

## 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 |

\*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 |

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 United States Mint (Mint) provides quarterly updates on the participation and hiring of PWD and PWTD, allowing leadership to make informed decisions on how the agency is doing towards meeting the established goals for PWD and PWTD.

### Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

#### **A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM**

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If “no”, describe the agency’s plan to improve the staffing for the upcoming year.

Answer Yes

2. Identify all staff responsible for implementing the agency's disability employment program by the office, staff employment status, and responsible official.

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing reasonable accommodation requests from applicants and employees	4	0	0	
Special Emphasis Program for PWD and PWTD	4	0	0	
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Nicole Scarborough HR Specialist, HCD Office
Architectural Barriers Act Compliance	4	0	0	
Processing applications from PWD and PWTD	1	0	11	Nicole Scarborough HR Specialist, HCD Office
Section 508 Compliance	0	0	0	David.Kinchen@usmint.tre

3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If “yes”, describe the training that disability program staff have received. If “no”, describe the training planned for the upcoming year.

Answer Yes

In FY 2018, the Mint EEO Managers attended multiple training sessions provided by OCRD staff on the new Part J and use of the MD-715 V2 workforce data tables. Annually, all human resources (HR) professionals are required to complete online courses related to veteran’s employment, which include disability components.

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

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

Answer Yes

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

<b>Brief Description of Program Deficiency</b>	C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC’s regulations and guidance? [see 29 CFR §1614.203(d)(3)]		
<b>Objective</b>	Ensure the Mint's RA policy and procedures are in compliance with EEOC requirements and submitted to EEOC for review and final approval		
<b>Target Date</b>	Dec 30, 2020		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019	March 23, 2017	Submit the Mint's updated RA policy and procedures to Treasury Office of Civil Rights and Diversity (OCRD) for review and comment and submission to EEOC
	Nov 30, 2019	March 31, 2017	If changes are required, finalize the revisions for submission to EEOC
	Dec 30, 2020		Post the final RA policy and procedures approved by EEOC on the Mint's internal and external websites
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2017	Reasonable Accommodation Directive sent to the Department of Treasury for review and submission to EEOC for further guidance and/or approval	

**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.

Participates in recruitment/outreach events, fairs, and conferences, i.e., Pikes Peak Career Fair for the Disabled, to market the United States Mint and its job opportunities. Attends veteran hiring events. Established partnerships with local military Wounded Warrior programs to include internships for military members. Continues partnership with the Veterans Administration (VA) Employment Coordinator to identify disabled veteran applicants for potential job opportunities. Continued outreach with local Department of Rehabilitation offices to identify potential applicants with disabilities.

2. Pursuant to 29 C.F.R. §1614.203(a)(3), describe the agency’s use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and 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. The Selective Placement Coordinator has established numerous external partnerships with private and public organizations that assist PWD/PWTD candidates in finding meaningful employment.

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 submit their resumes directly to the Selective Placement Coordinator (SPC) for vacant positions within Mint, the SPC refers the resumes to the designated servicing HR Specialist at ARC. The HR Specialist reviews the resumes to determine qualifications. If qualifications and Schedule A eligibility are met, the resumes are then forwarded to the hiring manager for consideration, with guidance on selection procedures.

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

All Mint managers, supervisors, and selected human resources professionals completed online courses related to disability and veteran's employment training as of October 25, 2018. This training, provided by the Department of the Treasury, is mandated by EO 13518 and assigned to those individuals required to take it in the Treasury Learning Management Systems (TLMS). This training is provided annually to managers, supervisors and selected HR professionals.

**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.

Established relationships with local organizations to include local community colleges, technical schools, universities, rehabilitation, and veteran organizations. Attend various events held at military installations focusing on service members and veterans for future civilian employment at the Mint. Continued partnership with the Veterans Administration (VA) i.e. Veterans Administration Employment Coordinator. Based on feedback from EEOC, the Mint plans to broaden the outreach activities to include America Job Centers, Centers for Independent Living, and Employment Network Service providers, as appropriate.

**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

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 2018 HIRES QUALIFIED vs. HIRES QUALIFIED vs. HIRES 0083 (28) Hires PWD: 2.89% - 35.71% PWTD: 2.52% - 0.00% 2210 (2) Hires: PWD: 5.00% - 50.00% PWTD: 1.88% - 0.00% 3414 (1) Hires: PWD: 5.88% - 0.00% PWTD: 2.94% - 0.00% 3869 (3) Hires: PWD: 4.88% - 33.33% PWTD: 1.95% - 33.33% 5440 (1) Hires: PWD: 0.00% - 0.00% PWTD: 0.00% - 0.00% The 0083, Police Officer occupation, limits the employment opportunities available for PWTD based upon OPM established medical requirements for the position. Therefore, we would expect the hire of PWTD to be zero and do not consider it to be a trigger. We also noted a trigger when comparing the qualified applicant flow data with the hires for PWTD in occupations 2210 and 3414 and PWD in 3414. The occupations had limited hiring and there was not enough hires to determine if there is an actual trigger. With limited hiring there cannot be a realistic expectation that all groups (PWD and PWTD) would be hired at rates comparable to their qualification rates.

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

There were no “internal only” job announcements. However, existing Mint employees applied to external vacancy announcement and were deemed qualified and promoted. (Status announcements)

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

There were no “internal only” job announcements. However, existing Mint employees applied to external vacancy announcement and were deemed qualified and promoted. (Status announcements)

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

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

**A. ADVANCEMENT PROGRAM PLAN**

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

The United States Mint provides the following programs designed for development opportunities: Operator Certification Apprenticeship Program (OCAP) (San Francisco) OCAP ensures consistent and accurate training while strengthening the relationship between employee and supervisor through designed interaction. The training is structured and integrated to focus on developing Mint personnel to be competitive with the manufacturing industry as a whole. Those employees who complete the Program will receive a nationally recognized certificate of apprenticeship that can increase their competitiveness within the industry. Manufacturer Certification Apprenticeship Program (MCAP) (Philadelphia and Denver) MCAP is a competency-based training and development program that allows employees to acquire the experience, knowledge, and skills necessary to perform the varied duties directly related to the manufacturing of coins and dies at the Mint. In short, it’s cross-training. MCAP participants also receive a nationally recognized certificate, and the Program provides career growth and advancement opportunities

**B. CAREER DEVELOPMENT OPPORTUNITES**

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

The Mint does not have a formal Career Development program; however, the MCAP and OCAP programs are available to PWD and PWTD.

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

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

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

a. Applicants (PWD) Answer No

b. Selections (PWD) Answer No

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 No
- b. Selections (PWTD) Answer No

The Mint does not have a formal career development program

**C. AWARDS**

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

- a. Awards, Bonuses, & Incentives (PWD) Answer No
- b. Awards, Bonuses, & Incentives (PWTD) Answer No

The inclusion rate for PWTD (0.00%) fell below the inclusion rate for employees with no disability (0.09%) for Time Off Hours 11 – 20 hours. We noted a slight difference (0.09%) but this difference is not significant enough to be considered a trigger at this time. The inclusion rate for PWTD (0.00%) fell below the inclusion rate for employees with no disability (0.43%) for Time Off Hours 31 – 40 hours. We noted a slight difference (0.43%) but this difference is not significant enough to be considered a trigger at this time. The inclusion rate for PWD (59.61%) fell below the inclusion rate for employees with no disability (74.36%) for Cash awards \$500 and under. The inclusion rate for PWD (13.36%)/PWTD (14.04%) fell below the inclusion rate for employees with no disability (18.31%) for Cash awards \$501 – \$999. The inclusion rate for PWD (21.82%)/PWTD (21.05%) fell below the inclusion rate for employees with no disability (22.83%) for Cash awards \$1,000 – \$1,999. The inclusion rate for PWD (9.45%)/PWTD (5.26%) fell below the inclusion rate for employees with no disability (9.97%) for Cash awards \$2,000 - \$2,999. The inclusion rate for PWD (0.00%)/PWTD (0.00%) fell below the inclusion rate for employees with no disability (0.17%) for Cash awards \$3,000 – \$3,999. \* The inclusion rate for PWD (0.00%)/PWTD (0.00%) fell below the inclusion rate for employees with no disability (0.17%) for Cash awards \$4,000 - \$4,999. \* The inclusion rate for PWD (0.33%)/PWTD (0.00%) fell below the inclusion rate for employees with no disability (0.26%) for Cash awards \$5,000 or higher. \* \*While we did note triggers for these cash award categories, further review showed there is no disparity because there are too few number of awards for any statistical analysis.

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

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

- a. Pay Increases (PWD) Answer Yes
- b. Pay Increases (PWTD) Answer Yes

The inclusion rate for PWD (1.30%)/PWTD (0.00%) fell below the inclusion rate for employees with no disability (2.13%) for Quality Step Increases.

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

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## 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	No

d. Grade GS-13

i. Qualified Internal Applicants (PWD)	Answer	No
ii. Internal Selections (PWD)	Answer	No

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

a. SES

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

There were no “internal only” job announcements. However, existing Mint employees applied to external vacancy announcement and were deemed qualified and promoted. (Status announcements)

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

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

SES PWD: 4.55% - 0.00% GS-15 – PWD: 0.00% - 0.00% GS-14 – PWD: 5.03% - 6.25% GS-13 – PWD: 6.23% - 0.00% We noted triggers for PWD in SES and GS-13 grade levels. There were not enough hires to determine if there is an actual trigger at the SES level. With limited hiring in the SES levels there cannot be a realistic expectation that PWD would be hired at rates comparable to their qualification rates.

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

Qualified Applicants/Hires SES PWTD: 2.27% - 0.00% GS-15 – PWTD: 0.00% - 0.00% GS-14 – PWTD: 2.35% - 6.25% GS-13 – PWTD: 2.72% - 0.00% We noted triggers for PWD in SES and GS-13 grade levels. There were not enough hires to determine if there is an actual trigger at the SES level. With limited hiring in the SES levels there cannot be a realistic expectation that PWD would be hired at rates comparable to their qualification rates.

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

- a. Executives
  - i. Qualified Internal Applicants (PWD) Answer No

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

There were no “internal only” job announcements. However, existing Mint employees applied to external vacancy announcement and were deemed qualified and promoted. (Status announcements)

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 No
  - ii. Internal Selections (PWTd) Answer No
- c. Supervisors
  - i. Qualified Internal Applicants (PWTd) Answer No
  - ii. Internal Selections (PWTd) Answer No

There were no “internal only” job announcements. However, existing Mint employees applied to external vacancy announcement and were deemed qualified and promoted. (Status announcements)

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: 6.78% - 0.00% Managers - PWD: 3.96% - 8.33% Supervisors- PWD: 0.00% - 0.00% There were not enough hires to determine if there is an actual trigger at the Executive level. With limited hiring in the Executive levels there cannot be a realistic expectation that PWD would be hired at rates comparable to their qualification rates.

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: 1.69% - 0.00% Managers - PWTD: 2.97% - 8.33% Supervisors-PWTD: 0.00% - 0.00% There were not enough hires to determine if there is an actual trigger at the Executive level. With limited hiring in the Executive levels there cannot be a realistic expectation that PWD would be hired at rates comparable to their qualification rates.

## 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

In FY 2018, the Mint had zero Schedule A employees eligible for conversion to competitive service appointments

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 Yes

The inclusion rate for PWD (5.71%) exceeds the rate of persons with no disability (3.76%) 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 No
- b. Involuntary Separations (PWTD) Answer Yes

The inclusion rate for PWTD (12.5%) exceeded the rate of persons with no disability (3.76%) for involuntary 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.

When evaluating all separations (170) we noted that 97 were due to retirement, 38 were transfers, 26 were resignations, six were removals, two were due to death and one was a termination. The Mint does not consider separations due to retirement a trigger. The Mint analyzed the exit survey data and did not identify any possible triggers for separation rates. During the period of October 1, 2017 through September 30, 2018, of the 170 people that separated 46 people responded. Of these 46 people, six were from PWD. The overall responses from PWD were similar to the overall permanent employee responses in that 33.33% (2) had 13-25 years of service and 60% (3) were age 60 and older. Of the respondents with disabilities, 100% (6) were veterans and the most frequently cited reason for separation of PWD was retirement (50% or 3).

## 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.usmint.gov/about/careers/eeo/reasonable-accommodations>

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.usmint.gov/policies/accessibility/architectural-barriers-act>

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

The Mint continues to improve accessibility at its facilities to include the following projects: • Updating round knobs to door handles with newer models designed for individuals with limited hand strength and adjusting spring rates lower to insure ease of opening and that doors to not close too quickly (Denver) • Installed two automatic door openers to assist with PWD/PWTD accessing different offices (Denver) • Undergoing an improvement project to our Passenger Elevator (San Francisco)

## 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.)

Each facility is responsible for independently processing their request for reasonable accommodations. See below: Average days of processing: Headquarters/Fort Knox: 12 Philadelphia: 5 Denver: 10 San Francisco: 5 West Point: 0 (no requests received) Overall average of 8 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 Mint has an effective Disability Program supported by Treasury and Mint policies, procedures and practices, as shown by the timely processing of reasonable accommodations requests.

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

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

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

The Mint adopted the Treasury PAS policy and procedures during FY 2018. The PAS policy statement is posted on the internal and external websites. There have been no requests for PAS in the reporting period. The Mint plans to start conducting information sessions on PAS during the FY 2019 fiscal year.

## **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 Yes

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

N/A

### **B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION**

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

Answer No

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

Answer 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.

N/A

## Section VIII: Identification and Removal of Barriers

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

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

Answer No

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

Answer No

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>PWD new hires to the SES grade level were not hired at rates comparable to their qualification rates. PWTD new hires at the GS-14 grade level were not hired at rates comparable to their qualification rates.</p>
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>

<p><b>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 inclusion rate for PWD and PWTD exceeded the inclusion rate for PWND for voluntary separations.</p>
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>

<p><b>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 inclusion rate for PWD/PWTD fell below the inclusion rate for persons with no disability (PWND) for awards of \$501 - \$999, \$1,000 - \$1,999, \$3,000 - \$3,999 and \$4,000 - \$4,999; and the inclusion rate for PWD/PWTD fell below the inclusion rate for persons with no disability for Quality Step Increases.</p>
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>

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

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

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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.

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