

## 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 Yes

For cluster GS-11 to SES, 11.38% of the permanent workforce included PWD.

\*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

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

- a. Cluster GS-1 to GS-10 (PWTD) Answer No
- b. Cluster GS-11 to SES (PWTD) Answer No

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	12	4	33.33	2	16.67
Grades GS-11 to SES	123	14	11.38	4	3.25

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

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 PWTD	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 PWTD	0	0	1	Anthony Mitchell Director amitchell@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 FY2022, 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 will be 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 No

One of the 5 new hires in the permanent workforce (20%) was a PWD/PWTD.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	281	9.96	0.00	3.91	0.00
% of Qualified Applicants	131	6.87	0.00	1.53	0.00
% of New Hires	4	0.00	0.00	0.00	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 Yes
- b. New Hires for MCO (PWTD) Answer Yes

There were no individuals who identified themselves as PWD or PWTD among the new hires for MCOs.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
0201 HUMAN RESOURCES MANAGEMENT	0	0.00	0.00
0343 MANAGEMENT PROGRAM ANALYSIS	0	0.00	0.00
1082 WRITING AND EDITING	0	0.00	0.00
1109 GRANTS MANAGEMENT	0	0.00	0.00
1701 GENERAL EDUCATION AND TRAINING	4	0.00	0.00
2210 INFORMATION TECHNOLOGY MANAGEMENT	0	0.00	0.00

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 Yes
- b. Qualified Applicants for MCO (PWTD) Answer Yes

PWD and PWT were represented among qualified internal applicants at lower rates than expected based on the relevant applicant pool for all MCOs.

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWT 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 (PWT) Answer Yes

There were no individuals who identified as PWD or PWT among internal promotions for 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 PWT, have sufficient opportunities for advancement.

NEH will continue to review existing programs (including recruitment, training, promotion, reassignment, and developmental assignments) and make any needed adjustment or alteration 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/PWT in the agency's professional development programs.

### B. CAREER DEVELOPMENT OPPORTUNITES

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	9	9	11.11	11.11	0	0
Internship Programs						
Fellowship Programs						
Mentoring Programs						
Coaching Programs						
Training Programs						
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

Just under 12% of applicants and selectees for the ISRD/EOCD programs identified as 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 Yes
- b. Selections (PWTD) Answer Yes

None of the applicants or selectees for the ISRD or EOCD programs 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 received time-off awards of 21-30 hours or cash awards of \$5000 or more. No PWTD received any time off awards or cash awards of \$2000-\$2999. In categories where PWD and PWTD received awards, their inclusion rate was similar to that of persons without disabilities, with the exception of cash awards of \$1000-\$1999, awarded to 36% of persons without disabilities and 27% of PWD, and cash awards of \$2000-\$2999, awarded to 24% of persons without disabilities and 11% of PWD.

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	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
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	1	0.00	1.01	0.00	0.00
Time-Off Awards 21 - 30 Hours: Total Hours	24	0.00	24.24	0.00	0.00
Time-Off Awards 21 - 30 Hours: Average Hours	24	0.00	24.24	0.00	0.00
Time-Off Awards 31 - 40 hours: Awards Given	5	5.56	4.04	0.00	8.33
Time-Off Awards 31 - 40 Hours: Total Hours	240	222.22	202.02	0.00	333.33
Time-Off Awards 31 - 40 Hours: Average Hours	48	222.22	50.51	0.00	333.33
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	53	38.89	33.33	50.00	33.33
Cash Awards: \$501 - \$999: Total Amount	43859	34355.56	27597.98	45733.33	28666.67
Cash Awards: \$501 - \$999: Average Amount	827	4905.56	835.35	15233.33	-258.33
Cash Awards: \$1000 - \$1999: Awards Given	53	27.78	35.35	50.00	16.67
Cash Awards: \$1000 - \$1999: Total Amount	76123	40361.11	52211.11	80800.00	20141.67
Cash Awards: \$1000 - \$1999: Average Amount	1436	8072.22	1490.91	26933.33	-1358.33
Cash Awards: \$2000 - \$2999: Awards Given	29	11.11	24.24	0.00	16.67
Cash Awards: \$2000 - \$2999: Total Amount	73160	27855.56	61013.13	0.00	41783.33
Cash Awards: \$2000 - \$2999: Average Amount	2522	13927.78	2541.41	0.00	20891.67
Cash Awards: \$3000 - \$3999: Awards Given	33	27.78	26.26	16.67	33.33
Cash Awards: \$3000 - \$3999: Total Amount	118722	99027.78	94339.39	53316.67	121883.33
Cash Awards: \$3000 - \$3999: Average Amount	3597	19805.56	3628.28	53316.67	3050.00
Cash Awards: \$4000 - \$4999: Awards Given	13	11.11	7.07	16.67	8.33
Cash Awards: \$4000 - \$4999: Total Amount	59610	47705.56	32657.58	67383.33	37866.67

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$4000 - \$4999: Average Amount	4585	23850.00	4664.65	67383.33	2083.33
Cash Awards: \$5000 or more: Awards Given	8	0.00	8.08	0.00	0.00
Cash Awards: \$5000 or more: Total Amount	108858	0.00	109957.58	0.00	0.00
Cash Awards: \$5000 or more: Average Amount	13607	0.00	13744.44	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 No

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 Yes

ii. Internal Selections (PWD) Answer Yes

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 Yes

ii. Internal Selections (PWD) Answer Yes

## d. Grade GS-13

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

No qualified internal applicants at the GS14 level or SES level identified as PWD.
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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 | Yes |
| ii. Internal Selections (PWTB)          | Answer | Yes |

## 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 | Yes |
| 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 |

None of the qualified internal applicants or selectees for senior grade levels identified as PWTB.
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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 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 | Yes |
| c. New Hires to GS-14 (PWD) | Answer | Yes |
| d. New Hires to GS-13 (PWD) | Answer | Yes |

The new hires at the GS-13, GS14, and GS-15 levels did not identify as PWD.
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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 | Yes |
| c. New Hires to GS-14 (PWTD) | Answer | Yes |
| d. New Hires to GS-13 (PWTD) | Answer | Yes |

The new hires at the GS-13, GS-14, and GS-15 levels did not identify as a PWTD.
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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 | Yes |
| ii. Internal Selections (PWD)          | Answer | Yes |
| b. Managers                            |        |     |
| i. Qualified Internal Applicants (PWD) | Answer | Yes |
| ii. Internal Selections (PWD)          | Answer | Yes |
| c. Supervisors                         |        |     |
| i. Qualified Internal Applicants (PWD) | Answer | N/A |
| ii. Internal Selections (PWD)          | Answer | N/A |

PWD were not represented among the applicants or selectees for promotion to the Executive or Manager level. The agency did not make promotions to the Supervisor level.
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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 | Yes |
| ii. Internal Selections (PWTD)          | Answer | Yes |
| b. Managers                             |        |     |
| i. Qualified Internal Applicants (PWTD) | Answer | Yes |
| ii. Internal Selections (PWTD)          | Answer | Yes |
| c. Supervisors                          |        |     |
| i. Qualified Internal Applicants (PWTD) | Answer | N/A |

ii. Internal Selections (PWTD)

Answer N/A

PWTD were not represented among the applicants or selectees for promotion to the Executive or Manager level. The agency did not make promotions to the Supervisor level.

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 Yes

c. New Hires for Supervisors (PWD)

Answer N/A

The agency made one new hire to the manager level. That person did not identify as a PWD.

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

a. New Hires for Executives (PWTD)

Answer N/A

b. New Hires for Managers (PWTD)

Answer Yes

c. New Hires for Supervisors (PWTD)

Answer N/A

The agency made one new hire to the manager level. That person did not identify as a PWTD.

## 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 Yes

b. Involuntary Separations (PWD)

Answer No

For voluntary separations, 12.5% of PWD left the workforce, compared to 2.8% of persons without disabilities.

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	1	0.00	0.56
Permanent Workforce: Retirement	3	0.00	1.69
Permanent Workforce: Other Separations	4	12.50	0.56
Permanent Workforce: Total Separations	8	12.50	2.81

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

No PWTD left the permanent workforce in FY2022.

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	1	0.00	0.52
Permanent Workforce: Retirement	3	0.00	1.55
Permanent Workforce: Other Separations	4	0.00	2.06
Permanent Workforce: Total Separations	8	0.00	4.12

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 FY2022 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.

During the ongoing pandemic, the agency has worked to make sure that work-from-home technology is accessible to all employees. As the agency began plans to bring employees back to the office in FY2022, accessibility needs remained a priority. Employees have retained the flexibility to choose the working conditions that suit their health and accessibility needs.

**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 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.

Reasonable accommodation procedures were recently updated and approved by EEOC. 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.

Personal assistance services procedures were recently developed and approved by EEOC. 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 N/A

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

Answer N/A

- 3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

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 N/A

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

Answer N/A

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

The agency had no such findings.
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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 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.					
<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>	<b>Completion 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.
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.

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 met its goal of hiring one PWD and/or PWTD. Outreach activities were crucial in achieving this goal and helping the agency reach underserved populations. We have achieved the goal of at least 2% PWTD at level GS11 and above.

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.

While the agency did achieve its annual goal, inclusion of PWD and PWTD remains an ongoing effort. We have not yet reached the target rate of 12% PWD higher grade levels - currently at 11.38% - but will continue to move in the right direction.