

**Fiscal Year 2018  
(October 1, 2017 to September 30, 2018)**

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



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## 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

The Agency has less than 12 percent of employees with disabilities in grade levels GS-1 to GS-11 and SES.

\*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

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

- a. Cluster GS-1 to GS-10 (PWTD) Answer Yes
- b. Cluster GS-11 to SES (PWTD) Answer Yes

The Agency has less than 2 percent of employees with targeted disabilities in grade levels GS-1 to GS-11 and SES.

Grade Level Cluster(GS or Alternate Pay Plan)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	26	4	15.38	2	7.69
Grades GS-11 to SES	1300	26	2.00	3	0.23

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

The agency has secured a new workforce database system that will have the capability to send vacancy announcements to the affinity groups and colleges and universities of low participation populations. Also, with the new system, Division Directors will receive quarterly workforce reports and training on schedule A hiring authorities. In addition, OCR will collaborate with HR on recruitment initiatives and programs to increase low participation groups.

### Section II: Model Disability Program

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

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

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

Answer Yes

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing reasonable accommodation requests from applicants and employees	1	0	0	Leslie Corbin, EEO Specialist- RA Spec lvcorbin@usagm.gov
Processing applications from PWD and PWTB	1	0	0	Carroll Cobb, Director of HR ccobb@usagm.gov
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Carroll Cobb, Director of HR ccobb@usagm.gov
Section 508 Compliance	1	0	0	Quntion Sowell qsowell@usagm.gov
Special Emphasis Program for PWD and PWTB	0	0	0	Leslie Corbin, EEO Specialist- RA Spec lvcorbin@usagm.gov
Architectural Barriers Act Compliance	1	0	0	Piero Ciancio pciancio@usagm.gov

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

National Employment Law Institute (NELI), ADA Workshop; RA Series (Focused on Qualified Individuals, Essential Functions and Undue Hardship; and, Telework and Flexible Work as a RA.

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

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

Answer Yes

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

<b>Brief Description of Program Deficiency</b>	B.4.a.4. to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.		
<b>Objective</b>	To provide all managers, supervisors and employees with EEO training on an annual basis.		
<b>Target Date</b>	Sep 30, 2020		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jan 31, 2020	May 31, 2020	Secure dedicated funding and approval to purchase an electronic training module for all employees.
	Mar 31, 2020		Collaborate with the Director, Office of Workforce Support and Development to purchase an electronic EEO training module for the Agency.
	May 31, 2020		Implement mandatory online EEO training for all employees.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2018	OCR provides EEO training to managers and supervisors during the annual Foundations of Leadership Training and to all employees during New Employee Orientation. In addition, OCR sponsors a series of training sessions, including harassment, sexual harassment, reasonable accommodation, and respect and civility.	

<b>Brief Description of Program Deficiency</b>	B.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]		
<b>Objective</b>	Hire a full-time Special Emphasis Program Manager who can effectively administer the SEPM programs.		
<b>Target Date</b>	Dec 31, 2019		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Oct 31, 2019		Advertise vacancy for full-time permanent Special Emphasis Program Manager.
	Nov 30, 2019		Collaborate with HR and submit selection for new SEPM.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2018	For fiscal year 2018, OCR staff assisted with SEP programs until a detailee was secured to administer the programs.	

<b>Brief Description of Program Deficiency</b>	C.2.a.6. Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR §1614.203(d)(2)]		
<b>Objective</b>	Include disability-based harassment with the Agency's training materials on its anti-harassment policy.		
<b>Target Date</b>	Sep 30, 2019		
<b>Completion Date</b>			
<b>Planned Activities</b>	<i>Target Date</i>	<i>Completion Date</i>	<i>Planned Activity</i>
	Sep 30, 2019		Revise training materials to include disability-based harassment.
<b>Accomplishments</b>	<i>Fiscal Year</i>	<i>Accomplishment</i>	

<b>Brief Description of Program Deficiency</b>	C.2.c. Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR §1614.203(d)(6)]		
<b>Objective</b>	Develop procedures for processing personal assistance services (PAS)		
<b>Target Date</b>	Dec 31, 2019		
<b>Completion Date</b>			
<b>Planned Activities</b>	<i>Target Date</i>	<i>Completion Date</i>	<i>Planned Activity</i>
	Sep 30, 2019		Collaborate with other Small Agencies on their procedures for processing personal assistance services.
	Oct 31, 2019		Develop draft personal assistance services for review and clearance.
	Nov 30, 2019		Submit updated procedures to CEO/Director for signature.
	Mar 31, 2020		Distribute procedures for processing requests for personal assistance services and post to the public website.
<b>Accomplishments</b>	<i>Fiscal Year</i>	<i>Accomplishment</i>	

<b>Brief Description of Program Deficiency</b>	D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]		
<b>Objective</b>	Conduct exit interviews or surveys that include questions on how the agency could improve recruitment, hiring, inclusion, retention and advancement of individual with disabilities.		
<b>Target Date</b>	Sep 30, 2021		
<b>Completion Date</b>			
<b>Planned Activities</b>	<i>Target Date</i>	<i>Completion Date</i>	<i>Planned Activity</i>
	Jun 30, 2019		Collaborate with the Diversity and Inclusion Advisory Council for feedback on exit survey.
	Sep 30, 2019		Develop exit interview information or survey for Senior Agency review and comments.
	Mar 30, 2020		Research other small agencies' exit interview and/or survey process.
<b>Accomplishments</b>	<i>Fiscal Year</i>	<i>Accomplishment</i>	

<b>Brief Description of Program Deficiency</b>	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.		
<b>Objective</b>	To revise the Agency's Affirmative Action Plan and post the information on its public website.		
<b>Target Date</b>	Dec 31, 2019		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Nov 30, 2019		Update the Agency's current Affirmative Action Plan.
	Dec 31, 2019		Post the Agency's Affirmative Action Plan to the Agency's webpage.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	E.4.b. Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]		
<b>Objective</b>	Collaborate with HR and implement a plan to resurvey the workforce on a regular basis.		
<b>Target Date</b>	Sep 30, 2020		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019	September 30, 2019	Implement new database system that has the mechanism to capture survey data.
	Sep 30, 2020	September 30, 2020	Resurvey USAGM's workforce to update employees' race, national origin, disability and targeted disability status.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

### 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 PWTB

#### 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.

The Agency is working to increase the participation rates of qualified persons with targeted disabilities in the Federal workforce and strongly encourage hiring officials via training, briefings and meetings to utilize special hiring authorities, including Schedule A to hire qualified persons with disabilities. In addition, the Agency will continue to notify employees of affinity/resource groups and encourage and support employee participation; announce and publicize affinity/resource group activities by email, approved social media and word of mouth; and, reward and/or acknowledge employees and officials that made significant contributions to the success of the groups.

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 PWTB for positions in the permanent workforce

The Agency is working to increase the participation rates of qualified persons with targeted disabilities in the Federal workforce and strongly encourage hiring officials via training, briefings and meetings to utilize special hiring authorities, including Schedule A to hire qualified persons with disabilities.

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.

HR and OCR will work with hiring managers to use the Schedule A appointing authority and 30% or more disabled veterans hiring authority to identify and hire qualified PWD and PWTD professionals for positions in the permanent workforce.

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

Answer Yes

During FY 2018, OCR hosted several reasonable accommodation (RA) training sessions for supervisors, managers and employees, as well as Disability Awareness. For National Disability Employee Awareness Month, training was provided by Christopher Kuczynski, EEOC. Additionally, the Disability Program Manager provides individual training to employees and managers in reference to RA policies, changes and recommended accommodations. OCR also purchased a series of RA webinars from the Federal Employment Law Training Group, LLC for the use of supervisors, managers and employees. New supervisors and managers are provided leadership training within 6 months of being assigned, which includes training on the Agency's disability employment initiatives and the RA requirements.

### 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.

In conjunction with HR, the OCR attends career fairs specifically dedicated to recruitment and White House Initiatives to identify qualified PWD's and PWTDs for employment. In addition the AGENCY established and maintain contacts with various disabled Veteran's organizations and applicant referral services. In addition, the Agency has an Internship program and works with various organizations and groups that represent low populations.

### 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

Of the 44 permanent new hires, 43 (97.73%) were classified as not having a disability and 1 (2.27%) did not identify their disability. In addition, there were 1383 permanent employees where 1343 (97.11%) identified as not having a disability, 7 (0.51%) did not identify their disability, 33 (2.39%) were classified as having a disability and 6 (0.41%) were classified as having a targeted disability.

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

Applicants				
% of New Hires	0			

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

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

The Agency is working to secure a new contractor to provide workforce data, including applicant flow data.

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

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

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

The Agency is working to secure a new contractor to provide workforce data, including applicant flow data. In addition, there is an overall lower than expected participation rate of PWD and PWTD.

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

There are no reported permanent full-time employees in mission critical occupations.

## 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.

USAGM plans to utilize the Diversity and Inclusion Leadership Council (D&ILC) to address any triggers/barriers and anomalies.

including providing an overview of the workforce, PWDs and PWTDs. In addition, managers and supervisors receive annual mandatory training which includes an overview of the RA process and hiring authorities. Further, OCR will collaborate with HR regarding advancement opportunities for all employees, including PWDs and PWTDs.

**B. CAREER DEVELOPMENT OPPORTUNITES**

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

USAGM promotes Leadership 2020, which is a comprehensive career development and leadership initiative for Agency managers and supervisors with emphasis on all SES and GS-13s to GS15s. In addition, the Agency utilizes the Pathways Program and also plans to strengthen its partnerships with colleges and universities to secure internships for students with disabilities and targeted disabilities.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Mentoring Programs	0	0	0	0	0	0
Training Programs	0	0	0	0	0	0
Detail Programs	0	0	0	0	0	0
Other Career Development Programs	0	0	0	0	0	0
Fellowship Programs	0	0	0	0	0	0
Internship Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	0	0

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

- a. Applicants (PWD) Answer N/A
- b. Selections (PWD) Answer N/A

The Agency is working to secure a new workforce database system and applicant tracking. In addition, OCR and HR plans to meet quarterly regarding data requirements and reporting.

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 N/A
- b. Selections (PWTD) Answer N/A

There are no fulltime permanent PWTDs listed in mission critical occupations. For FY 2020, USAGM plans to secure a new contractor to provide workforce data and applicant tracking.

**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

OCR is working with HR to gain access to award data for all employees, including PWDs and PWTDs.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards: 1-9 hours : Total Time-Off Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards: 9+ hours : Total Time-Off Awards Given	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$100 - \$500: Total Cash Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$501+: Total Cash Awards Given	0	0.00	0.00	0.00	0.00

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

There is a low participation rate of PWDs and PWTDs; however, OCR will collaborate with HR to retrieve award and performance data.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Quality Step Increases (QSI): Total QSIs Awarded	0	0.00	0.00	0.00	0.00
Performance Based Pay Increase	0	0.00	0.00	0.00	0.00

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

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

The OCR will work with HR and other offices to capture data for employee and recognition awards.

**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

**For FY 2020, the Agency plans to implement its new workforce database system, including applicant flow data.**

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

## a. SES

i. Qualified Internal Applicants (PWTD) Answer 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

**The Agency has a low participation rate of PWDs and PWTDs. In order to address problems and/or issues, applicant data, therefore,**

**The Agency is working to update its current workforce database, including applicant flow data.**

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

**The Agency is working to implement a new workforce database system, including applicant flow data.**

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

**The Agency is working to implement a new workforce database system, including applicant flow data.**

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

There is a low participation rate of PWDs and PWTDs. Also, the Agency is working to implement a new workforce database system, including applicant flow data.

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

There is a low participation rate of PWDs and PWTDs. Also, the Agency is working to implement a new workforce database system, including applicant flow data.

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

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

There is a low participation rate of PWDs and PWTDs. Also, the Agency is working to implement a new workforce database system, including applicant flow data.

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

There is a low participation rate of PWDs and PWTDs. Also, the Agency is working to implement a new workforce database system, including applicant flow data.

## 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

OCR will collaborate with HR for a quarterly analysis of eligible employees ready for conversion.

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

- a. Voluntary Separations (PWD) Answer Yes
- b. Involuntary Separations (PWD) Answer Yes

OCR will collaborate with HR for exit surveys and information on Appointment Types.

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce	0	0.00	0.00
Total Separations	86	3.49	96.51
Voluntary Separations	83	3.61	96.39
Involuntary Separations	3	0.00	100.00

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

- a. Voluntary Separations (PWTD) Answer Yes
- b. Involuntary Separations (PWTD) Answer Yes

OCR will collaborate with HR for exit surveys and information on Appointment Types.

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce	0	0.00	0.00
Total Separations	86	2.33	97.67
Voluntary Separations	83	2.41	97.59
Involuntary Separations	3	0.00	100.00

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.

There is a low participation rate of PWDs and PWTD which significantly impacted the agency during the separation process. Additionally, OCR will collaborate with HR for exit survey information and Appointment Types.

**B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES**

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

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

<https://www.section508.gov/tools/coordinator-listing+> POC: Quinto Sowell Supervisor IT Specialist

2. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

<https://www.section508.gov/tools/coordinator-listing+>

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 OCR is working to conduct internal audits of its Divisions and Offices, including site reviews. In addition, accessibility data and reports are coordinated with our Facilities Division.

### C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

The average time frame for processing initial requests for reasonable accommodations during the reporting period was 7-10 days.

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

The Disability Program Manager conducts training on reasonable accommodation (RA) policies and procedures quarterly and meets with employees and senior leadership regularly regarding RA requests. OCR timely processes RA requests and Leadership frequently seeks guidance and clarification on the process.

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

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

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

The Agency is working to implement a policy for Personal Assistance Services (PAS). However, employees are referred to OCR for

needed services and accommodations.

## 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 N/A

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

### 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.

## Section VIII: Identification and Removal of Barriers

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

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

Answer Yes

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

Answer Yes

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

<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?		The participation rate of employees with targeted disabilities in the permanent workforce 6 (0.41%) was below EEOC's goad of 2%.		
<b>STATEMENT OF BARRIER GROUPS:</b>		<i>Barrier Group</i> People with Disabilities People with Disabilities		
<b>BARRIER ANALYSIS:</b>  Provide a description of the steps taken and data analyzed to determine cause of the condition.				
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.		The Agency has not identified a specific policy, procedure or practice as a barrier to the employment of persons with targeted disabilities. However, lack of disclosure of disabilities by applicants/employees, perceptions amongst hiring officials and inadequate targeted recruitment for this population may be factors in low participation rates for employees with targeted disabilities. As such, the Agency will take action to evaluate and address this issue.		
<b>Objective</b>		To ensure the Agency has an effective and efficient recruitment program for individual with disabilities and targeted disabilities, and the selection process is valid and fair for all employees.  Date Objective Initiated   Oct 1, 2014  Target Date For Completion Of Objective   Jun 30, 2017		
<b>Responsible Officials</b>		Senior Leadership Senior Leadership Carroll Cobb Director, OHR Shemmo McDay Director, OCR		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
06/30/2016	Reestablish partnership with the Council of State Administrators of Vocational Rehabilitation (CSAVR), National Employment Team (NET) and local disability organizations to assist the Agency with the recruitment, development and retention of qualified persons with targeted disabilities.	Yes	06/30/2016	09/30/2020
01/30/2017	Distribute an annual notice encouraging employees to identify/update their disability status in the Agency's database, which will include a statement regarding federal disability employment initiative and a notice of confidentiality.	Yes	01/30/2020	
06/30/2017	Evaluate the Agency's recruitment program for persons with targeted disabilities to promote efficiency, and effective collaboration amongst the offices and officials involved in the recruitment and selection process for persons with disabilities.	Yes	06/30/2020	
<b>Fiscal Year</b>		<b>Accomplishments</b>		
2018		The Diversity and Inclusion Leadership Council was reestablished and will promote the employment and reasonable accommodation of qualified persons with disabilities, and to provide leadership and participants with information, tools and resources to meet their obligations under the Rehabilitation Act, MD-715 and other applicable Federal regulations and guidelines.		

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

Not having applicant data, career development information, and performance and awards data has been an overall challenge in accurately assessing the agency for planned activities.

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

The Agency reestablished the Diversity and Inclusion Leadership Council (D&ILC) to address workforce and low participation problems and issues, as well as to learn best practices. Through this forum, an overview of the workforce is provided to participation to share with their individual Divisions and Offices.

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.

The Agency is working to implement a new workforce database system which will have the capabilities of capturing applicant flow data. Also, OCR plans to increase collaboration with HR and conduct quarterly meeting regarding workforce planning and data requirements. Further, the Agency will strengthen collaboration with colleges and universities to announce internships and vacancies; and also work with vocational rehabilitation.