

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 |

The percentage of PWD in the GS-11 to SES cluster was 6.54% in FY 2019, which falls below the goal of 12%. However, the percentage of PWD in the GS-1 to GS-10 cluster was 30.76%, exceeding the goal by 18.76%. Also, based on preliminary data it seems likely that OSC will meet the goal this fiscal year.

*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 |

The percentage of PWTD in the GS-11 to SES cluster was 1.87% in FY 2019, which falls slightly below the goal of 2%. However, the percentage of PWTD in the GS-1 to GS-10 cluster was 15.38%, exceeding the goal by 13.38%.

Grade Level Cluster(GS or Alternate Pay Plan)	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.

In FY 2019, the EEO Director communicated to senior staff, including all hiring managers, the goals of 2% for PWTD and 12% for PWD.

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

In FY 2020, the agency hired a new Acting Chief Human Capital Officer (CHCO), who serves as the Disability Program Manager (DPM). We have also designated a new responsibility, Medical Review Officer, based on OSC's updated Reasonable Accommodation and PAS procedures.

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	0	0	1	Zachary Kurz Communications Director zkurz@osc.gov
Architectural Barriers Act Compliance	0	0	1	Karl Kammann Chief Financial Officer kkammann@osc.gov
Answering questions from the public about hiring authorities that take disability into account	0	0	1	Lonnie Davis Acting Chief Human Capital Officer ldavis@osc.gov
Processing reasonable accommodation requests from applicants and employees	0	0	1	Lonnie Davis Acting Chief Human Capital Officer ldavis@osc.gov
Special Emphasis Program for PWD and PWTD	0	1	0	Shirine Moazed EEO Director smoazed@osc.gov
Processing applications from PWD and PWTD	0	0	1	Katherine King Employee Relations and Policy Officer kking@osc.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 No

The EEO and Human Capital Offices plan to identify and coordinate activities that build knowledge and improve skills among the disability program staff and supervisors. The Acting HCO has taken training during this time period which would help him identify disability issues.

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

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 agency did not collect applicant data in FY 2019 and cannot speak to the existence of triggers involving PWD and/or PWTD among the job applicants for any of the mission-critical occupations. OPM is responsible for OSC's delegated examining and we continue to consult with OPM to determine if it can collect and provide applicant data to OSC.

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 appropriate hiring authorities that take disability into account, e.g., Schedule A.

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.

(1) The CHCO ensures that the Schedule A authority is appropriate (for external vacancy announcements, OSC does not have delegated examining authority and relies on OPM to make determinations as to whether the individual is eligible for appointment under Schedule A). (2) The Human Capital Office routes all unsolicited requests for Schedule A appoints directly to the Senior Executive Service.

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

In August 2019, the agency provided training on the applicable hiring authorities via Graduate School USA. The course, Federal Staffing and Placement, will cover topics such as staffing rules, regulations, and principles; appointment authorities; recruitment methods and hiring procedures; qualifications; merit promotion; and in-service placement actions.

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 agency implemented a procedure to post vacancy announcements at a variety of diverse organizations, including organizations

that serve individuals with disabilities, to increase hiring of PWD. The agency has initiated the process of making contact with American Job Centers, State Vocational Rehabilitation Agencies, the Veterans' Vocational Rehabilitation and Employment Program, Centers for Independent Living, and Employment Network Service providers. The agency will make every effort to establish and maintain these contacts as well as identify additional organizations that assist PWD in securing and maintaining employment.

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

The 2019 percentages are as follows: the percentage of PWD among new hires (25) was 12%, which meets the goal of 12%. The percentage of PWTD among new hires was 4.00%, exceeding the benchmark by 2.00%.

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

The agency did not collect applicant data in FY 2019 and cannot speak to the existence of triggers involving PWD and/or PWTD among the job applicants for any of the mission-critical occupations. OPM is responsible for OSC's delegated examining and we continue to consult with OPM to determine if it can collect and provide applicant data to OSC.

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 N/A
- b. Qualified Applicants for MCO (PWTD) Answer N/A

The agency did not collect applicant data in FY 2019 and cannot speak to the existence of triggers involving PWD and/or PWTD among the job applicants for any of the mission-critical occupations. OPM is responsible for OSC's delegated examining and we continue to consult with OPM to determine if it can collect and provide applicant data to OSC.

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 N/A
- b. Promotions for MCO (PWTD) Answer N/A

The agency did not collect applicant data in FY 2019 and cannot speak to the existence of triggers involving PWD and/or PWTD among the job applicants for any of the mission-critical occupations. OPM is responsible for OSC's delegated examining and we continue to consult with OPM to determine if it can collect and provide applicant data to OSC.

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.

In FY 2019, the EEO and Human Capital Offices proposed a pilot program opening new positions to all employees, including PWD, as detail opportunities prior to posting the positions as vacancy announcements. The agency also issued its new PAS procedures along with its revised procedures for reasonable accommodation to ensure that PWD enjoy full access to equal employment opportunity.

B. CAREER DEVELOPMENT OPPORTUNITES

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

In FY 2018, the agency developed a new training plan to (1) set forth consistent guidelines for training requests; (2) ensure transparency when allocating training resources; (3) improve individual employee and organizational performance; and (4) assist in achieving the agency's mission and performance goals. The new plan will, in turn, better enable all employees, including PWD, to develop their careers through education and training opportunities. OSC also used detail opportunities in FY 2019 to provide professional growth opportunities. Additionally, in FY 2020 OSC rejuvenated its mentorship program which is available to all employees who are interested in seeking a mentor.

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						
Mentoring Programs						

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

The agency did not collect applicant data in FY 2019 and cannot speak to the existence of triggers involving PWD among applicants and/or selectees for any of the career development programs. OPM is responsible for OSC's delegated examining and we continue to be consult with OPM to determine if OSC has the recourses to collect and provide applicant data to OSC. In addition, OSC will determine whether NFC can track data for OSC's programs on mentoring and detailing. However, we note that for OSC's mentoring program all applicants/candidates are accepted.

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

The agency did not collect applicant data in FY 2019 and cannot speak to the existence of triggers involving PWD and/or PWTD among the job applicants for any of the mission-critical occupations. OPM is responsible for OSC's delegated examining and we continue to consult with OPM to determine if it can collect and provide applicant data to OSC.

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 No

The agency awarded 17 cash and time-off awards to the 11 PWD employed at the agency and 4 cash awards to the 2 PWTD employed at the agency.

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 Yes
- b. Pay Increases (PWTD) Answer Yes

The agency awarded 5 quality step increases, 2 of which were awarded to a PWD, and 1 of which was awarded to a PWTD. Based on its size, OSC has limited positions available for promotions beyond the GS level, and higher level positions are primarily attorneys and investigators which represent approximately 80% of the FTEs.

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 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

The percentage of PWD among the selected internal applicants was 11.76%. The agency did not collect internal applicant data in FY 2019 and cannot speak to the existence of triggers involving PWD and/or PWTD among the job applicants for any of the

mission-critical occupations. OSC relies on NFC to track its data and will inquire whether this data could be tracked by NFC.

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

The percentage of PWTB among the selected internal applicants was 5.88%. The agency did not collect internal applicant data in FY 2019 and cannot speak to the existence of triggers involving PWD and/or PWTB among the job applicants for any of the mission-critical occupations. OSC relies on NFC to track its data and will inquire whether this data could be tracked by NFC.

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

The agency did not collect applicant data in FY 2019 and cannot speak to the existence of triggers involving PWD among the new hires to the senior grade levels. OPM is responsible for OSC’s delegated examining and we continue to consult with OPM to determine if it can collect and provide applicant data to OSC.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB 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

The agency did not collect applicant data in FY 2019 and cannot speak to the existence of triggers involving PWD among the new hires to the senior grade levels. OPM is responsible for OSC's delegated examining and we continue to consult with OPM to determine if it can collect and provide applicant data to OSC.

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

OSC relies on NFC to track its data on internal actions and will inquire whether this data could be tracked by NFC.

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

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

OSC relies on NFC to track its data on internal actions and will inquire whether this data could be tracked by NFC.

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 |

The agency did not collect applicant data in FY 2019 and cannot speak to the existence of triggers involving PWD among the new hires to the senior grade levels. OPM is responsible for OSC's delegated examining and we continue to consult with OPM to determine if it can collect and provide applicant data to OSC.

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 |

The agency did not collect applicant data in FY 2019 and cannot speak to the existence of triggers involving PWD among the new hires to the senior grade levels. OPM is responsible for OSC's delegated examining and we continue to consult with OPM to determine if it can collect and provide applicant data to OSC.

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

The agency had one eligible Schedule A candidate who was hired into a permanent position to convert into the competitive service after two years of satisfactory service.

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 |

The percentage of PWD among voluntary and involuntary separations (21.73%) did not exceed that of persons without disabilities (78.26%).

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

The percentage of PWTD among voluntary and involuntary separations (4.35%) did not exceed that of persons without targeted disabilities (78.26%).

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.

N/A While employees may list the reason for their departure, the agency is currently revising its exit interview questions to ensure such information is captured, especially for PWD.

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://osc.gov/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://osc.gov/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.

OSC continues to monitor other small agencies for additional resources to ensure that the agency is aware of the latest equipment innovations to meet the needs of PWD. In FY 2018, the agency also revisited their emergency response procedures and evacuation plan to include special provisions and ensure safe movement of PWD in case of emergency.

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 agency's Procedures for Accommodation of Persons with Disabilities state that requests shall be processed and the accommodation, if approved, shall be provided in 20 business days from receipt of request, or sooner, if possible. In FY 2019, the average processing time was approximately 18 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.

In FY 2018, the agency revised its Procedures for Accommodation of Persons with Disabilities to include EEOC's minimum requirements as well as the new PAS procedures. The consolidated directive provides extensive direction and precise guidelines for supervisors, employees, and applicants for employment. The effectiveness of the agency's reasonable accommodation program is demonstrated by the responsive and timely processing of requests and approved accommodations. Managers and supervisors will attend training to refresh and enhance their knowledge of relevant laws and agency procedures. In FY 2019, we including this information in all onboarding packages and on OSC's Intranet and Internet.

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.

As stated above, the agency revised its Procedures for Accommodation of Persons with Disabilities to include new PAS procedures. The agency has not yet received a request for PAS; however, the consolidated directive provides extensive direction and precise guidelines for supervisors and employees. Managers and supervisors will attend training to gain knowledge of relevant laws and agency procedures.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer No

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

Answer No

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

N/A

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer No

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

Answer No

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

N/A

Section VIII: Identification and Removal of Barriers

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

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

Answer 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

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

The agency is not required to complete Part I, i.e., conduct barrier analysis, with only 145 employees. If barriers were found, the EEO Director would meet with senior staff to implement changes.

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

Please see the above response.

- 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.

Please see the above response.