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

No. In the permanent workforce, PWD in the GS-1 to GS-10 grade cluster, make up 25.75% of the workforce (Table B4) In the GS-11 to SES grades, the composition is 10.42%, just below the regulatory 12% goal.

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

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

a. Cluster GS-1 to GS-10 (PWTD)

Answer No

b. Cluster GS-11 to SES (PWTD)

Answer No

No. In the permanent workforce, the SBA has met the regulatory goal for PWTD in both the GS-1 to GS-10 grade cluster. GS 1-10 make up 6.72% of the workforce, and GS-11 to SES grades make up 2.18% of the workforce. (Table B4)

Grade Level Cluster(GS or Alternate Pay	Total	Reportable	Disability	Targeted Disability		
Planb)	#	#	%	#	%	
Numarical Goal		12%		2%		
Grades GS-1 to GS-10	268	42	15.67	9	3.36	
Grades GS-11 to SES	2293	239	10.42	50	2.18	

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

The Office of Human Resource Solutions (OHRS) Selective Placement Program Coordinator (SPPC) actively engages managers and supervisors during recruitment activities while reminding them of the hiring goals.

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.

D: 170 D	# of FTE	Staff By Employm	ent Status	Responsible Official
Disability Program Task	Full Time	Part Time	Collateral Duty	(Name, Title, Office Email)
Special Emphasis Program for PWD and PWTD	1	0	0	Judette Crosbie DEPM, ODI&CR
Architectural Barriers Act Compliance	1	0	0	Kenneth Ethridge Director, Administrative Services
Section 508 Compliance	1	0	0	Shawn Garner Section 508 Coordinator, OCIO
Processing reasonable accommodation requests from applicants and employees	1	0	0	Judette Crosbie DEPM, ODI&CR
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Kathy Mitcham HR Specialist, OHRS
Processing applications from PWD and PWTD	1	0	0	Kathy Mitcham kathy.Mitcham@sba.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

The Disability Employment Program Manager attends monthly webinars hosted by the Job Accommodation Network as well as participates in the quarterly Federal Exchange on Employment and Disability (FEED) meetings, hosted by the Department of Labor.

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	A.2.b.3. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.				
Objective	Post the Procedur	es on the Agency's	external website.		
Target Date	Jul 31, 2021				
Completion Date					
Planned Activities	Target Date	Completion Date	Planned Activity		
Planned Activities	Jul 31, 2021		Post 508 compliant Procedures		
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>			

	c.1. Does the agency post its procedures for processing requests for Personal Assistance Services on its public site? [see 29 CFR §1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column.				
Objective	Ensure procedures for Personal Assistance is posted to the public website.				
Target Date	Aug 31, 2021				
Completion Date					
Planned Activities	Target Date Completion Date Planned Activity				
Accomplishments	Fiscal Year Accomplishment				

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.

On May 20, 2020, SBA's Office of Human Resource Solutions (OHRS) rolled out an agency wide National Strategic Recruitment Plan: Building the Pipeline of Future Leaders to recruit, sustain, and effectively deploy a skilled, knowledgeable, diverse, and highperforming workforce to meet the current and emerging needs of its customers. SBA guidelines state that hiring officials will first consider all applicants eligible to be appointed under special hiring authorities including qualified veterans and persons with disabilities prior to making a final selection. On that same day, SBA's Office of Human Resource Solutions participated in the Veterans Employment Program Managers (VEPM) Quarterly Roundtable to share information with other veteran stakeholders. To help ensure all hiring managers were aware of the flexibilities available to hire disabled veterans, OHRS hosted a "Supervisors Community of Practice" on September 16, 2020 to share information on all hiring flexibilities as well as the following topics: • How to fill vacancies quickly through the use of hiring flexibilities • Highlighted various recruitment flexibilities, as well as improve the hiring of quality employees by utilizing effective assessment strategies • SBA Hiring Authorities Goals • Increase diversity of civil servant applicant pools • Build strong teams by hiring employees with varied backgrounds so different strengths can be leveraged to tackle program operations • Re-release of SBA's National Strategic Recruitment Plan which highlights a variety of hiring flexibilities including the hiring of veterans with disabilities • Partnerships and recruitment opportunities to increase awareness of SBA vacancies and attract top talent • How to attract the best candidates for SBA positions In addition, OHRS has partnered with the Office of Personnel Management (OPM) to host workshops on Hiring in the Federal workplace to educate employees on special hiring authorities associated with persons with disabilities, 30% or more disabled veterans and how hiring managers can take advantage of these authorities. SBA provides advice and guidance to applicants via phone and email with respect to required documents on the Federal hiring process utilizing veterans' preference; collects veteran resumes for hiring managers using special hiring authorities; consults with applicants to provide clear guidance and assistance in resume building and job placement; and searches for highly skilled veterans through the Veterans Employment Program Office and the OPM list of persons

with disabilities to meet Agency staffing needs and to support agency mission objectivities. OHRS has reached out to various recruitment sources targeting a diverse group of candidates, including disabled veterans. OHRS Executive Resources uses an internal database with resumes for Persons with Disabilities, Peace Corp volunteers and Veterans who are 30% or more disabled. The resumes are shared with supervisors and managers on request. Additionally, OHRS partners with the following organizations and agencies to assist with their recruitment events: • Maryland State Department of Education, Division of Rehabilitation Services • Military Spouse Hiring Authority and Educational Institutions and disability organizations (SBA entered into a written partnership agreement on 1/13/20) • The Office of Veterans Affairs Rehabilitation Services The Agency continued to leverage a broad-based recruiting strategy to attract a diverse pool of job applicants, including those with disabilities. One element of the strategy is to expand opportunities to hire and retain veterans through a variety of veteran-focused recruitment and retention strategies, such as the Wounded Warriors/Operations Warfighter Program, the Veterans Affairs (VA) Non-paid Work Experience Programs, and targeted recruitment fairs. The SBA participated in several virtual recruitment webinars including the Virtual HBCU Hiring Event, American University Virtual Recruiting, Peace Corps Virtual Job Fair, Military Spouse Program Webinar, and the George Washington School of Business Virtual Information Session. The SBA used the hiring manager's toolkit and trained hiring managers on various hiring flexibilities (e.g., Cybersecurity direct-hire authority, Schedule A, Veterans Programs, and the COVID-19 Excepted Service Hiring Authority). The SBA fully deployed a National Strategic Recruitment Plan highlighting the various hiring flexibilities. Additionally, the SBA implemented the use of the Schedule A hiring authority in support of the CARES Act to expedite temporary employee hiring (appointments of one-year with the option to extend for an additional year) for 220 employees in non-disaster positions. The Agency also received a dual compensation waiver from OPM to allow re-hiring of annuitants.

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

SBA's Special Placement Program Coordinator (SPPC) utilizes all hiring authorities that cover disabilities. The SPPC coordinates the onboarding; however, there is not a process in place to ensure that PWTD completes a SF 256 reflecting their targeted disability as completion is completely voluntary. There has not been an increase in requests for Reasonable Accommodation nor Personal Assistant Services. In FY 20, the number of Schedule A PWD in the permanent workforce increased from 27 to 38, while the PWTD decreased from 8 to 7. Of the 34 Schedule A new hires in the permanent workforce, 55.88 percent or 19 employees had a disability and 2.94 percent, or 1 employee had a targeted disability. It is also noted that of all the new hires in FY 20, there were no new hires of PWD and PWTD in the senior grades.

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.

Applicants who apply under Schedule A via USAJobs have eligibility determinations via the same evaluation process as other candidates but are placed on a separate certificate for hiring managers' consideration. Applicants who apply directly to the SPPC have their qualifications determined by a Human Resources Specialist (locally identified by the SPP) for the position identified, in which the Human Resources Specialist explains whether and how the hire can/will be affected, and the person brought on board.

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

OHRS has partnered with the Office of Personnel Management (OPM) to host workshops in the Federal workplace to educate all employees on special hiring authorities associated with persons with disabilities, 30% or more disabled veterans and how hiring managers can take advantage of these authorities. OHRS utilizes the National Strategic Recruitment Plan to educate SBA hiring managers about the wide variety of hiring flexibilities, as well as provide critical information about the full hiring life-cycle. In FY 20, SBA pushed out online content (SkillSoft and Manager Advantage) geared to educating managers and supervisors on employing people with disabilities. This content describes the special hiring authority and provides the steps for using Schedule A. SBA regularly provides training to agency hiring managers and human resources staff on Schedule A hiring authority. Most recently, in

September 2020, OHRS provided training to supervisors and hiring managers on the Schedule A hiring authority during a quarterly Supervisor Community of Practice. The training also included the following topics: • SBA Hiring Authorities and Goals for Hiring Persons with Disabilities and Targeted Disabilities • How to fill vacancies quickly through the use of hiring flexibilities • Recruitment flexibilities and improving the hiring of quality employees by utilizing effective assessment strategies • The importance of increasing diversity in civil servant applicant pools • Building strong teams by hiring employees with varied backgrounds so different strengths can be leveraged to tackle program operations • Orientation to SBA's National Strategic Recruitment Plan which highlights a variety of hiring flexibilities including the hiring of veterans with disabilities • Partnerships and recruitment opportunities to increase awareness of SBA vacancies and attract top talent The Workforce Recruitment Program for College Students with Disabilities (WRP) is a recruitment and referral program that connects federal and private sector employers nationwide with highly motivated college students and recent graduates with disabilities who are eager to prove their abilities in the workplace through summer or permanent jobs. The training SBA conducted in September 2020 generated increased interest from managers in the WRP. As a result of the training, three hiring managers expressed interest in becoming WRP Recruiters. Two of them were selected to become Recruiters.

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.

OHRS maintains monthly contact with the Department of Veteran's Affairs Vocational Rehabilitation Program and maintains a strong working relationship with the counselors to assist with SBA's recruitment of PWD and PWTD. SBA continues to recruit from sources such as Peace Corps, and AmeriCorps to attract candidates with disabilities. SBA also participates in the Operation Warfighter's Internship Recruitment Fair, and recruitment fairs at Gallaudet University.

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 Yes

Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, there is not a trigger in the permanent workforce for new hires for PWD which is over the 12% goal at 16.74%. There is a trigger for PWTDs in the permanent workforce as the agency was only at .93%, therefore not attaining the goal of 2%.

		Reportable	Disability	Targeted Disability		
New Hires	Total	Permanent Workforce	Temporary Workforce	Permanent Workforce	Temporary Workforce	
	(#)	(%)	(%)	(%)	(%)	
% of Total Applicants	13080	5.32	0.00	2.51	0.00	
% of Qualified Applicants	6804	7.33	0.00	3.12	0.00	
% of New Hires	195	6.67	0.00	1.03	0.00	

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

b. New Hires for MCO (PWTD)

Answer Yes

Yes

Using the qualified applicant pool (Table B7) as the benchmark, with the exception of PWTD in the 1165 series (9.20%), triggers exist for PWD and PWTD in the mission-critical occupations. There were no selections of PWTD in the 1101, 1102, and 2210 series. Similarly, for the 1102 and 2210 series there were no selections for PWD, and selection rate was 4.95% for the 1101.

New Hires to		Reportable	Disability	Targetable Disability		
Mission-Critical Occupations	Total (#)	Qualified Applicants (%)	New Hires	Qualified Applicants (%)	New Hires	
Numerical Goal		12	12%			
1101GENERAL BUSINESS AND INDUSTRY	0	0.00	0.00	0.00	0.00	
1102CONTRACTIN	0	0.00	0.00	0.00	0.00	
1165LOAN SPECIALIST	0	0.00	0.00	0.00	0.00	
2210INFORMATION TECHNOLOGY MANAGEMENT	0	0.00	0.00	0.00	0.00	

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

Using the benchmark of qualified internal applicants (Table B-9), triggers exist the mission critical occupations as follows: 1101 PWD was 10.19%; PWTD was 5.64% 1102, PWD was 2.56%; PWTD was 0.00% 1165, PWD was 6.82%; PWTD was 0.00% 2210, PWD was 4.17%; PWTD was 2.78%

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

Using the qualified applicant pool as the benchmark (Table B-9), triggers exist in promotions for PWD and PWTD as follows: 1102, PWD was 0.00%; PWTD was 0.00% 1165, PWD was 0.00% 2210, PWD was 0.00%; PWTD was 0.00%

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.

SBA uses a centralized approach to address the Agency's strategic, talent development needs. A centralized training budget and blanket purchase agreement enable SBA to effectively and efficiently provide leadership, professional and technical development needs for its mission critical occupations (MCOs), which account for more than 65% of the Agency's workforce. Leveraging a centralized training budget for core and mission critical technical training promotes the ability to achieve economies of scale by identifying and meeting talent development needs at the corporate level. The Blanket Purchase Agreement affords SBA a costeffective contracting vehicle that streamlines the procurement process and allows for added flexibility to plan and respond to talent development needs in a timely manner. Strategies include: • Conducting talent needs and competency assessments and ensuring adequate development opportunities to address identified needs at all levels. • Developing an Individual Development Plan in SBA's online Talent Management Center and educating staff and managers on the use of Individual Development Plans. • Building workforce plans to assess the current state of the workforce, identify gaps, and develop strategies to address them. • Creating a strategic succession planning program that aligns with the Agency Strategic Plan to address organizational needs and better identify talent pools. • Educating hiring managers about hiring practices and available hiring authorities via resources such as the National Strategic Recruitment Plan and the Hiring Manager's toolkit. • Standardizing position descriptions to ensure greater efficiency and better utilization of resources to create upward mobility for employees. • Utilizing the Excellence in Government Fellows program to provide developmental opportunities to more than 20 future leaders. • Administering the mentoring program with more than 74 mentees in FY 20 to prepare future leaders and improve knowledge transfer.

B. CAREER DEVELOPMENT OPPORTUNITES

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

SBA's Learning Management System (LMS) continues to give all employees access to on-line training on demand. Thousands of courses are available to meet employees' career and individual developmental needs. All employees can look up and register for online, and on-site training classes. SBA has also successfully leveraged the Franklin Covey All Access Pass to extend quality learning and development opportunities throughout SBA. Franklin Covey workshops and webinars continue to be a pillar in SBA's leadership development efforts. Moving forward, SBA will use Franklin Covey's All Access Pass's Leadership Learning Journeys to provide leadership development across the SBA leader pipeline. The SBA continues to expand educational offerings and increase training, certification, cross-training, rotational opportunities, leadership development programs, coaching, and mentoring, thereby providing opportunities for employees to enhance their learning and development goals.

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

Company	Total Participants		PWD		PWTD	
Career Development Opportunities	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	0	0
Training Programs	0	0	0	0	0	0
Detail Programs	0	0	0	0	0	0
Fellowship Programs	22	5	5	0	0	0
Mentoring Programs	132	132	4	4	3	3
Other Career Development 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 N/A

b. Selections (PWD)

Answer N/A

It could not be determined whether triegers exist for PWD and or selectees for any of the career development programs that the

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

a. Applicants (PWTD)

Answer N/A

b. Selections (PWTD)

Answer N/A

It could not be determined whether triggers exist for PWD and or selectees for any of the career development programs that the agency offers, as the data is not tracked.

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

Using the inclusion rate as the benchmark, there are no triggers involving PWD or PWTD for awards.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	708	28.47	27.85	33.90	27.03
Time-Off Awards 1 - 10 Hours: Total Hours	4937.75	195.91	193.28	219.49	189.64
Time-Off Awards 1 - 10 Hours: Average Hours	6.97	2.45	0.34	10.98	0.18
Time-Off Awards 11 - 20 hours: Awards Given	211	8.90	8.40	3.39	10.36
Time-Off Awards 11 - 20 Hours: Total Hours	3361.5	143.06	133.57	54.24	166.67
Time-Off Awards 11 - 20 Hours: Average Hours	15.93	5.72	0.78	27.12	0.04
Time-Off Awards 21 - 30 hours: Awards Given	81	4.63	2.90	6.78	4.05
Time-Off Awards 21 - 30 Hours: Total Hours	1945	111.03	69.70	162.71	97.30
Time-Off Awards 21 - 30 Hours: Average Hours	24.01	8.54	1.18	40.68	0.00
Time-Off Awards 31 - 40 hours: Awards Given	81	2.85	3.19	3.39	2.70
Time-Off Awards 31 - 40 Hours: Total Hours	3096	105.34	122.20	122.03	100.90
Time-Off Awards 31 - 40 Hours: Average Hours	38.22	13.17	1.88	61.02	0.45
Time-Off Awards 41 or more Hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0	0.00	0.00	0.00	0.00

Reportable

Time-Off Awards	Total (#)	Disability %	Disability %	" " " " " " " " " " " " " " " " " " "	Disability %
Time-Off Awards 41 or more Hours: Average Hours	0	0.00	0.00	0.00	0.00
Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	474	18.51	18.96	23.73	17.12
Cash Awards: \$501 - \$999: Total Amount	350585.31	13708.58	13992.31	19135.00	12266.43
Cash Awards: \$501 - \$999: Average Amount	739.63	263.63	36.25	1366.78	-29.55
Cash Awards: \$1000 - \$1999: Awards Given	1067	36.65	43.42	37.29	36.49
Cash Awards: \$1000 - \$1999: Total Amount	1512591.59	52326.98	61733.48	52902.46	52174.04
Cash Awards: \$1000 - \$1999: Average Amount	1417.61	508.03	69.83	2404.66	3.97
Cash Awards: \$2000 - \$2999: Awards Given	714	18.86	31.19	18.64	18.92
Cash Awards: \$2000 - \$2999: Total Amount	1708111.72	45599.65	74562.97	45186.36	45709.49

860.37

4.98

16883.26

1205.95

0.71

3014.92

1507.46

0.71

9249.47

4624.73

117.42

5.65

18221.24

158.45

1.62

6784.82

205.60

2.16

32929.67

748.40

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)

2392.31

134

434989.42

3246.19

35

146610.88

4188.88

47

714265

15197.13

Answer No

Without Reportable | Targeted Disability | Without Targeted

4107.85

1.69

6470.47

6470.47

1.69

7196.19

7196.19

1.69

14957.63

14957.63

-2.70

5.86

19650.62

-193.18

0.45

1903.68

-4.41

0.45

7732.43

1878.60

b. Pay Increases (PWTD)

Cash Awards: \$2000 - \$2999:

Average Amount

Cash Awards: \$3000 - \$3999:

Awards Given
Cash Awards: \$3000 - \$3999: Total

Amount

Cash Awards: \$3000 - \$3999:

Average Amount
Cash Awards: \$4000 - \$4999:

Awards Given
Cash Awards: \$4000 - \$4999: Total

Amount

Cash Awards: \$4000 - \$4999:

Average Amount

Cash Awards: \$5000 or more:

Awards Given
Cash Awards: \$5000 or more: Total

Amount
Cash Awards: \$5000 or more:

Average Amount

Answer No

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	39	0.36	1.82	0.00	0.45

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 Yes ii. Internal Selections (PWD) Answer Yes c. Grade GS-14 i. Qualified Internal Applicants (PWD) Yes Answer ii. Internal Selections (PWD) Yes Answer d. Grade GS-13 i. Qualified Internal Applicants (PWD) Answer Yes

At the GS 15 grade, 2.30% of PWD applicants were qualified and none were selected. At the GS14 grade, 4.01% (4) of PWD applicants were qualified and 10% (1) one was selected. At the GS13 grade, 8.62% (15) of PWD applicants were qualified and 30.77% (4) were selected. Data reflecting the qualification and selection of SES applicants was not available.

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.

Answer

No

a. SES

i. Qualified Internal Applicants (PWTD)

Answer N/A

ii. Internal Selections (PWTD)

Answer N/A

b. Grade GS-15

ii. Internal Selections (PWD)

i. Qualified Internal Applicants (PWTD) Answer Yes ii. Internal Selections (PWTD) Answer Yes c. Grade GS-14 i. Qualified Internal Applicants (PWTD) Answer No ii. Internal Selections (PWTD) Answer Yes d. Grade GS-13 i. Qualified Internal Applicants (PWTD) Answer No

At the GS14 grade level, PWTD applicants, none of the qualified (2.14%) were selected. At the GS15 grade levels, there were no qualified PWTD applicants.

ii. Internal Selections (PWTD)

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

Answer

No

a. New Hires to SES (PWD)	Answer	N/A
b. New Hires to GS-15 (PWD)	Answer	Yes
c. New Hires to GS-14 (PWD)	Answer	Yes
d. New Hires to GS-13 (PWD)	Answer	Yes

The agency determined that SES/SLs would be categorized as Executives, GS15's as Managers, and GS14's and below with a supervisory code would be identified as Supervisors. There were no new hires of PWTD's at the senior grade levels.

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

The agency determined that SES/SLs would be categorized as Executives, GS15's as Managers, and GS14's and below with a supervisory code would be identified as Supervisors. Of the 4.01% (15) of qualified PWD applicants, there was only 1 selection of PWD (10.0%).

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 No

ii. Internal Selections (PWD)

Answer Yes

The agency determined that SES/SLs would be categorized as Executives, GS15's as Managers, and GS14's and below with a supervisory code would be identified as Supervisors. Although 8 (2.14%) PWTD applicants were qualified, none were selected.

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 Yes

b. Managers

i. Qualified Internal Applicants (PWTD)

Answer Yes

ii. Internal Selections (PWTD)

Answer N/A

c. Supervisors

i. Qualified Internal Applicants (PWTD)

Answer N/A

ii. Internal Selections (PWTD)

Answer N/A

The agency determined that SES/SLs would be categorized as Executives, GS15's as Managers, and GS14's and below with a supervisory code would be identified as Supervisors. There were no new hires of PWTD's.

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 Yes

c. New Hires for Supervisors (PWD)

Answer Yes

The agency determined that SES/SLs would be categorized as Executives, GS15's as Managers, and GS14's and below with a

supervisory code would be identified as Supervisors. There were no new hires of PWD's.

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 Yes

c. New Hires for Supervisors (PWTD)

Answer Yes

The agency determined that SES/SLs would be categorized as Executives, GS15's as Managers, and GS14's and below with a supervisory code would be identified as Supervisors. There were no new hires of PWTD's.

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 No

No. In FY 18, 13 employees were hired under the Schedule A disability hiring authority. Of those, eight were converted into the competitive service as of the end of FY 20. Two employees are still employed with SBA but do not have a conversion action. Three employees left SBA prior to the two-year period. OHRS has initiated action to build a disability Schedule A hires tickler report to ensure both the Acquisition staff and managers are notified of employees eligible to be converted after two years of successful performance.

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

Using the inclusion rate as the benchmark, separations of PWD did not exceed persons without disabilities in neither voluntary nor involuntary separations.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	5	0.12	0.04
Permanent Workforce: Resignation	24	0.58	0.21
Permanent Workforce: Retirement	98	1.16	0.96
Permanent Workforce: Other Separations	127	2.10	1.19
Permanent Workforce: Total Separations	254	3.96	2.40

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

Using the inclusion rate as the benchmark, separations of PWTD did not exceed persons without disabilities in neither voluntary nor involuntary separations.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	5	0.57	0.04
Permanent Workforce: Resignation	24	1.71	0.21
Permanent Workforce: Retirement	98	1.71	0.96
Permanent Workforce: Other Separations	127	2.29	1.25
Permanent Workforce: Total Separations	254	6.29	2.46

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.

NA

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.sba.gov/about-sba/open-government/about-sbagov-website/accessibility SBA is committed to making the information it delivers through its Internet site accessible for all members of the public, including individuals with disabilities. In the spirit of this commitment, the SBA strives to provide electronic and information technology that meets or exceeds the compliance requirements of Section 508 of the Rehabilitation Act of 1973, as amended. If an individual has feedback, concerns or complaints related to the accessibility of electronic and information technology provided by the SBA, including content on the web site. SBA Office of Diversity Inclusion and Civil Rights, 409 Third St. SW suite 6400, Washington, DC 20416. Individuals may also send complaints regarding Section 508 to the following address: they may contact the Section 508 Coordinator via email at: 508@sba.gov.

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.sba.gov/about-sba/open-government/about-sbagov-website/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.

SBA occupies office space through the continental United States, in federal buildings and GSA leased spaces. The Disability Employment Program Manager works with the ABA Compliance Manager to address any accessibility concerns and take specific actions to modify spaces for employees, as a reasonable accommodation. During FY 20, one employee requested modification of her office space as an accommodation when the office relocated. Working together with the general contractor for the move project, all requested modifications were made to accommodate the employee.

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.)

At SBA, supervisors, in consultation with the Disability Employment Program Manager, makes the decision on requests for Reasonable Accommodation. Procedurally, the requirement is within 30 business days, baring no extenuating circumstances. During FY 20 there were fewer requests for Reasonable Accommodation, which is attributed to the workforce teleworking because of the COVID-19 Pandemic. The average processing time was significantly reduced from 27.7 days the previous FY to 17.00 days. Employees were able to successful perform the essential duties of their position, responding to COVID-related actions, from the comfort of their homes under the agency's Reconstitution Plan. Using EEOC' guidance, specific language for managers to respond to reasonable accommodations requests to Telework because of COVID-19, was developed during the 3rd and 4th Quarter. Reasonable Accommodation training is provided on a as needed or request basis. During FY 20, no training to the workforce was provided; however, the Disability Employment Program Manager routinely provides one-on-one training to any supervisor who is unfamiliar with the agency's process. Reasonable Accommodation training is also presented to new supervisors on a quarterly basis and the Disability Employment Program Manager, along with subject matter experts from Human Resources, appear as panelist during the week-long training to answer any questions relating to variety of topics, to include reasonable accommodation. In July 2020, on the 30th anniversary of the signing of the Americans with Disability Act, the Disability Employment Program Manager highlighted this significant milestone for individuals with disabilities and featured a news article in the agency's daily newsletter. Additionally, in recognition of National Disability Employment Awareness month (October 2020), plans were initiated for a special observance featuring the Deputy Assistant Secretary, Office of Disability Employment Policy, U.S. Department of Labor and a lead consultant from the Job Accommodation Network. The program was hugely successful and was well receive.

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.

Attributed to the surge in hiring a temporary workforce under the CARES Act to respond to the COVID pandemic, there was an observable trend where employees' request centered around reduced work hours as an accommodation. Employees hired in response to the pandemic is typically expected to work 10-hour days and on the weekends. During the FY, the agency also adopted GAO's recommendation of developing a feedback mechanism to evaluate the effectiveness of the Reasonable Accommodation program.

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.

While there were no requests for personal assistance service during the FY, the procedures for requesting services were incorporated into the Reasonable Accommodation Procedures and approved by EEOC in December 2020 and is undergoing the

agency's review process before it is published.

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.

Government-wide average for formal complaints filed by people with disabilities for Harassment is 20.82%. During FY 20, there were no findings of discrimination alleging harassment based on disability status.

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.

Government-wide average for formal complaints filed by people with disabilities for Failure to Accommodate is Harassment is 14.02%.

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

FY 2020

Specific Workforce Data Table: Workforce Data Table: Bratter State	Source of the Tri	gger:	Workforce Data (if so identify the table)							
the required 2% goal, established by EEOC. For FY 20, of the eight (8) new hires only two (2) or . ATRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition at issue. How was the condition at issue. How was the condition at issue. Barrier Group People with Disabilities Barrier Analysis Process Completed?: Barrier(s) Identified?: NSTATEMENT OF BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition. Objective(s) and Dates for EEO Plan Date Initiated Target Date Staffing? Title Deputy Chief Human Capital Officer, Office of Human Resource Solutions Planned Activities Toward Completion of Objective Target Date Planned Activities Sufficient Staffing & Date Funding? Planned Activities Toward Completion of Objective Target Date Planned Activities Sufficient Staffing & Date Funding? Planned Activities Toward Completion of Objective Funding? Planned Activities Sufficient Staffing & Date Funding? Planned Activities Toward Completion of Objective Funding? Planned Activities Toward Completion of Objective Funding? Planned Activities Toward Completion of Objective Funding? Planned Activities Toward Completion of Objective Date Funding?	_	rce Data	Workforce D	Workforce Data Table - B8						
describing the condition at issue. How was the condition recognized as a potential barrier? STATEMENT OF BARRIER GROUPS: Barrier Analysis Process Completed?: Barrier(s) Identified?: N STATEMENT OF BARRIER: Barrier Name Description of Policy, Procedure, or Practice NA NA Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition. Objective(s) and Dates for EEO Plan Date Initiated Target Date Funding / Staffing? 10/01/2020 09/20/2022 Yes Date Completed Responsible Official(s) Title Name Standards Address The Plan? Deputy Chief Human Capital Officer, Office of Human Resource Solutions Planned Activities Toward Completion of Objective Target Date Planned Activities Toward Completion of Objective Planned Activities Toward Completion of Objective Funding? Planted Planned Activities Toward Completion of Objective Funding? Planted Activities Toward Completion of Objective Funding?	CONDITION TO A TRIGGER FO POTENTIAL BA	HAT WAS OR A ARRIER:	the required 2% goal, established by EEOC. For FY 20, of the eight (8) new 93% were PWTD.							
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Report of Accomplishments	requirements for an effective affirmative action program									
Fiscal Year Accomplishment	Fiscal Year									

	Source of the Trigger: Workforce Data (if so identify the table)								
CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier? STATEMENT OF BARRIER GROUPS: Barrier Analysis Process Completed?: Barrier(s) Identified?: N STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure of practice that has been determined to be the barrier of the undesired condition. Objective(s) and Dates for EEO Plan Date Initiated Target Date Sufficient Date Modified Completed Notifing? Total Date Objective Description of Policy in place to require hiring manager Total Date Objective to require hiring manager	_	xforce Data	Workforce Data Table - B7						
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PWD and 2% PWTD. Managers require training both in regard to recruiting individuals with disabilities and creating an inclusive work environment for differently abled individuals. Educate managers and hiring officials on the requirements for an effective affirmative action program for People with Disabilities no later than	10/01/2020	09/20/2022	Yes			Educate managers and hiring officials on the requirements for an effective affirmative action			
Responsible Official(s)									
Title Name Standards Address The Plan?		Title		Kespo!		1(8)	Standards Address The Plan?		
Deputy Chief Human Capital Officer Julie Brill No	Deputy Chief		Officer J	Julie Brill	1 1002210				

Planned Activities Toward Completion of Objective								
Target Date	Planned Activities Sufficient Modified Completio Staffing & Date Date Funding?							
09/30/2021	Decided an anger and hiring officials on the requirements for an effective affirmative action program for People with Disabilities no later than September 30, 2021.							
Report of Accomplishments								
Fiscal Year Accomplishment								

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

The triggers were only identified during a review of the FY 20 workforce data and a plan was developed with a target completion date of 9/30/2022.

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

NA

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.

NA