

Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 CFR §1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with targeted disabilities in the federal government

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

- | | | |
|--------------------------------|--------|-----|
| a. Cluster GS-1 to GS-10 (PWD) | Answer | Yes |
| b. Cluster GS-11 to SES (PWD) | Answer | Yes |

The Commission did not meet the 12% target for PWD. The Commission has 5.88% PWD in its workforce, all of whom are in the GS-11 to SES equivalent levels.

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

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

- | | | |
|---------------------------------|--------|-----|
| a. Cluster GS-1 to GS-10 (PWTD) | Answer | Yes |
| b. Cluster GS-11 to SES (PWTD) | Answer | Yes |

The Commission did not meet the 2% target for PWTD. The Commission has 1.47% PWTD in its workforce, all of whom are in the GS-11 to SES equivalent levels.

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.

The Commission's EEO Director communicated the numerical goals to the Chairman and the office heads in the December 10, 2018 and the June 25, 2019 Strategic Action Plan meetings. The office heads serve as the hiring/selecting officials for Commission vacancies. The Secretary of the Commission, who is the Chief Human Capital Officer, subsequently notified the HR Specialist (who is responsible for the hiring process, including recruitment).

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	
Answering questions from the public about hiring authorities that take disability into account	0	0	1	Sherri Proctor HR Specialist
Section 508 Compliance	0	0	2	Lee Martin IT Manager
Processing reasonable accommodation requests from applicants and employees	0	0	1	Sherri Proctor HR Specialist
Architectural Barriers Act Compliance	0	0	2	Ruth Ann Abrams Deputy Secretary
Processing applications from PWD and PWTD	1	0	0	Sherri Proctor HR Specialist
Special Emphasis Program for PWD and PWTD	0	0	2	Ruth Ann Abrams Deputy Secretary

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 Commission had a severely constrained budget in FY 2019, and curtailed all training across the agency, which limited the ability to provide specific disability training to staff. The EEO Director provided reasonable accommodation training to the HR Specialist as part of the transition of this function from EEO to Human Resources. In FY 2020, if budget permits, the Commission plans to provide training to the IT staff in section 508 compliance, as this is an area that the Commission has a skills gap. The Commission also plans to provide specific training on disability awareness and responsibilities to all employees and supervisors during the biennial EEO/No FEAR Act training that will be held in FY 2020.

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

Brief Description of Program Deficiency	B.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]		
Objective	Establish a Diversity and Inclusion (D&I) Committee with volunteer staff representing all departments within the Commission, including senior managers, to gather information regarding the SEP duties and responsibilities required of SEP managers and requirements of individual SEP programs. The Commission does not have the staff or budget to appoint full-time SEP managers, but is looking to designate volunteer collateral duty SEP managers in the upcoming fiscal year.		
Target Date	Sep 30, 2020		
Completion Date			
Planned Activities	<u>Target Date</u> <u>Completion Date</u> <u>Planned Activity</u>		
	Mar 1, 2020		Gather volunteers, including senior managers, to establish a D&I Committee. Research SEP programs, SEP manager duties and responsibilities. Designate volunteer collateral duty SEP managers in the upcoming fiscal year.
Accomplishments	<u>Fiscal Year</u> <u>Accomplishment</u>		
	2020	In March 2020, the Commission established a Diversity and Inclusion (D&I) Committee consisting of volunteer staff representing all departments within the Commission, including senior managers. The D&I Committee has been gathering information regarding the SEP duties and responsibilities required of SEP managers and requirements of individual SEP programs.	

Brief Description of Program Deficiency	C.3.b.6. Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]		
Objective	Add element to performance appraisal for all managers and supervisors that evaluates their performance with respect to the EEO component requirements of 29 CFR 1614.102.		
Target Date	Sep 30, 2020		
Completion Date			
Planned Activities	<u>Target Date</u> <u>Completion Date</u> <u>Planned Activity</u>		
	May 1, 2020		Add an EEO component for managers and supervisors in its Performance Plan and Assessment form that is used for mid-year reviews and end-of-year performance appraisals.
Accomplishments	<u>Fiscal Year</u> <u>Accomplishment</u>		
	2020	In April 2020, the Commission added an EEO component for managers and supervisors in its Performance Plan and Assessment form that is used for mid-year reviews and end-of-year performance appraisals. This component evaluates each individual manager’s commitment and understanding of the EEO policies and program at the Commission.	

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 Commission's Human Resources (HR) function is the centralized hub for all Commission hiring, and the HR specialist serves as the primary staff resource to identify job applicants with disabilities. The HR specialist maintains the file of applications received that indicate Schedule A eligibility. The Commission also uses the shared list of disabilities available on max.gov to locate qualified applicants with disabilities, including targeted disabilities. In FY 2020, the Commission also sent its vacancy announcements to Galludet University.

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 Chairman of the Commission directed all hiring managers to first use Schedule A hiring authority for Commission vacancies. The HR Specialist oversees this required utilization of Schedule A, ensures that hiring managers comply with the Chairman's directive, and documents the result for each vacancy. Prior to posting those vacancies, hiring managers review the file of Schedule A candidates maintained by the HR Specialist and search the OPM shared list.

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 HR Specialist reviews all Schedule A applications and provides the applications to the hiring manager. When a hiring manager is interested in a hiring authority eligible candidate, the HR Specialist coordinates the use of the applicable appointment authority.

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 Commission provides specific training during the in-person biennial EEO/No FEAR Act training. Additionally, the HR Specialist has received specific training from the online OPM training offerings. Additionally, prior to posting a vacancy, the HR Specialist reviews the Schedule A process with the hiring manager and provides guidance.

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.

During FY 2019, the Commission did not conduct outreach to establish or maintain contacts with organizations that assist PWD. This has been identified as a barrier in the FY 2019 barrier analysis. In FY 2020, the Commission has provided vacancies to Galludet University and is working towards establishing contacts with America Job Centers, local vocational rehabilitation agencies, the Veterans' Vocational Rehabilitation and Employment Program, Centers for Independent Living, and Employment Network Service Providers.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

a. New Hires for Permanent Workforce (PWD)

Answer Yes

b. New Hires for Permanent Workforce (PWTD)

Answer Yes

The Commission did not meet the 12% target for PWD or the 2% target for PWTD. It is important to note that the Commission had only 5 new staff hires in FY 2019, of which only 1 was Commission staff (the remaining hires were presidentially-appointed, senate-confirmed Commissioners and their staff). The Commission did not have visibility into the applicant demographic data in FY 2019 and in FY 2020 is working with USA staffing to understand how to run reports and access applicant demographic data.

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 N/A

b. New Hires for MCO (PWTD)

Answer N/A

Applicant data is not available for the one staff vacancy that was filled in FY 2019; the Commission did not have visibility into its applicant demographic data and in FY 2020 is working with USA staffing to understand how to run reports and access applicant demographic data. This was identified as a barrier in the Commission's barrier analysis and the Commission is looking to use and understand this data moving forward.

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

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

a. Qualified Applicants for MCO (PWD)

Answer Yes

b. Qualified Applicants for MCO (PWTD)

Answer Yes

The Commission did not meet the 12% target for PWD or the 2% target for PWTD in its internal workforce, which limits the relevant applicant pool for internal applicants. The Commission did not have any internal applicants for the vacancy filled in FY 2019.

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

The Commission did not meet the 12% target for PWD or the 2% target for PWTD in its internal workforce, which limits the relevant promotional pool for MCOs. The Commission did not have any employees promoted to MCOs for the vacancy filled in FY 2019.

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 Commission is committed to using disability as a positive factor when advancement opportunities arise. The Commission is a very small agency, with 68 employees in FY 2019, and is a relatively flat organization with limited opportunities for advancement. In recognition of this limitation, the Commission developed career ladders for mission critical occupations (MCOs), to ensure that all employees in MCOs, including PWD and PWTD, have an identified advancement path. The Commission also offers tuition reimbursement and specialized training for all employees so they can improve their skills and develop their careers during their time at the Commission. The Commission is working on strengthening its internal training program to provide training opportunities to all employees and focus on managerial training to understand how to provide and support advancement opportunities for employees with disabilities.

B. CAREER DEVELOPMENT OPPORTUNITES

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

The Commission is committed to the development and training of all employees to enable them to acquire knowledge and skills relevant to their current position, prepare them for greater responsibilities, and advance their careers. While the Commission does not have a formal career development program, it provides individual training opportunities to develop its employees. However, in FY 2019, the Commission had a severely constrained budget, and curtailed all training and development activities, including the completion of Individual Development Plans. During times where budget places limitations on training, the Commission focuses its efforts on encouraging employees to take advantage of free training and internal mentoring.

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 (%)
Mentoring Programs	0	0	0	0	0	0
Fellowship Programs	0	0	0	0	0	0
Other Career Development Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	0	0
Training Programs	0	0	0	0	0	0
Internship Programs	0	0	0	0	0	0
Detail Programs	0	0	0	0	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 Yes
- b. Selections (PWD) Answer Yes

The Commission did not meet the 12% target for PWD in its internal workforce, which limits the eligible pool for career development programs. Additionally, budgetary constraints curtailed all career development offerings. The Commission does not require application to its career development options, as the career development opportunities are based on the Individual Development Plan, and are open to all employees.

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 Yes

The Commission did not meet the 2% target for PWTd in its internal workforce, which limits the eligible pool for career development programs. Additionally, budgetary constraints curtailed all career development offerings. The Commission does not require application to its career development options, as the career development program are based on the Individual Development Plan, and are open to all employees.

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

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 No
- b. Pay Increases (PWTd) Answer No

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

The Commission had no other recognition program in FY 2019.

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 Yes

ii. Internal Selections (PWD) Answer N/A

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 N/A

The Commission does not meet the 12% PWD target in the internal workforce, which is the potential applicant pool for these positions. There were two senior level positions available in FY 2019, but they were not selected until FY 2020.

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 | Yes |
| ii. Internal Selections (PWTD) | Answer | N/A |

The Commission did not meet the 2% target in the internal workforce, which is the potential applicant pool for these positions. There were two senior level positions available in FY 2019, but they were not selected until FY 2020.

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 |

There were two senior level positions available in FY 2019, but they were not selected until FY 2020.

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

There were two senior level positions available in FY 2019, but they were not selected until FY 2020.

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

The Commission does not meet the 12% target for PWD in its internal workforce, which is the potential applicant pool for these positions. There were two senior level positions available in FY 2019, but they were not selected until FY 2020.

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 Yes
 - ii. Internal Selections (PWTd) Answer N/A
- c. Supervisors
 - i. Qualified Internal Applicants (PWTd) Answer Yes
 - ii. Internal Selections (PWTd) Answer N/A

The Commission did not meet the 2% target for PWTd in the internal workforce, which is the potential applicant pool for these positions. There were two supervisory positions available in FY 2019, but they were not selected until FY 2020.

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 two supervisory positions available in FY 2019, but they were not selected until FY 2020.

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 two supervisory positions available in FY 2019, but they were not selected until FY 2020.

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 Commission had no eligible Schedule A employees in FY 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

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

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.

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.prc.gov/accessibility>

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.prc.gov/accessibility>

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 Commission is located in a LEED Gold-certified, privately-owned building that meets all accessibility requirements. In FY 2019, the property owner renovated both main entrances. This renovation included updates to accessibility points. In the next two fiscal years (FY 2020 and 2021), the Commission plans to upgrade government-furnished equipment for employees, and will include accessibility options as a positive factor in determining which equipment to procure. In FY 2020, the Commission's newly established Diversity and Inclusion Committee is reviewing accessibility of Commission meeting rooms and hearing space.

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 time frame for processing initial requests for reasonable accommodation is 2 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 Commission's reasonable accommodation program processed all requests in a timely fashion, provided requested accommodation in a timely fashion, monitored accommodation requests for trends and worked with IT and accounting to obtain needed equipment based on the trend monitoring. Additionally, the Commission's safety manager offered ergonomics training to all interested employees.

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

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

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

The Commission updated its PAS procedures and posted the updated procedures on the Commission's public facing website. The Commission did not receive any requests during FY 2019. The Commission follows procedures for PAS requests in a similar manner to reasonable accommodation requests and managers are also provided training about PAS requirements.

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.

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 N/A

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.

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>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>The Commission did not meet the 12% target for PWD or the 2% target for PWTD in its workforce. This condition was recognized as a potential barrier through analysis of the Commission's workforce demographics.</p>											
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>											
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>												
<p>STATEMENT OF IDENTIFIED BARRIER:</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>The Commission collects applicant demographic data by including the OMB- issued Demographic Information on Applicant form with each vacancy announcement. However, the Commission does not currently analyze the demographic data that is collected by USA staffing as a result of applicants filing out the form, limiting insight into potential remedies to this barrier.</p>											
<p>Objective</p>	<p>Improved ability to analyze the applicant pool by gaining access to applicant demographic data collected by USA staffing.</p> <table border="1" data-bbox="487 976 649 1123"> <tr> <td>Date Objective Initiated</td> <td>Apr 22, 2020</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2020</td> </tr> </table> <p>Improve the diversity of the applicant pool by increasing outreach.</p> <table border="1" data-bbox="487 1165 649 1312"> <tr> <td>Date Objective Initiated</td> <td>Mar 13, 2020</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2020</td> </tr> </table>				Date Objective Initiated	Apr 22, 2020	Target Date For Completion Of Objective	Sep 30, 2020	Date Objective Initiated	Mar 13, 2020	Target Date For Completion Of Objective	Sep 30, 2020
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<p>Responsible Officials</p>	<p>Sherri Proctor Senior HR Specialist</p>											
<p>Target Date (mm/dd/yyyy)</p>	<p>Planned Activities</p>	<p>Sufficient Staffing & Funding (Yes or No)</p>	<p>Modified Date (mm/dd/yyyy)</p>	<p>Completion Date (mm/dd/yyyy)</p>								
<p>09/30/2020</p>	<p>Collaborate with USA staffing to gain an understanding of how to utilize existing tools, specifically access to the results from the applicant demographic data form, to gain visibility and analyze the applicant pool. Implement the selected tool(s).</p>	<p>Yes</p>										
<p>09/30/2020</p>	<p>Establish and implement a standard recruitment practice for outreach to ensure persons from underrepresented groups are aware of and encouraged to apply to Commission vacancies. The Commission will specifically reach out to America Job Centers, State Vocational Rehabilitation Agencies, the Veterans' Vocational Rehabilitation and Employment Program, Centers for Independent Living, and Employment Network Service providers.</p>	<p>Yes</p>										
<p>Fiscal Year</p>	<p>Accomplishments</p>											

BARRIER ANALYSIS: Provide a description of the steps taken and data analyzed to determine cause of the condition.				
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.		The Commission conducts outreach in its recruitment practice that has been generally limited to Schedule A hiring practices and outreach to Howard University. For the FY 2019 vacancy that was filled in FY 2019, the Commission utilized the Schedule A database within the Commission and OPM shared list, but did not use any specific colleges or universities to advertise the vacancy and did not reach out to affinity groups. The Commission also did not use social media to advertise the vacancies.		
Objective		Improved ability to analyze the applicant pool by gaining access to applicant demographic data collected by USA staffing. Date Objective Initiated Apr 22, 2020 Target Date For Completion Of Objective Sep 30, 2020		
		Improve the diversity of the applicant pool by increasing outreach. Date Objective Initiated Mar 13, 2020 Target Date For Completion Of Objective Sep 30, 2020		
Responsible Officials		Sherri Proctor Senior HR Specialist		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Collaborate with USA staffing to gain an understanding of how to utilize existing tools, specifically access to the results from the applicant demographic data form, to gain visibility and analyze the applicant pool. Implement the selected tool(s).	Yes		
09/30/2020	Establish and implement a standard recruitment practice for outreach to ensure persons from underrepresented groups are aware of and encouraged to apply to Commission vacancies. The Commission will specifically reach out to America Job Centers, State Vocational Rehabilitation Agencies, the Veterans' Vocational Rehabilitation and Employment Program, Centers for Independent Living, and Employment Network Service providers.	Yes		
Fiscal Year	Accomplishments			

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

Due to budgetary constraints and a transition in senior leadership, the Commission was not able to complete the planned activities in FY 2019. It is important to note that the Commission filled one staff vacancy during FY 2019.

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

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.

The Commission plans to target outreach to affinity groups, colleges, and universities to ensure that persons with disabilities are aware of and encouraged to apply for Commission vacancies. The Commission also plans to work with USA staffing to be able to retrieve and analyze its applicant data. The Commission also has established a Diversity and Inclusion Committee and is researching Special Emphasis Programs to improve its recruitment, hiring, and retention of persons with disabilities and increase the diversity of its workforce.