

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 | No |
| b. Cluster GS-11 to SES (PWD) | Answer | No |

*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 | No |
| b. Cluster GS-11 to SES (PWTD) | Answer | No |

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10					
Grades GS-11 to SES					

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

The Operations Service Division held customer service meetings with each staffing specialist along with their servicing District Directors and District Resource Managers to discuss utilizing non-competitive hiring flexibilities (Schedule A Disability Hiring) to fill positions.

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	
Section 508 Compliance	2	0	0	terri.youngblood@eeoc.gov
Processing reasonable accommodation requests from applicants and employees	1	0	0	Jackie Cumber Disability Program Manager jackie.cumber@eeoc.gov
Processing applications from PWD and PWTD	6	0	0	Shelita Aldrich Director, Operational Services Division Shelita.Aldrich@eeoc.gov
Answering questions from the public about hiring authorities that take disability into account	6	0	0	Shelita Aldrich Branch Chief, Operational Services Division Shelita.Aldrich@eeoc.gov
Architectural Barriers Act Compliance	2	0	0	Donnie Landon Director donnie.landon@eeoc.gov
Special Emphasis Program for PWD and PWTD	1	0	1	Stan Pietrusiak Director Stan.Pietrusiak@eeoc.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

The DPM received the following trainings: ROI-Beyond Adequacy; COVID-19 and ADA Issues; Civility in the Workplace-Taming the Bully; Hot Topics and Emerging Issues in Workplace Accommodation; Age Discrimination Trends; Legal Updates 2020; Connecting Employer Practices to Disability Outcomes; and Race and Color Discrimination Issues.

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

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.

The Agency maintains a database of Schedule A eligible candidates. Also, Staffing Specialists are registered for the Workforce Recruitment Program (WRP) database, which is a free resource that helps federal hiring managers connect with qualified candidates with disabilities for all jobs. The WRP database offers various candidates to include students and recent graduates with disabilities who are available for internships, temporary, or permanent employment in the Federal Government. OPM's Shared List of People with Disabilities for recruitment; Ticket-to-Work Program which provides people receiving Social Security disability benefits choices for receiving employment services; State Vocational Rehabilitation Agencies (SVRAs) and State Disability Service agencies to recruit potential applicants with disabilities; DOL's Veterans' Employment and Training Service (VETS) program; VA's Vocational Rehabilitation and Employment (VR&E) Service, which fills workforce needs with trained, educated, and experienced disabled veterans; DOD's Operation Warfighter and Hiring Heroes Programs.

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

The agency is currently using Schedule A (Disability) and 30% disabled veteran hiring authority to recruit PWD and PWTD.

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.

A. All EEOC applicants use USAJOBS, where applicants with disabilities are directed to fax or email their completed application package directly to the Human Resources Specialist (HRS) specifying the vacancy for which they wish to be considered. Once received, the HRS determines if the applicant meets the Schedule A 213.23102(u) requirements and then forwards the application package to the appropriate HRS for a qualification analysis. B. Applicants with disabilities may also provide their application directly to the hiring office at any time. The District Resources Manager (DRM) or HRS should forward any medical documentation to the HRS to certify that the candidate meets the Schedule A 213.3102(u) requirements and to insure the confidentiality of all medical information. The DRM or HRS may then certify that the applicant meets the qualifications for the position. C. Applicants with disabilities may also provide their application to an EEOC representative at job fairs. These applications are then provided to the HRS who will determine whether the candidate meets the Schedule A 213.3102 (u) requirements before forwarding the application package to the appropriate DRM and/or HRS for a qualification analysis. D. Applicants with disabilities may also provide their application directly to the HRS at any time. The HRS reviews the current recruitment inventory to identify potential position(s) for which the applicant is suited, determines whether the applicant meets the Schedule A 213.3102(u) requirements, and then forwards the application package to the appropriate HRS for a qualification analysis.

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

The Agency provides training on hiring to new supervisors and mid-level managers, which includes Schedule A hiring for PWD/PWTDs. Also, the Agency has developed for "ABCs of SCHEDULE A for the Hiring Manager" and "How to Hire Using the Schedule A Appointing Authority" for use throughout the federal government.

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 plans to continue utilizing the following resources: WRP; OPM's Shared List of People with Disabilities for recruitment; the Ticket-to-Work Program; State Vocational Rehabilitation Agencies (SVRAs); DOL's Veterans' Employment and Training Service (VETS) program; VA's Vocational Rehabilitation and Employment (VR&E) Service; and DOD's Operation Warfighter and Hiring Heroes Programs.

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 No
- b. New Hires for Permanent Workforce (PWTD) Answer No

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

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 No
- b. New Hires for MCO (PWTD) Answer No

The PTWD data shows that there were no qualified applicants in FY 2020; however, three PWTD applicants were selected. This indicates that applicants did not disclose their disability on the application forms, but when selected they do so on the SF 256. Therefore, a trigger does not exist.

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 No
- b. Qualified Applicants for MCO (PWTD) Answer No

The PWD data shows that there were no qualified applicants in FY 2020; however, three PWTD applicants were selected. This indicates that applicants do not disclose their disability on the application forms, but when selected they do so on the SF 256. Therefore, a trigger does not exist.

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 No
- b. Promotions for MCO (PWTD) Answer No

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.

The EEOC ensures that employees with disabilities are accommodated in all training and development opportunities. In FY 2020, the EEOC provided various external opportunities for training and development for employees at all levels (entry, mid-level, supervisory, managerial, and executive). Most programs supported professional and technical training and developmental needs as part of each employee’s Individual Development Plan (IDP). Employees submit training requests quarterly. Also, the EEOC provides technical training and development through its National Training Program. This Program is geared towards EEOC's mission-critical occupations.

B. CAREER DEVELOPMENT OPPORTUNITES

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

In FY 2020, the EEOC provided various external opportunities for training and development for employees at all levels (entry, mid, supervisory, managerial, and executive). Most programs supported professional and technical training and developmental needs as part of our Individual Development Program (IDP). Also, EEOC provides technical training and development through its national training program. This Program is geared towards EEOC's mission-critical occupations. In all training and development activities, EEOC ensures that employees with disabilities are accommodated.

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	10	10	0	0	0	0
Internship Programs	0	0	0	0	0	0
Fellowship Programs	0	0	0	0	0	0
Training Programs	0	0	0	0	0	0
Other Career Development Programs	0	0	0	0	0	0
Coaching Programs	5	5	0	0	0	0
Detail 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 Yes
- b. Selections (PWD) Answer Yes

In FY 2020, no PWDs applied or were selected for career development programs. Because the number of employees participating in these programs was so low (only .51% of all Agency employees), it was not possible to determine if there are any barriers in any Agency policy, practice, or procedure for these programs.

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 Yes
- b. Selections (PWTD) Answer Yes

In FY 2020, no PWTDs applied or were selected for career development programs. Because the number of employees participating in these programs was so low (only .51% of all Agency employees), it was not possible to determine if there are any barriers in any Agency policy, practice, or procedure for these programs.

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

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %

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

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

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

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

D. PROMOTIONS

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

a. SES

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

ii. Internal Selections (PWD) Answer N/A

b. Grade GS-15

i. Qualified Internal Applicants (PWD) Answer No

ii. Internal Selections (PWD) Answer No

c. Grade GS-14

i. Qualified Internal Applicants (PWD) Answer No

ii. Internal Selections (PWD) Answer No

d. Grade GS-13

i. Qualified Internal Applicants (PWD) Answer Yes

ii. Internal Selections (PWD) Answer No

The GS-13 Relevant Applicant Pool for PWD for FY 2020 was 29.21%; however, the percentage of Qualified Agency PWD applicants was 24.30% (a difference of more than 1%). Note: An abnormally high percentage of internal applicants did not identify their disability status. This high rate of non-identification for applicants at these GS levels made it difficult for OEO to identify triggers and perform the barrier analysis where applicants did not report their status (but internally selected candidates did so). By using a combination of applicants who identified a disability and veterans with a service-connected disability, OEO was able to

obtain a more accurate total of PWD. We also note that most applicants were not qualified because they were ineligible for the position. .

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 Yes

ii. Internal Selections (PWTD) Answer Yes

c. Grade GS-14

i. Qualified Internal Applicants (PWTD) Answer No

ii. Internal Selections (PWTD) Answer No

d. Grade GS-13

i. Qualified Internal Applicants (PWTD) Answer No

ii. Internal Selections (PWTD) Answer No

The GS-15 Relevant Applicant Pool was 3.33%; however, the percentage of Qualified Internal PWTD applicants was 1.61%. (A difference of more than 1%). Of these, none were selected. As with the PWD data (see note above), the high rate of applicants who did not identify their disability status made it difficult for OEO to identify triggers and perform the barrier analysis where applicants did not report their status (but internally selected candidates did so). Additionally, the total number of selected individuals at the for GS-15 level in FY 2020 was only five employees; as a result, it is very difficult to identify any barriers for this group.

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 No

c. New Hires to GS-14 (PWD) Answer No

d. New Hires to GS-13 (PWD) Answer No

Applicant Flow Data (AFD) is not available for SES positions at the EEOC because the Agency does not utilize the certificate feature in USAS. As a result, the EEOC issues SES certificates and closes the files manually. For AFD to be available, the Agency must audit certificates/close out announcements within the USAS system.

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 No
- c. New Hires to GS-14 (PWTD) Answer No
- d. New Hires to GS-13 (PWTD) Answer No

Applicant Flow Data (AFD) is not available for SES positions at the EEOC.

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 No
 - ii. Internal Selections (PWD) Answer No

The Agency’s applicant flow data does not contain information regarding executives or managers.

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 No

ii. Internal Selections (PWTD) Answer No

The Agency's applicant flow data does not contain information regarding executives or managers.

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 No

The Agency's applicant flow data does not contain information regarding executives or managers.

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 No

The Agency's applicant flow data does not contain information regarding executives or managers.

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 No

The Office of Personnel Management does not currently require the Agency to convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service. The Agency does highly encourage supervisors to do so. OCHCO utilizes a report to track these employees and is working to convert the remaining Schedule A employees.

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

The percentage of voluntary separations of persons without a disability in FY 2020 was 9.86%; however, the percentage of voluntary separations-PWD was 11.84 % (a difference of 1.98%). The percentage of involuntary separations of persons without a disability in FY 2020 was 0.34%, however, the percentage of involuntary separations-PWD was 0.66% (a difference 0.32%).

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
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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

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
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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.

The majority of separations were comprised of employees who voluntarily left the EEOC to work for another federal agency or who retired.

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.

For the EEOC's Section 508 compliance, contact Terri Youngblood at (202) 663-4419 or Deanna Scott at (202) 540-9189, or e-mail 508coordinator@eoc.gov. For information about filing a complaint against the EEOC under Section 508, contact the Office of Equal Opportunity at (202) 663-7081 or TTY at (202) 663-7002. To file a complaint against another agency, contact that agency's Section 508 Coordinator. Contact information for Section 508 Coordinators may be found at www.section508.gov/508-coordinator-listing

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 Architectural Barriers Act (ABA) requires access to facilities that are designed, built, altered, or leased with Federal funds. The Access Board is the federal agency responsible for enforcing the ABA. The Access Board's accessibility standards are available on their website at www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards, and information about filing a complaint may be found at www.access-board.gov/aba-enforcement/file-a-complaint.

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 EEOC continues to design its field offices in a way that meets (and sometimes exceeds) what is required to comply with the Architectural Barriers Act (ABA) and Americans with Disabilities Act (ADA). For example, the use of automatic door operators at entrance doors in EEOC field offices (which is not required by ADA or ABA) is now a standard provision of EEOC in our field offices. The EEOC also follows the Uniform Federal Accessibility Standards (UFAS) as well. The EEOC upgraded enterprise Adobe licensing to provide all staff with Adobe Acrobat Pro Document Cloud (DC), enabling staff to more easily create, test and remediate accessible PDF documents. In addition, Document Accessibility Training was offered Agency-wide, teaching employees how to create accessible Microsoft Word documents and how to convert them to fully accessible PDFs. In the second quarter of fiscal year 2021, EEOC is offering a course on PDF Accessibility that will teach employees how to ensure PDF documents are accessible and how to fix documents that are not accessible using Adobe DC. In FY 2020, EEOC redesigned its website using the US Web Design System, which is a library of design components that can help government developers quickly make trustworthy, accessible, and consistent digital government services. The migration allowed the agency to develop a more accessible and mobile-friendly www.eeoc.gov. The new site scales automatically and is much more accessible to stakeholders that use smartphones to reach the site. Similarly, the migration allows the website to provide a near seamless transition for users who toggle between English and Spanish content on the website. The Agency has made significant progress toward increasing language access to the portions of the website concerning the rights of applicants and employees. The material has been translated into seven languages, the website platform has been modified to better host those translations, and OCLA expects them to be posted in the third quarter of FY 2021. In addition, the EEOC acquired an automated website accessibility tool to assist with continuous accessibility testing and remediation. Finally, during fiscal year 2020, EEOC began modernizing its Integrated Mission System (IMS) with monies received through GSA's Technology Modernization Fund. EEOC's IMS is in use by all EEOC offices as well as 92 State and Local Government Fair Employment Practices Agencies. This modernization effort will remove some accessibility concerns and work arounds that were inherent within the legacy technology. To ensure that the new modern system is accessible to everyone, 508 requirements are a critical part of the systems design, development, and testing.

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 requests for reasonable accommodations during FY 2020 was twenty (20) business 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 EEOC's reasonable accommodation (RA) policies, procedures and practices were essential to the program's success in FY 2020. Examples of the program's effectiveness include the following: • The average number of days for initial contact was two (2) business days (the requirement set forth in the Agency's R/A policy is 7 business days). • The average timeframe for processing R/A requests was twenty (20) business days (R/A/ policy requirement is 30 business days). • Approximately ninety-six (96%) percent of all requests received were completed by the end of FY 2020. • OCHCO conducted three R/A training sessions for managers and supervisors. • The most requested RA items from EEOC employees were telework and modifications to work schedules, workspaces, job duties, and duty stations.

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.

EEOC's PAS policies, procedures and practices in past fiscal years have been successful. There were no PAS requests in FY 2020. OCHCO conducted three R/A training sessions (which included PAS) for managers and supervisors.

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 Yes

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.

Even though the Agency's rate of harassment complaints is higher than the government-wide rate, the Agency's per capita rate of these complaints is also higher than the government-wide rate. No specific barrier identified. Gathering data on other agencies per capital rate.

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 Yes

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.

Even though the Agency's rate of failure-to-provide-reasonable-accommodation complaints is higher than the government-wide rate, the Agency per capita rate is also higher than the government-wide rate. No specific barrier identified.

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 N/A

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

There was no planned activities from last years report

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.

Continue to work on more complete data for analysis.