

# Transcript of the Federal Exchange on Employment and Disability (FEED) Meeting

---

February 9, 2022

1:00-3:00 p.m. ET

[Michelle Alvord provides information about using the Zoom platform].

**AKINYEMI BANJO:** Thank you, Michelle, for that housekeeping information. Good afternoon again to all our participants. My name is Akinyemi Banjo, and I'm one of the members of the team that manages FEED. Our last meeting was in September 2021, so this is our first FEED meeting in 2022. And we're glad you've joined us today. We'll be talking about implementing [Executive Order \(EO\) 14035](#), how to build accessibility into our respective agency plans and the resources to help us do that. But first, it's my pleasure to introduce the Assistant Secretary of Labor for Disability Employment Policy, Taryn Williams, for some welcoming remarks.

**ASSISTANT SECRETARY WILLIAMS:** Good afternoon, and thank you for joining today's meeting. My name is Taryn Williams, and I serve as the Assistant Secretary of Labor for Disability Employment Policy at the U.S. Department of Labor. I head the Department's Office of Disability Employment Policy, or ODEP, as we call it for short. ODEP's mission is to increase employment opportunities for people with disabilities. We do this by providing leadership, coordination and expertise within the Department of Labor, across federal agencies, at all levels of government and among key stakeholders. So, collaborating with our federal colleagues through FEED is essential to our work.

Under this administration, our four priorities are: ensuring an inclusive recovery from the pandemic, promoting equity, advancing competitive integrated employment, and helping youth and young adults with disabilities transition into employment. These priorities reflect the historic executive order signed by the President to advance equity.

One of these is the Executive Order on Diversity, Equity, Inclusion and Accessibility (DEIA) in the Federal Workforce, which was issued in June 2021. Together with our agency partners, we're working to educate and engage federal agencies on this potentially transformative executive order. As the nation's largest employer, the federal workforce must be a leader and exemplar in DEIA.

We know that meeting this mandate requires all of us, public servants at all levels of every agency, to be proactive in advancing DEIA in the federal workforce. The fact that so many agencies are represented here today shows a commitment to DEIA, and ODEP is eager to support you in this work. We can all benefit from your collective energy.

Accessibility is a key aspect of the DEIA Executive Order and its emphasis on access for all, including people with disabilities. To this day, accessibility is often a major barrier to the hiring and long-term workplace success of people with disabilities, including in the federal workforce. This executive order presents an opportunity to turn a barrier into an accelerator. That is, if we start with accessibility from the outset, whether in recruitment, training, leadership opportunities and more, it can be part of the foundation for a diverse, inclusive, equitable federal workforce. Without accessibility and inclusion of people with disabilities, we cannot fully achieve diversity, equity and inclusion. This includes ensuring

that people with disabilities can independently access every outward facing and internal activity or electronic spaces across agencies. And this includes that we adopt best practices, such as universal design.

In the discussion today, we'll talk about how to build your agency's accessibility roadmap and the resources available to support you. In closing, I want to thank our partners from EEOC, OPM, GSA, OMB and everyone else for having me here today and for joining us for this conversation. FEED is a great and longstanding community of practice that will continue to support you all in this work. We should aim high. We should challenge the status quo and make the most of this administration's historic commitment to equity.

I also want to thank Lou Orslene and Akinyemi Banjo on ODEP's Employer Team for their expertise and the energy that they bring to this work. I look forward to their continued leadership and to our continued collaboration as we all work together to build a truly inclusive federal workforce. Thank you.

**AKINYEMI BANJO:** Thank you so much, Assistant Secretary Williams, for taking time out of your busy schedule to be with us today. The first segment in today's discussion is an overview of the [Government-wide Strategic Plan to Advance Diversity, Equity, Inclusion and Accessibility \(DEIA\) in the Federal Workforce](#). And leading us in this segment is Dexter Brooks, the Associate Director for Federal Sector Programs in the Office of Federal Operations at the Equal Employment Opportunity Commission (EEOC).

**DEXTER BROOKS:** It's a pleasure to be with colleagues today and with the FEED membership. I just want to start off by thanking, like Taryn said, the interagency partnership, in particular the Office of Disability Employment Policy, for their continuing leadership. Working with Lou, Akinyemi and the team from Cornell has been extremely fruitful for all of us in the Federal Government, and their constant pursuit for ways to improve opportunities has been inspiring and has been something that's been a huge value added for the Equal Employment Opportunity Commission.

[Slide 2]. Just to go over today's agenda, first I'm going to be presenting an overview of the Government-wide Strategic Plan. This will be followed by my colleague Andrew Nielson from GSA. GSA has been doing some great work in terms of accessibility, so he'll be providing information on building your agency's accessibility roadmap and some resources to help. And then we're going to move to the Cornell team. Sarah von Schrader is going to talk about a survey identifying priorities that you participated in late last year/earlier this year, that really was a huge value added and will be leveraged in many different ways. So, she'll share information about that. Then Bobby Silverstein will be providing resources to supporting development of your DEIA strategies, and finally Lou Orslene will provide closing remarks.

[Slide 3]. I'll start off with a basic overview of the Government-wide Strategic Plan under Executive Order 14035. So, what we have on the screen is just some information about the diversity, equity, inclusion and accessibility Strategic Plan, we use the acronym DEIA. And there's a picture of the front cover of the Government-wide Strategic Plan that was published and presented to the community in November of last year. As you know, the executive order was issued in June of 2021. The Government-wide DEIA Strategic Plan lays out and provides leadership, technical assistance and guidance to federal agencies on ways to achieve the priorities laid out in the executive order.

Implementation of the executive order is a cross agency collaborative being led by the White House. The White House actually owns the leadership, it hasn't been delegated to other agencies, but they have

brought in other agencies to partner. So, the White House Domestic Policy Council leads the DEIA initiative. Reports and things of that nature go to the Office of Personnel Management (OPM) and the Office of Management and Budget (OMB). And there are several agencies that serve as the primary consultants, including EEOC, the Department of Labor and GSA. They are amongst the agencies that work in collaboration with the White House on this initiative.

This slide highlights the government-wide vision, and that is to advance diversity, equity, inclusion and accessibility throughout the workforce. The president has put out a broad vision of equity, and I think Taryn touched upon it earlier. And it started with the very first executive order President Biden signed, [Executive Order 13985](#) (Advancing Racial Equity and Support for Underserved Communities Through the Federal Government). President Biden asked each agency to take an equity assessment of how the Federal Government is delivering services to underserved communities.

So, the American population is a very diverse population. And as government agencies, we provide critical services to this population. The very first executive order under this administration was about how we assess our effectiveness in delivering service equitably. And it was a newer question, and I think that's something inherently we all thought we did, but it wasn't structured where agencies were asked consistent questions and had an opportunity to think about what we are doing to make sure what we put out in the system is equitable for everyone.

At EEOC, we introduced a new portal for complainants, for those who want to file charges with the EEOC utilizing technology. And so as a part of our equity assessment, we should be looking to see if there are any communities that have limited access to technology that may now have some struggles in terms of interacting with the services that we provide at EEOC.

That very first executive order of this administration, sometimes we call it the "Day One EO," is outward facing, asking "What can we do to ensure that underserved communities have full access to the benefits and privileges of our government services?" And then that was followed up with the executive order that we're talking about today, which is EO 14035.

In terms of the federal workforce, diversity is extremely important because if we have the diversity of our citizenship reflected in our workforce, then it's more likely that we won't miss underserved communities. We'll have that knowledge base to ensure that our services are reaching those folks. And we want the Federal Government to be a "model employer." So, that's two part--that's external and internal--but they work together, and agencies have to develop plans to address both the external and the internal.

Today we'll be talking about the internal portion of the EO. The mission statement, as it says here on the screen, it is that agencies work collaboratively to drive innovation, organizational outcomes and draw from the full diversity of our nation, as well as position the Federal Government as a Model Employer.

So, the "Day One EO" wanted agencies to look at and assess the services they're providing to Americans to make sure that no underserved communities are being left behind. And in combination with that, we have the internal executive order that we're talking about today to look at the workforce and make sure it's drawing from all populations to add to our collective knowledge so we can be that model employer.

The executive order implementation is being done in stages. So, it was passed in June. Agencies were then asked to submit documentation on promising practices that they were employing to advance

diversity, equity, inclusion and accessibility. And then after that, agencies were to submit a self-assessment of their current state of DEIA. In November, the Government-wide Strategic Plan for Advancing DEIA was released. As I mentioned, it offers a roadmap for implementing the executive order that lays out key steps agencies need to take to strengthen their DEIA policies, practices and procedures in order to improve culture.

[Slide 4]. The plan provides the vision and mission statement that we just went over. It also establishes five operating principles to advance and sustain DEIA within agencies, and I'll go over that in a couple of minutes. It also further outlines the DEIA priorities expressed in the executive order. And I'll go over the priorities as well, and it provides examples and a "maturity model" to support growth.

That was a real new value added to our effort, and OPM really took a strong lead in developing the maturity model. When you are doing the self-assessment and then evaluating where you are in terms of your DEIA efforts, the maturity model will help you answer key questions like, "Are you building a foundation?" That's level one. "Are you advancing outcomes?" That's level two. Level three is when your agency's DEIA plan is pretty much mature and you're sustaining and innovating. So it gives a framework for each agency to look at the different priorities to see where you lie in the maturity model to help you plan to advance to the next stage and then ultimately get to the most mature level. And that's all in the Government-wide Strategic Plan. And hopefully you've had a chance to read this and digest it.

The plan also outlines steps for creating a framework to address workplace harassment. There's a separate emphasis on workplace safety and harassment and looking at that from all contexts, including disability harassment. And then the plan explains the next steps for advancing DEIA.

So, that is the Government-wide Plan that was issued in November. And then in January, we provided agencies with a template for completing their agency strategic plans, because that's the next step in the process. The Government-wide Plan came out in November and agencies will now submit their DEIA strategic plan by March 23, 2022.

So, that's where we are now with agencies. Your agencies should be working on your internal strategic plan. One of the things that we want to make sure of today as part of this conversation and our ongoing efforts through the FEED membership is that you are raising your voice and can be a value-added to your agency as it's laying out its DEIA strategic priorities. And in particular, today we're going to be focused on accessibility, as accessibility is one of the primary areas in the EO.

[Slide 5]. On this slide is the definition of underserved communities. While we're in the framework of talking about accessibility and employees with disabilities, there is a broader definition of underserved community. So, we just wanted to make sure you can see how the executive order lays it out.

It's even broader than what we do at EEOC. At EEOC, we have statutes that give us statutory authority to look at discrimination and inequality based on certain criteria. And this is probably one of the most expansive definitions of underserved communities in the EO, and very meaningful. It includes people of color, individuals living in rural communities, first generation college students and professionals, immigrants, formerly incarcerated people, people with disabilities, LGBTQ+ individuals, individuals with limited language proficiency, older adults, and persons adversely impacted by persistent poverty or discrimination or inequality. This is a broad category that different groups that you may not have thought of would fall into – women, individuals facing religious discrimination, veterans and military

spouses, and also parents, caregivers and individuals facing pregnancy discrimination. So, this is the broad definition of underserved community.

Under prior administrations, sometimes we would have DEIA executive orders and then a separate one to talk about disability inclusion and disability hiring, and it gave the impression to some that DEI didn't include a disability analysis or accessibility analysis. Well, it wasn't true at that time and it's not true now. But just to make everything holistic, this executive order combines them all, and accessibility is one of the cornerstones. In the list of underserved communities, people with disability are there, and there's an even more enhanced view of accessibility in this executive order.

[Slide 6]. This slide lays out the priorities in the strategic plan that agencies will be addressing. They include safe workplaces, and that goes with the anti-harassment piece that I talked about earlier. The strategic plan laid out, and the executive order did as well, the need to elevate a Chief Diversity Officer to help synthesize all these efforts going on at the agency. This is supposed to be a whole agency approach. Sometimes in the past, you would have accessibility siloed. It would fall into the EEO program, or it would fall into Human Capital or another program if you had a separate diversity office. The vision with this is to have a position that's really looking across the agency. One of the reasons why I think in the past we've struggled with accessibility is because it doesn't fall neatly into one portion of the agency.

So, your EEO programs or your Human Capital may be doing reasonable accommodation and Schedule A hiring, but you also have portions of your agency, like IT, that's procuring software and systems for employees to use. You have your procurement staff that's providing requirements to contractors who are going to be providing technology services to your agency. And they all have to be vested in accessibility requirements. The idea behind a Chief Diversity Officer would not only be a person that can synthesize those internal needs of employees, but also, as we talked about earlier, the external piece of equity, looking at underserved communities receiving services. So, the idea is to have a Chief Diversity Officer that really could be the conduit for that "whole-of-agency" approach.

Data collection is one of the priorities because we want to ensure that decisions are made based on data, that we are making evidence-based decisions. And so we're really looking to make sure agencies are collecting the type of data needed to make informed decisions and also provide guidance on data that doesn't exist, that needs to be added to the collection to help agencies make informed decisions.

Partnerships and recruitment is a priority, and there's a big push for internships. One of the programs that ODEP and the Department of Labor leads, the [Workforce Recruitment Program](#) (WRP), is highlighted in the EO as a recruitment source to bring on federal employees and increase opportunities and diversity.

In addition to WRP, the administration is looking to limit the use of unpaid internships because that has an impact on equity. Not every college student can afford to come to Washington, DC to do an internship on their own dime during the summer months. Some of the cities where we're headquartered are very expensive and that requires additional resources, so someone from a disadvantaged socioeconomic background may not be able to participate in the opportunities that the government presents. So, we are looking at ways that we can do different things to allow greater participation in all aspects from recruitment to hiring, internship programs to improving opportunities for underserved communities.

Professional development and advancement is also a key data point that we found is missing in the federal sector. Some agencies track it, some don't. But who's getting the opportunities? Are the

population of employees with disabilities receiving developmental training, developmental assignments and opportunities for advancement? One of the things we'll be working on is trying to give agencies a clear framework on what we expect in terms of leadership development and how to track it, to see which populations have not had adequate opportunities to participate.

The last bullet on this side is about DEIA training and learning. There's been some controversy around DEIA training, and some of these things have become politically a hot topic. We want to lay out guidance for how to conduct DEIA training and learning so that it is more focused on outcome-based measures.

In the past, training may have been about awareness, where you're training someone about reasonable accommodation or about accessibility so that they understand it. But what we're looking at now is how do we set up a framework where when you're offering training, it has a tie to some impact or outcome that your organization is seeking? So, if you're going to do accessibility training, are you doing it for folks that are in procurement and giving them periodic reminders that before you complete a procurement contract, you need to make sure you've laid out all the accessibility requirements? Or if a manager is going through a hiring process, and the agency has concerns about implicit bias and things of that nature, how to make sure that there's some real time training, maybe a 10-minute session, before a selection panel takes place. These are some of the things that can impact the way we review candidates that can limit opportunity. So, we're really trying to explore how to do DEIA training that are outcome focused.

There's also a separate piece of the executive order and the Government-wide Strategic plan that's focused on advancing equities for employees with disabilities. And that's going to be part of the discussion from our colleagues from GSA and ODEP.

There is also a part on advancing equity for LGBTQ+ employees as a population. There's some strategies there to deal with data collection, benefits and things of that nature.

Continuing on, we're going to be looking at pay equality and pay equity. It's been a priority for the Federal Government for many years. The Federal Government has done better than other segments, but still has room for growth, so we're going to be looking at different initiatives there. In particular, right now there's a lot of talk around initial pay setting. How are those determinations made and are they equitable?

And then finally, we're looking at expanding opportunities for formerly incarcerated individuals. And there have been different initiatives there and OPM has been taking the lead on looking for ways to expand those opportunities. So, those are the priorities of EO and Government-wide Strategic Plan.

[Slide 7]. On this next slide are the five operating principles that I had mentioned at the beginning of the presentation. And the first one is, "use data and evidence-based decision-making." So we want decisions to be informed. Now, that means it takes more time. When we get professional development data in an organized manner, we can look at that data and see if the population of employees with disabilities are not participating in professional development. And that doesn't mean we just start forcing people to take training. What we'll do is ask "Why?" Why are folks not participating? What's the selection process? What are the criteria we use and is it fair and accurate? That means you have to break it down and use the data to make evidence-based decisions to change policies, practices and culture, not just jump to a conclusion, but really try to find the root cause and fix it, similar to what we do at EEOC under our Management Directive (MD) 715.

The second operating principle is focused on continuous improvement. And that's where the maturity model comes in, so that agencies can assess where they are and are always moving to the next level. Even if you've reached the third level of the maturity model, then you should be providing innovation and ideas for other agencies. So, when you meet that third level of the maturity model, there's still room for continuous improvement.

The third operating principle is to adopt a collective whole-of-agency mandate with partnership engagement. And I know I touched on this a little earlier, but this really involves all aspects of the agency, human capital, finance, IT, civil rights, EEO, etc. This is not just something that lies within one stovepipe of that organization, but rather is integrated across the organization, and everyone shares responsibility.

And that leads to the fourth principle, which is prioritizing accountability and sustainability, making sure that as we are developing our agency-wide strategic plans and individual performance plans for our senior leaders that the things that will further accessibility in DEIA in general are embedded in accountability for our leaders, all the way down to employees, and that it becomes a common practice within the organization, and therefore becomes sustainable.

And then the final operating principle is to understand the perspectives of the workforce and the customers. So, you always want to get buy-in. This is the third time we've talked about the executive order in a FEED meeting, and it's to meet this very operating principle that we want to make sure your voice is heard and that it provides impact in decision-making.

This is part of why we did the survey before the fall meeting that Akinyemi mentioned, which was very useful in terms of us understanding the things that we needed to do to build the Government-wide Strategic Plan and help agencies develop their priorities. And we'll keep asking questions of the workforce and of customers, and really leverage this FEED workgroup as one of our principal advisors as we move forward.

I don't have a slide with the resources, but one of the things that the DEIA initiative has laid out, and OPM and OMB have provided, is a community of practice forum for us on [OMB MAX](#). For those of you who don't know what OMB MAX is, it's an interactive portal that OMB manages where different communities can share information and create collections and it serves as a repository of that information. The DEIA initiative has a MAX page. I'll put the link in the chat after my presentation so you can access it. You have to have a .gov or .mil email address to join, but if you want to see the different resources that are out there, look at some of the presentations from learning community sessions, etc. they are all there.

I know that we're planning for Andrew, who's going to present later today, to do a learning community session for the DEIA community of practice, and that is those folks that the agencies have identified as their DEIA leaders, including EEO, HR, IT and others. And if you were involved with your agency's DEIA efforts, you definitely can join in on that session.

So, the resources are there for anyone who wants to see them, but the targeted group for this community of practice is those folks who are implementing DEIA initiatives within their agency. We did a session two weeks ago on physical accessibility, and we had our great partners from the Access Board come in and share some of their resources and some of the pilot projects that they're working on with

federal agencies in terms of accessibility. And we're going to be doing another one with GSA similar to what you're going to see today. You're actually going to see it first here as we talk about some of the resources that GSA is providing.

Wendy, are there any questions so far?

**WENDY STROBEL GOWER:** Yes, there are some questions. One of our members is curious if there are any agencies that have a plan on hiring paths for formerly incarcerated individuals.

**DEXTER BROOKS:** This one is probably more for OPM, but I know that EEOC is working on something in that vein. I don't think it's completed yet, I think it's a work in progress at this point. Does anyone from OPM want to jump in here? Our colleague from OPM, Natalie Veeney, who you all know very well, was unable to participate today, but she may have some information on the progress of that initiative. Akinyemi may know something about it as well.

**AKINYEMI BANJO:** I don't have a specific example that I can reference here, but I'll also ask if any of our participants have something that they are working on in this area within their agency? If so, please share that information in the chat box if you like.

**WENDY STROBEL GOWER:** Dexter, we have another question that came in. Who is holding agencies accountable for following through with these priorities and how are they being held accountable?

**DEXTER BROOKS:** That's a good question. We're working on it in many different avenues. One of the things that the White House was clear about is that it would be a whole-of-government effort. So, instead of just delegating it to OPM, EEOC or the Department of Labor, for example, and saying "Fix it," the White House really kept the accountability and leadership at their level. We all have our different communities that we work with, and the White House works with the cabinet and cabinet agencies. OMB works with the deputy secretaries and the management portions of the agency. OPM works with human capital. EEOC, we work with the EEO, civil rights folks, etc.

The Government-wide Strategic Plan lays out what the secretaries and the heads of each agencies are required to do and report back to the DEIA initiative, and then this will be reviewed and we will provide input from our team. So, the President has laid out his management agenda to complement what we are doing. Agencies have to have within their strategic plans clear information about DEIA. One way to see it is that it's like when your agency is reporting to EEOC every year in your MD-715, and then we do our follow-up in pushes. OPM does the same with their Human Capital Function.

So now this will be a part of your agency's assessment by OMB that affects your budget, and as a part of the President's management agenda, you're going to have to present that information there as well. So you are getting this from different parts of the government, but it's the same effort. What is more enhanced this time is its connection to the agency strategic plan and resources. And with that, we anticipate greater accountability.

**WENDY STROBEL GOWER:** Thank you, Dexter. That's all the questions we have time for right now. So we're going to turn it over to Andrew Nielson, the Director of the Government-wide IT Accessibility Program for the Office of Government-wide Policy at GSA.

**ANDREW NIELSON:** [Slides 8 and 9]. Thank you very much, Wendy. I'm really happy to be with you today. I'm going to give a little bit of an introduction, not just to me, but to my organization as well. So, why it is that I'm the one that's here talking to you today?

But first, I want to provide a brief physical description of myself. I'm a middle aged white man with a close cropped beard. When my coworker asked my youngest daughter how she would dress if she were to dress like her dad for Halloween, she said that she would need to get some makeup so she could make herself look like she has tired eyes. [Laughter]. So, I also have tired eyes. My Zoom background is a much more modern and stylish background than my actual living room, with an accent wall and the GSA logo on that wall. I use he/him pronouns. And again, I'm from the Office of Government-wide Policy at GSA. So, that is a tiny bit of background.

The Section 508 legislation is the legislation that requires agencies to make their IT accessible to people with disabilities. That same legislation gave mandate to the U.S. Access Board to create the Section 508 standards by which we determine whether or not we are accessible with our IT. It also directed and gave mandate to the Access Board, together with GSA, to provide technical assistance to agencies on fulfilling the requirements of Section 508.

So, that's my role as the Director of the Government-wide IT Accessibility Program and our Office of Government-wide Policy, and that's why I'm talking to you today. I'm here today to talk to you about incorporating accessibility into your agency-specific DEIA strategic plans that are due in March and that Dexter talked about before.

[Slide 10]. On this slide is the imperative in the Government-wide DEIA Strategic Plan which Dexter co- led the effort to develop and which was published in November. And the imperative is that the Federal Government must consistently design, construct, develop and maintain facilities, technology, programs and services so that all people, including people with disabilities can fully and independently use them.

My focus, of course, is on the technology aspect of that. But I also want to emphasize that with this imperative, when we say, "including people with disabilities," at least when it comes to technology accessibility, those standards that were developed by the Access Board (the Section 508 standards), they're intended to help all people, regardless of whether or not they have a disability or what their disability is. They're intended to level the playing field and make IT accessible to all so that whatever your ability or disability, you can adapt to the digital world in a way that works for you. And really, that's true for all of us. We all have different ways of using technology, so it really is supposed to be inclusive.

[Slide 11]. So, now a little bit more background on how we got to where we are today and the imperative to include accessibility in your agency specific DEIA strategic plans. During the Obama Administration, in 2013, the administration issued a Strategic Plan for Improving Management of Section 508 of the Rehabilitation Act. That legislation was issued back in 1998. And in mid-2020, we felt like it was a good opportunity for us to revisit that strategic plan. So, we started holding focus groups and planning sessions with key members of the accessibility community of practice in partnership with our colleagues at the Access Board and OMB to start to revisit and reset our targets for accessibility.

And we were very fortunate that lined up really well for this larger initiative with regard to diversity, equity, inclusion and accessibility. And so we were able to take those conversations that we held specific on Section 508 and incorporate them into our discussions with Dexter and the whole team that was leading the effort on the DEIA Government-wide Strategic Plan.

And we're very pleased that much of our input, if not all of it, was incorporated into that DEIA Strategic Plan at the appropriate level. I think we have still a ways to go, but again, I'm very pleased that our efforts really aligned well and that we were ready to engage in that conversation with OMB, OPM and EEOC on the DEIA initiative.

The DEIA Strategic Plan also directs OMB and GSA to revise guidance on Section 508, and that is still to come. We're still having conversations on what form that will take, whether or not it will be an entirely new strategic plan or another directive or guidance from OMB and GSA. So, I don't want to show my hand too much yet, mostly because I don't have clearance to do that because we are still having those conversations with OMB, but there's still more to come.

[Slide 12]. Within the Government-wide DEIA Strategic Plan, there are some examples of what to include in your agency accessibility roadmaps. And again, here is where our conversations prior to the DEIA government-wide effort were fruitful as we were able to help provide some suggestions by providing training and guidance on processes to make physical and virtual environments more accessible, to create equitable spaces.

This slide includes information on training users and operators in virtual environments about conducting accessible meetings, creating accessible documents, addressing potential physical and attitudinal barriers, regularly assessing your information technology and facilities, and ensuring that all technology, whether developed in-house or externally, conforms to the Section 508 standards and complies with the legislation, which requires that we make our IT accessible to people with disabilities. It also mentions assessing the average time for resolution of accommodation requests for individuals with disabilities and evaluating the need to establish a centralized fund to improve accessibility and provide accommodations. So, these are recommendations for you and your agencies to include in your accessibility roadmaps and/or as part of your agency specific DEIA strategic plan.

[Slide 13]. We also have additional resources beyond those simple suggestions in the DEIA Strategic Plan, resources on our website [Section508.gov](https://www.section508.gov) and elsewhere. So, I want to make you aware of what we have available and offer some tips on how to make great use of it.

[Slide 14]. Probably first and foremost is knowing what your starting point is with regard to IT accessibility. GSA provides a service called the [Digital Dashboard](https://www.digitaldashboard.gov) that has more than just accessibility related information, but it has an accessibility module where we provide data on the accessibility of agency websites.

At the moment, it's just primary information, not the top level domain, but your primary domain, whether it's GSA.gov or DOL.gov, etc. We're just providing data on the homepage and we're only doing limited automated testing on accessibility. We've expanded this to make it even more useful, but we've limited the automated accessibility testing to those that we trust most and that best align with recommendations we refer to as the "ICT accessibility testing baseline," which is essentially a standard for how to test accessibility of websites.

This information is available on [www.digitaldashboard.gov](https://www.digitaldashboard.gov), only to government employees, and you do need to [request access](#). If you go to the website, there's information on how to request access. It uses MAX.gov, which Dexter referred to earlier as a great platform for collaboration that OMB has made available to all agencies, as a login platform.

In addition to the digital dashboard, every six months agencies are required to report their own data on accessibility, including on their program maturity (how well or how mature their Section 508 programs are) and on some more objective measures on testing their websites, both internal and external (intranet and internet). This is part of that 2013 Strategic Plan and memo from OMB from the Obama Administration that I mentioned previously. GSA also does some additional analysis. We gather that information, consolidate it and do some initial analysis. We also combine it with some of the information we have from the Digital Dashboard where we're doing some centralized testing. So, we do some analysis and pass that information back directly to agency Chief Information Officers (CIO) and to Section 508 Program Managers.

So, if you're looking for where to start, those are some very key points that you can start from, the Digital Dashboard and your own reports, along with our analysis and summary of those reports that we give back to the CIO. So, reach out to your agency's CIO and Section 508 Program Managers. That's a great place to start just to know where your agency is now to set your baseline and then start to identify where your agency can move from there.

[Slide 15]. After the Government-wide DEIA Strategic Plan was issued in November, we also published an article on our website, on [Section508.gov](http://Section508.gov). And this presentation that I'm giving you is really based on that article. So, if you go to [section508.gov/manage/deia-guidance](http://section508.gov/manage/deia-guidance), you can get the full download of our recommendations for how to incorporate accessibility into your agency specific DEIA strategic plans.

The information we've provided there is targeted at certain audiences. We have an [Executive Guide to Federal IT Accessibility](#), a [Quick Guide to IT Accessibility for Program Managers](#), which is more for IT program and project managers, and a [Technology Accessibility Playbook](#), which I'm going to focus on a lot more in the coming slides. We also have a [guide for procurement officials](#) about buying and selling accessible products and services and [one for web developers, designers and software engineers](#) on designing and developing accessible products.

We really have a very large audience, since the vast majority of federal employees create digital content of some type. We have our fingers deep in Microsoft Word and PowerPoint and whenever and wherever else we're developing work products and communications. So, we have guidance on [creating accessible digital products](#), like documents and presentations, and for [creating and hosting accessible meetings](#), like this one. We break the guidance down to some key audiences, So visit [section508.gov](http://section508.gov) to get more information about this.

[Slide 16]. Now I'm going to focus on our [Technology Accessibility Playbook](#) because that really is what I think what would be most useful to you in incorporating accessibility when building your agency accessibility roadmaps and incorporating accessibility into your agency specific DEIA strategic plans. The Playbook really provides a framework for integration of strategic business and technology management to ensure that your technology is accessible for people with disabilities. We borrowed from elsewhere in government and from industry to create this playbook and tailored the information to our needs with a focus on accessibility. The intent is to give you a set of plays, or steps. They may not be entirely sequential, but a number of these plays you can use to help mature, in an iterative manner, your agency's approach to accessibility, primarily IT accessibility.

On this slide, I have included an image of two football players from Gallaudet University. Continuing with our sports theme, and also recognizing that the Super Bowl is this Sunday, here is a little factoid. Some of you may already be aware of this, but the huddle used by high school, college and professional

football teams originated in 1894 at Gallaudet University. That year, when Gallaudet was playing two other schools with primarily deaf players, Gallaudet's quarterback was worried that the other teams were stealing his plays when he was signing to his teammates. So, they formed a huddle, and that's where the huddle came from. It was developed in 1894 at Gallaudet University in Washington, DC.

To go back to the Technology Accessibility Playbook again, you can find that on our website at [www.section508.gov/tools/playbooks](http://www.section508.gov/tools/playbooks). There's a link to the Technology Accessibility Playbook as well as some other resources on that page. If you want to go straight to the Technology Accessibility Playbook, the URL is [www.section508.gov/tools/playbooks/technology-accessibility-playbook-intro](http://www.section508.gov/tools/playbooks/technology-accessibility-playbook-intro). Sorry for the long URL.

[Slide 17]. On this slide are the plays, again continuing with the sports theme, from our playbook. There are 12. I won't read all of them to you right now. I've highlighted Play 3 on the slide, and that is "develop a Section 508 accessibility roadmap." So, that would be a key one to visit. Among the others, "Play 1: Establish a Section 508 program." Also "Play Two: Assess your Section 508 program maturity." Once you know what your maturity is, then develop your accessibility roadmap so you can improve your maturity.

The remaining plays can be part of your roadmap, or maybe they're just best practices that you should implement as part of your approach to address accessibility in your IT. I'm going to focus on a few of these in the next slides just so I can highlight them as important and key.

[Slide 18]. So, for "Play 2: Assess your Section 508 program maturity," your agencies really are already doing this to a degree in the program maturity report data that we get every six months. And these accessibility maturity measures come from and are defined in other guidance we have available on [section508.gov](http://section508.gov) for completing these reports and providing this data.

These maturity measures are taken loosely from the CMMI, the Capability Maturity Model Framework for assessing maturity of organizations. So we start with "Ad Hoc," meaning that you have no formal policies, processes or procedures defined. "Planned" is next and it means that you have policies and processes and procedures defined and communicated. And now "Resourced," going one step further, means that not only do you have those policies and processes defined, but also you have resources committed and trained to implement those policies and processes and procedures. And then finally, "Measured," which means all of the above plus you're actually validating whether or not you're following through on your plans and executing your policies and processes as defined. So you're measuring, tracking and actively taking steps to remediate or fix any deficiencies when they arise.

And we provide those measures in a few different accessibility related maturity domains. With regard to acquisition for our agency technology life cycles, for testing and validation, for complaint management and for training, whether or not we are providing adequate accessibility training. So, that is all part of Play 2. Of course there is more information if you go to [Section508.gov](http://Section508.gov) and the Technology Accessibility Playbook, but that's really the meat of it.

[Slide 19]. Play 3 is "develop a Section 508 Accessibility Roadmap." This is not rocket science. This really is just strategic planning with a bent towards accessibility. Of course, define your Section 508 program challenges and opportunities. Do your strengths, weaknesses, opportunities and threats (SWOT) analysis to identify where you sit so you can identify where you need to go. Then develop an iterative plan to address those priorities and gaps in policies, processes, tools and resources.

Again, assuming that you have some of that information already from the program maturity data your agencies are reporting, you should have some idea of where you stand and how mature you are. Assess the organization's readiness to adopt planned changes and develop an approach to build adoption for the plan.

Then estimate and prioritize budget requirements. Budget for key expenses, including Section 508 program staff, as well as compliance testing and tracking tools. And I'll pause there and simply mention that while budgeting for accessibility is part of what we recommend, budgeting for accessibility is not simply budgeting to tack on accessibility, just like we do not tack on security when we're building IT. That really needs to be part of how we do business.

And yes, there may be some additional budget or cost to agencies to maintain a Section 508 team who can then provide guidance to others in the organization. The real cost is absorbed in how we do business and making sure that our teams really are trained and have the correct expertise so that they can develop accessible IT, and also making sure that we are checking this, that we have processes in place to verify accessibility.

But you cannot measure accessibility into a product. Sometimes by the time that you're verifying, it's more cumbersome, more expensive to do this, so it's best to build in accessibility from the beginning. So, budget doesn't typically mean a huge budget for accessibility, it means changing how we do business to make sure that accessibility is part of just how we develop. And this isn't just for developers, of course, because as I mentioned, most of us create some type of digital content. So, it's also making sure that we, all of us, have the right information about how to create an accessible document and that we build that into how we do things on a daily basis. So, then identify target milestones, and of course, communicate your plan to key stakeholders to get approval and support.

[Slide 20]. The next step I'm going to discuss is Play 12: Educating the Workforce. It's really just making sure that those who are involved in creating digital content or information technology of any type know how to do it correctly. And when I say correctly, I mean accessibly of course. So, they are some of that key audience, those content creators. And I guess I should also make sure you understand what is meant by "official communications." The Section 508 regulation has a definition for what has to be 508 conformant. So, definitely any websites, internal or external, your emergency notifications, policies and processes, directives from your agency, etc. Basically any time you are interacting with the public, all of those things are agency official communications and have to be accessible.

So, you need to identify who the people in your agency who need to be part of your accessibility roadmap. Who are those people at your agency who are doing that the most? Is it your communications staff? Is it those that are reviewing and processing grant applications, etc.? Who is involved most in an agency official communications? And then target them and make sure that they have the right training. Procurement professionals, in particular those who deal with IT acquisitions, also need to make sure that they build accessibility needs and requirements into contracts and so they need to have the right training to know how to do that. And of course, you also need to include developers and testers, not only developers, but also designers.

Taryn emphasized our need for adopting universal design, so I'm going to mention that again now. And quality assurance (QA) testers, need to be involved, too. One of my pet projects is making sure that we test the right way so that we can all share information, and making sure we're doing it consistently, so

that I can test, and you can test, and we can share the same opinion about whether or not something is accessible.

I've provided a link to additional online training resources we have on [Section508.gov](https://section508.gov). Apologies for not including all of these links on the slides, but I believe you will have access to the presentation deck so that you can click through those links as well. [Note: all materials and resources from the presentation are available at <https://askearn.org/page/feed-meeting-february-9-2022>].

[Slide 21]. Really, the next steps on guidance are that I don't have anything definitive to give you right now as to where we're going next with OMB for additional guidance on Section 508 specifically. But we are having conversations, so there's still more to come. So, this is really just a teaser and we'll likely offer some additional guidance at some point, we're just not sure what form that will take. We can open it up to questions now. I hope this has been helpful, at least to point you to some of the good resources you can take advantage of to get you started on developing your accessibility roadmaps as part of your agency DEIA strategic plans.

I apologize for not leaving more time for questions, but I'll take at least whatever I can and then I would be happy to answer additional questions via email or perhaps at the very end if we have a little bit more time.

**WENDY STROBEL GOWER:** I have one question for you before we turn it over to Bobby for his presentation. This Section 508 DEIA guidance on the website states that it's "solely on information technology information communication technology accessibility." While this is very helpful, would there be resources to support the development of a DEIA strategic plan that includes other areas?

**ANDREW NIELSON:** Yes. Thank you for the question and I hope this does not feel like I'm passing the buck, but my constraint is that my mandate is related to Section 508, and that scope is for digital information technology, for digital accessibility. So, I think that's a great suggestion to offer and provide guidance on accessibility more holistically.

Of course, we do have guidance from the Access Board on physical access with regard to the Architectural Barriers Act. So, they have related guidance there as well. I think that is a good suggestion for us to take back as a group to develop more holistic guidance on accessibility as a whole, not just related to IT accessibility.

Again, I have some constraints that my mandate is just on Section 508, but I definitely have regular interaction with leaders of this group, and so I'm happy to take that feedback and attempt to provide some more holistic guidance.

**WENDY STROBEL GOWER:** Thank you so much, Andrew. We appreciate you filling the shoes of three people today.

**ANDREW NIELSON:** My pleasure, and as I think I have already mentioned, Justin and Natalie both would have loved to be here, but just were not able to for different reasons. But thank you all so much for having me. I hope this is at least a little bit helpful.

**WENDY STROBEL GOWER:** Thank you so much. Sarah von Schrader from EARN, we're now going to turn it over to you to go through some of our survey results.

**SARAH VON SCHRADER:** [Slide 22]. Great, thank you, Wendy. That was a great presentation. Thank you, Andrew. I am Sarah von Schrader. I'm the Director of Research and Program Evaluation at the Yang Tan Institute at Cornell University, and I'm also the lead for our research team at EARN.

[Slide 23]. Over the last couple of weeks we fielded a quick poll, which you all are probably aware of because when you were invited to this meeting, there should have been a link to that poll. This was a way to try to gauge from the FEED group what are their priority strategies for increasing accessibility and reducing barriers to employment for people with disabilities. The purpose of the poll was to identify what strategies rose to the top.

The way we went about this is that we asked FEED members to review a list of 16 strategies that were compiled by ODEP that came out of a lot of different meetings, including from this group. These were strategies that had identified as being really key for increasing accessibility and reducing barriers. So, we asked people to read these 16 strategies and choose what they thought would be the top three strategies to increase accessibility and reduce barriers in their agency. Participants chose their top three strategies, and then for each of the strategies they chose, how this strategy would impact their agency.

We had good participation; we had 127 respondents. And we had a lot of open-ended feedback, although we don't really have time to go through all of it, that feedback has been shared with the EO workgroup, which organizes and thinks about the agendas for this meeting and that can take some of this information and it could be quite useful. There were lots of good recommendations in the feedback. The data was collected from January 19 to January 26, so quite recently.

[Slide 24]. So, moving into the results. As I said, there were 16 strategies to choose from. And I believe you all should have access to this slide deck, so I don't want to go through of them right now. I'm going to focus on just the top six strategies that were selected. These are the strategies that were most commonly listed in the top three by respondents to the survey. The strategy finishing number one was "establish a Chief Disability Officer and a Chief Accessibility Officer position at each agency to provide oversight for implementation and review the DEIA Strategic Plan at the agency level." 44 of the 127 poll participants selected that strategy in their top three.

Coming in as a close #2 was "establish a centralized government-wide Disability Center of Excellence to create and implement a framework for the provision of accommodation." 40 of the 127 respondents selected that in their top three. And #3 was "establish a disability working group within each agency to implement the agency DEIA Strategic Plan." 35 people selected that choice in their top three.

The next three, which I'll read quickly, were:

- #4: "Add questions regarding the effectiveness of workplace accommodations to the annual Employee Viewpoint Survey." (30 respondents)
- #5: "Develop a model agency Standard Operating Procedure for hiring people with disabilities using Schedules A and D." (28 respondents)
- #6: "Centralize contracting services, such as sign language interpreters and relay services." (27 respondents).

[Slides 25 and 26]. So, the next two slides have the rest of the results. I'm not going to read all of these, but I encourage you to do so. I think what's clear is that all of these strategies have a lot of potential to be useful, but we're trying to prioritize what people thought would have the most impact at this stage of the DEIA EO implementation.

[Slides 27 and 28]. I decided because we have pretty limited time today that we would focus a bit more deeply on the top three strategies that were selected, including some key themes and sample quotes. As I said, the most popular strategy, the one most people put in their top three, was “establish a Chief Disability officer and a Chief Accessibility Officer.” People felt like this was really critical to have people in these roles so that they could “ensure a focus on disability in the implementation of the executive order around DEIA.” So about 44 people entered comments about why they felt that this particular strategy would have an impact in their agency.

I'm also going to include some things that are quotes. The bulleted items on these slides are actual quotes from people who responded to the survey. I'll read them to try to get at the message that folks were trying to convey, but the main idea here is that people really want to make sure through these positions that there's a focus on disability. For example, one person stated that often disability gets overlooked in DEI efforts, and another person noted that agencies, including components, organize differently. Some don't have a Disability Program Manager, and in those cases, it's often unclear who has overall responsibility or who to contact with regard to disability matters. So, having these roles would allow people to really understand who would be the person to contact.

As I said, we asked people to indicate how this would impact their agency. A lot of what we ended up receiving in these responses was really good recommendations for how these strategies might be implemented. People really highlighted that these roles need to be people who have disability knowledge and the ability to focus on disability issues. One respondent noted that EEO and/or Diversity Officers are not usually specialists in disability employment. They're more well-rounded when it comes to civil rights, EEO practices and other areas. So, some respondents felt that the people in these roles need to really understand the challenges of people in the disability community.

Another comment was that agencies should understand that these roles are really important and that the focus of them should be on disability at all times, as sometimes there's a tendency to add additional responsibilities to these roles that pull them away from really focusing on disability issues. Another recommendation from several people was that the people in these positions should have direct access or be a direct report to the agency head.

So, that's a quick summary of some of the comments that we received from the top strategy. And as I said, the full results were shared and we're going to be compiling more information from this. And the EO Workgroup does have access to this information, so all of the really helpful comments that people included are being shared.

[Slide 29]. For the second most popular strategy, “establish a centralized government-wide Disability Center of Excellence,” the key theme was that this would lead to faster processing of reasonable accommodation and other disability-related requests. It would allow for “streamlined contracting efforts and faster processing that is not limited by reasonable accommodation turnover or restricted budget or resources by agency,” according to one respondent.

I have highlighted in this next quote the phrase “reinventing the wheel” because I think at least four or five people used that exact same phrase. The comment is, “Many supervisors are reinventing the wheel every time they receive a request for a reasonable accommodation (RA), and therefore they take a long time to process.” People mentioned that this may be particularly true at smaller agencies that may not get as many reasonable accommodation requests, and therefore not having as much experience with RA requests was leading to “reinventing the wheel” each time.

The second theme for this strategy is ensuring consistency and understanding of the framework for accommodation. According to one respondent, “We should have a place for Disability Program Managers to share resources and awareness on different types of accommodations, which accommodations work or not, and have clear guidance on the framework.”

Another respondent wrote of this strategy, “This would add consistency across the government and most of all provide a resource that everyone can utilize. Supervisors and employees alike would benefit in knowing and understanding the framework for accommodations.” Another respondent mentioned that this strategy could help spread best practices and creative solutions across the government, and also reduce instances of not so good practices being used. For example, this person mentioned “supervisors directly requesting excessive medical documents.” Another thing that is not directly mentioned here, but came up several times, is that this would be a particularly useful strategy to support smaller agencies who may not have the capacity that larger agencies do.

[Slide 30]. And the next top strategy was “establish a disability working group within each agency to implement the DEIA Strategic Plan.” Respondents mentioned that a working group could help “ensure consistency, accountability and awareness across the agency.” Another respondent noted that they felt that working groups are better able to establish and monitor the strategic plan and noted, “The working group's key focus is ensuring the plan is successful and agency employees are better equipped to address the best practices for their agency and what is needed.” Another respondent stated, “Our agency is currently not meeting goals for disability hiring. This working group would identify barriers and training needs to ensure that we're hiring and retaining individuals with disabilities.” So, they felt it would provide consistency and accountability among offices throughout the agency regarding reasonable accommodation and accessibility.

And I think this is really key and something that came up frequently that the working group would bring awareness agency-wide and make the program visible, particularly if the members of the working group have representation from across the agency. There were also recommendations related to working group composition. People felt that they should be engaging employees from across the agency because that would build inclusion and the expectation that it is everyone's responsibility that it's not just one part of the agency, but that everybody should be aware of the strategic plan and its implementation.

And finally, respondents noted that people with disabilities need to be included to get their perspectives and ideas on how to be a model employer for people with disabilities and ensure equal access and maximum inclusivity. So, that was something that came up for the working group as well.

Another thing that came up not infrequently was that there needs to be time allocated for this work. For example, if there is a working group that is charged with this, this should be deemed a collateral duty assignment to ensure that people have the availability to focus on this work.

[Slide 31]. So, this is really the main feedback that we received on those top three strategies. If there are any questions, I'm happy to answer them. I think we'll be summarizing this a little more fully in the future. We had sort of a quick turnaround this time, but if anybody has any questions, I'd be happy to address those now.

**WENDY STROBEL GOWER:** I don't see any questions about this data review, so I think we can turn it over to Bobby.

**BOBBY SILVERSTEIN:** [Slide 32]. Hi, my name is Bobby Silverstein. I'm the policy counsel to the EARN project, the former Staff Director and Chief Counsel to the U.S. Senate Subcommittee on Disability Policy, where we worked on, among other things, the Americans with Disabilities Act (ADA), Section 508, and multiple reauthorizations of the Rehab Act.

Before I jump into my presentation, I want to provide a context. And the context is Taryn and Dexter's comments. Taryn talked about the need to be proactive and transformative in what you do, to aim high and to challenge the status quo.

Dexter talked about raising your voice and identified a series of priorities that were included in the executive order and the Government-wide Strategic Plan. If we take an active voice and become proactive, we have an opportunity initially with the March presentation of the agency-wide strategic plan to develop a series of best promising and emerging practices.

The purpose of my presentation is to not go through 100 best practices, but to share with you a new resource that has been developed to help you develop the disability inclusive components of the DEIA strategic plan for your agency

[Slide 33]. This document is called "Federal Agency Employment Strategies: A Framework for Disability, Diversity, Equity, Inclusion and Accessibility (DEIA), the 2022 Edition." I have asked Lou to jump in here to explain what this is and what it's not. You'll see on the slide it says, "Deliberative Draft." Lou?

**LOU ORSLENE:** Thanks very much, Bobby. Just so everyone knows, Bobby, the EARN team and our Employer Team here at ODEP worked very swiftly to produce this refreshed framework for all of you so that you can use these to ensure people with disabilities are included in your DEIA strategic plans. So, we did this revision very quickly, and therefore it has not been cleared. It is a "deliberative draft," so we ask you to not share it beyond this group. By all means, do go through the strategies and see what's relevant and applicable to your agencies and please embrace those in your plans. But we ask that it not be shared outside of this group since it has not had the highest level of clearance yet. So, thank you very much, Bobby and the EARN team for putting this together so quickly. I appreciate it. And I will turn it back over to Bobby.

**BOBBY SILVERSTEIN:** Thank you, Lou. So this document has six major components. The first one is entitled "Lead the Way," which deals with issues of leadership, commitment, internal and external communication and anti-harassment policy. The next topic is "Build the Pipeline," which is outreach and recruitment. The third is "Hire the Best," which is in personnel processes, the hiring process, as well as advancement and retention. The fourth, "Ensure Productivity," focuses on reasonable accommodation and personal assistance services. The fifth is "Virtual and Physical Accessibility," so it includes accessibility of information and communication technology (ICT) and physical accessibility in terms of the Architectural Barriers Act. The final topic area is "Grow Success," which includes establishing of goals, conducting barrier analyses, workforce analyses, conducting assessments and reporting progress, which obviously also requires recordkeeping.

[Slide 34]. The structure of this document is key. Dexter, in his presentation, talked about the priorities in the executive order and the Government-wide DEIA Strategic Plan implementing the executive order. So, for every one of these six topic areas, the first discussion is a description of what's in the executive order in terms of policy and what's in the Government-wide Strategic Plan.

There is also a list of examples that come directly from either the executive order or the Government-wide Strategic Plan, all from a disability perspective. So, if you're the disability go-to person working on your agency strategic plan, you could use this document. It includes everything that's in the strategic plan and everything that's in the executive order, organized in terms of these six components. So, if there's any reference to anything that's directly related to disability or affects people with disabilities in the executive order or strategic plan, it's included in this Federal Framework.

Next, there is a description of what's in the Section 501 of the Rehabilitation Act regulations related to non-discrimination and affirmative action, with a focus on the sections on the affirmative action provisions. And there are examples in the regulations that are included in the text of the Federal Framework. There are also examples of best, promising and emerging practices from agency MD-715 Part J agency affirmative action plans. And based on a review of the Obama Strategic Plan, the executive order and agency affirmative action plans submitted to EEOC, there are additional examples that come directly from agencies.

So, this document is a lens. It's a guidepost. It's a checklist. It's an encyclopedia of the gestalt of practices that you may want to think about including. It's not a document to necessarily read from front to back. It's a document that's a resource so that you, using the phrase that you heard Sarah refer to, don't have to "reinvent the wheel." You can learn from your colleagues and what they're doing in terms of trying to ensure that DEI is inclusive of people with disabilities and that the "A," the accessibility component, is also addressed.

[Slide 35]. The first of the six components of the document is "Lead the Way." This includes leadership and commitment, external and internal communication, designation of responsible individuals and anti-harassment policy. Now, I want to use this first section as an example to illustrate how one could possibly use this resource. And I'm not going to go into this level of detail for all of the other sections. My purpose is not to share with you all of the best practices. My purpose is very simply to get you interested in using this document when you're helping make sure that your agency strategic plan is disability inclusive.

So, in terms of leadership, there are statements in the executive order about the importance of training. There are statements in the Government-wide Strategic Plan about training as well, so this is a critical component. Dexter also made this very important point, which is that DEIA is not an add-on or a separate program, but rather a priority for the agency. And it cuts across agency functions and must be embedded in the agency culture. This is language to use, to borrow when you're making a justification for disability-inclusive language to include in your agency plans to break down the traditional silos.

When you look at the Government-wide Strategic Plan, there are a series of examples that happen to be disability specific. Investing in an infrastructure that provides timely and effective accommodations, embedding accessibility as a core design component, training supervisors on providing accommodations and accessibility, etc. I could go on with a number of other examples.

The Section 501 rule talks about making sure that the agency has an annual EEO statement on an agency letterhead that talks about appointing Disability Program Managers and Selective Placement Program Coordinators, making sure that there is sufficient funding and resources, etc. And then you've got a series of additional examples that are gleaned from a review of agency affirmative action plans, such as developing disability specific employee resource groups (ERGs) and having diversity inclusion change agents. So, as Sarah talked about, having Chief Disability Officers, Chief Accessibility Officers, disability

working groups, etc. These are all examples of leadership and infrastructure that will increase the likelihood of implementation.

In terms of internal communication, one example is a centralized website that acts as a one-stop shop for disability employment. So, that recommendation would be consistent with the overarching recommendation for a Disability Center of Excellence across the Federal Government, which would have a website as a one-stop shop where folks can go for information. Having a disability community of practice is another example of this.

Another key theme that Dexter pointed out that I think needs emphasis is the notion that this executive order focuses on the importance of understanding the lived experience of employees. In the disability community, as you know, we say, “Nothing about us without us.” And if you're looking for justification for nothing about us without us at the table, there are explicit references in the Government-wide Strategic Plan that emphasize the importance of knowing and getting the lived employee experience.

In this resource guide, there are explicit references to the provisions in the strategic plan. So again, you don't have to find them, they are there under this section on internal communication. And this includes designation of the responsible individuals, again, using Sarah's results of the survey, the importance of having a Chief Accessibility Officer or a Chief Diversity Inclusion Officer with expertise in disability. Another recommendation that is included in some agencies is to make sure that the Disability Program Manager has the same stature as other folks who are working on race and gender, for example.

[Slide 36]. In terms of outreach and recruitment, the resource guide has a section on the Workforce Recruitment Program (WRP). And one idea there, for example, is that the agency itself pays the interns who are hired under the WRP, rather than the program operating component doing so, as a strategy or incentive to increase the likelihood that folks with disabilities will be part of the internship experience at the agency. And there are references to the partnership initiative, which again was a priority that Dexter talks about. So, the resource guide describes that before it gets into examples from Section 501 or from the MD-715 instructions or other agencies.

One of the examples included in the resource guide is to establish a Disability Recruitment Task Force. Some agencies have called it the “Hiring Tiger team.” So, creating a database of those who applied through Schedule A, but may not have gotten a particular job, ensuring that all online applications are accessible to and usable by people with disabilities, using a disability-related employee resource group (ERG) as part of the recruitment strategies team, etc.

[Slide 37]. In terms of hiring the best, we're going to be talking about hiring strategies, including personnel processes, advancement and retention. And some of the examples that you will see are things like including in the job application not only a statement about reasonable accommodation, but also a statement about Schedule A and how to apply for it.

There's a whole series of examples in the guide about Schedule A, including the fourth example that Sarah referred to previously, which is the importance of having agency policies and standing operating procedures. Some agencies have mandatory training, some have a database, some require tracking. So, again, establish disability hiring task forces and use Schedule A, and make it clear in the policy, not only for recruitment and hiring, but also for advancement and promotions as well. Other examples that were provided are utilizing not only exit interviews but also “stay interviews” as well.

[Slide 38]. This slide is about ensuring productivity, and that includes both reasonable accommodation and the provision of personal assistance services. Reasonable accommodation is mentioned explicitly a number of times in the executive order and the Government-wide Strategic Plan. The first portion of that section of the resource guide will articulate that.

So again, go through the whole executive order or the Government-wide strategic plan. We pulled out every reference to reasonable accommodation. So, you can have it as a background memo of what might be included in an agency strategic plan. We included the references in the preamble to the Section 501 regulations, which talk about centralized accommodation funds. There were strong recommendations that this should be a requirement, but it was decided not to make it a requirement. However, the regulation itself talks about a centralized accommodation fund as the best and easiest way to provide reasonable accommodations, but also mentions that this can be done through other means. So, all of this is included in the guide if you're trying to convince somebody to do a centralized accommodation fund. And again, centralized accommodation funds are specifically referenced in the Government-wide Strategic Plan as a good or best practice.

[Slides 39 and 40]. Andrew said everything that I could possibly say here and said it a whole lot better than I can in terms of accessibility of information and communication technology (ICT). I spent Sunday looking through the GSA document. If you want to see the roadmap for ICT accessibility, not full accessibility, but ICT accessibility, there's nothing you could possibly do that would be an improvement on what GSA put together in the document he mentioned, the one about integrating accessibility information in agency DEIA implementation plans.

That document is absolutely brilliant. And if I were you, maybe going outside of my role for a second, I would be advocating for, at a minimum, the following sentence to be included in your agency's strategic plan: "We will establish and assign a Chief Accessibility Officer and establish an accessibility team to implement the GSA's Integrating Accessibility Information into Agency DEIA Implementation Plans, including the Technology Accessibility Playbook."

If you can get that sentence into the strategic plan, you have the handle for, as Taryn said, challenging the status quo, making transformative changes with respect to ICT accessibility. So, I'm going to end there. That's my time allotted. We have three minutes left for any questions that you might have.

**WENDY STROBEL GOWER:** Thank you. Bobby, we have lots of questions, but I think some of them are for the larger group. So, if you'll allow us, we'll go back to some of these questions we got earlier. One of which was, "Ending Fed Relay for Video Remote Interpreting (VRI) and Relay Conference Captioning (RCC) is an example of decentralizing accommodations, which resulted in more cost for the government. How is GSA planning to evaluate the impact of this, not only for the cost, but also for the impact of DEIA on employees who need those services?" This sounds like it's for Andrew, maybe.

**ANDREW NIELSON:** This is Andrew. I'm afraid I don't have a great answer in terms of how GSA is planning to evaluate the impact on agencies and difference in costs now that we've decentralized from Fed Relay. I'll try to put myself in the shoes of the project manager that oversaw some of those changes, and I think that his statement would be that they did evaluate before making that change and made the change, I think, somewhat because of cost considerations. I think they also realized there was some redundancy with some of the services that Fed Relay offered in terms of what FCC also offers. I believe that was some of the rationale for that change.

I think this community recognizes that there are a number of concerns with regard to how that change has been communicated and where agencies are currently, and that there are still services that are now quite decentralized. And likely there is some added cost to those specific services because we're now procuring those services under decentralized contracts, rather than through a centralized one.

I'm afraid I can't give you a better answer than that at the moment. But again, other than to try to put myself in the shoes of the GSA program manager who oversaw that change, and understand that cost was part of the consideration in making that move in order to reduce redundancy and costs associated with those services. So, they moved largely to a number of the services that are already provided by the FCC and are directing agencies to use those services.

**WENDY STROBEL GOWER:** Bobby, there was one question for you. It asks, "Can you talk a little bit about the use of contract staff, such as an accessibility specialist? In many agencies, such roles under the IT group are contracted out."

**BOBBY SILVERSTEIN:** Again, is this a best promising emerging practice? I defer to Andrew for contracting out the important role of making sure that ICT is accessible to and usable by all, and ask if that contract person would have the same access to leadership and be able to carry out the DEIA Executive Order in an effective way? And based on my leading question, you can obviously tell what I think.

**ANDREW NIELSON:** So, this is Andrew again. And I would agree in large part. You know, certainly there are a number of experts out there, and I came from consulting myself before I joined the Federal Government. Of course there are roles for contract staff who specialize in accessibility. I think the caution I would offer is that if the motivation is to outsource accessibility, rather than assume responsibility, to Bobby's point, among or with someone who is in a role that has leadership's ear, I think that's the wrong approach. The right approach is to, of course, assume direct responsibility.

Really, we all need to accept responsibility for accessibility. My primary message is that accessibility should really be part of how all of us do our jobs. If I don't know how to make a document accessible, I should learn how. And so that's really true for everyone. But again, there is a role for contract support certainly. And there are companies and there are individuals who specialize in accessibility and are great at giving advice and support with regard to accessibility. So, there's definitely a place for that.

**BOBBY SILVERSTEIN:** And the key phrase is advice and support.

**WENDY STROBEL GOWER:** Thank you, Andrew. Lou, I'll turn it over to you to close.

**LOU ORSLENE:** Thanks Andrew and Bobby. I will add that you can also look at accessibility contractors as a bridge to your future. If you don't have that internal expertise, particularly to audit your learning management system, other various tracking systems, your budgetary tracking systems, etc., then you very well may need to bring them in to do that audit of your systems. That should be part of your process. And you should also be developing that internal expertise in digital accessibility, physical accessibility, and such. But again, if you don't have that now, contractors are great to create that bridge.

I know we're coming on the three o'clock hour. Assistant Secretary Williams, Dexter, Andrew, Bobby, Sarah, Akinyemi and the whole EARN team, thanks so much for all of the work that you did to prepare for today. It's taken us the last six or seven months to get to where we are. We're looking for transformation here, and we're all very enthused, passionate and excited about that. I want to thank all

of you, too, because you participated in those discussion groups last fall, which really led to the 16 priority strategies, which are leading us to the three priorities today, and I'm really grateful for that. So, thanks for attending those meetings, thanks for participating and thanks to those who completed the survey for today's meeting.

As you move through your planning process and your implementation process, all of ODEP's TA centers, that's the Job Accommodation Network (JAN), that's EARN, that's PEAT (the Partnership on Employment and Accessible Technology) and others, are all here to support your efforts.

I just want to wish all of you the best of luck in getting through your strategic plans and submitting those by March 23. So with that, everybody have a great afternoon, and thanks so much for joining us today.