

## 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 percentage of PWD in the GS-1 to GS-10 cluster was 28.6%. In FY2019, which exceeds the goal of 12%. The percentage of PWD in the GS-11 to SES cluster was 13.1% in FY2019, which exceeds the goal of 12%.

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

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

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

The percentage of PWTD in the GS-1 to GS-10 cluster was 14.3% in FY2019, which exceeds the goal of 2%.

The percentage of PWTD in the GS-11 to SES cluster was 2.2% in FY2019, which exceeds the goal of 2%.

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

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

Every year, the Director of EEODI communicates to Agency leadership, including hiring managers and recruiters, the numerical disability hiring goals when debriefing senior leadership on the State of the Agency in compliance with the EEOC MD-715 reporting requirements.

### 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	1	0	0	Veronica Burrell Selective Placement Program Coordinator veronica.burrell@ntsb.gov
Special Emphasis Program for PWD and PWTD	1	0	1	Shannon.wilson@ntsb.gov sindprp@ntsb.gov
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Veronica Burrell Selective Placement Program Coordinator veronica.burrell@ntsb.gov
Processing reasonable accommodation requests from applicants and employees	1	0	0	Shannon Wilson Disability Employment Program Manager Shannon.wilson@ntsb.gov
Section 508 Compliance	0	0	1	Shamicka Fulson Strategic Planner Shamicka.fulson@ntsb.gov
Architectural Barriers Act Compliance	0	0	1	Frank Perla Chief of Facilities frank.perla@ntsb.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

In FY2019, the Disability Program Staff received a variety of training to carry out their responsibilities during the reporting period. Various staff members received a refresher on Special Hiring Authorities, which provided information concerning hiring PWD and PWTD. Additionally, EEO Specialists and the Disability Employment Program Manager attended special employment related conferences that specifically addressed topics that are related to the Agency’s Disability Program. Conferences that were attended in FY2019 include EXCEL, FDR, and National Employment Law Institute (NELI). Lastly, all Disability Program Staff consistently receive informal training while carrying out their responsibilities. These informal opportunities to learn are conducted internally by the Director of EEODI, General Counsel, and/or other members of the Disability Program Staff.

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

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

Answer Yes

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

<b>Brief Description of Program Deficiency</b>	C.2.b.3. Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR §1614.203(d)(1)(ii)(B)]		
<b>Objective</b>	The Human Resources Division and the Office of EEO, Diversity and Inclusion will collaborate to rewrite the verbiage for vacancy announcements so that the link does not go to OPM versus the NTSB.		
<b>Target Date</b>	Oct 1, 2020		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2020	December 30, 2020	Internal and External Applicant Flow data concerning race, national origin, sex, and disability is missing and/or inaccurate because hiring certificates are not closed and audited. Due to staffing shortages and turnover the HR Office has committed to closing out certificates of eligible (s) in 2020. Once the certificated are closed out and audited ODI, OPM will release the applicant flow data which will allow EEODI to conduct barrier analysis studies on hiring process
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2021	The HRD office has committed to fixing the reasonable accommodation vacancy announcement link so that applicants with disabilities can contact HRD if they need a reasonable accommodation to apply for a position and/or to participate in an employment interview.	

### 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 PWTDD

#### 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 NTSB has a full-time Disability Employment Program Manager (DEPM), who is responsible for serving as agency Point of Contact (POC) for the Workforce Recruitment Program (WRP) and the DoD Computer/Electronic Accommodations Program (CAP). Currently, outreach and targeted recruitment occurs only when Human Resources Division (HRD) notifies EEODI staff of potential vacancies. Current and planned efforts include these: • Maintaining a list and a network of disability recruitment sources. • Using shared registers (for example, the OPM Shared Register) and databases (WRP) to identify candidates for NTSB vacancies. • Increasing outreach through professional organizations and publications, state vocational rehabilitation and disability service agencies, the Internet, and social media. • Posting vacancies nationwide on www.USAJobs.gov. • Expanding use of the Pathways Program to hire student interns and targeting outreach to students with disabilities.

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 PWTDD for positions in the permanent 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 No

b. New Hires for MCO (PWTD) Answer No

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	

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

a. Qualified Applicants for MCO (PWD) Answer No

b. Qualified Applicants for MCO (PWTD) Answer Yes

Please see answer to Section IV question C.3. in Part J Supporting Document.

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

a. Promotions for MCO (PWD) Answer No

b. Promotions for MCO (PWTD) Answer No

## Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

### A. ADVANCEMENT PROGRAM PLAN

Describe the agency’s plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

• Continuing the use of telework and alternative work schedules as workplace flexibilities. • Developed exit interview surveys in FY2019 and plan to administer them in FY2020 to identify retention tools for individuals with disabilities. • Conducting workshops on reasonable accommodations, to include the resources available for people with disabilities and targeted disabilities, to educate all NTSB hiring managers and HRD staff officials. • Developing relationships with organizations and groups both internal and external to the Agency that can provide resources for the advancement of employees who are disabled.

**B. CAREER DEVELOPMENT OPPORTUNITES**

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

NTSB offers a variety of career development opportunities to its employees. Career development opportunities include the following: • The NTSB Leadership Development Program, which is open to permanent staff in grades GS-13 through GS-15. It is based on OPM’s Executive Core Qualifications and will focus on developing individuals who have high potential for serving as future senior leaders of the NTSB. • The NTSB Shadow Program is open to all NTSB employees and provides employees the opportunity to observe NTSB colleagues in their day to day setting. • The NTSB Connected Across the Board Agency Internal Assignment Program Pilot (CAB) is an innovative career development program that was developed and implemented in FY2018. Selected CAB employees are temporarily assigned to an office to support special tasks or projects, and to gain exposure to the office mission and functions. The program is designed to enhance and develop the knowledge, skills, and abilities of the NTSB CAB participants. Additionally, every year the Agency offers employees the opportunity to apply to various detail assignments throughout the agency.

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 (%)
Detail Programs	4	4	50%	50%	0	0
Internship Programs	N/A	23	N/A	21.7%	N/A	0
Fellowship Programs						
Other Career Development Programs	4	4	50%	50%	0	0
Mentoring Programs						
Coaching Programs						
Training 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 No

We were unable to analyze whether triggers exist for the Internship Program as applicant flow data was unavailable. However, for other career development programs there does not appear to be triggers. EEODI will work with HRD to provide accurate applicant flow data.

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 No

We were unable to analyze whether triggers exist for the Internship Program as applicant flow data was unavailable. However, for other career development programs there does not appear to be triggers. EEODI will work with HRD to provide accurate applicant flow data.

### 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

For time off awards, the PWD Inclusion Rate (IR) is 1.85% (1/54), PWTD is 0% (0/11) and Persons Without Disabilities (PWOD) IR (8/333) is 2.4%. PWD are underrepresented in this category by 25% and PWTD are not represented at all in this category when compared to PWOD. For cash bonuses, the PWD IR is (57/54) 106%, PWTD is 91% (10/11) and PWOD IR is approximately 141% (469/333). PWD are underrepresented in this category by 25%, and PWTD are underrepresented by 35% in this category when compared to PWOD.

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

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

For quality step increases, the PWD IR is 3.7% (2/54), PWTD is 0 (0/11), and PWOD IR is 4.8% (16/333). Relative to PWOD, PWD was 23% underrepresented in the QSI category and PWTD are not represented at all in the QSI category.

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
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ii. Internal Selections (PWD)	Answer	No
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## b. Grade GS-15

i. Qualified Internal Applicants (PWD)	Answer	No
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ii. Internal Selections (PWD)	Answer	No
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## c. Grade GS-14

i. Qualified Internal Applicants (PWD)	Answer	No
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ii. Internal Selections (PWD)	Answer	Yes
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## d. Grade GS-13

i. Qualified Internal Applicants (PWD)	Answer	No
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ii. Internal Selections (PWD)	Answer	No
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Please see answer to Section V question D.1. in Part J Supporting Document.
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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	No
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ii. Internal Selections (PWTD)	Answer	No
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## b. Grade GS-15

i. Qualified Internal Applicants (PWTD)	Answer	Yes
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ii. Internal Selections (PWTD)	Answer	No
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## c. Grade GS-14

i. Qualified Internal Applicants (PWTD)	Answer	Yes
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ii. Internal Selections (PWTD)	Answer	No
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## d. Grade GS-13

i. Qualified Internal Applicants (PWTD)	Answer	No
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ii. Internal Selections (PWTD)	Answer	No
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Please see answer to Section V question D.2. in Part J Supporting Document.

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

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

Please see answer to Section V question D.3. in Part J Supporting Document.

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

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

Please see answer to Section V question D.4. in Part J Supporting Document.

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

a. Executives		
i. Qualified Internal Applicants (PWD)	Answer	No
ii. Internal Selections (PWD)	Answer	No
b. Managers		
i. Qualified Internal Applicants (PWD)	Answer	No
ii. Internal Selections (PWD)	Answer	No
c. Supervisors		
i. Qualified Internal Applicants (PWD)	Answer	No
ii. Internal Selections (PWD)	Answer	No

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

a. Executives

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

b. Managers

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

c. Supervisors

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

Please see answer to Section V question D.6. in Part J Supporting Document.

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

- |                                    |        |     |
|------------------------------------|--------|-----|
| a. New Hires for Executives (PWD)  | Answer | Yes |
| b. New Hires for Managers (PWD)    | Answer | No  |
| c. New Hires for Supervisors (PWD) | Answer | No  |

Please see answer to Section V question D.7. in Part J Supporting Document.

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

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

## Section VI: Plan to Improve Retention of Persons with Disabilities

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

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

- 1.

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

Answer N/A

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

a. Voluntary Separations (PWD) Answer Yes

b. Involuntary Separations (PWD) Answer No

For voluntary separations, the PWD IR is 9.3% (5/54) and the PWOD IR is 7.5% (25/333). PWD are overrepresented in this category by approximately 24% when compared to PWOD. A trigger therefore exists. There were no involuntary separations involving PWD.

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 No

b. Involuntary Separations (PWTD) Answer No

There were no voluntary or involuntary separations involving PWTD.

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.

N/A

**B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES**

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

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

<https://www.nts.gov/about/Policies/Pages/accessibility.aspx>

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

<https://www.ntsb.gov/about/Policies/Pages/accessibility.aspx>

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 Agency has updated wheelchair accessibility maps indicating signage and routes to various NTSB facilities within L'Enfant Plaza. Additionally, the Disability Employment Program Manager implemented an action plan to provide a handicap-accessible restroom door at the Training Center facility in Ashburn, VA.

## 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 average processing time for accommodation requests completed in FY2019 was 16 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.

Adhering to the completion of reasonable accommodation requests within a 30-day timeframe, this allows for individuals with time sensitive requests to receive the assistance they need to be effective and productive as employees in the workplace. Implementing the practice of tracking reasonable accommodation using a spreadsheet, we've been able to effectively update the status of each request and this coordination helps limit the processing time. Additionally, beginning in FY2018, the Agency required all managers and supervisors to receive EEO Compliance training that included an extensive module on reasonable accommodation. The objectives were to: (a) enhance managers and supervisors understanding of the interactive process and emphasize the requirement for prompt action; and (b) clarify the need to provide reasonable accommodation, thereby reducing delays due to deciding officials' need to seek guidance. We expect that this EEO Compliance training will assist in reducing processing delays and eliminate improper denials that could result in formal complaints.

## 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, the Agency has not received any requests for PAS services. However, in FY2019, EEODI conducted training informing supervisors and managers of the Agency's obligation to provide PAS.

## 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

## 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 N/A

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.

The finding came in the last quarter of 2019. In addition to providing other relief mandated by the EEOC OFO, the Agency provided reasonable accommodation training to all supervisors and managers in the Washington, DC area. The recommended corrective actions were implemented in 2020.

## Section VIII: Identification and Removal of Barriers

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

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

Answer Yes

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

Answer Yes

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

<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>There is a trigger involving PWD and PWTD for time-off awards, cash bonuses, and quality step increases as the rates of inclusion for PWTD and PWD are less than the rate of inclusion for PWOD in these three award categories.</p>							
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>							
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>Have yet to identify or determine whether there is a barrier.</p>							
<p><b>Objective</b></p>	<p>Conduct barrier analysis to identify and eliminate any potential barriers to equal participation in the area of performance awards.</p> <table border="1" data-bbox="483 978 776 1115"> <tr> <td><b>Date Objective Initiated</b></td> <td>Jul 31, 2020</td> </tr> <tr> <td><b>Target Date For Completion Of Objective</b></td> <td>Dec 30, 2021</td> </tr> </table>				<b>Date Objective Initiated</b>	Jul 31, 2020	<b>Target Date For Completion Of Objective</b>	Dec 30, 2021
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<b>Target Date For Completion Of Objective</b>	Dec 30, 2021							
<p><b>Responsible Officials</b></p>	<p>Fara Guest EEODI Director</p> <p>Shannon L. Wilson Disability Employment Program Manager</p> <p>Yvette Delgado Diversity &amp; Inclusion Officer</p>							
<p><b>Target Date (mm/dd/yyyy)</b></p>	<p><b>Planned Activities</b></p>	<p><b>Sufficient Staffing &amp; Funding (Yes or No)</b></p>	<p><b>Modified Date (mm/dd/yyyy)</b></p>	<p><b>Completion Date (mm/dd/yyyy)</b></p>				
<p>07/31/2020</p>	<p>Create Barrier Analysis Working Group</p>	<p>Yes</p>		<p>07/31/2020</p>				
<p>12/31/2021</p>	<p>Establish and implement plan of action to resolve identified barriers.</p>	<p>Yes</p>						
<p>08/01/2021</p>	<p>Complete investigation for barrier analysis process and identify any potential barriers.</p>	<p>Yes</p>						
<p>11/30/2020</p>	<p>Train Barrier Analysis Working Group on identifying triggers and conducting investigations to pinpoint actual barriers.</p>	<p>Yes</p>						
<p><b>Fiscal Year</b></p>	<p><b>Accomplishments</b></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>Slight trigger among the qualified internal applicants for promotions to GS-14, GS-15, Manager, and Mission Critical Occupation positions as the participation rates of PWTD in the qualified applicant pools for these positions are slightly lower than the participation rates in the relevant applicant pools.</p>			
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Targeted Disabilities</p>			
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>				
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>Have yet to identify or determine whether there is a barrier.</p>			
<p><b>Objective</b></p>	<p>Conduct barrier analysis to identify and eliminate any potential barriers in promotion and career enhancement opportunities for Agency employees who identify as PWTD.</p> <p><b>Date Objective Initiated</b> Jul 31, 2020</p> <p><b>Target Date For Completion Of Objective</b> Dec 31, 2021</p>			
<p><b>Responsible Officials</b></p>	<p>Shannon Wilson Disability Employment Program Manager</p> <p>Fara Guest EEODI Director</p> <p>Yvette Delgado Diversity and Inclusion Officer</p>			
<p><b>Target Date (mm/dd/yyyy)</b></p>	<p><b>Planned Activities</b></p>	<p><b>Sufficient Staffing &amp; Funding (Yes or No)</b></p>	<p><b>Modified Date (mm/dd/yyyy)</b></p>	<p><b>Completion Date (mm/dd/yyyy)</b></p>
<p>07/31/2020</p>	<p>Establish quarterly meetings with HRD to obtain more comprehensive applicant flow data in order to monitor the participation rates of PWTD in the actual applicant pool and relevant applicant pool.</p>	<p>Yes</p>		<p>07/31/2020</p>
<p>10/15/2020</p>	<p>Examine FEVS data</p>	<p>Yes</p>		
<p>11/30/2020</p>	<p>Train Barrier Analysis Working Group on identifying triggers and conducting investigation to pinpoint actual barriers.</p>	<p>Yes</p>		
<p>07/31/2020</p>	<p>Create Barrier Analysis Working Group</p>	<p>Yes</p>		<p>07/31/2020</p>
<p>03/01/2021</p>	<p>Complete investigation for barrier analysis process and identify any potential barriers</p>	<p>Yes</p>		
<p>11/15/2020</p>	<p>Examine Career Trajectories of PWTD in the Agency</p>	<p>Yes</p>		
<p>06/01/2021</p>	<p>Establish and Implement plan of action to resolve identified barriers.</p>	<p>Yes</p>		

Fiscal Year	Accomplishments
2019	In FY19, the Office of EEODI revised NTSB's policy on reasonable accommodation to include provisions for personal assistant services. EEODI also trained supervisors and managers on the revised reasonable accommodation procedures.
2019	In FY19, the Agency continued to strengthen its Disability Employment Program by educating HRD and supervisors and managers pm the Schedule A Hiring Authority. On September 17, 2019, EEODI sent out guidance explaining the benefits of utilizing Schedule A. As a result of this guidance, the Agency hired at least one PWD for FY2020.
2019	In 2019, EEODI created a barrier analysis working group to assist in identifying and eliminating barriers to equal employment opportunity. The work of the barrier analysis group is ongoing.
2019	In 2019, EEODI established quarterly meetings with HRD to obtain more comprehensive applicant flow data. Although the applicant flow data had not improved in time for completion of the 2019 MD-715 Report, EEODI expects significant improvement for the FY2020 Report.

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

N/A

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

The planned activities that were completed enabled the Agency to begin the barrier analysis process.

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

N/A