

# 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 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.

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

n/a

\* 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

n/a

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

The agency's directors are the hiring managers. The directors meet bi-weekly and continually discuss the hiring needs of the agency.

## 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 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

n/a

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 PWTB	2	0	9	Ana Torres-Davis, Executive Director, atorresdavis@ncd.gov  Keith Woods, Financial Management kwoods@ncd.gov
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Keith Woods, Financial Management kwoods@ncd.gov
Processing reasonable accommodation requests from applicants and employees	2	0	0	Ana Torres-Davis, <a href="mailto:atorresdavis@ncd.gov">atorresdavis@ncd.gov</a> , Executive Director  Keith Woods  kwoods@ncd.gov
Section 508 Compliance	1	0	0	Nick Sabula, Section 508 coordinator, <a href="mailto:nsabula@ncd.gov">nsabula@ncd.gov</a>

Architectural Barriers Act Compliance	3	0	0	Keith Woods,  Financial Management Analyst kwoods@ncd.gov  Stacey S. Brown, Staff Assistant, sbrown@ncd.gov  Ana Torres Davis,
Special Emphasis Program for PWD and PWTD	0	0	0	Executive Director

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(s) that disability program staff have received. If “no”, describe the training(s) planned for the upcoming year.

Answer:Yes

Reasonable Accommodation training provided.

**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

Reasonable Accomodation training needed.

**Section III: Program Deficiencies in the Disability Program**

The agency has not reported any program deficiencies involving 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 APPLICANTS WITH DISABILITIES**

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

NCD has an active Selective Placement Program Coordinator (SPPC) and encourages people with disabilities to apply in all recruitment postings.

- 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.

NCD actively employs the use of Schedule A hiring authority.

- 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.

Schedule A applicants must submit a letter identifying them as an individual with a disability and your readiness from medical professional or member.

- 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

NCD advocates and trains all hiring managers and staff to promote employment of people with disabilities.

**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.

NCD works collaboratively with private entities and other agencies to link job postings with Schedule A candidates.

**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

n/a

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) Answer:No

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

n/a

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified *internal* mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

a. Qualified Applicants for MCO (PWD) Answer:No

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

n/a

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) Answer:No

b. Promotions for MCO (PWTD) Answer:No

n/a

## 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.

All Schedule A employees are converted after a successful completion of two years probation.

### B. CAREER DEVELOPMENT OPPORTUNITIES

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

Training dollars are allocated annually to all employees.

2. 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 applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

- a. Applicants (PWD) Answer:No
- b. Selections (PWD) Answer:No

n/a

3. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

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

n/a

### 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

n/a

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or merit 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

n/a

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:No
- b. Other Types of Recognition (PWTD) Answer:No

n/a
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## 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) 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:No
- d. Grade GS-13
- i. Qualified Internal Applicants (PWD) Answer:No
- ii. Internal Selections (PWD) Answer:No

n/a
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2. Does your agency have a trigger involving internal applicants and/or selectees for promotions to the next grade level? (The appropriate benchmarks are the internal promotion pool for qualified internal applicants and the internal promotion pool for selectees.) For non-GS pay, provide the approximate senior grade levels. If none, provide the qualified trigger(s) in the text box. a. SES *n/a*

i. Qualified Internal Applicants (PWTD) ii. Internal Selections (PWTD)

b. Grade GS-15 Answer:No

i. Qualified Internal Applicants (PWTD) Answer:No

ii. Internal Selections Answer:No

(PWTD) Answer:No

c. Grade GS-14

i. Qualified Internal Applicants (PWTD) Answer:No

ii. Internal Selections Answer:No

(PWTD) Answer:No

d. Grade GS-13 Answer:No

i. Qualified Internal Applicants (PWTD) ii. Internal Selections (PWTD)

n/a
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3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior 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) Answer:No
- 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

n/a

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) 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

n/a

5. Does your agency have a trigger involving the qualified and/or selectees for promotions to superior? If "yes", describe the trigger(s) in the text box. (If "no", appropriate benchmarks are the relevant qualified internal applicants and the qualified internal selectees.)

- i. Qualified Internal Applicants (PWD) Answer:No
- ii. Internal Selections (PWD) Answer:No
- b. Managers Answer:No
  - i. Qualified Internal Applicants (PWD) Answer:No
  - ii. Internal Selections (PWD) Answer:No

c. Supervisors

- i. Qualified Internal Applicants (PWD)
- ii. Internal Selections (PWD)

n/a

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) Answer:No
- ii. Internal Selections (PWTD) Answer:No

b. Managers Answer:No

- i. Qualified Internal Applicants (PWTD) Answer:No
- ii. Internal Selections (PWTD)

c. Supervisors

- i. Qualified Internal Applicants (PWTD)
- ii. Internal Selections (PWTD) Answer:No

n/a

- 7. Using the qualified applicant pool as the agency have a trigger involving PWD an new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.
  - a. New Hires for Executives (PWD) Answer:No
  - b. New Hires for Managers (PWD) Answer:No
  - c. New Hires for Supervisors (PWD) Answer:No

n/a

- 8. Using the qualified applicant pool as the benchmark, trigger involving PWTD does your agency among the selectees for new positions? If "yes", describe the trigger(s) 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

n/a

### Section VI: Plan to Improve Retention of Persons with Disabilities

To be a 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 personal 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: Yes

n/a

- 2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If "yes", describe the trigger below.
  - a. Voluntary Separations (PWD) Answer:No
  - b. Involuntary Separations (PWD) Answer:No

n/a

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

n/a

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.

n/a

## **B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES**

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

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

<https://ncd.gov/accessibility/>

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

<https://ncd.gov/accessibility/>

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.

NCD is in the process of implementing an intranet platform to increase accessibility among employees using different accessible software applications.

## **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.)

Immediate to no greater than 3 days from date of request.

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.

NCD is a model agency for employing and accommodating people with disabilities. NCD is effective at recruiting, hiring, accommodating and retaining people with disabilities.

## **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, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

All request for PAS services are evaluated immediately and modified as needed by the employee.

## **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 government-wide average?

Answer: No

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

Answer: Yes (settlement agreement)

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? 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: Yes, settlement agreement.

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
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**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.

<b>Trigger</b>			
<b>Barrier(s)</b>			
<b>Objective(s)</b>			
<b>Responsible Official(s)</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>		
<b>Barrier Analysis Process Completed? (Yes or No)</b>	<b>Barrier(s) Identified? (Yes or No)</b>		

Sources of Data		Sources Reviewed? (Yes or No)	Identify Information Collected		
Workforce Data Tables					
Complaint Data (Trends)					
Grievance Data (Trends)					
Findings from Decisions (e.g., EEO, Grievance, MSPB, AntiHarassment Processes)					
Climate Assessment Survey (e.g., FEVS)					
Exit Interview Data					
Focus Groups					
Interviews					
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)					
Other (Please Describe)					
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)	
Fiscal Year	Accomplishments				

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

N/A

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

N/A

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.

N/A