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

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

Section I: Efforts to Reach Regulatory Goals

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

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

a. Cluster GS-1 to GS-10 (PWD) Answer Yes

b. Cluster GS-11 to SES (PWD) Answer Yes

a) According to the data provided in Table B4 for the Agency’s permanent workforce, the Agency has no identified PWD (0%) at the GS-1 to GS-10 levels. There are 2 PWD at unspecified grade levels, but even if they were at the GS-1 to GS-10 levels, the percent would be below 12%. Specifically, 2 permanent employees out of 109 permanent employees equates to 1.8%. Therefore, there is a trigger for these grades. b) According to the data provided in Table B4 for the Agency’s permanent workforce, the agency has 5 identified PWD at the GS-11 to SES levels, out of 109 employees, which represents 4.59% of employees at those levels. If the additional 2 PWD at unspecified grade levels are presumed to be at the GS-11 - SES levels (given the large number of higher-graded employees at the agency), this would bring the total to 7 PWD at those levels out of 109 permanent employees for a total of 6.42% PWD. Therefore, under either percentage (4.59 or 6.42) there is a trigger in the permanent workforce compared to the 12% benchmark.

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

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

b. Cluster GS-11 to SES (PWTD) Answer Yes

a) According to the data provided in Table B4 for the permanent workforce, the Agency has no identified PWTD (0%) at the GS-1 to GS-10 levels. There is one PWTD at an unspecified level, but even assuming this person was within the GS-1 to GS-10 levels, 1/109 equates to .92%. Therefore, a trigger exists for PWTD at these levels. b) According to the data provided in Table B4, the Agency has 1 identified PWTD at the GS-11 to SES levels, out of 109 employees, which represents 0.92% of the permanent employees at those levels. Therefore, a slight trigger exists at these grade levels. However, if the additional PWTD at an unspecified level is presumed to be at the GS-11 -SES level (given the large number of higher-graded employees at the agency), this would bring the total to 2/109 or 1.83% PWTD for these levels, which would no longer be a trigger.

Grade Level Cluster(GS or Alternate Pay Planb) | Total | Reportable Disability | Targeted Disability
--- | --- | --- | ---
| | # | # | % | # | %

| Numerical Goal | -- | 12% | 2% |
| Grades GS-1 to GS-10 | 6 | 0 | 0.00 | 0 | 0.00 |

*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.
<table>
<thead>
<tr>
<th>Grade Level Cluster (GS or Alternate Pay Planb)</th>
<th>Total</th>
<th>Reportable Disability</th>
<th>Targeted Disability</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>#</td>
<td>#</td>
</tr>
<tr>
<td>Numerical Goal</td>
<td>--</td>
<td>12%</td>
<td>2%</td>
</tr>
<tr>
<td>Grades GS-11 to SES</td>
<td>92</td>
<td>7</td>
<td>7.61</td>
</tr>
</tbody>
</table>

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

The agency has not explicitly communicated these numerical goals to hiring managers, but it has discussed -- generally -- targeted recruitment of PWD, including PWTD, at monthly managers meetings or as individual managers commence a recruitment action. More communication and education around this topic is needed and will be addressed in FY 2019 as the agency undertakes to review all internal policies and all mandates that require revision to existing internal policies or development of additional policies and procedures.

Section II: Model Disability Program

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

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

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

   Answer: Yes

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

<table>
<thead>
<tr>
<th>Disability Program Task</th>
<th># of FTE Staff By Employment Status</th>
<th>Responsible Official (Name, Title, Office Email)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Full Time</td>
<td>Part Time</td>
</tr>
<tr>
<td>Section 508 Compliance</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Architectural Barriers Act Compliance</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Processing applications from PWD and PWTD</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td>Answering questions from the public about hiring authorities that take disability into account</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td>Processing reasonable accommodation requests from applicants and employees</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td>Disability Program Task</td>
<td>Full Time</td>
<td>Part Time</td>
</tr>
<tr>
<td>-------------------------</td>
<td>-----------</td>
<td>-----------</td>
</tr>
<tr>
<td>Special Emphasis Program for PWD and PWTD</td>
<td>1</td>
<td>0</td>
</tr>
</tbody>
</table>

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

Answer  Yes

It is unclear whether disability program staff has received sufficient training to carry out their disability program responsibilities. Before September 30, 2019, the Executive Director will convene a meeting of all relevant disability program staff listed above to determine which resources and training are necessary to educate staff about their responsibilities so that they can communicate this information to hiring officials throughout the agency.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer  Yes

Section III: Program Deficiencies In The Disability Program

| Brief Description of Program Deficiency | D-4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments. |

Section IV: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

As consistent with the Agency's Strategic Plan and Goals, the Agency will continue to: • Ensure that hiring a diverse workforce, including hiring people with disabilities, is part of the overall recruitment strategy for each staffing action. • Conduct targeted outreach to attract qualified candidates with disabilities. Successful recruitment efforts can be built through collaboration with community-based partners such as nonprofit organizations, national and local disability organizations, and federally funded state and local employment programs that have connections to qualified candidates. Examples include vocational rehabilitation facilities, employment networks, American Job Centers and Centers for Independent Living. • Develop community linkages that will allow the establishment of on-going relationships that facilitate our ability to diversify the workforce. • Retain and review applications from people with disabilities for future openings. • Ensure the utilization of fully accessible online job applications and electronic and social media recruitment materials. Posting vacancies on job boards designed for people with disabilities, in disability-related
publications and with disability organizations that will increase the diversity of the applicant pool. Examples of national job boards for people with disabilities that the agency will utilize include the Workforce Recruitment Program and the Talent Acquisition Portal.

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.

As consistent with the Agency's Strategic Plan and Goals, the Agency will continue to: • Ensure that hiring a diverse workforce, including hiring people with disabilities, is part of the overall recruitment strategy for each staffing action. • Conduct targeted outreach to attract qualified candidates with disabilities. Successful recruitment efforts can be built through collaboration with community-based partners such as nonprofit organizations, national and local disability organizations, and federally funded state and local employment programs that have connections to qualified candidates. Examples include vocational rehabilitation facilities, employment networks, American Job Centers and Centers for Independent Living. • Develop community linkages that will allow the establishment of on-going relationships that facilitate our ability to diversify the workforce. • Retain and review applications from people with disabilities for future openings. • Ensure the utilization of fully accessible online job applications and electronic and social media recruitment materials. Posting vacancies on job boards designed for people with disabilities, in disability-related publications and with disability organizations that will increase the diversity of the applicant pool. Examples of national job boards for people with disabilities that the agency will utilize include the Workforce Recruitment Program and the Talent Acquisition Portal.

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.

As the Agency has never exercised any Schedule A -- or any other -- authority that takes disability into account, the procedures for addressing an individual's eligibility under such authority and how that individual's application will be directed to the appropriate hiring official will need to be established.

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

Answer   No

As noted above, although the Agency has discussed with managers -- generally -- the use of hiring authorities to take disability into account, it has not conducted a thorough or comprehensive training for hiring managers on the topic. The agency plans to provide such training to all agency managers in FY 2019 at one of the monthly managers meetings.

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.

The Agency has not previously engaged in efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment. It plans to explore all available options in FY 2019-20 and identify those that make sense for the Agency, just as it did when it focused its efforts on increasing the Agency's racial diversity by developing a list of racial and gender affinity organizations to which it would submit attorney vacancy announcements.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If “yes”, please describe the triggers below.
a. New Hires for Permanent Workforce (PWD)  Answer  Yes
b. New Hires for Permanent Workforce (PWTD)  Answer  Yes

According to Tables B7 and B8 for the permanent workforce, the agency hired one new employee with a disability (PWD) into its permanent workforce out of eight total new hires to its permanent workforce (1/8 or 12.5%), but the tables do not identify which grade level that the PWD was hired at. Therefore, it is unclear as to whether there is a trigger for PWD at either level in terms of new hires, but it is likely that a trigger exists at at least one level for PWD that were newly hired. The agency did not hire any new permanent employees with a targeted disability (PWTD) during the reporting year. Therefore, there is a trigger at both levels for PWTD in terms of new hires.

<table>
<thead>
<tr>
<th>New Hires</th>
<th>Total (#)</th>
<th>Reportable Disability</th>
<th>Targeted Disability</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Permanent Workforce (%</td>
<td>Temporary Workforce</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(%)</td>
<td>(%)</td>
</tr>
<tr>
<td>% of Total Applicants</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>% of Qualified Applicants</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>% of New Hires</td>
<td>10</td>
<td>10.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

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

a. New Hires for MCO (PWD)  Answer  N/A
b. New Hires for MCO (PWTD)  Answer  N/A

The applicant pool data regarding MCOs is not currently available to the Agency. The Agency plans to investigate whether there are services available to automatically capture this data, and if not, it plans to explore options for manually tracking the information for each vacancy announcement when considering costs and available resources.

<table>
<thead>
<tr>
<th>New Hires to Mission-Critical Occupations</th>
<th>Total (#)</th>
<th>Reportable Disability</th>
<th>Targetable Disability</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Qualified Applicants (%)</td>
<td>New Hires (%)</td>
</tr>
<tr>
<td>Numerical Goal</td>
<td>--</td>
<td>12%</td>
<td>0.00</td>
</tr>
<tr>
<td>0905 ATTORNEY ADVISOR</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

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

a. Qualified Applicants for MCO (PWD)  Answer  N/A
b. Qualified Applicants for MCO (PWTD)  Answer  N/A

The applicant pool data regarding MCOs is not currently available to the Agency. The Agency plans to investigate whether there are services available to automatically capture this data, and if not, it plans to explore options for manually tracking the information for each vacancy announcement when considering costs and available resources.
4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

   a. Promotions for MCO (PWD) Answer N/A
   b. Promotions for MCO (PWTD) Answer N/A

The applicant pool data regarding MCOs is not currently available to the Agency. The Agency plans to investigate whether there are services available to automatically capture this data, and if not, it plans to explore options for manually tracking the information for each vacancy announcement when considering costs and available resources.

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

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

A. ADVANCEMENT PROGRAM PLAN

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

PWD and PWTD are afforded the same career development programs as persons without disabilities within the Agency.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

The Agency does not currently employ any career development programs apart from the normal career-ladder progression of each position.

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

<table>
<thead>
<tr>
<th>Career Development Opportunities</th>
<th>Total Participants</th>
<th>PWD</th>
<th>PWTD</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Applicants (#)</td>
<td>Selectees (%)</td>
<td>Applicants (%)</td>
</tr>
<tr>
<td>Internship Programs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fellowship Programs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mentoring Programs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Coaching Programs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Training Programs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Detail Programs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other Career Development Programs</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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.
Federal Labor Relations Authority  
FY 2018

a. Applicants (PWD)  
Answer  No

b. Selections (PWD)  
Answer  No

As there are no such programs, there are no triggers.

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

a. Applicants (PWTD)  
Answer  No

b. Selections (PWTD)  
Answer  No

As there are no such programs, there are no triggers.

C. AWARDS

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

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

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

As reflected on Table 13, during FY 18, the Agency awarded 15 cash awards from $100-$500. Out of the 15, 1 (1/15 = 6.7%) went to a PWTD and 2 went to PWD (2/15=13.33%). For case awards of $501+, there were a total of 84 awards with 0 going to PWTD and 6 going to PWD (6/84= 7.14%). For time off awards of 1-9 hours, there were a total of 16 awards with 1 going to a PWTD (1/16= 6.25%) and 1 going to a PWD (1/16= 6.25%). For time off awards of 9+ hours, there were 22 awards with 0 going to PWD and 0 going to PWTD. Therefore, there does not appear to be a trigger for awards, bonuses, and incentives for PWTD or PWD.

<table>
<thead>
<tr>
<th>Time-Off Awards</th>
<th>Total (#)</th>
<th>Reportable Disability %</th>
<th>Without Reportable Disability %</th>
<th>Targeted Disability %</th>
<th>Without Targeted Disability %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Time-Off Awards: 1-9 hours : Total Time-Off Awards Given</td>
<td>16</td>
<td>6.25</td>
<td>81.25</td>
<td>6.25</td>
<td>0.00</td>
</tr>
<tr>
<td>Time-Off Awards: 9+ hours : Total Time-Off Awards Given</td>
<td>22</td>
<td>0.00</td>
<td>86.36</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Cash Awards</th>
<th>Total (#)</th>
<th>Reportable Disability %</th>
<th>Without Reportable Disability %</th>
<th>Targeted Disability %</th>
<th>Without Targeted Disability %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash Awards: $100 - $500: Total Cash Awards Given</td>
<td>15</td>
<td>13.33</td>
<td>86.67</td>
<td>6.67</td>
<td>6.67</td>
</tr>
<tr>
<td>Cash Awards: $501+: Total Cash Awards Given</td>
<td>84</td>
<td>7.14</td>
<td>92.86</td>
<td>0.00</td>
<td>7.14</td>
</tr>
</tbody>
</table>

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

a. Pay Increases (PWD)  
Answer  No

b. Pay Increases (PWTD)  
Answer  No

As reflected on Table 13, during FY 18, the Agency awarded 4 quality step increases (QSIs) with 1 going to a PWTD (1/4= 25%) and 1 going to a PWD (1/4= 25%). Therefore, there does not appear to be a trigger for QSIs for PWTD or PWD.
### Other Awards

<table>
<thead>
<tr>
<th>Other Awards</th>
<th>Total (#)</th>
<th>Reportable Disability %</th>
<th>Without Reportable Disability %</th>
<th>Targeted Disability %</th>
<th>Without Targeted Disability %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Quality Step Increases (QSI):</td>
<td>4</td>
<td>25.00</td>
<td>75.00</td>
<td>25.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Total QSIs Awarded</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Performance Based Pay Increase</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.

a. Other Types of Recognition (PWD)  
Answer  N/A

b. Other Types of Recognition (PWTD) 
Answer  N/A

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**The Agency does not have other types of employee recognition programs.**

### D. PROMOTIONS

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

   a. SES
      
      i. Qualified Internal Applicants (PWD)  
      Answer  N/A

      ii. Internal Selections (PWD)  
      Answer  N/A

   b. Grade GS-15
      
      i. Qualified Internal Applicants (PWD)  
      Answer  N/A

      ii. Internal Selections (PWD)  
      Answer  N/A

   c. Grade GS-14
      
      i. Qualified Internal Applicants (PWD)  
      Answer  N/A

      ii. Internal Selections (PWD)  
      Answer  N/A

   d. Grade GS-13
      
      i. Qualified Internal Applicants (PWD)  
      Answer  N/A

      ii. Internal Selections (PWD)  
      Answer  N/A

In the absence of data regarding PWD among qualified internal applicants and/or selectees for promotions to the senior grade levels, it is unclear whether there are triggers. Generating accurate and comprehensive and accurate workforce data will be a priority to address this question.

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 (PWD)  
      Answer  N/A

      ii. Internal Selections (PWD)  
      Answer  N/A
i. Qualified Internal Applicants (PWTD)  Answer N/A
ii. Internal Selections (PWTD)  Answer N/A

b. Grade GS-15
i. Qualified Internal Applicants (PWTD)  Answer N/A
ii. Internal Selections (PWTD)  Answer N/A

c. Grade GS-14
i. Qualified Internal Applicants (PWTD)  Answer N/A
ii. Internal Selections (PWTD)  Answer N/A

d. Grade GS-13
i. Qualified Internal Applicants (PWTD)  Answer N/A
ii. Internal Selections (PWTD)  Answer N/A

In the absence of data regarding PWTD among qualified internal applicants and/or selectees for promotions to the senior grade levels, it is unclear whether there are triggers. Generating accurate and comprehensive workforce data will be a priority to address this question.

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

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

In the absence of data regarding PWD among the new hires to senior grade levels, it is unclear whether there are triggers. Generating accurate and comprehensive workforce data will have to be a priority to address this question.

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

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

In the absence of data regarding PWTD among the new hires to senior grade levels, it is unclear whether there are triggers. Generating accurate and comprehensive workforce data will be a priority to address this question.
5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

   a. Executives
      i. Qualified Internal Applicants (PWD)  Answer N/A
      ii. Internal Selections (PWD)          Answer N/A

   b. Managers
      i. Qualified Internal Applicants (PWD) Answer N/A
      ii. Internal Selections (PWD)          Answer N/A

   c. Supervisors
      i. Qualified Internal Applicants (PWD) Answer N/A
      ii. Internal Selections (PWD)          Answer N/A

In the absence of data regarding PWD among qualified internal applicants and/or selectees for promotions to supervisory positions, it is unclear whether there are triggers. Generating accurate and comprehensive and accurate workforce data will be a priority to address this question.

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

   a. Executives
      i. Qualified Internal Applicants (PWTD) Answer N/A
      ii. Internal Selections (PWTD)          Answer N/A

   b. Managers
      i. Qualified Internal Applicants (PWTD) Answer N/A
      ii. Internal Selections (PWTD)          Answer N/A

   c. Supervisors
      i. Qualified Internal Applicants (PWTD) Answer N/A
      ii. Internal Selections (PWTD)          Answer N/A

In the absence of data regarding PWTD among qualified internal applicants and/or selectees for promotions to supervisory positions, it is unclear whether there are triggers. Generating accurate and comprehensive and accurate workforce data will be a priority to address this question.

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.
In the absence of data regarding PWD among the selectees for new hires to supervisory positions, it is unclear whether there are triggers. Generating accurate and comprehensive and accurate workforce data will be a priority to address this question.

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

| a. New Hires for Executives (PWTD) | Answer | N/A |
| b. New Hires for Managers (PWTD) | Answer | N/A |
| c. New Hires for Supervisors (PWTD) | Answer | N/A |

In the absence of data regarding PWTD among the selectees for new hires to supervisory positions, it is unclear whether there are triggers. Generating accurate and comprehensive and accurate workforce data will have to be a priority to address this question.

Section VI: Plan to Improve Retention of Persons with Disabilities

To be model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace assistance services.

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If “no”, please explain why the agency did not convert all eligible Schedule A employees.

Answer | N/A

As the Agency had no Schedule A employees, it had no Schedule A employees to convert to the competitive 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) | Answer | No |
| b. Involuntary Separations (PWD) | Answer | No |

The Agency had 20 voluntary separations from its total workforce, one of which was a PWD (1/20= 5% of total voluntary separations from the Agency's workforce). There were 0 involuntary separations from the Agency's total workforce. As such, there were no triggers regarding separations.

<table>
<thead>
<tr>
<th>Separations</th>
<th>Total #</th>
<th>Reportable Disabilities %</th>
<th>Without Reportable Disabilities %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permenant Workforce</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Total Separations</td>
<td>20</td>
<td>5.00</td>
<td>95.00</td>
</tr>
<tr>
<td>Voluntary Separations</td>
<td>20</td>
<td>5.00</td>
<td>95.00</td>
</tr>
</tbody>
</table>
3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If “yes”, describe the trigger below.

   a. Voluntary Separations (PWTD) Answer No
   b. Involuntary Separations (PWTD) Answer No

The Agency had 20 voluntary separations from its total workforce, none of which was a PWTD. There were 0 involuntary separations from the Agency's total workforce. As such, there were no triggers regarding separations.

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.

   No such trigger exists.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 CFR §1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the agency’s public website for its notice explaining employees’ and applicants’ rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

   The Agency has not yet affirmatively posted on its public website, pursuant to 29 C.F.R. § 1614.203(d)(4), its notice explaining employees' and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint. In developing its disability program over the course of FY 2019, a necessary element will be to specifically determine whether the existing notice complies with this regulatory requirement, and, if it does not, to create/modify an appropriate notice by September 30, 2019.

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.

   The Agency has not yet posted on its public website a notice explaining employees' and applicant's rights under the Architectural Barriers Act, including a description of how to file a complaint. In resolving the deficiency noted in the previous question, the agency will also resolve this deficiency.

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.
The Agency will develop all necessary programs, policies, and practices necessary to bring the agency into conformance with relevant regulatory changes by September 30, 2019.

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.)

No applicant requested a reasonable accommodation in connection with any vacancy in FY 2018.

2. Describe the effectiveness of the policies, procedures, or practices to implement the agency’s reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

The Agency recently updated its Reasonable Accommodation Procedures (RAP), Personal Assistance Services (PAS), EEO policy, Anti-harassment policies, etc. (all of which are posted on the Agency's website) to ensure more efficient and effective Agency practices. The Agency also provides Bi-Annual NoFear Act and Whistle Blower training (and training to all new employees), EEO training for managers, and has been exploring options to improve its exit interview processes.

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

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

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

The Agency recently updated its PAS, which were approved by the EEOC, and are posted on the Agency's website. The PAS provide for timely processing of requests for PAS and timely provision of services when approved. The Reasonable Accommodation Director is exploring training options on the provision of PAS for managers and supervisors to be implemented in FY 19-20.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the governmentwide average?

Answer No

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Answer No

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.
There were no findings of discrimination against that Agency in FY 2018.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

   Answer No

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

   Answer No

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

   The Agency did not receive any formal complaints of discrimination involving failure to provide a reasonable accommodation in FY 2018.

Section VIII: Identification and Removal of Barriers

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

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

   Answer No

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

   Answer No

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

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

   Limited time, limited resources, and an abundance of other assignments are primarily what prevented the agency from timely completing more planned activities in FY 2018.

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

   The Agency celebrated African American Heritage Month during FY 18 (October 1, 2017 to September 30, 2018) and Presidential Leadership attended the inter-agency Holocaust Remembrance Program, which employees were also invited to attend. Encouraged attendance at events such as these demonstrate the Agency's ongoing appreciate for diversity and inclusion in the workforce.

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.
As developing a robust and legally compliant disability program is a priority of the current agency head, the agency leadership will continue to plan new initiatives by September 30, 2019.