

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

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

### Section I: Efforts to Reach Regulatory Goals

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

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

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

Not applicable for the general schedule.

\*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 No  |

Cluster GS-1 to GS-10 BEP is (0.92) 1.08% below from meeting the goal of 2%.

Grade Level Cluster(GS or Alternate Pay Planb)	Total		Reportable Disability		Targeted Disability	
	#	%	#	%	#	%
Numerical 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 BEP communicated the numerical goals to hiring managers and recruiters through: internal Bureau partnership meetings, internal Bureau communications, executive briefings, recruitments events, and an SF-256 re-survey campaign.

### 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

Not applicable.

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	11	0	15	Karnelis Godette, Chief, Office of Human Resources (Karnelis.Godette@bep.gov)
Section 508 Compliance	0	0	2	Sharilyn Cook, Manager, Office of Enterprise Solutions
Architectural Barriers Act Compliance	0	0	1	
Processing applications from PWD and PWTB	20	0	2	Karnelis Godette, Chief, Office of Human Resources (Karnelis.Godette@bep.gov)
Processing reasonable accommodation requests from applicants and employees	0	0	4	Judith Diaz Myers, Acting Chief, Office of Equal Employment and Diversity Management
Special Emphasis Program for PWD and PWTB	0	0	4	

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

During FY 2019, disability staff attended Equal Employment Opportunity Commission (EEOC) Disability Program Manager training and National Employment Law Institute training. The entire disability program staff received reasonable accommodation training.

**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

Not applicable.

## Section III: Program Deficiencies In The Disability Program

## Section IV: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency’s recruitment program plan for PWD and PWTD

### A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

1. Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.

BEP’s Office of Equal Employment and Diversity Management (OEODM) and Office of Human Resources (OHR) collaboratively manage a Schedule A data sheet to help track, maintain, and identify qualified Schedule A applications that are received. BEP partners with the Wounded Warrior and the Workforce Recruitment Program (WRP) in an effort to identify qualified applicants with disabilities, including individuals with targeted disabilities. BEP developed a Schedule A resume repository and gained access to an automated government-wide Schedule A repository in fiscal year 2019. BEP partnered with the Department of the Treasury and Monster Government Services to create a customized job search tool that provides veterans services such as, a federal resume tutorial, a military skills translator, and a resume to job match capability. BEP has established an outreach and recruitment team as indicated within the Diversity and Inclusion Strategic Implementation Plan. The primary objective of the team is to identify, plan, and implement changes that will improve or increase the Ethnic and Race Indicator (ERI)/gender participation rates within the workforce.

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

Schedule A is available for use along with Veteran Appointment Authorities to non-competitively appoint PWD and PWTD and veterans with service-connected disability rating of 30% or more. OHR implemented a mandatory Strategic Consult with all hiring officials prior to recruitment. During this consult, OHR and hiring officials discuss hiring flexibilities, including Schedule A and Veterans appointments.

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.

When individuals apply utilizing the Schedule A hiring authority, the servicing HR Specialist reviews and determines if the applicant meets qualifications/position requirements and that they have provided the required proof of disability. Applicants deemed qualified are referred to the hiring manager on a Schedule A certificate of eligibility with guidance on selection procedures, including the application of veterans’ preference (where applicable). Managers have the option to interview and/or hire from the Schedule A certificate or to consider other candidates from other issued certificates (e.g. Merit Promotion, Non-Competitive, VRA, etc.). Alternatively, when individuals submit their resumes directly to BEP or the Bureau Special Placement Program Coordinator (SPPC) for vacant positions, the SPPC refers the resumes to the designated servicing HR Specialist. The HR Specialist then reviews the resumes to determine qualifications and eligibility. If qualifications and Schedule A eligibility are met, the resumes are then

forwarded to the hiring manager for consideration, with guidance on selection procedures, including the application of veterans' preference, when applicable.

- 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

OHR partnered with the agency's Veteran's Employment Resource Group (VERG) to host a lunch and learn on Veteran Hiring Authorities in December 2017. Additionally, OHR mandates a Strategic Consult for all hiring officials prior to recruitment, whereby hiring flexibilities and authorities (including Schedule A and Veterans appointments) are encouraged and discussed. As an on-going effort, OEODM has future plans in FY 2020 to train, advertise and promote hiring authorities and information about converting eligible Schedule A employees after their two-year probationary period.

**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.

BEP has established a working relationship with the Computer/Electronic Accommodation Program (CAP) to secure devices frequently used by PWD and PWTD. BEP also maintains contact with interpreter service providers and partners with the Wounded Warrior and the Workforce Recruitment Program (WRP) to be able to identify qualified applicants with disabilities and targeted disabilities.

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

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

a. New Hires for Permanent Workforce (PWD) Answer No

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

Not applicable.

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

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

a. New Hires for MCO (PWD) Answer Yes

b. New Hires for MCO (PWTD) Answer Yes

FY 2019 Hires Qualified vs. Hires Qualified vs. Hires 0083 (5) Hires: PWD: not applicable PWTD: 1.40% - 0.00% 2210 (7) Hires: PWD: 9.52% - 0.00% PWTD: 4.01% - 0.00% Police Officers (0083) and Information Technology Management (2210), both have a low application rate for PWD among the new hires for the mission critical occupations. The occupation series 2210 also has a low application rate for PWD among the new hires for the mission critical occupations. Based on FY 2018 data, the application rates for Police and Information Technology Management were not an area of concern when they had low hires. A determination cannot be made if there is an actual trigger; due to limited hiring. BEP will conduct an annual self-assessment to monitor and identify any areas of concern.

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

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

- a. Qualified Applicants for MCO (PWD) Answer No
- b. Qualified Applicants for MCO (PWTD) Answer No

Not applicable.

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

- a. Promotions for MCO (PWD) Answer No
- b. Promotions for MCO (PWTD) Answer No

Not applicable.

## 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.

BEP offers career development opportunities to all employees via non-competitive details and temporary promotions. The career development opportunities are marketed through internal communications and external sources. BEP designed and implemented an upward mobility program for all eligible employees (including PWD and PWTD) in FY 2018; the program is designed for current employees who are in a position or an occupational series that has limited or no upward career mobility. The program just completed its first year of implementation and it will be monitored over the next two years to determine the effectiveness and identify any areas of improvements.

**B. CAREER DEVELOPMENT OPPORTUNITIES**

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

Below is a list of the various career development programs the Bureau provides to its employees: New Leaders Program (NLP). The NLP targets GS 7-11 employees (or equivalent) and is designed to develop future public service leaders. The program includes leadership self-assessments, experiential learning, and individual development opportunities integrated into a competency-based learning approach. Executive Leadership Program (ELP). The ELP is designed for GS 12-13 (or equivalent) employees seeking to support their organization in meeting its mission and goals. The program focuses specifically on the competency of “leading people” through developmental activities and experiences. Executive Potential Program (EPP). The EPP is a competency-based leadership program that prepares high-potential GS 14–15 employees (or equivalent) to lead effectively at senior levels in the federal government. The curriculum is focused on “leading change” and transforming senior managers into change leaders. Career Development (CADE) Program. The CADE Program provides upward mobility via defined career training and opportunities that allow the selection and training of disabled veterans (and other employees) GS-11 (or equivalent) and below, whose positions offer limited promotion potential, for placement into positions in other occupational series for which they would not otherwise be qualified. Electro-Machinist & Mechanical-Machinist Trainee Program. This program is advertised as a four-year trainee program to journeyman Electro-Machinists. This position is located in the Electro-Machine Shop, Office of Security Printing. The incumbent participates in a four-year training program with the Bureau of Engraving and Printing including formal, laboratory, and on-the-job training. The incumbent is normally assigned to maintain/support all currency printing/processing equipment, including temporary and permanent modifications and installations required to maintain production goals. The incumbent works with journeymen and other peers, while participating in on-the-job training.

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		PWTB	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	0	0	0	0	0	0
Fellowship Programs	0	0	0	0	0	0
Mentoring 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	3	1	0	0	0	0
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 No
- b. Selections (PWD) Answer No

Not applicable.

4. Do triggers exist for PWTB 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 (PWTB) Answer No

b. Selections (PWTD)

Answer No

Not applicable.

**C. AWARDS**

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

a. Awards, Bonuses, & Incentives (PWD)

Answer Yes

b. Awards, Bonuses, & Incentives (PWTD)

Answer Yes

The inclusion rate for PWD (4.51%) and PWTD (2.63%) was below the inclusion rate for employees with no disability (8.06%) for time-off awards between 1 - 10 hours. The inclusion rate for PWTD (0.00%) was below the inclusion rate for employees with no disability (0.69%) for time-off awards of between 21 - 30 hours. The inclusion rate for PWD (1.39%) and PWTD (0.00%) was below the inclusion rate for employees with no disability (2.08%) for time-off awards of between 31 - 40 hours. The inclusion rate for PWD (10.42%) and PWTD (5.26%) in cash awards \$500 or less, was below the inclusion rate for employees with no disability (17.79%). The inclusion rate for PWD (5.90%) and PWTD (2.63%) in cash awards \$501 - \$999 was below the inclusion rate for employees with no disability (8.41%). The inclusion rate for PWD (51.39%) and PWTD (52.63%) in cash awards \$1000 - \$1999 was below the inclusion rate for employees with no disability (68.94%). The inclusion rate for PWTD (0.00%) in cash awards \$2000 - \$2999 was below the inclusion rate for employees with no disability (2.85%). The inclusion rate for PWD (2.08%) and PWTD (2.63%) in cash awards \$3000 - \$3999, was below the inclusion rate for employees with no disability (3.47%). The inclusion rate for PWD (0.00%) and PWTD (0.00%) in cash awards \$5000 or greater, was below the inclusion rate for employees with no disability (0.07%).

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 Yes

The inclusion rate for PWTD (0.00%) in quality step increases fell below the inclusion rate for employees with no disability (0.49%).

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

Not applicable.

**D. PROMOTIONS**

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

a. SES

i. Qualified Internal Applicants (PWD) Answer No

ii. Internal Selections (PWD) Answer No

b. Grade GS-15

i. Qualified Internal Applicants (PWD) Answer No

ii. Internal Selections (PWD) Answer No

c. Grade GS-14

i. Qualified Internal Applicants (PWD) Answer No

ii. Internal Selections (PWD) Answer Yes

d. Grade GS-13

i. Qualified Internal Applicants (PWD) Answer No

ii. Internal Selections (PWD) Answer No

Applicants/Qualified/Promotions GS-14 – PWD: 18.18% - 20.00% - 16.67%

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

a. SES

i. Qualified Internal Applicants (PWTD) Answer No

ii. Internal Selections (PWTD) Answer No

b. Grade GS-15

i. Qualified Internal Applicants (PWTD) Answer No

ii. Internal Selections (PWTD) Answer No

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

ii. Internal Selections (PWTD) Answer No

Applicants/Qualified/Promotions GS-14 – PWTD: 18.18% - 20.00% - 0.00%

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

Qualified Applicants/Hires GS-15 – PWD: 6.72% - 0.00%

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

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

Qualified Applicants/Hires GS-15 - PWTD: 2.99% - 0.00% GS-13 - PWTD: 6.70% - 0.00%

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

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

Qualified Applicants/Promotions Managers – PWD: 33.33% - 16.67%

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

a. Executives

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

b. Managers

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

c. Supervisors

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

Qualified Applicants/Promotions Managers – PWTD: 33.33% - 0.00%

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

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

Qualified Applicants/Hires Executives – PWD: 5.66% - 0.00%

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 Yes
- b. New Hires for Managers (PWTD) Answer No
- c. New Hires for Supervisors (PWTD) Answer No

Qualified Applicants/Hires Executives – PWTD: 2.52% - 0.00%

## 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

One employee was eligible to be converted in FY 2019, and was not converted due to a misunderstanding the employee had about the conversion. The conversion is pending with OHR.

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

a. Voluntary Separations (PWD) Answer Yes

b. Involuntary Separations (PWD) Answer Yes

Number of Perm Employees: NO DIS – 1431 PWD – 285 VOL SEP Inclusion Rate: NO DIS – 5.38% (77) PWD – 7.01% (20) InVOL Sep Inclusion Rate: NO DIS – 0.34% (5) PWD – 1.05% (3) The inclusion rate for PWD (7.01%) exceeded the inclusion rate of persons with no disability (5.38%) for voluntary separations. The inclusion rate for PWD (1.05%) exceeded the inclusion rate of persons with no disability (0.34%) for involuntary separations.

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

a. Voluntary Separations (PWTD) Answer Yes

b. Involuntary Separations (PWTD) Answer No

Number of Perm Employees: NO DIS – 1,431 PWTD – 38 VOL SEP Inclusion Rate: NO DIS – 5.38% (77) PWTD – 10.52% (4) InVOL Sep Inclusion Rate: NO DIS – 0.34% (5) PWTD – 0.00% (0) The inclusion rate for PWTD (10.52%) is below the inclusion rate of persons with no disability (5.38%) for voluntary separations.

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

23 permanent PWD separated from BEP in FY 2019. Of those, 20 were voluntary and three were involuntary. Eight employees separated due to retirement and six transferred to another Federal agency; whereas, four employees resigned, one was removed and two were discharged. Two employee separations was due to death.

**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.moneyfactory.gov/eoadr.html>

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.moneyfactory.gov/accessibilitystatement.html>

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.

BEP has improved the accessibility of the parking program by ensuring an adequate number of accessible spaces are available to employees for on premise parking. BEP has also worked to install several accessible doors, as well as an accessible ramp for entering and exiting the facility. During FY 2019, we continued to use closed captioning for our lunch and learns and provided hearing impaired employees with the use of an iPad to video-chat with an interpreter during meetings. BEP is working to procure and install accessible doors for disabled employees in the fitness center.

## 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 reasonable accommodation requests during the reporting period was nine 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 BEP continued using centralized funding to ensure reasonable accommodation training and providing the necessary equipment for reasonable accommodation requests. During the reporting period, there were 23 reasonable accommodation requests. Additionally, reasonable accommodation supervisory training was deployed in FY 2019, and all new employees were briefed on reasonable accommodation during the new employee orientation process.

## 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.

During the FY 2018 reporting period, the BEP developed a Personal Assistance Services (PAS) policy and procedures, which can be found on BEP's internal and external websites. Additionally, internal communications to the workforce were released to inform

employees of how they can electronically access the Bureau's current policies and procedures. In FY 2019, internal communications went out to the workforce on the proper procedures for when they encounter an individual with a service animal. PAS training is scheduled for managers and supervisors in FY 2020.

## 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 Yes

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.

Not applicable.

### 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 Yes

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

Not applicable.

## Section VIII: Identification and Removal of Barriers

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

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

Answer Yes

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

Answer Yes

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

<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>The participation rate of PWTDD is below the federal goal of 2%.</p>							
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Targeted Disabilities</p>							
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>BEP lacks a targeted strategic hiring plan for PWTDD.</p>							
<p><b>Objective</b></p>	<p>Increase participation rate of PWTDD to the established federal 2% goal.</p> <table border="1" data-bbox="483 926 1503 1066"> <tr> <td><b>Date Objective Initiated</b></td> <td>Sep 30, 2017</td> </tr> <tr> <td><b>Target Date For Completion Of Objective</b></td> <td>Sep 30, 2020</td> </tr> </table>				<b>Date Objective Initiated</b>	Sep 30, 2017	<b>Target Date For Completion Of Objective</b>	Sep 30, 2020
<b>Date Objective Initiated</b>	Sep 30, 2017							
<b>Target Date For Completion Of Objective</b>	Sep 30, 2020							
<p><b>Responsible Officials</b></p>	<p>Patricia (Marty) Greiner, Deputy Director, (Chief Administrative Officer)</p> <p>Judith DiazMyers Acting Chief, of Office of Equal Opportunity and Diversity Management</p> <p>Tanya Everett Chief, of Office of Human Resources</p>							
<p><b>Target Date (mm/dd/yyyy)</b></p>	<p><b>Planned Activities</b></p>	<p><b>Sufficient Staffing &amp; Funding (Yes or No)</b></p>	<p><b>Modified Date (mm/dd/yyyy)</b></p>	<p><b>Completion Date (mm/dd/yyyy)</b></p>				
<p>09/30/2018</p>	<p>Use the Special Hiring and Outreach Program policy and/or standard operating procedures to conduct one outreach effort.</p>	<p>Yes</p>		<p>09/12/2018</p>				
<p>09/30/2018</p>	<p>Work closely with shared services provider, HR, and hiring managers to put in place processes for identifying when vacancies are available.</p>	<p>Yes</p>		<p>06/11/2018</p>				
<p><b>Fiscal Year</b></p>	<p><b>Accomplishments</b></p>							
<p>2017</p>	<p>Established a relationship with external stakeholders; such as, Wounded Warriors, Workforce Recruitment Program, Department of Veterans Affairs, Department of Defense's Hiring Heroes to gain access to PWD and PWTDD.</p>							
<p>2017</p>	<p>Conducted a Partnership Building Event for supervisors and managers to educate them on hiring practices, hiring flexibilities, and network with external stakeholders.</p>							
<p>2017</p>	<p>Implemented the usage of a Human Resources Strategic Consult with hiring officials to provide them with options of utilizing Schedule A, Appointing Veterans and/or other hiring flexibilities.</p>							

<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>PWD among voluntary and involuntary separations exceed that of person without disabilities.</p>							
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p>							
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>BEP lacks a comprehensive retention strategy for its employees with disabilities.</p>							
<p><b>Objective</b></p>	<p>To retain persons with disabilities.</p> <table border="1" data-bbox="483 926 1500 1066"> <tr> <td><b>Date Objective Initiated</b></td> <td>Mar 31, 2018</td> </tr> <tr> <td><b>Target Date For Completion Of Objective</b></td> <td>Sep 30, 2019</td> </tr> </table>				<b>Date Objective Initiated</b>	Mar 31, 2018	<b>Target Date For Completion Of Objective</b>	Sep 30, 2019
<b>Date Objective Initiated</b>	Mar 31, 2018							
<b>Target Date For Completion Of Objective</b>	Sep 30, 2019							
<p><b>Responsible Officials</b></p>	<p>Patricia Griener Deputy Director, (Chief Administrative Officer)</p> <p>Judith DiazMeyers Acting Chief, Office of Equal Employment and Diversity Management</p> <p>Karnelis Godette Acting Chief, Office of Human Resources</p>							
<p><b>Target Date (mm/dd/yyyy)</b></p>	<p><b>Planned Activities</b></p>	<p><b>Sufficient Staffing &amp; Funding (Yes or No)</b></p>	<p><b>Modified Date (mm/dd/yyyy)</b></p>	<p><b>Completion Date (mm/dd/yyyy)</b></p>				
<p>03/30/2019</p>	<p>OEODM train workforce on reasonable accommodation program and workplace personal assistance services. 2/5/2019 3/4/2019 4/1/2019 4/2/2019 4/7/2019 5/30/2019 6/3/2019 6/4/2019 7/1/2019 7/9/2019</p>	<p>Yes</p>		<p>07/09/2019</p>				
<p>03/30/2019</p>	<p>OEODM analyze workforce separation data to identify barriers retaining employees with disabilities</p>	<p>Yes</p>		<p>11/30/2018</p>				
<p>06/15/2019</p>	<p>OEODM present barrier analysis and draft strategic plan for retention of PWD to HR. 5/7/2019 7/21/2019</p>	<p>Yes</p>		<p>05/07/2019</p>				
<p>09/30/2019</p>	<p>In collaboration with HR, implement strategic plan to address retention.</p>	<p>Yes</p>	<p>09/30/2020</p>					
<p>09/30/2019</p>	<p>In collaboration with HR, continue promotion of training, mentoring programs and similar programs that address advancement.</p>	<p>Yes</p>		<p>08/20/2019</p>				
<p>09/30/2020</p>	<p>Continue to ensure accessibility of technology and facilities.</p>	<p>Yes</p>						

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

Not applicable

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

BEP was able to reach its hiring goal of 2% due to the hiring requirements of our Police Officers (Series 0083), which resulted in the selection of hiring an individual with a targeted disability.

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.

Not applicable.