, EEOC natalie.bell@hhs.gov
Answering questions from the public about hiring authorities that take disability into account	0	0	0	See notes in response to question 3.
Processing applications from PWD and PWTD	0	0	0	See notes in response to question 3.
Special Emphasis Program for PWD and PWTD	4	0	0	Bonita V. White Director, Diversity and Inclusion, OHR Bonita.White@HHS.GOV

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

Answer Yes

While the Office of the Secretary (OS) does not have a distinct disability employment program, several of its divisions collaborate to support equal opportunity for employees with disabilities. Equal Employment Opportunity, Service Center - Manages reasonable accommodation OHR, Staffing Recruitment Operations Center (SROC) Office of the Chief Information Officer – Section 508 in all areas of employment

**B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM**

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

Answer Yes

### Section III: Program Deficiencies In The Disability Program

<b>Brief Description of Program Deficiency</b>	A.2.c.3. Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.		
<b>Objective</b>	Expand marketing and training to include emphasis on RA program understanding, access and processing.		
<b>Target Date</b>	Mar 31, 2021		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jul 30, 2020		Update LMS NoFear/EEO/RA training module
	Aug 31, 2020		Include RA program information handout during New Employee Orientation (NEO). Handout explains the RA program and refers employees to HHS intranet EEODI website for additional program and specialist contact information.
	Aug 31, 2020		Assistant Secretary for Administration (ASA) notifies all EEOSC serviced population of required completion of LMS based EEO/RA/ Diversity training module.
	Dec 31, 2020		Establish recurring, audience specific, quarterly classroom training sessions for managers and employees.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]		
<b>Objective</b>	Acquire skilled RA staff to deliver all aspects of the reasonable accommodation program with emphasis on proactive program marketing, training and timely provision of approved accommodations. Initiate new Disability program for OS.		
<b>Target Date</b>	Dec 31, 2021		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Dec 31, 2021		Acquire FTE to establish capable RA and Disability program.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	B.4.a.4. to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.		
<b>Objective</b>	Develop alternative training approaches and capabilities to ensure outreach to all staff and managers with effective trainings including EEO, retaliation, harassment, religious and physical and mental accommodations, the complaint process and alternative dispute resolution.		
<b>Target Date</b>	Dec 31, 2020		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Dec 31, 2020		Update LMS NoFear/EEO/RA training module.
	Jan 31, 2021		Establish quarterly training delivery requirements for each EEOSC staff member as a performance evaluation requirement.
	Jul 30, 2021		Establish recurring quarterly classroom training sessions for managers and employees.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	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]		
<b>Objective</b>	Acquire position(s) to manage and support SEPs to include Federal Women's programs, Hispanic Employment programs, and People with Disabilities programs. Transitioning SEP activities to EEOSC in CY 2021.		
<b>Target Date</b>	Dec 31, 2021		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jul 1, 2020		Request funded FTE approval for FY2022.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	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.		
<b>Objective</b>	Fill the vacant EEOSC RA staff FTE enabling timely processing of requests and implementation of proactive training initiatives for the serviced population.		
<b>Target Date</b>	Sep 30, 2020		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Aug 30, 2020		Fill vacant GS-13 position.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	C.3.b.6. Provide disability accommodations when such accommodations do not cause an undue hardship? [ see 29 CFR §1614.102(a)(8)]		
<b>Objective</b>	HHS EEODI will develop this critical element for manager and supervisor performance evaluations to effect compliance with this program essential element.		
<b>Target Date</b>	Dec 31, 2022		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Mar 31, 2021		HHS EEODI will develop this critical element for manager and supervisor performance evaluations to effect compliance with this program essential element.
	Apr 30, 2021		Submit draft critical element language to the ASA for approval.
	Dec 31, 2022		Integrate approved critical element language into the supervisor and manager performance evaluation criteria.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]		
<b>Objective</b>	In conjunction with the barrier analysis and involvement of Sr. managers in the planning process, affirmative initiatives will be identified and implemented.		
<b>Target Date</b>	Dec 31, 2021		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Apr 30, 2021		Identify appropriate Sr. Managers to ensure inclusion in the MD-715 report process and barrier analysis action planning.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	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)]		
<b>Objective</b>	EEOSC will collaborate with OHR to review the current exit survey questions and acquire survey results for inclusion in the trigger analysis as well as review for any other EEO related matters or trends.		
<b>Target Date</b>	Jul 31, 2021		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Dec 31, 2020		Identify HR POC for exit survey matters and collaborate on survey question review. regarding regular acquisition of exit survey data.
	Mar 31, 2021		Collaborate with HR regarding exit survey matters and regular acquisition and assessment of exit survey data.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	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.		
<b>Objective</b>	When completed, the agency will post the affirmative action plan on the external facing web site.		
<b>Target Date</b>	Dec 31, 2020		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jun 30, 2021		Post FY2020 plan to the agency website following approval.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	D.4.b. Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR §1614.203(d)(1)(i)]		
<b>Objective</b>	Determine what processes are currently in place to disseminate vacancy information to people with disabilities and what can be done to encourage application for vacant positions.		
<b>Target Date</b>	Jul 30, 2022		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Dec 31, 2021		In concert with other MD-715 initiatives identify the HR POC for recruitment activities and assess and assist in development or improvements of targeted recruitment programs for underrepresented PWDs and PWTDS.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	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)]		
<b>Objective</b>	Work with HR recruitment POC to improve recruitment plans that target people with disabilities and people with targeted disabilities.		
<b>Target Date</b>	Jul 30, 2021		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jul 30, 2021		In concert with other MD-715 initiatives, collaborate with HR recruitment POC to advise and assist with recruitment plans that target people with disabilities and people with targeted disabilities.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	E.4.b. Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]		
<b>Objective</b>	HHS/EEODI is working on a HHS global solution to this problem.		
<b>Target Date</b>	Dec 31, 2021		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
<b>Accomplishments</b>	<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.

OS applicant data is available via OPM's COGNOS. OS receives applications from the OHR/SROC (servicing personnel office) for our vacant positions.

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

OS uses Schedule A hiring authority, as well as the hiring of veterans with disabilities.

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.

HHS job announcements include detailed instructions for Schedule A-eligible applicants on how to use the online application portal, [www.USAJOBS.gov](http://www.USAJOBS.gov). If an applicant is unable to apply this way, applications can be sent to [Recruiter@hhs.gov](mailto:Recruiter@hhs.gov). A recruiter will then contact the applicant to acknowledge receipt and answer any questions regarding the process. All eligible applicants are then referred to the SROC of the Office of Human (OHR) for review. A list of qualified candidates is shared with hiring managers for consideration.

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If "yes", describe the type(s) of training and frequency. If "no", describe the agency's plan to provide this training.

Answer Yes

OS provides training on how to use of non-competitive hiring authorities. OS has an internal partnership between employee resource groups, EEO representatives, and D&I Councils that provides EEO education to managers, senior leaders, HR professionals and employees. Topics covered include reasonable accommodation, disability and cultural sensitivity awareness, the CAP program, and use of the Schedule A hiring flexibility. Trainings are also offered annually by OPM and/or the HHS Office of Human Resources.

## 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.

The OS-based HHS-SROC utilizes a three-pronged approach—Branding, Education, and Partnerships—to strengthen and diversify recruitment and outreach practices for individuals with disabilities. SROC conducts targeted outreach to, and candidate sourcing of, qualified Schedule A-eligible applicants for open vacancies prior to posting on USAJOBS. To facilitate sourcing, recruiters developed plain-language ads to generate awareness of HHS occupations and upcoming vacancies, posting on over 50 disability-friendly organization and university career boards, yielding more than 1,000 pre-screened talented individuals, and resulting in the placement of numerous candidates. Additionally, HHS partners with the Workforce Recruitment Program (WRP) to obtain a pool of talented and highly skilled students with disabilities who seek employment with federal agencies.

**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

Both PWD and PWTD permanent new hires are below the respective thresholds (3.51% and 0.80%, respectively).

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 the top 4 MCO, only Misc. Admin/Program -0301 fell below the respective benchmarks: PWTD Qualified Benchmark 3.66% New Hire 3.33%; PWD Qualified Benchmark 7.48% New Hire 0.00%

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

For FY2019, the top 4 MCOs did not meet the benchmark: General Attorney -0905 PWD Benchmark 6.6%/Qualified Applicants 5.99%; PWTD Benchmark 4.38%/Qualified Applicants 3.26% Management Analysis - 0343 PWD Benchmark 9.43%/Qualified Applicants 9.23%; PWTD Benchmark 5.14%/Qualified Applicants 4.74% Auditing - 0511 PWD Benchmark 6.48%/Qualified Applicants 6.14 PWTD Benchmark 3.67%/Qualified 3.71% Misc Admin/Program - 0301 PWD Benchmark 8.11%/Qualified Applicants 7.48%; PWTD Benchmark 4.39%/Qualified Applicants 3.66%

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

This was a major challenge for HHS/OS, as almost all internal competitive promotions were persons without disabilities (PWODs). This trend continued in FY 2019 for the General Attorney series - 0905, and the Auditing series - 0511. Specifically, for the General Attorney series, the PWD Qualified benchmark was 5.99% and the Internal Promotion rate was 0.00%, while the PWTD Qualified Benchmark was 3.26% and the Internal Promotion rate was 0.00%. For the Auditing series, the PWD Qualified benchmark was 6.14% and the Internal Promotion rate was 0.00%, while the PWTD Qualified benchmark was 3.71% and the Internal Promotion rate was 0.00%. For the Management Analysis series - 0343, the PWTDs Qualified benchmark was 4.74% and the Internal Promotion rate was 2.47%. However, there was some progress where the Internal Promotion rates were either comparable or exceeded the qualified applicant benchmarks for both PWDs and PWTDs applying to the Misc. Admin/Programming series, and for PWDs applying to the Management Analysis series.

## 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 Department uses a three-pronged approach (Branding, Education and Partnerships) to improve the participation of individuals with disabilities.

### B. CAREER DEVELOPMENT OPPORTUNITES

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

HHS recruiters, in collaboration with the Selective Placement Coordinators and D&I and EEO offices, provide employees with frequent professional development/career management webinars and workshops, roundtable discussions, individual consultations, and informal and formal mentoring programs. This collaborative effort also offers online and classroom training on topics of interest and concern to employees and supervisors (e.g., unconscious bias, cultural awareness, workplace bullying, American Sign Language basics, etc.). HHS recruiters continue to encourage and implement strategic pre-recruitment discussions among hiring officials and HR professionals, including detailed information about available hiring options and available pipelines for applicants with disabilities.

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

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Other Career Development Programs						
Internship Programs						
Detail Programs						
Training Programs						
Mentoring Programs						

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

a. Applicants (PWD) Answer N/A

b. Selections (PWD) Answer N/A

It will be a priority for us to remedy the issue over the next reporting period.

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

It will be a priority for us to remedy the issue over the next reporting period.

**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

Time - Off Awards During FY 2019, 954 employees received Time-Off Awards of which 878 (14.56% benchmark) identified as a PWOD. However, of the 566 PWDs who received any type of reward, 76 (13.43%) PWDs were awarded with Time-Off causing a trigger. When broken into 10-hour groups, PWDs were included at a lower rate for 1-10 Hours, 21-30 Hours and 31-40 Hours. For PWTDs during FY 2019, 25 (out of 173 Total Awards) received Time-Off Awards. While the PWTD inclusion rate does create a trigger when compared with PWOTDs, the difference is negligible (14.45% vs 14.47%, respectively). However, two (2) triggers did exist when breaking down into 10-hour groups: 1-10 Hours ( 5.20% PWTD vs 5.98% PWOTD) and 21-30 Hours (1.73% PWTD vs 1.85% PWOTD). Cash Awards During FY 2019, 98 PWDs of the overall PWD Awards Total of 566 received a Cash Award at a rate of 17.31%. This is higher than the PWOD inclusion rate of 17.20% (1037 PWODs). Thus, as a group, there is no trigger. However, there are triggers in different Cash Award bands: \$501-\$999 (2.30% PWDs vs 3.02% PWODs); \$1000-\$1999 (5.12% PWDs vs 5.97% PWODs); \$2000-\$2999 (0.35% PWDs vs 1.01% PWODs); \$3000-\$3999 (0.35% PWDs vs 0.38% PWODs); \$7000-\$7999 (0.00% PWDs vs 0.02% PWODs); and \$10000-\$19999 (0.00% PWDs vs 0.02% PWODs). The overall Cash Award PWTD inclusion rate creates a trigger when compared with the overall PWOTD rate (29 employees/16.76% vs 1118 employees/17.41%, respectively). This trigger is also reflected in these Cash Award categories: \$1000-\$1999 (2.89% PWTDs vs 6.03%

PWOTDs); \$2000-\$2999 (0.00% PWTDS vs 0.98% PWOTDs); \$3000-\$3999 (0.00% PWTDS vs 0.39% PWOTDs); \$4000-\$4999 (0.00% PWTDS vs 0.06% PWOTDs); \$7000-\$7999 (0.00% PWTDS vs 0.02% PWOTDs); and \$10000-\$19999 (0.00% PWTDS vs 0.02% PWOTDs).

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 PWTDD 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 (PWTDD) Answer Yes

Quality Step Increases A trigger exists for both PWDs and PWTDDs. When comparing against PWDs/PWOTDs rate of 0.05% for each, the inclusion rates for PWDs/PWTDDs are lower at 0.00%. Performance Based Awards During FY 2019, no PWD or PWTDD received a Performance-Based Pay Increase compared to 17 PWDs/PWOTDs (which represent 0.28% and 0.26% of the total number of employees who received any award.

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 PWTDD 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 (PWTDD) Answer N/A

Data are not available to complete a comprehensive assessment of participation by PWD and PWTDD in other employee recognition programs. OS will be working during the next several months to improve our data systems, data collection methods, reporting mechanisms, and use of data, including data regarding employee recognition programs.

**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 |

Due to limitations this year, we were unable to accurately collect and report on this data. It will be a priority for us to remedy the issue over the next reporting period.

2. Does your agency have a trigger involving PWTB 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 (PWTB) | Answer | N/A |
| ii. Internal Selections (PWTB)          | Answer | N/A |
- b. Grade GS-15
- |   |        |     |
|---|--------|-----|
| i. Qualified Internal Applicants (PWTB) | Answer | N/A |
| ii. Internal Selections (PWTB)          | Answer | N/A |
- c. Grade GS-14
- |   |        |     |
|---|--------|-----|
| i. Qualified Internal Applicants (PWTB) | Answer | N/A |
| ii. Internal Selections (PWTB)          | Answer | N/A |
- d. Grade GS-13
- |   |        |     |
|---|--------|-----|
| i. Qualified Internal Applicants (PWTB) | Answer | N/A |
| ii. Internal Selections (PWTB)          | Answer | N/A |

Due to limitations this year, we were unable to accurately collect and report on this data. It will be a priority for us to remedy the issue over the next reporting period.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- |                             |        |     |
|-----------------------------|--------|-----|
| a. New Hires to SES (PWD)   | Answer | N/A |
| b. New Hires to GS-15 (PWD) | Answer | N/A |
| c. New Hires to GS-14 (PWD) | Answer | N/A |
| d. New Hires to GS-13 (PWD) | Answer | N/A |

Due to limitations this year, we were unable to accurately collect and report on this data. It will be a priority for us to remedy the issue over the next reporting period.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- |                              |        |     |
|------------------------------|--------|-----|
| a. New Hires to SES (PWTD)   | Answer | N/A |
| b. New Hires to GS-15 (PWTD) | Answer | N/A |
| c. New Hires to GS-14 (PWTD) | Answer | N/A |
| d. New Hires to GS-13 (PWTD) | Answer | N/A |

Due to limitations this year, we were unable to accurately collect and report on this data. It will be a priority for us to remedy the issue over the next reporting period.

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 |

Due to limitations this year, we were unable to accurately collect and report on this data. It will be a priority for us to remedy the issue over the next reporting period. We can report that internal promotions at the Executives and Managers did not meet benchmark participation rates, meaning that OS has not closed the gap between current employment rates and target employment goals.

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
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ii. Internal Selections (PWTD)	Answer	N/A
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## c. Supervisors

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

ii. Internal Selections (PWTD)	Answer	N/A
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Due to limitations this year, we were unable to accurately collect and report on this data. It will be a priority for us to remedy the issue over the next reporting period.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires for Executives (PWD)	Answer	N/A
-----------------------------------	--------	-----

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

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

Due to limitations this year, we were unable to accurately collect and report on this data. It will be a priority for us to remedy the issue over the next reporting period. We can report that new hires for Executives and Managers did not meet benchmark participation rates, meaning that OS has not closed the gap between current employment rates and target employment goals.

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

a. New Hires for Executives (PWTD)	Answer	N/A
------------------------------------	--------	-----

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

c. New Hires for Supervisors (PWTD)	Answer	N/A
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Due to limitations this year, we were unable to accurately collect and report on this data. It will be a priority for us to remedy the issue over the next reporting period.

## 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
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Due to limitations this year, we were unable to accurately collect and report on this data. It will be a priority for us to remedy the issue over the next reporting 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 Yes
- b. Involuntary Separations (PWD) Answer Yes

Voluntary Separations PWDs exceeded non-PWDs for FY 2019 for both Resignations and Retirements. For PWDs, the Resignation separation rate was 3.18% vs 2.85% for non-PWDs. Similarly, The Retirement separation rate for PWDs was 3.89% vs 2.50%. Involuntary Separations The PWD Removal separation rate was more than the non-PWDs during FY 2019. For PWDs, the Resignation rate was 1.06% vs 0.43% for non-PWDs. No employees were removed as result in a Reduction in Force.

Seperations	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 PWTDs exceeded non-PWTDs for FY 2019 for both Resignations and Retirements. The Resignation separation rate was 2.89% - which is not that much lower than non-PWTDs at 2.88%. However, the PWTD Retirement rate was higher than non-PWTD Retirement rate, 4.05% and 2.58% , respectively. Involuntary Separations Similar to the Involuntary rate for PWDs, there were more PWTDs involuntary separated compared to the non-PWTD separation rate. For FY 2019, while no employee separated as a result of a Reduction in Force, PWTDs were Removed at a greater than non-PWTDs, 1.16% vs 0.47%, respectively.

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

Due to limitations this year, we were unable to accurately collect and report on this data. It will be a priority for us to remedy the issue over the next reporting period.

**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.

Several divisions in HHS have public-facing informational websites at <https://www.hhs.gov/> and via the intranet at <https://intranet.hhs.gov/about-hhs/administrative-and-organizational-information/eeeco/faqs>.

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.

HHS and OS will be creating a public website discussing the Architectural Barriers Act.

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

## C. REASONABLE ACCOMMODATION PROGRAM

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

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

The current OS processing time for Reasonable Accommodations is in compliance with HHS policy.

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.

OS continues its efforts to reduce processing times. These efforts include improvements in automating procedures (established during FY 2018), continuing to review relevant policy and hiring new staff.

## 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.

To date, OS has not received a request for PAS. In preparation for such a request, the OS EEO office has engaged the contract office, researched vendors, and implemented an IDIQ contract with a vendor.

## 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 Yes

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.

OS did not have any findings of discrimination involving the harassment. Five (5) complaints alleging harassment based on disability were settled. Corrective Actions agreed to by both parties includes Back Pay, Lump Sum Payment, Compensatory Damages, Attorney Fees and Costs, Reassignments, Restored Leave and providing a Neutral Reference. Nevertheless, OS continues to develop a more proactive and wide-reaching approach.

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

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

Answer Yes

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

Answer Yes

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

OS did not have any findings of discrimination involving the failure to provide a reasonable accommodation. Eight (8) complaints involving failure to provide a reasonable accommodations were settled. Corrective Actions agreed to by both parties includes Back Pay, Lump Sum Payment, Compensatory Damages, Attorney Fees and Costs, Reassignments, Restored Leave and providing a Neutral Reference.

**Section VIII: Identification and Removal of Barriers**

*Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.*

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Answer No

2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?

Answer N/A

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments

<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>A Low Entry/High Exit Barrier Analysis has identified that OS has low participation rates for Persons With Disabilities (PWD) with respect to new hires. Analysis of the data revealed that PWD new permanent hires were under represented at a rate of 3.51% of the OS new hires, as compared to the overall PWD participation rate of 12.08%. However, OS's Overall Participation slightly exceeded the Civilian Labor Force rate, 12.08% and 12.00%, respectively.</p>
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <hr/> <p>People with Disabilities</p>

<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>Further, analysis of the data related to Persons with Targeted Disabilities (PWTD) revealed a similar trend to PWDs. That is, PWTD new permanent hires were underrepresented at a rate of 0.80% of the OS new hires, as compared to the overall PWTD participation rate of 2.83%. However, in terms of raw numbers, the total number of separations were either greater (PWD) or nearly equal (PWTD) to the number of new hires.</p>
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <hr/> <p>People with Targeted Disabilities</p>

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

Staffing limitations prevented continuity of reporting and tracking activities. As vacancies are projected to be filled during FY 2020, normal operations should resume.

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

Staffing limitations prevented continuity of reporting and tracking activities. As vacancies are projected to be filled during FY 2020, normal operations should resume.

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.

Staffing limitations prevented continuity of reporting and tracking activities. As vacancies are projected to be filled during FY 2020, normal operations should resume.