

## 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	
	#	#	%	#	%
Numarical Goal	--	12%		2%	
Grades GS-11 to SES					
Grades GS-1 to GS-10					

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

Hiring goals are communicated during to agency leadership, including hiring managers, during the EEO director's annual "State of the Agency" briefing. Additionally, as Schedule A applications are referred for consideration, managers are educated on the Schedule A appointment process and the targeted goals of the agency. These goals are also communicated to managers during the State of the Agency briefing each year.

### 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	1	0	0	Renee Exton Human Resources Specialist rexton@neh.gov
Architectural Barriers Act Compliance	1	0	0	Renee Exton Human Resources Specialist rexton@neh.gov
Processing applications from PWD and PWTB	1	0	0	Renee Exton Human Resources Specialist rexton@neh.gov
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Renee Exton Human Resources Specialist rexton@neh.gov
Processing reasonable accommodation requests from applicants and employees	1	0	0	Renee Exton Human Resources Specialist rexton@neh.gov
Special Emphasis Program for PWD and PWTB	0	0	1	Anthony Mitchell Senior Deputy Chair and EEO Director amtichell@neh.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 Reasonable Accommodation/ Schedule A Coordinator has received both formal training at a previous agency and on-the-job training at NEH.

**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

Funding and other resources are sufficient.

### 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.

Individuals with Disabilities self-identify when applying for jobs. For example, Schedule A applicants submit Schedule A letters certifying their disability status and eligibility for consideration under this special hiring authority. Disabled veteran applicants submit their DD-214, VA letters certifying the disability eligibility, and SF-15 to support their applications. Employees self-identify their status by completing the SF-256 form.

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 NEH accepts Schedule A applications through USAStaffing when positions vacancies are announced. Applications are also received separately from vacancy announcements through the Schedule A Coordinator. These applications are submitted to management for consideration as positions become available.

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.

Resumes are considered based on the specialized experience required of the positions, then supporting documents such as the Schedule A letter are verified. Applicants who meet the eligibility requirements are referred for consideration. Selecting officials are briefed on the requirements of the Schedule A special hiring authority.

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

Hiring managers receive this training as part of supervisory training.

#### B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

Describe the agency’s efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

In the NEH Disability Recruitment Plan, establishing relationships with disability employment organizations remains an ongoing goal. In FY2024, the agency maintained its existing relationships and looks to broaden outreach in future years. The agency is

currently updating its Disability Recruitment Plan, and an updated hiring goal is being developed for the new plan.

**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 Yes

None of the new hires in the permanent workforce identified as PWTD.

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 Yes
- b. New Hires for MCO (PWTD) Answer Yes

While no trigger existed for PWD in 1701, no individuals who identified as PWD were hired in 1109. There were no individuals who identified as PWTD hired in either 1701 or 1109. These were the only MCOs with new hires in FY2024.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	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

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 Yes
- b. Promotions for MCO (PWTD) Answer Yes

While no trigger existed for PWD in 1701, no individuals who identified as PWD were promoted in 1109 or 2210. There were no individuals who identified as PWTD promoted in 1701, 2210, or 1109. These were the only MCOs with promotions in FY2024.

## 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.

NEH will continue to review existing programs (including recruitment, training, promotion, reassignment, and developmental assignments) and make any needed adjustments or alterations to ensure that any qualified person with a disability can apply, participate, and enjoy equal benefits and privileges of employment. This will include providing appropriate information and training to supervisors so that they can support employment of persons with disabilities. Of particular interest in our review will be the low number of PWD/PWTD in the agency's professional development programs.

### B. CAREER DEVELOPMENT OPPORTUNITIES

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

While NEH does not have any formal career development programs of the type reported in tables B12 and B20, each employee is encouraged to have an initial and annual Individual Development Plan (IDP) created in coordination with his or her supervisor and supported by appropriate resources. The NEH continues to promote agency development programs in order to give agency managers, supervisors, and employees the skills and competencies needed to improve their advancement opportunities. As informal professional development programs, the NEH offers the "Independent, Study, Research, and Development (ISRDR)" program and "Educational Opportunities for Career Development (EOCD)" program to all eligible employees. The ISRDR program includes time off to pursue independent study, research, and/or development activities that are designed to maintain an employee’s professional competence and to permit staff members to maintain active scholarly lives. The EOCD program provides financial support and/or time off from work for employees who are interested in formal course work or other structured training that enables the employee to further the mission of the agency and assist the employee in achieving his/her career development goals. In addition to these internal professional development programs, NEH maintains an overall training budget to provide opportunities for employees to attend federal job-related training courses, conferences, seminars etc. The NEH continues to utilize the Computer/Electronic Accommodations Program (CAP) which provides technology-based assistance and other servicing programs to support NEH employees with certain disabling conditions as necessary.

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 (%)
Other Career Development Programs	7	6	0	0	0	0
Fellowship Programs						
Mentoring Programs						

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Coaching Programs						
Training Programs						
Internship Programs	251	15	8.37	6.67	5.17	0
Detail Programs						

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

None of the applicants or selectees for the ISRD or EOCD programs identified as PWD. Among applicants to the agency's paid student internship program, PWD represented 8.37% of applicants and 6.67% of selectees.

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

None of the applicants or selectees for the ISRD or EOCD programs identified as PWTD. None of the selectees to the agency's paid student internship program identified as 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

No PWD/PWTD received time-off awards. The agency gave only 5 time-off awards. The inclusion rate of PWD was lower than that of persons without disabilities for cash awards of \$500-\$999, \$3000-\$3999, and \$5000 or more. The inclusion rate of PWTD was lower than that of persons without disabilities for cash awards of under \$500, \$500-\$999, and \$3000-\$3999. This is an improvement over FY2023.

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	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
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	5	0.00	3.81	0.00	0.00
Time-Off Awards 31 - 40 Hours: Total Hours	200	0.00	152.38	0.00	0.00
Time-Off Awards 31 - 40 Hours: Average Hours	40	0.00	38.10	0.00	0.00
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	57	24.00	40.00	20.00	25.00
Cash Awards: \$501 - \$999: Total Amount	45140	19628.00	31434.29	17540.00	20150.00
Cash Awards: \$501 - \$999: Average Amount	791	3268.00	747.62	17540.00	-300.00
Cash Awards: \$1000 - \$1999: Awards Given	43	32.00	24.76	40.00	30.00
Cash Awards: \$1000 - \$1999: Total Amount	64105	43408.00	37695.24	53420.00	40905.00
Cash Awards: \$1000 - \$1999: Average Amount	1490	5424.00	1449.52	26700.00	105.00
Cash Awards: \$2000 - \$2999: Awards Given	33	20.00	22.86	40.00	15.00
Cash Awards: \$2000 - \$2999: Total Amount	81693	52288.00	55695.24	100700.00	40185.00
Cash Awards: \$2000 - \$2999: Average Amount	2475	10456.00	2320.00	50340.00	485.00
Cash Awards: \$3000 - \$3999: Awards Given	29	0.00	20.95	0.00	0.00
Cash Awards: \$3000 - \$3999: Total Amount	99688	0.00	72199.05	0.00	0.00
Cash Awards: \$3000 - \$3999: Average Amount	3437	0.00	3280.95	0.00	0.00
Cash Awards: \$4000 - \$4999: Awards Given	34	28.00	22.86	60.00	20.00
Cash Awards: \$4000 - \$4999: Total Amount	148924	123420.00	100427.62	270020.00	86770.00
Cash Awards: \$4000 - \$4999: Average Amount	4380	17628.00	4183.81	90000.00	-465.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$5000 or more: Awards Given	28	12.00	20.95	40.00	5.00
Cash Awards: \$5000 or more: Total Amount	234413	119256.00	178995.24	493140.00	25785.00
Cash Awards: \$5000 or more: Average Amount	8371	39752.00	8135.24	246560.00	-11950.00

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 Yes

b. Pay Increases (PWTD) Answer Yes

PWD/PWTD did not receive one of the 2 QSIs awarded in FY2024

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 N/A

ii. Internal Selections (PWD) Answer N/A

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 N/A

ii. Internal Selections (PWD) Answer N/A

The agency did not make promotions to the SES, GS-15, or GS-13 level in FY2024.

2. Does your agency have a trigger involving PWTB 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 (PWTB) Answer N/A

ii. Internal Selections (PWTB) Answer N/A

b. Grade GS-15

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

ii. Internal Selections (PWTB) Answer N/A

c. Grade GS-14

i. Qualified Internal Applicants (PWTB) Answer No

ii. Internal Selections (PWTB) Answer Yes

d. Grade GS-13

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

ii. Internal Selections (PWTB) Answer N/A

No selectees to the GS-14 level identified as PWTB. The agency did not make promotions to the GS-13, GS-15, or SES level in FY2024.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires to SES (PWD) Answer N/A

b. New Hires to GS-15 (PWD) Answer N/A

c. New Hires to GS-14 (PWD) Answer N/A

d. New Hires to GS-13 (PWD) Answer Yes

None of the new hires at the GS-13 level identified as PWD. The agency did not make any new hires at the GS-14, GS-15, or SES level.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires to SES (PWTD)	Answer	N/A
b. New Hires to GS-15 (PWTD)	Answer	N/A
c. New Hires to GS-14 (PWTD)	Answer	N/A
d. New Hires to GS-13 (PWTD)	Answer	Yes

None of the new hires at the GS-13 level identified as PWTD. The agency did not make any new hires at the GS-14, GS-15, or SES level.

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	No
ii. Internal Selections (PWD)	Answer	No

c. Supervisors

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

The agency did not make promotions to the Executive or Supervisor level in FY2024.

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	No
ii. Internal Selections (PWTD)	Answer	Yes

c. Supervisors

i. Qualified Internal Applicants (PWTD)	Answer	N/A
ii. Internal Selections (PWTD)	Answer	N/A

None of the selectees to the Manager level identified as a PWT. The agency did not make promotions to the Manager or Supervisor level in FY2024.

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

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

The agency did not make any new hires at the Executive, Manager, or Supervisor level.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWT 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 (PWT) Answer N/A
- b. New Hires for Managers (PWT) Answer N/A
- c. New Hires for Supervisors (PWT) Answer N/A

The agency did not make any new hires at the Executive, Manager, or Supervisor level.

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

To be model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace assistance services.

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If “no”, please explain why the agency did not convert all eligible Schedule A employees.

Answer N/A

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

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Removal	0	0.00	0.00
Permanent Workforce: Resignation	2	0.00	1.10
Permanent Workforce: Retirement	3	3.23	1.10
Permanent Workforce: Other Separations	2	0.00	1.10
Permanent Workforce: Total Separations	7	3.23	3.30

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

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

For voluntary separations, 14.29% of PWTd left the workforce, compared to 2.91% of persons without targeted disabilities. (This represents one individual.)

Seperations	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	2	0.00	0.97
Permanent Workforce: Retirement	3	14.29	0.97
Permanent Workforce: Other Separations	2	0.00	0.97
Permanent Workforce: Total Separations	7	14.29	2.91

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.

None of the individuals with disabilities who left the workforce in FY2024 included disability status or accommodations as part of their rationales for leaving.

**B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES**

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

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

<https://www.neh.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://www.neh.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.

As the agency plans for all employees to return to the physical office space in FY2025, accessibility and ensuring that all employees have the accommodations they require will be a top priority.

**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.)

Average time for processing initial requests is 6 days, well within the policy's limit of 15 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.

All requests are processed in a timely manner.

**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.

All requests are processed in a timely manner.

**Section VII: EEO Complaint and Findings Data**

**A. EEO COMPLAINT DATA INVOLVING HARASSMENT**

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

Answer No

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

Answer 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.

The agency had no such findings.

**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.

The agency had no such findings.

## Section VIII: Identification and Removal of Barriers

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

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

Answer Yes

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

Answer Yes

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

<b>Source of the Trigger:</b>	Workforce Data (if so identify the table)				
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B4				
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	PWD are included in the workforce at lower rates at levels GS-11 and above. The agency eliminated this trigger in FY2023.				
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i> People with Disabilities				
<b>Barrier Analysis Process Completed?:</b>	N				
<b>Barrier(s) Identified?:</b>	N				
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b>		<b>Description of Policy, Procedure, or Practice</b>		
	Pipeline		PWD and PWTD tend to be underrepresented among people who hold advanced degrees in the humanities, which is the group most critical for agency hiring and operations.		
	Recruitment		Agency recruiting practices have not reached out to as many sources as possible to attract PWD and PWTD.		
<b>Objective(s) and Dates for EEO Plan</b>					
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>
10/01/2018	09/30/2019	Yes			Hire at least one PWD and/or PWTD each fiscal year.
<b>Responsible Official(s)</b>					
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>	
Director of Human Resources		Anthony Mitchell		No	
<b>Planned Activities Toward Completion of Objective</b>					
<b>Target Date</b>	<b>Planned Activities</b>			<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>
09/30/2019	Outreach to organizations that encourage and facilitate employment of PWD and PWTD.			Yes	
<b>Report of Accomplishments</b>					
<b>Fiscal Year</b>	<b>Accomplishment</b>				
2020	The agency achieved its goal of hiring a PWD to the permanent workforce and has now met the benchmarks for PWD at the GS1-10 levels and for PWTD at both the GS1-10 levels and the GS11-SES levels. The inclusion of PWD at the GS11-SES levels improved to 11.3%.				

<b>Report of Accomplishments</b>	
<b>Fiscal Year</b>	<b>Accomplishment</b>
2019	The agency achieved its goal of adding PWD and PWTD to the permanent workforce in FY2019. The agency will maintain the goal as one that is ongoing for FY2020 and beyond.
2023	In FY2023, the agency met the 12% benchmark for PWD employed at the GS11 level and above. This is especially significant because more than 90% of the agency's highly educated workforce is employed at GS11 and above.
2021	The agency hired two PWD in FY2021, continuing to meet its overall goal of hiring at least one PWD/PWTD each year. The agency will maintain this goal as one that is ongoing and will continue efforts to increase the participation of PWD at levels GS-11-SES.

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).

In FY2022, the agency exceeded its hiring goals and achieved the goal of at least 12% PWD and at least 2% PWTD at GS11 and above. Outreach activities were crucial in achieving this goal and helping the agency reach underserved populations.

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.

In FY2023, the agency corrected the trigger.