

MD-715 – Part J

Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

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

Section I: Efforts to Reach Regulatory Goals

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

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

- | | | |
|--------------------------------|-----|--|
| a. Cluster GS-1 to GS-10 (PWD) | Yes | No <input checked="" type="checkbox"/> |
| b. Cluster GS-11 to SES (PWD) | Yes | No <input checked="" type="checkbox"/> |

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

- | | | |
|---------------------------------|-----|--|
| a. Cluster GS-1 to GS-10 (PWTD) | Yes | No <input checked="" type="checkbox"/> |
| b. Cluster GS-11 to SES (PWTD) | Yes | No <input checked="" type="checkbox"/> |

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

The numerical goals for PWTD and PWD were communicated through multiple media including emails, EEO training, supervisors training, Agency web page, senior leadership meetings and Human Capital recruiters. Additionally, the Agency Director provided a venue for the EEO Director to address the Agency deficit of PWTDs during a quarterly Agency all-hands meeting where employees were encouraged to verify/update/correct their information in the MyBiz personnel system on a quarterly basis. The agency sponsored a supervisory forum which consisted of panel members from EEO and Recruitment. A PWTD from DCMA was selected as the key note speaker for the Agency Disability Awareness Month event. The speaker's topic of

discussion focused on how to communicate effectively with deaf and hard of hearing employees.

Section II: Model Disability Program

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

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

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

Yes No **X**

The Agency has not designated sufficient qualified personnel to implement its disability program. The program is currently managed on a part-time basis by the Alternative Dispute Resolution (ADR) Manager. Pursuant to 29 CFR §1614.203, the Agency did allocate a new full-time permanent Disability Program Manager (DPM) position to effectively administer the Disability Program; however, the position was not funded in FY 2018. The EEO Director continues to request full funding of a permanent full-time DPM. In the interim, the EEO Director has and will continue to have the ADR Manager manage the duties and responsibilities of the DPM on a part-time basis.

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	X			Mr. Russell Murphy; HR Specialist (Recruiting); Human Capital; russell.w.murphy6.civ@mail.mil

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Answering questions from the public about hiring authorities that take disability into account	X			Mr. Russell Murphy; HR Specialist (Recruiting); Human Capital; russell.w.murphy6.civ@mail.mil
Processing reasonable accommodation requests from applicants and employees	X			Ms. Debra Simmon; Disability Program Manager; EEO Office; debra.l.simmon.civ@mail.mil
Section 508 Compliance	X			Mr. Antonio Boston; Program Manager; Information Technology; antonio.boston.civ@mail.mil
Architectural Barriers Act Compliance	X			Mr. Edward Spence; DCMA Director; Facilities Service Center; edward.l.spence.civ@mail.mil
Special Emphasis Program for PWD and PWTD	X			Mr. Kevin Morgan; Special Emphasis Program Manager; EEO Office; kevin.c.morgan1.civ@mail.mil

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

Yes **X** No

The Alternative Dispute Resolution (ADR) Manager (who also served as a part-time DPM) attended the Federal Dispute Resolution conference. The conference provided training on Disability Inclusion and Reasonable Accommodations and Complex Issues related to Reasonable Accommodations. The ADR (again, acting in the capacity of a DPM) also attended training hosted by affinity groups that provided training pertaining to employment of IWDs.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Yes No **X**

Although a 508 Program Manager exists, no funding was provided for services and equipment in FY-18. The 508 Program Manager is leading efforts in concert with the EEO Director, General Counsel representative and the CIO to secure funding in FY-19.

Section III: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

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

The Human Capital (HC) Directorate uses the following programs and resources: Army Servicing Team (AST), LinkedIn, Twitter, and Facebook; career fairs, affinity groups, Keystone Internship Program, university visits, USAJOBS and the Workforce Recruitment Program (WRP).

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.

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The Agency used Schedule A direct hiring, Veterans Recruitment Authority and 30 percent or more Disabled Veterans Authority. In addition, the Agency utilizes the Workforce Recruitment Program and Keystone Internship Program to recruit or hire PWD or PWTD for positions in the permanent workforce. The HC recruiters attended 15 targeted recruitment events throughout the year

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.

To ensure eligibility, the employee or applicant must provide a signed Schedule A letter or other required documentation that indicates 30 percent or more disabled. The hiring official has the ability to contact the HCI recruiter to query the registry for candidates in a specific job series. The Army Servicing Team forwards the applicant's resume to the hiring official prior to the competitive process with an explanation of the type of appointment the individual is qualified for hire.

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

Yes No N/A

The Agency provided training to all hiring managers on the use of hiring authorities that take disability into account. The training educated managers on the different types of authority that are available to hire individuals with disabilities and individuals with a targeted disabilities. The training also focused on recruitment for hiring individuals with disabilities and individuals with targeted disabilities. Managers were afforded the opportunity to use the Supervisor Resource Recruitment home page that further clarified the hiring process. The Field Support Center developed a video to explain the Schedule-A hiring authority process entitled "How to do Information" for hiring managers.

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 FY 2018, DCMA established external partnerships with the U.S. Department of Labor, Office of Disability Employment Policy (ODEP) and the U.S. Department of Defense (DoD), Office of Diversity Management & Equal Opportunity (ODMEO). The stand-in DCMA Disability Program Manager collaborated with the DoD Disability Program Managers Working Group members to discuss significant advantages and disadvantages regarding employment to increase PWD and PWTD.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If “yes”, please describe the triggers below.

- | | | |
|---|-----|-------------|
| a. New Hires for Permanent Workforce (PWD) | Yes | No X |
| b. New Hires for Permanent Workforce (PWTD) | Yes | No X |

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.

- | | | |
|-----------------------------|-----|-------------|
| a. New Hires for MCO (PWD) | Yes | No X |
| b. New Hires for MCO (PWTD) | Yes | No X |

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.

- | | | |
|--|-----|-------------|
| a. Qualified Applicants for MCO (PWD) | Yes | No X |
| b. Qualified Applicants for MCO (PWTD) | Yes | No X |

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.

- | | | |
|------------------------------|-----|-------------|
| a. Promotions for MCO (PWD) | Yes | No X |
| b. Promotions for MCO (PWTD) | Yes | No X |

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

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

A. ADVANCEMENT PROGRAM PLAN

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

The Agency has requested that all supervisors identify vacant positions that can be utilized for hiring and the advancement for IWD and IWTD. Employees are also encouraged to update their Individual Development Plan to request specific training that will increase their advancement opportunity within the organization. The Agency will explore/exercise viable options to convert WRP interns to permanent employees.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

The DCMA provided a variety of career developmental opportunities:

- **Centralized Development Program (CDP)**; offers a variety of leadership, management, education and technical oriented training courses that provided a foundation for organizational excellence by encouraging the development of a well-trained and educated workforce.
- **Defense Civilian Emerging Leader Program (DCELP)**; focused on leader development at the entry level for emerging, high potential candidates and provided training to the next generation of DoD Leaders. This program was sponsored by the Defense Civilian Personnel Advisory Service (DCPAS).
- **Leadership for a Democratic Society**; a leadership development opportunity that challenged students to reach beyond their past experiences to embrace a broader perspective of their government and the unique roles they serve in supporting the government and the populace. Students' progressed through a challenging program as members of small leadership development teams, facilitated by experienced credentialed faculty members.
- **The Keystone Program**; comprised of a cadre of highly qualified employees capable of performing at a journeyman level with a high degree of technical competence and broad understanding of the total DCMA organization and mission. The participants developed skills through formal training and developmental assignments. Each Keystone employee will achieve Level II

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certification in accordance with requirements established by the Defense Acquisition Workforce Improvement Act (DAWIA) and the Department of Defense (DoD).

➤ **Mentoring and Succession Planning Program**; was piloted during the reporting period. Fifty-one members of the workforce participated in a program featuring algorithmic matching and the use of internet portals to promote non-resident mentoring.

These developmental programs are announced on an annual basis through a Tasking Memorandum. Tuition and travel for these programs are centrally funded and managed by Human Capital Division (HCD). Applicants competed for consideration to participate in developmental opportunities. The Agency-centralized board selected primary and alternate candidates to forward to the sponsoring educational institution or program. However, selections by the Agency does not guarantee selection by the sponsoring educational institution as some programs have additional vetting processes.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate. [Collection begins with the FY 2018 MD-715 report, which is due on February 28, 2019.]

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	Data not collected	Data not collected	Data not available	Data not available	Data not available	Data not available
Fellowship Programs	20	8	2	1	0	0
Mentoring Programs	51	51	4	4	1	1
Coaching Programs	Data not collected	Data not collected	Data not available	Data not available	Data not available	Data not available
Training Programs	1	0	0	0	0	0
Detail Programs	Data not collected	Data not collected	Data not available	Data not available	Data not available	Data not available

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.

a. SES

- | | | |
|--|-----|-------------|
| i. Qualified Internal Applicants (PWD) | Yes | No X |
| ii. Internal Selections (PWD) | Yes | No X |

b. Grade GS-15

- | | | |
|--|-----|-------------|
| i. Qualified Internal Applicants (PWD) | Yes | No X |
| ii. Internal Selections (PWD) | Yes | No X |

c. Grade GS-14

- | | | |
|--|-----|-------------|
| i. Qualified Internal Applicants (PWD) | Yes | No X |
| ii. Internal Selections (PWD) | Yes | No X |

d. Grade GS-13

- | | | |
|--|-----|-------------|
| i. Qualified Internal Applicants (PWD) | Yes | No X |
| ii. Internal Selections (PWD) | Yes | No X |

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.

a. SES

- | | | |
|---|-----|-------------|
| i. Qualified Internal Applicants (PWTD) | Yes | No X |
| ii. Internal Selections (PWTD) | Yes | No X |

b. Grade GS-15

- | | | |
|---|-----|-------------|
| i. Qualified Internal Applicants (PWTD) | Yes | No X |
| ii. Internal Selections (PWTD) | Yes | No X |

c. Grade GS-14

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

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.

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

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.

- | | | |
|------------------------------|-----|-------------|
| a. New Hires to SES (PWTD) | Yes | No X |
| b. New Hires to GS-15 (PWTD) | Yes | No X |
| c. New Hires to GS-14 (PWTD) | Yes | No X |
| d. New Hires to GS-13 (PWTD) | Yes | No X |

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.

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a. Executives

- i. Qualified Internal Applicants (PWD) Yes No **X**
- ii. Internal Selections (PWD) Yes No **X**

b. Managers

- i. Qualified Internal Applicants (PWD) Yes No **X**
- ii. Internal Selections (PWD) Yes No **X**

c. Supervisors

- i. Qualified Internal Applicants (PWD) Yes No **X**
- ii. Internal Selections (PWD) Yes No **X**

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.

a. Executives

- i. Qualified Internal Applicants (PWTD) Yes No **X**
- ii. Internal Selections (PWTD) Yes No **X**

b. Managers

- i. Qualified Internal Applicants (PWTD) Yes No **X**
- ii. Internal Selections (PWTD) Yes No **X**

c. Supervisors

- i. Qualified Internal Applicants (PWTD) Yes No **X**
- ii. Internal Selections (PWTD) Yes No **X**

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.

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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.

Voluntary Separations (PWTD)	Yes	No X
Involuntary Separations (PWTD)	Yes	No X

N/A

3. 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.

N/A.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

The Agency internet address is: <http://www.dcmamail.com/508>. However, a description on how to file an EEO complaint is not visible on the Agency's web page because the Agency does not have a 508-compliant program.

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 did not display the internet address on the Agency's public website for its notice explaining employees' and applicants' rights under the Architectural Barriers Act (ABA) or a description of how to file a complaint.

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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 procured services to provide American Sign Language (ASL), for over 200 deaf and hard-of-hearing (D/HH) employees.
- The Agency ensured that all 21 D/HH employees who needed an accommodation were provided with a long term-solution and were able to acquire the new authorized ZVRS Z-70 phones that conformed to the agency, as well as IT security and DoD standards prior to Defense Information Systems Agency deadline.
- Funding for the 508 Program to ensure accessibility for employees and applicants with disabilities.
- The WRP Intern developed and deployed an Exit Survey for IWD/IWTDs

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 accommodation is within seven days of the request. Accommodations that may be more complex due to the needed collaboration with the General Council (GC), Labor and Employee Relations (LER), Federal Occupational Health (FOH) or management may take 30 days or more. If so, employees requesting accommodations are notified of the delay in writing.

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 has an effective Reasonable Accommodation (RA) program in place. Initial requests for RA are processed within seven days. Complex RA requests require external communications and are usually processed within 30 days; requesters are kept informed regularly as the process progresses. The entire RA process is monitored end-to-end by the DPM to ensure that all requests are handled effectively and efficiently; the monitoring process is reviewed by the EEO Director to maintain integrity. All employees receive periodic training on RA, with emphasis on supervisors/managers on how to process RA requests. Additionally, all employees are provided with the Agency's RA Guidance which further explains the rights and responsibilities of the Agency and IWD, application procedure and timeline of the process. Personal Assistance Service (PAS) guidance is also incorporated in the RA guidance.

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

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

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

The personal assistance services (PAS) was not requested by a DCMA employee to demonstrate the effectiveness of the program.

Section VI: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Yes **X** No N/A

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

Yes No **X** 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.

N/A

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Yes No N/A

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

Yes No N/A

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

N/A

Section VII: Identification and Removal of Barriers

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

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

Yes No

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

Yes No N/A

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- 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.

Trigger 1	The Rehabilitation Act of 1973 requires the Agency to make their electronic and information technology (EIT) accessible to people with disabilities. The law (29 U.S.C § 794 (d)) applies to all Federal agencies when they develop, procure, maintain, or use electronic and information technology.	
Barrier(s)	The Agency did not provide all disabled employees public access to information comparable to the access available to others.	
Objective(s)	Ensure that all EIT that is developed, procured, maintained or used by the Agency are accessible to all members requesting accommodations as required by Section 508 of the Rehabilitation Act of 1973.	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
Information Technology (IT) Director, Mr. Ray Coleman		Yes
Mr. Antonio Boston, 508 Compliance Program Manager		
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
Yes		Yes
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	No	
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, Merit System Promotion Board (MSPB), Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	No	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, Equal Employment Opportunity Commission (EEOC), MSPB,	No	

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Government Accountability Office (GAO), Office of Personnel Management (OPM))					
Other (Please Describe)		Yes	IWD/IWTDS were not able to access all EIT.		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)	
03/15/2019	Develop 508 Strategic Action Plan				
09/30/2019	Fund the program prior to the end of FY19.				
Fiscal Year	Accomplishments				

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

Although a Disability Program Manager exists, the Agency allocated no funding for services and equipment to administer the program.

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

No resources were allocated to implement actions toward achieving this requirement.

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 508 Program Manager will request adequate funding to fully implement the program.

Trigger 2	The Agency did not provide full funding to hire a permanent full-time DPM.
Barrier(s)	The ADR Manager has been performing the duties and responsibilities of a DPM on a part-time basis, which is inadequate to fully implement the program.
Objective(s)	Pursuant to 29 CFR §1614.203, the agency is to provide full funding to hire a permanent full-time DPM to effectively administer the program.

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Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)		
Executive Director Financial and Business Operations/Comptroller, HQ, Ms. Pamela Conklin		Yes		
EEO Director, Ms. Linda Galimore		Yes		
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)		
Yes		Yes		
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected		
Workforce Data Tables	No			
Complaint Data (Trends)	No			
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	No			
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	Yes	Major Headquarters Alignment		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
12/31/2019	Secure funding for a Disability Program Manager	No		
Fiscal Year	Accomplishments			

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

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 U.S. Equal Employment Opportunity Commission
 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

The Agency eliminated the DPM position during the Major Headquarters Alignment (MHA).

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

The Agency authorized a position, however funding was not allocated for a full-time permanent DPM.

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 ADR Manager will continue to perform the duties and responsibilities of a DPM on a part-time basis; however, this is inadequate to fully implement the program. The EEO Director will continue to engage the Financial and Business (FB) Directorate for internal reprogramming to identify resources to support hiring a permanent full-time DPM.

Trigger 3	Employees and applicants' rights under Section 508 of the Rehabilitation Act were not available on the Agency's public website.	
Barrier(s)	A description on how to file an EEO complaint is not visible on the Agency web page.	
Objective(s)	Provide employees and applicants a notice on the Agency website explaining their rights under Section 508 of the Rehabilitation Act.	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
Information Technology (IT) Director, Mr. Ray Coleman		Yes
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
Yes		Yes
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	No	
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	

EEOC FORM
 U.S. Equal Employment Opportunity Commission
 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	No			
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	Yes	Information unavailable		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
06/30/2019	Secure funding for the 508 program	Yes		
Fiscal Year	Accomplishments			

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

The Agency did not have a 508 team in place to implement the program.

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

No resources were allocated to implement actions toward achieving this requirement.

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 508 Program Manager will request adequate funding to fully implement the program.

EEOC FORM

U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Trigger 4	Employees and applicant's rights under the ABA as amended 42 U.S.C. §§ 4151 et seq. was not available on the agency's public website.			
Barrier(s)	A description on how to file an EEO complaint is not visible on the Agency web page.			
Objective(s)	Provide employees and applicants a notice on the agency website explaining their rights under ABA.			
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)		
Facilities Service Center Director, Mr. Edward Spence		N/A		
Information Technology (IT) Director, Mr. Ray Coleman				
Mr. Antonio Boston, 508 Compliance Program Manager				
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)		
No		No		
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected		
Workforce Data Tables	No			
Complaint Data (Trends)	No			
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	No			
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	Yes	Information unavailable		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)

EEOC FORM
U.S. Equal Employment Opportunity Commission
 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

03/15/2019	Develop 508 Strategic Action Plan			
06/30/2019	Establish an agency internet address for the ABA.			
Fiscal Year	Accomplishments			

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

The Agency did not allocate funding for services and equipment to administer the program.

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

No resources were allocated to implement actions toward achieving this requirement.

5. 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 508 Program Manager will request adequate funding to fully implement the program.

EEOC FORM
 U.S. Equal Employment Opportunity Commission
 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Trigger 5	Table B1 Participation of IWTD in population			
Barrier(s)	Cultural/Attitudinal			
Objective(s)	Continue to educate and encourage employees and supervisors about biases and Hiring flexibilities regarding IWTD and self-identification.			
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)		
Disability Program Manager, Debra Simmon		Yes		
EEO Director, Ms. Linda Galimore		Yes		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
3/30/2019	Continue to provide training on biases	Yes	N/A	08/22/2018
3/30/2019	EEO will continue quarterly reminders to Agency to self-identify in MyBiz.	Yes	N/A	08/03/2018
3/30/2019	Enhance Outreach to Targeted Disability serving organizations. .	Yes	N/A	09/21/2018
Fiscal Year	Accomplishments			
2018	Quarterly messenger Agency-wide encouraging employees to self - identify in MyBiz.			
2018	Utilized the new Standard Form 256, Self-Identification of Disabilities, to calculate our participation.			

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

N/A – The Agency reached the required goals.

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U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

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

N/A – The Agency reached the required goals.

3. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

N/A – The Agency reached the required goals.