

## MD-715 – Part J

### Special Program 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 plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

#### Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 C.F.R. § 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) Yes  No
  - b. Cluster GS-11 to SES (PWD) Yes  No

The percentage of PWD in the GS-11 to SES cluster was 9.92% in FY 2019, which fell below the goal of 12%.

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) Yes  No
  - b. Cluster GS-11 to SES (PWTD) Yes  No

The percentage of PWTD in the GS-11 to SES cluster was 1.40% in FY 2019, which fell below the goal of 2%.

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

The numerical goals and additional information about the Disability Program and resources are available on the Office of Diversity and Inclusion (ODI) Web page.

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**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.

Yes       No

VA currently has one staff member to oversee all aspects of the National Disability Program with the exception of oversight of the National Reasonable Accommodation Program and Section 508 compliance. VA is in the process of adding staff members in addition to the requested detailees to assist in supporting the needs associated with the Disability Program to meet workforce and policy demands.

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 applications from PWD and PWTD	1	0	400	Roberto Rojo, National Disability Program Manager
Answering questions from the public about hiring authorities that take disability into account	1	0	400	Roberto Rojo, National Disability Program Manager
Processing reasonable accommodation requests from applicants and employees	1	0	400	André M. Sutton, Chief of Reasonable Accommodation, Office of Resolution Management, <a href="mailto:Andree.Sutton@va.gov">Andree.Sutton@va.gov</a>
Section 508 Compliance	25	0	0	Pat Sheehan, Director, VA Section 508 Office,

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				Office of Information and Technology, <a href="mailto:Pat.Sheehan@va.gov">Pat.Sheehan@va.gov</a>
Architectural Barriers Act Compliance	1	0	10	Roberto Rojo, National Disability Program Manager
Special Emphasis Program for PWD and PWTD	1	0	300	Roberto Rojo, National Disability Program Manager

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.

Yes  No

In FY 2019, the National Disability Program Manager received training by the (1.) Multi-agency Task Force on Increasing Employment Opportunities for People with Disabilities; (2.) Office of Personnel Management, USA Staffing Resource Center, Reports and Analytics, Talent Acquisition System for Federal Agencies, Applicant Flow Data Staffing Reports; (3.) Employment Learning Innovations, Civil Treatment Workplace, Civil Treatment for Leaders, and Civil Treatment for Employees, Human Resources (HR) Certification received for 20 HR General Credit Hours by the HR Certification Institute. Additionally, the Chief of Reasonable Accommodation also attended training by NELI focused on disability law in the area of reasonable accommodations. (I cannot confirm training attended by the Chief of Reasonable Accommodation.)

**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.

Yes  No

Currently, there are no plans to ensure sufficient funding for the disability program.

**Section III: 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.

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**A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES**

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

VA works regularly with Veterans, to include disabled Veterans, through the Vocational Rehabilitation and Employment (VR&E) Program and through the Veterans Employment Service Office (VESO), to assist Veterans with seeking employment. VR&E also assists Disabled Veterans with job-related training that may assist them with building skills to assist with employment. VESO works with 9 assigned coordinators who work with Veterans with disabilities, to include those with targeted disabilities, to support them with seeking employment, and provide services such as assistance with resume writing and resume review. Additionally, there is a National Selective Placement Program (SPP) Manager, Administration-level SPP Managers, and SPP Coordinators (SPPC) at every VA facility who assist PWD and PWTD with employment opportunities using the Schedule A hiring authority.

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.

SPPC and Managers have increased awareness of the Schedule A hiring authority through marketing. Standard training for VA SPPCs is being further developed.

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority and (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

The SPPC receives the individual's resume and schedule A letter and reviews it to ensure eligibility. Once confirmed, the SPPC forwards the resume to the hiring manager of an open, vacant position for consideration and advises the hiring manager of the benefits of using this non-competitive hiring authority.

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If "yes", describe the type(s) of training and frequency. If "no", describe the agency's plan to provide this training.

Yes  No  N/A

The SPPC training, currently in development, will be offered to VA hiring managers to ensure VA HR content/context is unilaterally processed.

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**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.

VA places the onus on each facility to ensure they are partnering with and marketing employment opportunities to external organizations such as state and local Disability Committees, Commissions, Department of Labor, and organizations as well as the disability offices at local colleges and universities.

At the Department-level, VA is pursuing establishing memoranda of understanding with local universities that have a high student population of PWD and PWTD. Once the policy document on Section 504 is published, VA will establish a stakeholders group, which will include several disability and disabled Veterans affinity group leadership.

**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)  | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| b. New Hires for Permanent Workforce (PWTD) | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

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)  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |
| b. New Hires for MCO (PWTD) | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | N/A <input type="checkbox"/> |

As compared to the benchmark, triggers exist for PWD in the Medical Officer occupation.

For PWTD, triggers exist in the Psychology, Human Resources Management, Medical Officer, Nurse, Practical Nurse, Physical Therapist, Medical Technologist, and Pharmacist occupations.

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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)                      Yes     No     N/A
- b. Qualified Applicants for MCO (PWTD)                      Yes     No     N/A

As compared to the benchmark, triggers exist for PWD in the Psychology, Human Resources Management, Medical Officer, Physician’s Assistant, Nurse, Practical Nurse, Occupational Therapist, Physical Therapist, Medical Technologist, Pharmacist, Veterans Claims Examining, Contracting, Information Technology Management, and Cemetery Caretaking occupations.

For PWTD, triggers exist in the Medical Officer occupation.

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)                                      Yes     No     N/A
- b. Promotions for MCO (PWTD)                                      Yes     No     N/A

As compared to the benchmark, triggers exist for PWD in the Medical Officer occupation.

For PWTD, triggers exist in the Psychology, Human Resources Management, Medical Officer, Nurse, Practical Nurse, Occupational Therapist, Physical Therapist, Medical Technologist, Pharmacist, Veterans Claims Examining, Information Technology Management, Cemetery Caretaking occupations.

## Section IV: 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.

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Through the re-establishment of the Diversity and Inclusion in VA Disability Committee, plans are underway to change the dialogue regarding the benefits of employing and promoting PWD and PWTD. In addition, an internal policy document is being created to ensure managers and supervisors understand how they can better utilize available tools to encourage participation in opportunities for career development and promotion. VA designated learning officers at most VA facilities to assist VA staff in identifying career development and training resources and opportunities. Program announcements for advancement opportunities or development will contain language, to include PWD and PWTD.

**B. CAREER DEVELOPMENT OPPORTUNITIES**

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

VA has numerous formal career and leadership development programs available for all employees. In addition, the VA Acquisition Academy offers training opportunities that lead to certifications in Federal Acquisition processes that employees can use to seek further career advancement.

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	N/A	227	N/A	47.00%	N/A	6.17%
Fellowship Programs	N/A	46	N/A	41.00%	N/A	0.00%
Mentoring Programs	N/A	N/A	N/A	N/A	N/A	N/A
Coaching Programs	N/A	N/A	N/A	N/A	N/A	N/A
Training Programs	N/A	327	N/A	28.00%	N/A	0.30%
Detail Programs	N/A	N/A	N/A	N/A	N/A	N/A
Other Career Development Programs	402	39	20.15%	5.00%	0.49%	0.00%

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)                      Yes                       No                       N/A

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b. Selections (PWD)                      Yes                       No                       N/A

VA is working to collect this data enterprise-wide.

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)                      Yes                       No                       N/A   
b. Selections (PWTD)                      Yes                       No                       N/A

VA is working to collect this data enterprise-wide.

**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)                      Yes                       No   
b. Awards, Bonuses, & Incentives (PWTD)                      Yes                       No

In FY 2019, VA identified triggers involving the percentage of PWD who received time-off awards (11 - 20 hours, and 21 – 30 hours) and cash awards (\$501 - \$999, \$1,000 - \$1,999, \$2,000 - \$2,999, \$3,000 - \$3,999, \$4,000 - \$4,999, and \$5,000 or more).

Also, VA identified triggers involving the percentage of PWTD who received time-off awards (11 -20 hours, 21 – 30 hours, and 31 – 40 hours) and cash awards (\$501 - \$999, \$1,000 - \$1,999, \$2,000 - \$2,999, \$3,000 - \$3,999, and \$5,000 or more).

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)                      Yes                       No   
b. Pay Increases (PWTD)                      Yes                       No

In FY 2019, VA identified a trigger involving the percentage of PWD who received performance-based increases. Also, VA identified triggers involving the percentage of PWTD who received quality step increases and performance-based increases.

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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)    Yes     No     N/A
- b. Other Types of Recognition (PWTD)    Yes     No     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)    Yes     No     N/A
- ii. Internal Selections (PWD)    Yes     No     N/A

b. Grade GS-15

- i. Qualified Internal Applicants (PWD)    Yes     No     N/A
- ii. Internal Selections (PWD)    Yes     No     N/A

c. Grade GS-14

- i. Qualified Internal Applicants (PWD)    Yes     No     N/A
- ii. Internal Selections (PWD)    Yes     No     N/A

d. Grade GS-13

- i. Qualified Internal Applicants (PWD)    Yes     No     N/A
- ii. Internal Selections (PWD)    Yes     No     N/A

In FY 2019, the percentage of PWD among the qualified internal applicants for grades GS-15, 14, and 13 fell below the benchmark. Also, the percentage of PWD among the selectees for promotion at grades GS-15 and 14 fell below the benchmark.

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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)    Yes     No     N/A
    - ii. Internal Selections (PWTD)            Yes     No     N/A
  - b. Grade GS-15
    - i. Qualified Internal Applicants (PWTD)    Yes     No     N/A
    - ii. Internal Selections (PWTD)            Yes     No     N/A
  - c. Grade GS-14
    - i. Qualified Internal Applicants (PWTD)    Yes     No     N/A
    - ii. Internal Selections (PWTD)            Yes     No     N/A
  - d. Grade GS-13
    - i. Qualified Internal Applicants (PWTD)    Yes     No     N/A
    - ii. Internal Selections (PWTD)            Yes     No     N/A

In FY 2019, the percentage of PWTD among the selectees for promotion at SES and grades GS-15, 14, and 13 fell below the benchmark.
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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)            Yes     No     N/A
  - b. New Hires to GS-15(PWD)        Yes     No     N/A
  - c. New Hires to GS-14 (PWD)        Yes     No     N/A
  - d. New Hires to GS-13(PWD)        Yes     No     N/A

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In FY 2019, the percentage of PWD among the new hires at SES and grade GS-15 fell below the benchmark.

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)   | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/>            | N/A <input type="checkbox"/> |
| b. New Hires to GS-15 (PWTD) | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/>            | N/A <input type="checkbox"/> |
| c. New Hires to GS-14 (PWTD) | Yes <input type="checkbox"/>            | No <input checked="" type="checkbox"/> | N/A <input type="checkbox"/> |
| d. New Hires to GS-13 (PWTD) | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/>            | N/A <input type="checkbox"/> |

In FY 2019, the percentage of PWTD among the new hires at SES and grade GS-15 and 14 fell below the benchmark.

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) | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| ii. Internal Selections (PWD)          | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| b. Managers                            |                              |                             |   |
| i. Qualified Internal Applicants (PWD) | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| ii. Internal Selections (PWD)          | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| c. Supervisors                         |                              |                             |   |
| i. Qualified Internal Applicants (PWD) | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |
| ii. Internal Selections (PWD)          | Yes <input type="checkbox"/> | No <input type="checkbox"/> | N/A <input checked="" type="checkbox"/> |

OPM’s USA-Staffing applicant flow system currently does not provide the necessary information.

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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)    Yes     No     N/A

ii. Internal Selections (PWTD)            Yes     No     N/A

b. Managers

i. Qualified Internal Applicants (PWTD)    Yes     No     N/A

ii. Internal Selections (PWTD)            Yes     No     N/A

c. Supervisors

i. Qualified Internal Applicants (PWTD)    Yes     No     N/A

ii. Internal Selections (PWTD)            Yes     No     N/A

OPM's USA-Staffing applicant flow system currently does not provide the necessary information.

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)            Yes     No     N/A

b. New Hires for Managers (PWD)            Yes     No     N/A

c. New Hires for Supervisors (PWD)            Yes     No     N/A

OPM's USA-Staffing applicant flow system currently does not provide the necessary information.

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.

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- a. New Hires for Executives (PWTD)      Yes     No     N/A
- b. New Hires for Managers (PWTD)      Yes     No     N/A
- c. New Hires for Supervisors (PWTD)    Yes     No     N/A

OPM's USA-Staffing applicant flow system currently does not provide the necessary information.

## Section V: 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.

Yes       No       N/A

VA was unable to verify if all eligible Schedule A employees with a disability were converted into the competitive service after two years of satisfactory service.

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

- a. Voluntary Separations (PWD)      Yes       No
- b. Involuntary Separations (PWD)      Yes       No

In FY 2019, triggers exist for PWD (12.50%) who voluntarily separated from VA, as compared to the rate of persons without disabilities (9.22%) and for PWD (2.04%) who involuntarily separated from VA, as compared to the rate of persons without disabilities (0.90%).

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)      Yes       No

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b. Involuntary Separations (PWTD) Yes  No

In FY 2019, triggers exist for PWTD (13.83%) who voluntarily separated from VA, as compared to the rate of persons without targeted disabilities (9.68%) and for PWTD (2.94%) who involuntarily separated from VA, as compared to the rate of persons without targeted disabilities (1.06%).

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*.

In FY 2019, the top three most important reasons PWD voluntarily left VA was due to personal health issues, unethical behavior on the part of leadership or the organization, and opportunity for advancement.

The top three most important reasons PWTD voluntarily left VA was due to personal health issues, personal/family matters such as caring for a parent or a child, poor working relationship with supervisor or co-worker(s) (tied for second), and unethical behavior on the part of leadership or the organization.

## **B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES**

Pursuant to 29 C.F.R. § 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.

The VA Secretary's EEO, Diversity and Inclusion, No FEAR, and Whistleblower Rights and Protection Policy Statement, most recently signed on August 27, 2018, contains employee and applicant rights under all Sections of the Rehabilitation Act, to include section 508 and can be found at <https://www.diversity.va.gov/policy/statement.aspx>. Additional information can be found at the VA Section 508 Office Website at <https://www.section508.va.gov/index.asp>.

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.

Currently, VA does not have a link explaining employees' and applicants' rights under the Architectural Barriers Act. However, we are working to correct this.

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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.

VA's final updated internal RA policy is currently moving through the approval process. VA's current RA policy is still active, meeting the requirement of the Rehabilitation Act of 1973. VA is working to expand oversight of section 504 and implement policy to ensure access by the public to VA activities, services, and benefits. Also, the Diversity and Inclusion at VA Council Disability Committee is working to create internal policy for selective placement, to include Schedule A. In addition, the Section 508 Office has increased to more than twice its size since FY 2017 to ensure electronic accessibility of internal systems and electronic documents.

### **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.)

VA is unable to determine the average time frame for processing initial requests for reasonable accommodations. VA is developing a RA tracking system to monitor timeliness of requests. This system is expected to be operational in FY 2020.

RA must be processed within 30 calendar days for employees and 10 calendar days for processing applications according to the current VA Handbook 5975.1, dated Nov 2013.

The handbook will be revised in FY 2020 and the timeframe will shift to 30 business days for employee's RA and PAS requests and 10 business days for applicants RA requests. PAS is not afforded during the applicant phase.

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.

During this reporting period the VA has implemented a RA and PAS Clinic process. The RA/PAS clinics afford managers and reasonable accommodation coordinators to discuss complex cases with the agency dedicated subject matter expert. This proactive approach and supportive measure have improved the relationship with management and employees and minimized risks to the Department related to timeliness and effective accommodations.

The VA has conducted over 125 supervisor and manager RA/PAS training sessions. In FY 2019, more than 4,800 supervisors and managers were trained in both in person and webinar formats.

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

Pursuant to 29 C.F.R. § 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 this reporting period the VA has implemented a RA and PAS Clinic process. The RA/PAS clinics afford managers and reasonable accommodation coordinators to discuss complex cases with the agency dedicated subject matter expert. This proactive approach and supportive measure have improved the relationship with management and employees and minimized risks to the Department related to timeliness and effective accommodations.

The VA has conducted over 220 live training sessions related to RA and PAS during this timeframe.

**Section VI: 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 government-wide average?  
Yes  No  N/A
2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?  
Yes  No  N/A
3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

In FY 2019, there is 36.6% PWD who filed complaints at the VA.  
Training for all individuals involved;  
Consideration of disciplinary action for involved management officials;  
Make-whole relief for the complainant;  
Posting a notice of the violation;  
Payment of attorney fees (if represented)

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**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?

Yes  No  N/A

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

Yes  No  N/A

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

In FY 2019, 35% of PWD alleged failure to provide a reasonable accommodation at the VA. The VA had 967 total disability cases and 339 disability RA cases.

Providing a reasonable accommodation to the complainant

Training for all individuals involved;

Consideration of disciplinary action for involved management officials;

Make-whole relief for the complainant;

Posting a notice of the violation;

Payment of attorney fees (if represented)

**Section VII: 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?

Yes  No

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

Yes  No  N/A

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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.

<b>Trigger 1</b>	The less than expected participation rate of people with disabilities in the GS-11 to SES (9.92%) grade level cluster, as compared to the goal of 12%.	
<b>Barrier(s)</b>	The specific policy, procedure, or practice causing the less than expected participation rates for people with disabilities is currently not known. Further analysis is needed.	
<b>Objective(s)</b>	Resurvey the workforce regarding their disability status. Complete a barrier analysis to identify the specific policy, procedure, or practice that could be causing the trigger.	
<b>Responsible Official(s)</b>		<b>Performance Standards Address the Plan?</b> (Yes or No)
Karen M. Basnight, Director of Outreach and Retention		No
Joseph Thele, Associate Deputy Assistant Secretary for Human Resources Systems and Analytics		No
Ryan Pugh, Management and Program Analyst		Yes
<b>Barrier Analysis Process Completed?</b> (Yes or No)		<b>Barrier(s) Identified?</b> (Yes or No)
No		No
<b>Sources of Data</b>	<b>Sources Reviewed?</b> (Yes or No)	<b>Identify Information Collected</b>
Workforce Data Tables	No	
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	No	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	

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Other (Please Describe)		Yes	In FY 2019, the percentage of PWD in the GS-1 to 10 grade cluster was 17.75%. While the percentage of PWD in the GS-11 to SES cluster was 9.92%, which fell below the goal of 12%.		
<b>Target Date</b> (mm/dd/yyyy)	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding</b> (Yes or No)	<b>Modified Date</b> (mm/dd/yyyy)	<b>Completion Date</b> (mm/dd/yyyy)	
10/01/2020	Develop an electronic self-reporting tool for employees to verify and change their race, ethnicity, gender, and disability status that functions within HR Smart.	Yes			
03/31/2021	Implement the self-reporting tool.	Yes			
11/02/2020	Establish a barrier analysis working group.	Yes			
06/30/2021	Conduct a thorough investigation of relevant policies, procedures, and practices to determine the cause of the less than expected participation rates.	No			
09/30/2021	Devise a plan to eliminate the identified barrier.	Yes			
<b>Fiscal Year</b>	<b>Accomplishments</b>				

<b>Trigger 2</b>	The less than expected participation rate of people with targeted disabilities in the GS-11 to SES (1.40%) grade level cluster, as compared to the goal of 2%.	
<b>Barrier(s)</b>	The specific policy, procedure, or practice causing the less than expected participation rates for people with targeted disabilities is currently not known. Further analysis is needed.	
<b>Objective(s)</b>	Resurvey the workforce regarding their disability status. Complete a barrier analysis to identify the specific policy, procedure, or practice that could be causing the trigger.	
<b>Responsible Official(s)</b>		<b>Performance Standards Address the Plan?</b> (Yes or No)
Karen M. Basnight, Director of Outreach and Retention		No

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Joseph Thele, Associate Deputy Assistant Secretary for Human Resources Systems and Analytics		No		
Ryan Pugh, Management and Program Analyst		Yes		
<b>Barrier Analysis Process Completed?</b> (Yes or No)		<b>Barrier(s) Identified?</b> (Yes or No)		
No		No		
<b>Sources of Data</b>	<b>Sources Reviewed?</b> (Yes or No)	<b>Identify Information Collected</b>		
Workforce Data Tables	No			
Complaint Data (Trends)	No			
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	No			
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	Yes	In FY 2019, the percentage of PWTD in the GS-1 to 10 grade cluster was 3.72%. While the percentage of PWTD in the GS-11 to SES cluster was 1.40%, which fell below the goal of 2%.		
<b>Target Date</b> (mm/dd/yyyy)	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding</b> (Yes or No)	<b>Modified Date</b> (mm/dd/yyyy)	<b>Completion Date</b> (mm/dd/yyyy)
10/01/2020	Develop an electronic self-reporting tool for employees to verify and change their race, ethnicity, gender, and disability status that functions within HR Smart.	Yes		
03/31/2021	Implement the self-reporting tool.	Yes		
11/02/2020	Establish a barrier analysis working group.	Yes		

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06/30/2021	Conduct a thorough investigation of relevant policies, procedures, and practices to determine the cause of the less than expected participation rates.	No		
09/30/2021	Devise a plan to eliminate the identified barrier.	Yes		
<b>Fiscal Year</b>	<b>Accomplishments</b>			

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

N/A

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

N/A

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.

N/A