

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 |

The participation rate for PWD is above the 12% benchmark for the GS-1 to GS-10 (32.41%) cluster and GS-11 to SES (22.19%) cluster.

*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 |

The participation rate for PWTD is above the 2% goal for the GS-1 to GS-10 cluster (10.74%) and GS-11 to SES cluster (5.17%).

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical Goal	--	12%		2%	
Grades GS-1 to GS-10	0	0	0.00	0	0.00
Grades GS-11 to SES	0	0	0.00	0	0.00

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

Hiring goals are communicated to hiring officials during their HR consultation with District Directors and District Resource Managers when discussing the utilization of non-competitive hiring flexibilities (Schedule A Disability Hiring) to fill positions at the GS-11 and below. In addition, the hiring goals are communicated through the FEORP and DVAAP reports for the Agency on an annual basis.

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

In FY 2021, EEOC hired an additional DPM in OCHCO’s Employee Services Division.

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	2	0	0	jackie.cumber@eeoc.gov, Elizabeth.Kraszewski@eeo
Special Emphasis Program for PWD and PWTD	1	0	1	Ingrid Smith Special Emphasis Program Manager ingrid.smith@eeoc.gov
Architectural Barriers Act Compliance	1	0	0	Donnie Landon Director donnie.landon@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
Section 508 Compliance	2	0	0	terri.youngblood@eeoc.gov
Processing applications from PWD and PWTD	6	0	0	Shelita Aldrich Director, Operational Services Division Shelita.Aldrich@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 Jackie Cumber is a Certified Rehabilitation Counselor (CRC). In FY 2021, she completed the following trainings, conference and symposium: • How to work with Traumatic Memory • Medical Marijuana: Legal, Clinical and Ethical Issues • ADA Accessibility • ADA Section 504/508 • MD-715 Basics • Barrier Analysis • EEO Legal Updates • Symposium on Assistive Technology • EXCEL Conference

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 six OCHCO 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 contains students and recent graduates with disabilities who are available for internships, temporary, or permanent employment in the Federal Government. Candidates represent a wide range of academic and professional backgrounds. All candidates are eligible for federal hiring under the Schedule A hiring authority. The WRP is managed jointly by Department of Labor’s Office of Disability Employment Policy and the Department of Defense. The EEOC also utilizes OPM’s Shared List of People with Disabilities for recruitment through the OPM Talent Portal; the 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; and 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 uses 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. The EEOC utilizes USAJOBS, where applicants with disabilities are directed to fax or email their completed application package directly to the OCHCO Human Resource Specialist (HRS) specifying the vacancy they wish to be considered, by vacancy identification number. Once received, the Selective Placement Coordinator (SPC) 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 Resource Manager (DRM) or HRS should forward any medical documentation to the (SPC) to certify the candidate meets the Schedule A 213.3102(u) requirements and to ensure the confidentiality of all medical information. The 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 hiring job fairs. These applications are then provided to the SPC who will then certify that the candidate meets the Schedule A 213.3102 (u) requirements before forwarding the application package to the appropriate HRS for a qualification analysis. D. Applicants with disabilities may also provide their application directly to the SPC at any time. The SPC reviews the

current recruitment inventory to identify potential position (s), determines that the applicant meets the Schedule A 213.3102(u) requirements and then forwards the application package onto the appropriate HRS for possible certification.

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 provided annual training for new supervisors and mid-level supervisors on hiring, which included Schedule A hiring for PWD/PWTD. EEOC has also developed guidance for government-wide usage entitled the “ABCs of SCHEDULE A for the Hiring Manager and How to Hire Using the Schedule A Appointing Authority”. The guidance is located on EEOC.gov and our intranet page. EEOC Order 530.014, EEOC Excepted Service Policy, discusses the use of the excepted appointment under Schedule A that may be used to appoint applicants with disabilities without coemption and the required documents needed. During all HR consultations, managers are encouraged to review resumes of applicants with a disability if a position is posted on USAJobs.

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; 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. The Agency also continued outreach to establish a pipeline of qualified individuals with disabilities will be conducted in the upcoming fiscal year. The EEOC maintains contact with the National Telecommuting Institute (NTI), a non-profit organization whose mission is to identify and develop work-at-home jobs for home-based individuals with a physical disability. These individuals are part of the Social Security Administration’s Ticket to Work Program.

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	4139	6.98	0.00	3.82	0.00
% of Qualified Applicants	3592	6.99	0.00	3.54	0.00
% of New Hires	39	20.51	0.00	15.38	0.00

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

Applicant flow data for new hires shows the occupational series 0260 and 0905 had qualified applicant with PWD or PWTD with no selections. However, the Agency’s personnel system data shows the same selections having PWD and PWTD. Again, this indicates that the selected applicants did not disclose their disability status during the application process. After selection, however, they provide their disability status on the SF 256. There are no triggers for PWD and PWTD in the Agency’s MCOs.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
0260 EQUAL EMPLOYMENT SPECIALIST	0	0.00	0.00
0301 ADR MEDIATOR	4	50.00	0.00
0905 GENERAL ATTORNEY	15	0.00	0.00
1860 INVESTIGATOR	20	30.00	30.00

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

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

Applicant flow data shows that of those employees were promoted to any of the MCOs, none were PWD or PWTD. However, the Agency’s personnel system data shows the same selections having PWD and PWTD. Again, this indicates that the selected applicants did not disclose their disability status during the application process. After selection, however, they provide their disability status on the SF 256. There are no triggers for PWD and PWTD in the Agency’s MCOs.

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.

In FY 2021, 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 career training and developmental needs as part of our Individual Development Program (IDP) training. Employees submit training requests on a quarterly basis for external training opportunities. Also, EEOC provides technical training and development through its National Training Program. This program is geared towards EEOC's mission-critical occupations. In FY 2021, EEOC sponsored a myriad of internally facilitated courses that were offered virtually to all employees. Marketing of these courses included providing directions and resources to participate in these trainings for PWD and PWT. Lastly, the EEOC Mentoring Program is focused on connecting employees across EEOC with leaders who have experience and passion in the development of others. The goal of the program is to foster relationships between the leaders of EEOC with employees, who might work in a separate area, and to create discussion and learning around specific topics. This program is open to every EEOC employee, regardless of position, grade, or status. In all training and development activities, EEOC ensures that employees with disabilities are accommodated.

B. CAREER DEVELOPMENT OPPORTUNITES

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

Training and Employee Development Division (TEDD) delivers high-quality, non-technical training and employee development programs to Agency employees. TEDD successfully sponsored several leadership, supervisory, executive, professional, and career development programs for this performance cycle. Some of the workshops included Ten Soft Skills You Need, TEDD Book Discussion Win Every Day: Proven Practices for Extraordinary Results, Time Management, Communication Strategies, Goal Setting and Getting Things Done, Tuition Assistance Program Webinar and IDP Development, LMS, and SF-182 Review. In 2021, the Agency also reestablished its Mentoring Program for EEOC employees. In all training and development activities, EEOC ensures that it accommodates its employees with 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		PWT	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	0	0	0	0	0	0
Mentoring Programs	71	71	46	46	14	14
Coaching Programs	11	11	27	27	18	18
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
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 No
- b. Selections (PWD) Answer No

EEOC does not have a formal career development program; however, the agency re-established its formal mentoring program in 2021. Applicant flow data shows that there were no triggers for PWD and PWT in the mentoring and coaching programs. While the agency captured the number of applicants and selectees for other career development opportunities, we could not determine how many of those applicants and selectees were PWD.

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

- a. Applicants (PWTD) Answer No
- b. Selections (PWTD) Answer No

EEOC does not have a formal career development program; however, the agency re-established its formal mentoring program in 2021. There were other career development opportunities offered through the agency to include coaching programs and other training and development programs. While the agency captured the number of applicants and selectees for career development opportunities, there is no data to determine how many of the applicants and selectees were PWTD.

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 Yes
- b. Awards, Bonuses, & Incentives (PWTD) Answer Yes

Using the inclusion rate, the agency experienced the following triggers in its award distribution for PWD and PWTD: Time-Off Awards 1-10 hours – PWOTD 54.30% vs. PWTD 43.28% Time Off Awards 11-20 hours PWOD 47.25% vs. PWD 41.11% Time Off Awards 21-30 hours PWOTD 9.39% vs. PWTD 7.46% Cash Awards \$500 and Under PWOTD 44.24% vs. PWTD 39.55% Cash Awards \$1000-\$1999 PWOD 46.21% vs. PWD 37.55% Cash Awards \$1000-\$1999 PWOTD 44.86% vs. PWTD 32.84% Cash Awards \$3000-\$3999 PWOD 8.87% vs. PWD 5.73% Cash Awards \$3000-\$3999 PWOTD 8.40% vs. PWTD 3.73% Cash Awards \$4000-\$4999 PWOTD 1.62% vs. PWTD 0%

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 1 - 10 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 1 - 10 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Average Hours	0	0.00	0.00	0.00	0.00

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 41 or more Hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Average Amount	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 Yes

Quality Step Increases PWOTD 3.13% vs. PWTD 1.49%

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	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

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 No
 - ii. Internal Selections (PWD) Answer No
 - 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 Yes
 - d. Grade GS-13
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer No

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 No
 - ii. Internal Selections (PWTD) Answer No

b. Grade GS-15	
i. Qualified Internal Applicants (PWTD)	Answer No
ii. Internal Selections (PWTD)	Answer No
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

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 No
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 is not available for SES positions at 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 No
 - ii. Internal Selections (PWD) Answer No
- b. Managers
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer No
- c. Supervisors
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer No

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

6. Does your agency have a trigger involving PWTB 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 (PWTB) Answer No
 - ii. Internal Selections (PWTB) Answer No
- b. Managers
 - i. Qualified Internal Applicants (PWTB) Answer No
 - ii. Internal Selections (PWTB) Answer No
- c. Supervisors
 - i. Qualified Internal Applicants (PWTB) Answer No
 - ii. Internal Selections (PWTB) Answer No

EEOC'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

EEOC'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 No
- b. New Hires for Managers (PWTD) Answer No
- c. New Hires for Supervisors (PWTD) Answer No

EEOC’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

EEOC highly encourages supervisors to convert Schedule A employees to competitive service; however, there are 9 employees who have not been converted. The Agency plans to work with supervisors to why they have not been converted and facilitate conversion where appropriate.

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

- a. Voluntary Separations (PWD) Answer No
- b. Involuntary Separations (PWD) Answer Yes

The Agency had a total of 7 involuntary separations in FY 2021. Of those separations, 3 (inclusion rate 0.59%) were PWD and 4 (inclusion rate 0.26%) were PWOD. Further analysis revealed that there is no barrier causing this trigger.

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	0	0.00	0.00
Permanent Workforce: Resignation	0	0.00	0.00
Permanent Workforce: Retirement	0	0.00	0.00
Permanent Workforce: Other Separations	0	0.00	0.00
Permanent Workforce: Total Separations	0	0.00	0.00

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 No
- b. Involuntary Separations (PWTD) Answer No

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	0	0.00	0.00
Permanent Workforce: Resignation	0	0.00	0.00
Permanent Workforce: Retirement	0	0.00	0.00
Permanent Workforce: Other Separations	0	0.00	0.00
Permanent Workforce: Total Separations	0	0.00	0.00

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.

Of the three involuntary separations of PWDs, two were performance-based and one was conduct-based. Of the two performance-based separations, one was a resignation in lieu of involuntary action. The Agency did not identify a particular policy, procedure, or practice as the cause of this trigger.

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.

EEOC’s Accessibility Notice of Rights can be found at Accessibility: Notice of Rights | U.S. Equal Employment Opportunity Commission (eoc.gov). Employees and applicants with questions about the EEOC's Section 508 program supporting information and communications technology, can e-mail 508coordinator@eoc.gov. For information about filing a complaint against the EEOC under Section 508, employees and applicants can contact the Office of Equal Opportunity at (202) 291-2945 or provide an OEO email address.

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.

EEOC’s notice on the Architectural Barrier’s Act can also be found at Accessibility: Notice of Rights | U.S. Equal Employment Opportunity Commission (eoc.gov). 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.

During fiscal year 2021, EEOC upgraded its workstations with Adobe Acrobat Pro Document Cloud (DC), enabling staff to more easily create, test and remediate accessible PDF documents. 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. More recently, the Commission deployed its modernized charge management system to all EEOC offices and 92 State and Local Government Fair Employment Practices Agencies (FEPAs). The new browser-based system – named the Agency Records Center (ARC) – replaced

the Agency's 21-year-old Integrated Mission System (IMS) through monies received from GSA's Technology Modernization Fund. 508 requirements and testing were a critical part of the system design and development. This modernization effort mitigated accessibility concerns and work arounds that were inherent within the legacy client-based application, ensuring that ARC is fully accessible. An ARC Accessibility Guide was developed to assist users that use assistive technology with tips related to keyboard accessibility, navigating tabs, using screen readers, using voice recognition software, and setting color contrast. During FY 2022, the agency will continue to focus on safety and accessibility for PWD and PWTD. For employees who may have a remote work reasonable accommodation, the DPM will ensure those individuals are equipped with the adaptive technology and any other tools or resources they may require performing their essential work functions remotely.

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 number of business days from date request received by Disability Program Manager (DPM) to date of initial contact was 1 business day (The Agency's Reasonable Accommodation Policy (RAP) target is 7 business days). The average number of business days from date request received by the Agency to date request was completed was 27 business days (RAP target is 30 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.

EEOC's Reasonable Accommodation (RA) policies, procedures and practices were essential to the program's success in FY 2021. Examples of the reasonable accommodation program's effectiveness include: • The average number of days for initial contact was one (1) business day (target is 7 business days). • The average timeframe for process was twenty-seven (27) business days (target is 30 business days). • Approximately eighty-six (86) percent of all requests received were completed by the end of the FY. • The most requested items were Modifications (29 requests), Assistive Devices (26 requests), and Software (22 requests). • The Agency provided training on reasonable accommodation to new supervisors and mid-level managers. • The agency also provided a reasonable accommodation information session during a Special Emphasis program for National Disability in Employment Awareness Month.

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.

While EEOC's PAS policies, procedures and practices have been successfully implemented, zero (0) requests for PAS were received in FY 2021. Reasonable accommodation trainings (including PAS) were conducted 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.

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 No

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

Source of the Trigger:	Workforce Data (if so identify the table)					
Specific Workforce Data Table:	Workforce Data Table - B9					
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Time-Off Awards 1-10 hours – PWOTD 54.30% vs. PWTD 43.28% Time Off Awards 11-20 hours PWOD 47.25% vs. PWD 41.11% Time Off Awards 21-30 hours PWOTD 9.39% vs. PWTD 7.46% Cash Awards \$500 and Under PWOTD 44.24% vs. PWTD 39.55% Cash Awards \$1000-\$1999 PWOD 46.21% vs. PWD 37.55% Cash Awards \$1000-\$1999 PWOTD 44.86% vs. PWTD 32.84% Cash Awards \$3000-\$3999 PWOD 8.87% vs. PWD 5.73% Cash Awards \$3000-\$3999 PWOTD 8.40% vs. PWTD 3.73% Cash Awards \$4000-\$4999 PWOTD 1.62% vs. PWTD 0%					
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> People with Disabilities People with Targeted Disabilities					
Barrier Analysis Process Completed?:	N					
Barrier(s) Identified?:	N					
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	Barrier Name		Description of Policy, Procedure, or Practice			
	No barrier identified		No barrier identified at this time.			
Objective(s) and Dates for EEO Plan						
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description	
04/01/0022	04/01/0023	Yes			To analyze EEOC's policies, practices, and procedures to determine if the award distribution is implemented properly.	
Responsible Official(s)						
Title		Name		Standards Address The Plan?		
EEO Director		Stan Pietrusiak		Yes		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activities			Sufficient Staffing & Funding?	Modified Date	Completion Date
04/01/0022	Schedule bi-weekly meetings with the workgroup to discuss sources of data reviewed			Yes		
08/31/0022	Develop a summary of the findings from the workgroup and update action items as necessary.			Yes		

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
04/01/0022	Establish a barrier analysis workgroup to examine awards policies and distribution for PWD and PWTD.	Yes		
Report of Accomplishments				
Fiscal Year	Accomplishment			

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

This plan of action was established at the end of FY 2021; therefore, all planned activities will occur in 2022.

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

Based on preliminary analysis of available data, we have not found evidence that has caused the trigger for the awards distribution of PWD and PWTD. We will conduct a more in-depth analysis in FY 2022.

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.

Planned activities will be conducted in FY 22. We will re-evaluate the trigger once all planned activities have been conducted.