

## 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 No |

The NCUA was above the 12 percent benchmark for onboard PWDs at the end of FY2019. This figure was 12.9 percent. PWDs at each of the two grade level clusters at the end of FY2019 were as follows: • 19.1 percent of NCUA staff CU-10 and below reported a disability. • 12.3 percent of NCUA staff CU-11 and above reported a disability. EEOC 501 regulations specify that employees not paid under the General Schedule can be compared by salary to those under the General Schedule based on salary cut-offs at the Washington, DC Locality. When the CU pay scale was converted to the GS scale at each of the two clusters, the NCUA was also above the benchmark at each level (cutoff was GS10 Step 10 base salary compared to CU base salary). • 15.4 percent of employees paid a total salary at the GS-10 and below level equivalent reported a disability. • 12.4 percent of employees paid a total salary at the GS-11 and above level equivalent reported a disability.

\*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

- |                                 |           |
|---------------------------------|-----------|
| a. Cluster GS-1 to GS-10 (PWTD) | Answer No |
| b. Cluster GS-11 to SES (PWTD)  | Answer No |

The NCUA was above the 2 percent benchmark for onboard PWTDs at the end of FY2019; this figure was 2.9 percent. PWTDs at each of the two grade level clusters at the end of FY2019 were as follows: • 5.3 percent of NCUA staff CU-10 and below reported a targeted disability. • 2.7 percent of NCUA staff CU-11 and above reported a targeted disability. EEOC 501 regulations specify that employees not paid under the General Schedule can be compared by salary to those under the General Schedule based on salary cut-offs at the Washington, DC Locality. When the CU pay scale was converted to the GS scale at each of the two clusters, the NCUA was also above the benchmark at each level (cutoff was GS10 Step 10 base salary compared to CU base salary). • 4.2 percent of employees paid a total salary at the GS-10 and below level equivalent reported a targeted disability. • 2.8 percent of employees paid a total salary at the GS-11 and above level equivalent reported a targeted disability.

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

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

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

In 2017, the EEOC changed the disability codes. The agency’s Office of Minority and Women Inclusion informed all NCUA directors and managers about the new disability codes and resurveyed the workforce to update employees’ disability status. Upon completion, the NCUA exceeded the EEOC PWD and PWTD goals. Thereafter, the NCUA launched a new HR system which allows staff to update disability information without the need to submit a form. Employees were informed and encouraged to review their codes to ensure accuracy. Additionally, new data reporting is being put in place so that managers are aware of current demographics and disability levels of their office.

## Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

### A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If “no”, describe the agency’s plan to improve the staffing for the upcoming year.

Answer Yes

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	6	0	6	Lisa Bazemore, Lead HR Specialist Office of Human Resources
Answering questions from the public about hiring authorities that take disability into account	6	0	6	Lisa Bazemore, Lead HR Specialist mbazemore@ncua.gov
Processing reasonable accommodation requests from applicants and employees	2	0	2	Stephanie Smith, Senior EEO Specialist ssmith@ncua.gov
Section 508 Compliance	3	1	0	Nickol Davenport, Website Admin/Section 508 Coordinator edavenport@ncua.gov
Architectural Barriers Act Compliance	1	0	0	Alejandro Holguin aholguin@ncua.gov

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Special Emphasis Program for PWD and PWTD	1	0	0	Carmen Reynolds creynolds@ncua.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

OMWI and OHR staff attend yearly disability workshops at the Federal Dispute Resolution Conference and/or EEOC’s Examining Conflicts in Employment Laws (EXCEL) training conference. Additionally, human resources staff are provided on the job training regarding the sourcing, use and processing of various hiring appointing authorities, and their associated required documentation. New specialists are trained by senior specialists on the agency disability program and responsibilities.

**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>	C.2.c. Has the agency established procedures for processing requests for personal assistance services that comply with EEOC’s regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR §1614.203(d)(6)]		
<b>Objective</b>	Finalize a new personal assistance services instruction by the end January 31, 2021.		
<b>Target Date</b>	Jan 31, 2021		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jan 31, 2021		Rout instruction through proper NCUA channels for input before final agency approval.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	C.2.c.1. Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR §1614.203(d)(5)(v)] If “yes”, please provide the internet address in the comments column.		
<b>Objective</b>	Once the new Personal Assistance Services instruction is finalized, OMWI will post on NCUA’s public website by January 31, 2021.		
<b>Target Date</b>	Jan 31, 2021		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jan 31, 2021		Post the new Personal Assistance Services instruction on NCUA’s public website prior to January 31, 2021.
<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.

The NCUA participates in a number of activities to enhance outreach to individuals with disabilities. These efforts include: - Maintaining a "talent bank" of Schedule A applicants who apply for agency positions. - Participating in targeted outreach events sponsored by Career Expo for People with Disabilities & Wounded Warrior, National Association for the Deaf, and Careers & the Disabled magazine. - Expanding the NCUA's outreach through LinkedIn Recruiter and the USAJOBS Resume Mining tool to reach diverse applicants, including those with disabilities. - Offering the Workforce Recruitment Program Services as an additional resource for managers to source potential applicants to fill vacant positions, in addition to the regular competitive recruitment process. - Posting a full-page ad in DiversAbility magazine sponsored by DiversityComm.

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

The agency utilizes all available and appropriate hiring authorities to employ persons with disabilities. The NCUA's recruitment/outreach efforts included the following: - Utilizing LinkedIn to improve outreach efforts. This tool allows the NCUA to expand outreach efforts to a more diverse pool of applicants, to include targeting and connecting with various disabled veterans groups and communities in LinkedIn. - Distributing all NCUA vacancy announcements to over 550 diverse organizations, colleges and universities. This outreach effort includes veterans' organizations and organizations focused on hiring individuals with disabilities. - Posting all NCUA vacancy announcements on targeted websites to ensure maximum distribution to a diverse audience, which includes individuals with disabilities. - Maintaining a talent bank of Schedule A applicants, which includes disabled veterans who apply for positions with the agency. - Using the USAJobs Resume Mining database to search for highly qualified individuals with disabilities and/or veterans with a disability rating of 30% or more.

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 Disability Recruitment Program Manager utilizes a searchable Schedule A candidate database for hiring managers. Specialists discuss the process and review the Schedule A database with managers for every recruitment, and managers are encouraged to consider all available candidates prior to posting the vacancy. Additionally, once vacancy announcements are posted, each specialist is responsible for confirming the eligibility of qualified Schedule A candidates prior to issuing certificates to the hiring managers. Schedule A candidates may apply to agency postings through a vacancy announcement. Candidates who apply to a vacancy announcement are reviewed to determine their qualifications and eligibility. Thereafter, qualified candidates are forwarded to the hiring official on a referral list for consideration. Once the candidate's application and supporting documentation are received, the coordinator will conduct a qualifications analysis of all materials submitted. After a careful review, candidates are notified of their status (qualified/not qualified). Afterwards, qualified candidates are added to the agency's Schedule A database. Each HR Specialist is required to review the database (prior to posting the vacancy announcement) and refer qualified candidates to the hiring official (at the hiring official's request).

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

The agency has a supervisory orientation program and a resource center for employees who are newly appointed into supervisory positions. The resource center tools provide an overview of training requirements as well as immediate access to external training, webinars, and job aids. The Schedule A job aid tools cover the hiring authority details and answer several commonly asked questions. In addition to the supervisory training and resource center tools, each HR specialist is responsible for educating managers on the Schedule A hiring authority and process during the recruitment/hiring process.

**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 Office of Human Resources distributes all vacancy announcements to over 550 diverse organizations. This includes organizations focused on hiring individuals with disabilities.

**C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)**

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

- a. New Hires for Permanent Workforce (PWD) Answer Yes
- b. New Hires for Permanent Workforce (PWTD) Answer No

Table B8 indicates the agency hired 8 PWD (including 2 PWTD) out of a total of 94 permanent new hires. This represents 8.5 percent PWD new hires and 2.1 percent for PWTD, which suggests a trigger may exist for PWD among new hires in the permanent workforce. Although below the goal for PWD, these numbers are slightly up from 2018.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	0				
% of Qualified Applicants	0				
% of New Hires	0				

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

- a. New Hires for MCO (PWD) Answer Yes
- b. New Hires for MCO (PWTD) Answer Yes

Zero percent of the new hires for mission critical occupations (series 0580) were PWD (of 23 referred) or PWTD (of 10 referred), which suggests a trigger may exist for both PWD and PWTD among new hires in the permanent mission critical workforce.

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 No

Table B9P (relevant applicant pool): - PWD: 12.96 percent - PWTD: 3.04 percent Table B9P (Qualified of those identified) - PWD: 9.49 percent - PWTD: 4.17 percent

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

Table B9P: Qualified Applicant Pool: PWD: 9.49 percent PWTD: 4.17 percent Internal Selections: PWD: 2.33 percent PWTD: 2.33 percent

## 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 NCUA’s primary occupation is the Credit Union Examiner (CUE). Entry-level CUE positions are advertised and recruited as a career ladder position with promotion opportunity to a target level of CU-12. CUEs are provided extensive training to develop and reach the full performance level. Note: All CUE announcements are open to Schedule A candidates.

### B. CAREER DEVELOPMENT OPPORTUNITES

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

Leadership developmental training opportunities are offered through the Division of Training and Development. The programs are designed to provide competency-based leadership training. These programs include: • Aspiring Leader Program: a program offered by the Graduate School's Center for Leadership and Management. • Executive Leadership Program: a 9-month program offered to non-supervisors. Participants complete a variety of activities including a developmental detail, formal training sessions, etc. • Management Development Program: an 18-month developmental program for non-supervisors. Candidates gain experience in

defining project scopes, delegating work, developing others, etc. • Excellence in Government Fellows: a 12-month program for supervisors/managers. Candidates are able to enhance their skills through a combination of coursework, action-learning projects, executive coaching, and government-wide networking. Fellows remain in their full-time jobs, meet every six weeks, and spend a total of 24 days in session. • NCUA Executive Training Program: an 18-month program for senior level supervisors. This program prepares employees to transition from supervisory or managerial positions into senior leadership positions within the agency. • Executive Coaching Program: a 12-month program for the NCUA's executive staff. The program is designed to help managers become more highly effective leaders, reinforce leadership competencies, enhance performance, etc. In addition, the agency offers a series of training opportunities through its internal training catalog, external training organizations, agency shadowing assignments, and opportunities to participate in short-term detail assignments. The agency also provides career development opportunities through its agency-wide mentorship program. NOTE: These programs are not presented in Tables A/B12 & 20 because they are available for a grade range and are not reported in the format in those tables.

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						
Fellowship Programs						
Training Programs						
Detail Programs						
Mentoring Programs	63	60	8	7	2	2
Coaching Programs	29	29	3	3	0	0
Other Career Development Programs	58	19	7	1	0	0

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 No
- b. Selections (PWD) Answer No

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

- a. Applicants (PWTD) Answer Yes
- b. Selections (PWTD) Answer N/A

There were no PWTD applicants to the Leadership Development Programs; this may be a potential trigger. Since there were no PWTD applicants, selections this cannot be identified as a trigger or not, this would be N/A. Coaching is offered for senior staff and supervisors, and there is only one supervisor with targeted disability.

**C. AWARDS**

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of

the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

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

Table B13 shows there were eight time-off awards given in 2019. 1-10 hours: 3 ND, 1 PWD (surpasses workforce percentage) (no PWTD) 11-20 hours: 4 ND For cash awards, the majority of employees (1,443) received \$500 or less, with 37 PWD employees receiving awards in this category. This shows a lower representation than those with no disability, but 58 PWD received cash awards of \$501 or more. The PWTD group was close to workforce percentage for less than \$999, although fewer received higher awards (these awards had lower numbers overall). PWD PWTD Workforce 12.91 2.94 < \$500 2.56 2.91 \$501-\$999 11.84 2.19 \$1000-\$1999 13.33 1.03 \$2000-\$2999 14.29 0.00

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

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

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

The Quality Step Increase section of Table B13 does not apply to NCUA because the agency is on a merit-pay system – it is not an award similar to a QSI, since the vast majority of employees receive a merit raise yearly. The NCUA has not conducted an analysis of potential differentials in merit pay increases for PWD / PWTD employees as compared to others in the same occupations or grades. The NCUA may incorporate this element in future iterations of its barrier analysis process.

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

## 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 No
  - ii. Internal Selections (PWD) Answer Yes

- b. Grade GS-15
- |  |        |     |
|--|--------|-----|
| i. Qualified Internal Applicants (PWD) | Answer | Yes |
| ii. Internal Selections (PWD)          | Answer | N/A |
- c. Grade GS-14
- |  |        |     |
|--|--------|-----|
| i. Qualified Internal Applicants (PWD) | Answer | Yes |
| ii. Internal Selections (PWD)          | Answer | N/A |
- d. Grade GS-13
- |  |        |     |
|--|--------|-----|
| i. Qualified Internal Applicants (PWD) | Answer | Yes |
| ii. Internal Selections (PWD)          | Answer | Yes |

• There was only one senior staff position announced in 2019, resulting in only three applicants. Only one was categorized as qualified (not the one PWD applicant); no selections were made. • There was one CU-15 announcement with three applications, two qualified, and one selection. There were no PWD applications received. • There were three CU-14 announcements with 28 applications and three selections. No PWD applications were received. • There were 14 CU-13 announcements with 401 applications, including 39 PWDs; 177 qualified, including 13 PWDs; 21 selections, including one PWD, were made.

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

- a. SES
- |   |        |     |
|---|--------|-----|
| i. Qualified Internal Applicants (PWTD) | Answer | Yes |
| ii. Internal Selections (PWTD)          | Answer | N/A |
- b. Grade GS-15
- |   |        |     |
|---|--------|-----|
| i. Qualified Internal Applicants (PWTD) | Answer | Yes |
| ii. Internal Selections (PWTD)          | Answer | N/A |
- c. Grade GS-14
- |   |        |     |
|---|--------|-----|
| i. Qualified Internal Applicants (PWTD) | Answer | Yes |
| ii. Internal Selections (PWTD)          | Answer | N/A |
- d. Grade GS-13
- |   |        |    |
|---|--------|----|
| i. Qualified Internal Applicants (PWTD) | Answer | No |
| ii. Internal Selections (PWTD)          | Answer | No |

• There was only one senior staff position announced in 2019, resulting in only three applicants and no PWTD. Only one was categorized as qualified; no selections were made (No PWTDs in CU15 to apply; this is the potential trigger). • There was one CU-15 announcement with three applications. Two qualified and one was selected. No PWTD applied (Two PWTDs in CU14). • There were three CU-14 announcements with 28 applications, and three selections. There were no PWTD applications (Three PWTDs in CU13). • There were 14 CU-13 announcements with 401 applications. Eighteen were PWTDs. Of the 177 qualified

applicants, four were PWTDs. There were 21 selections including one PWTD.

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

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

The NCUA did not hire for CU-15 or senior staff positions externally in 2019. There were eight applicants for CU-14 positions: three qualified, one was referred, and none were selected. There were 20 applicants for CU-13 positions: 11 qualified, one was referred, and none were selected. Because no applicants were selected from a total applicant pool of 572 for CU-13, and 221 for CU-14, no trigger was identified.

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	No
d. New Hires to GS-13 (PWTD)	Answer	No

The NCUA did not hire for CU-15 or senior staff positions externally in 2019. There were six applicants to CU-13 positions: two qualified, one was referred, and none were selected. Because no applicants were selected from a total applicant pool of 572 for CU13, and 221, for CU14, no trigger was identified.

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

a. Executives		
i. Qualified Internal Applicants (PWD)	Answer	Yes
ii. Internal Selections (PWD)	Answer	Yes
b. Managers		
i. Qualified Internal Applicants (PWD)	Answer	N/A
ii. Internal Selections (PWD)	Answer	N/A
c. Supervisors		

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

The NCUA does not identify a separate “manager” category. Executives (senior staff) are also managers, so we choose to use that category. Supervisors here are those that are not senior staff. There was one executive internal announcement, with three applicants (one PWD who was not qualified, but the percentage surpassed Relevant Applicant Pool); no selection was made. Because the relevant applicant pool does contain PWD and PWTD, a trigger may be present although there were no hires from any category from the announcement. There were four supervisory vacancies with no PWD applicants.

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

a. Executives

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

There were no PWTD applications for executive or supervisor vacancies because they are not in the relevant applicant pool.

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

There were no external hire announcements for executives or supervisors in FY19; the NCUA has no manager category because executives are also managers.

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

There were no external hire announcements for executives or supervisors in FY19; the NCUA has no manager category because the executives are also managers.

## 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

NCUA did not have any eligible Schedule A staff for conversion in 2019.

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

a. Voluntary Separations (PWD) Answer No  
 b. Involuntary Separations (PWD) Answer No

In 2019, there were 91 separations: 43 were retirements, 28 were resignations, 3 were removals, and 16 were other separations. Percentages for PWDs were below workforce representation, while those with no disability were higher than workforce representation for retirement and resignation (there were 7 PWDs out of 91 separations).

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

a. Voluntary Separations (PWTD) Answer No  
 b. Involuntary Separations (PWTD) Answer No

In 2019, there were 91 separations: 43 were retirements, 28 were resignations, 3 were removals, and 16 were other separations. Percentages for PWTDs were higher than workforce representation, but this was due to the very small number of PWTDs who separated (3 PWTDs out of 91 total separations). This was still considered a trigger since the separation percentage was 3.3, while the workforce representation was 2.94.

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

Exit survey data is not available for review. This is a new program and between 2018 and 2019 there are only 11 exit surveys available so they are not available for review.

## B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 CFR §1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

The internet address on the NCUA'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 is <https://www.ncua.gov/About/Pages/open-government/accessibility-limited-english-proficiency.aspx>. (Note: The NCUA's reasonable accommodation policy includes Section 508 for accommodation purposes, including filing a complaint, but the policy does not go into details regarding the Section 508 statute.)

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

The NCUA amended the Accessibility Statement contained at its public website at <https://www.ncua.gov/accessibility-statement> to include notice of employees' and applicants' rights under the Architectural Barriers Act, and included a description of how to file a complaint.

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

The Section 508 Policy was approved and distributed December of 2017. The Office of the Chief Information Officer created a Section 508 Resource Center on our internal NCUA Central site. This offers training resources for staff and contractors, as well as other resources for meeting and learning about accessibility. There is also a dashboard available within NCUA's intranet that allows staff to view the progress of improving accessibility for the most highly visited sites and applications. The Office of the Chief Information Officer has identified, and continues to actively identify, areas that need remediation and/or updating. New NCUA content has to be accessible before it is posted on the public-facing websites. The Office of the Chief Information Officer works with content owners and creators to remediate deficiencies. Accessibility language has been updated in the Communications Manual. In 2019, the 508 Compliance team began the transition from the Office of the Chief Information Officer to the Office of External Affairs and Communications to streamline the process of making public content accessible. This transition will be complete in 2020.

## 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.)

10-20 business days.

2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

The NCUA's program includes timely processing of requests; providing timely approvals of accommodation requests; conducting training for managers and supervisors; consulting with managers, supervisors, and employees on the process and the laws governing reasonable accommodations; and being proactive regarding the needs of persons with disabilities.

## 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.

On July 10, 2020, the EEOC's Agency Oversight Division within the Office of Federal Operations provided the OMWI office feedback and guidance based on their (EEOC's) review of the updated draft reasonable accommodation instruction that is expected to be final by January 31, 2021. The OMWI office is currently revising the instruction to incorporate the edits required by the EEOC. Once the instruction is approved and finalized, it will be distributed to all agency personnel. Guidance on PAS services is incorporated into the updated instruction. To this date, there have been no requests for PAS 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 N/A

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 N/A

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

N/A There was only one complaint involving harassment due to disability and there has been no finding of discrimination.

### B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer No

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

Answer No

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

The agency had no findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year.

## 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

<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?		There are triggers for individuals with disabilities and individuals with targeted disabilities in the areas of new hires, promotions, and awards.		
<b>STATEMENT OF BARRIER GROUPS:</b>		<i>Barrier Group</i> People with Disabilities		
<b>BARRIER ANALYSIS:</b>  Provide a description of the steps taken and data analyzed to determine cause of the condition.				
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.		Routine group analysis		
<b>Objective</b>				
<b>Responsible Officials</b>		Tawanda Brooks OHR Director		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
12/31/2019	Root cause analysis/ Further adverse impact analysis of PE test. The NCUA utilized services from the Office of Personnel Management (OPM) to evaluate the Principal Examiner (PE) promotional process for adverse impact. The PE test is the process through which NCUA examiners obtains promotions. The results of this test and adverse impact relative to individuals with disabilities were evaluated by agency leadership in its Talent Management Council and plans have been established to evaluate any contributing barriers in the coming year. The TMC worked with OHR and OPM to develop a survey for examiners and for supervisory examiners. OPM and OHR convened focus groups to define the appropriate questions to determine the successful preparation techniques of the examiners who passed the PE test. The results from the survey will be used to identify best practices and to establish whether certain groups received differing levels of preparation from their supervisory examiners.	Yes		09/30/2019
Fiscal Year	Accomplishments			
2017	Adverse impact analysis of PE test			

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

The NCUA is working with the Office of Personnel Management to continue the barrier analysis of the Principal Examiner (PE) process.

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

The NCUA used services from the Office of Personnel Management (OPM) to evaluate the Principal Examiner (PE) promotional process for adverse impact. The PE test is the process through which NCUA examiners obtains promotions. The results of this test and adverse impact relative to individuals with disabilities are being evaluated by agency leadership in its Talent Management Council (TMC). The NCUA worked closely with OPM on the NCUA Examiner Career Development and Principal Examiner Certification Program Preparation Project. The NCUA developed short-term and long-term strategies to address barriers identified within the 2019 survey. The short-term strategies put into place include a community of practice (discussion board) for SEs and examiners, enhanced PE Exam resources made available to examiners, and early exposure to examiners of the PE Certification Program and potential career progression opportunities with detailed briefings offered during their first twelve (12) months of employment with the NCUA. Long-term strategies are being developed with the NCUA and OPM.

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.

Once the identified planned activities have been completed, the agency will address any needed corrective activity.