

## 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, 9.35% 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					
Grades GS-11 to SES					

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

The Disability Recruitment Plan is on the NEH website for management and employee access. As Schedule A applications are referred for consideration, managers are educated on the schedule A appointment process and the targeted goals 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 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	
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
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
Special Emphasis Program for PWD and PWTB	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

Yes, the Reasonable Accommodation/ Schedule A Coordinator has received both formal training at a previous agency and on-the-job training at the 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 the USAStaffing database 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 FY2019, the agency maintained its existing relationships and looks to broaden outreach in FY2020 and future years.

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

PWD represented 10.53% of new hires in the permanent workforce.

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

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	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

PWD represented 3.8% of qualified internal applicants for MCOs. There were no individuals who identified themselves as having targeted disabilities among qualified internal applicants for MCOs.

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

There were no PWD or PWTD 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 PWTD, have sufficient opportunities for advancement.

NEH will 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 generally enjoy equal benefits and privileges of employment. This will include providing appropriate information and training to supervisors so that they may 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 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. Specifically, 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 provides financial support and/or time off from work for a limited number of 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	4	4	0	0	0	0
Internship Programs						
Fellowship Programs						
Mentoring Programs						
Coaching Programs						
Training Programs						

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
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 for either of the agency's professional development programs in FY2019 were PWD.

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

a. Applicants (PWTD) Answer Yes

b. Selections (PWTD) Answer Yes

None of the applicants for either of the agency's professional development programs in FY2019 were PWTD.

**C. AWARDS**

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

a. Awards, Bonuses, & Incentives (PWD) Answer Yes

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

None of the recipients of time-off awards were PWD or PWTD. For cash awards of \$501+, 86.67% of PWD received awards, compared to 98% of persons without disabilities.

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

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

Of the two employees given QSIs, neither was a PWD or PWTD.

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

None of the qualified internal applicants or selectees for senior grade levels were PWD. (no promotions were made to SES, GS-15, or GS-13 in FY2019).

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

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

- |   |            |
|---|------------|
| b. Grade GS-15                          |            |
| i. Qualified Internal Applicants (PWTD) | Answer N/A |
| ii. Internal Selections (PWTD)          | Answer N/A |
| c. Grade GS-14                          |            |
| i. Qualified Internal Applicants (PWTD) | Answer Yes |
| ii. Internal Selections (PWTD)          | Answer Yes |
| d. Grade GS-13                          |            |
| i. Qualified Internal Applicants (PWTD) | Answer N/A |
| ii. Internal Selections (PWTD)          | Answer N/A |

None of the qualified internal applicants or selectees for senior grade levels were PWTD. (no promotions were made to SES, GS-15, or GS-13 in FY2019).
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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 N/A |
| c. New Hires to GS-14 (PWD) | Answer Yes |
| d. New Hires to GS-13 (PWD) | Answer Yes |

None of the new hires to senior grade levels identified as PWD. The agency did not make new hires at the GS15 or SES levels.
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4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- |                              |            |
|------------------------------|------------|
| a. New Hires to SES (PWTD)   | Answer N/A |
| b. New Hires to GS-15 (PWTD) | Answer N/A |
| c. New Hires to GS-14 (PWTD) | Answer Yes |
| d. New Hires to GS-13 (PWTD) | Answer Yes |

None of the new hires to senior grade levels identified as PWTD. The agency did not make new hires at the GS15 or SES levels
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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	N/A
ii. Internal Selections (PWD)	Answer	N/A
b. Managers		
i. Qualified Internal Applicants (PWD)	Answer	N/A
ii. Internal Selections (PWD)	Answer	N/A
c. Supervisors		
i. Qualified Internal Applicants (PWD)	Answer	N/A
ii. Internal Selections (PWD)	Answer	N/A

The agency did not make any promotions to supervisory levels.

6. Does your agency have a trigger involving PWTB among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives		
i. Qualified Internal Applicants (PWTB)	Answer	N/A
ii. Internal Selections (PWTB)	Answer	N/A
b. Managers		
i. Qualified Internal Applicants (PWTB)	Answer	N/A
ii. Internal Selections (PWTB)	Answer	N/A
c. Supervisors		
i. Qualified Internal Applicants (PWTB)	Answer	N/A
ii. Internal Selections (PWTB)	Answer	N/A

The agency did not make any promotions to supervisory levels.

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	Yes
b. New Hires for Managers (PWD)	Answer	Yes
c. New Hires for Supervisors (PWD)	Answer	Yes

None of the agency's new hires for supervisory positions were PWD.

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

None of the agency's new hires for supervisory positions were 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 Yes

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

The percentage of PWD among voluntary separations was 14.2%, compared to 11.7% for persons without targeted disabilities. The agency had no involuntary separations.

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
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3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If “yes”, describe the trigger below.

- a. Voluntary Separations (PWTD) Answer No
- b. Involuntary Separations (PWTD) Answer No

No PWTD separated from the agency in FY2019. The agency had no involuntary separations.

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
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4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

Factors related to disability were not part of the decision for either of the two separations representing PWD/PWTD.

### 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 current pandemic, the agency has worked to make sure that work-from-home technology is accessible to all employees.

### 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 not more than 5 business days.

2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

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.

## 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

<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>PWD and PWTD are included in the workforce at lower rates, especially at GS-11 and above.</p>							
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>							
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>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.</p>							
<p><b>Objective</b></p>	<p>Hire at least one PWD and/or PWTD in FY2019</p> <table border="1" data-bbox="438 955 1515 1102"> <tr> <td data-bbox="438 955 646 1010"><b>Date Objective Initiated</b></td> <td data-bbox="646 955 1515 1010">Oct 1, 2018</td> </tr> <tr> <td data-bbox="438 1010 646 1102"><b>Target Date For Completion Of Objective</b></td> <td data-bbox="646 1010 1515 1102">Sep 30, 2019</td> </tr> </table>				<b>Date Objective Initiated</b>	Oct 1, 2018	<b>Target Date For Completion Of Objective</b>	Sep 30, 2019
<b>Date Objective Initiated</b>	Oct 1, 2018							
<b>Target Date For Completion Of Objective</b>	Sep 30, 2019							
<p><b>Responsible Officials</b></p>		<p>Anthony Mitchell Director of Human Resources</p>						
<p><b>Target Date (mm/dd/yyyy)</b></p>	<p><b>Planned Activities</b></p>	<p><b>Sufficient Staffing &amp; Funding (Yes or No)</b></p>	<p><b>Modified Date (mm/dd/yyyy)</b></p>	<p><b>Completion Date (mm/dd/yyyy)</b></p>				
<p>09/30/2019</p>	<p>Outreach to organizations that encourage and facilitate employment of PWD and PWTD.</p>	<p>Yes</p>						
<p><b>Fiscal Year</b></p>	<p><b>Accomplishments</b></p>							
<p>2019</p>	<p>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.</p>							
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>Agency recruiting practices have not reached out to as many sources as possible to attract PWD and PWTD.</p>							

<b>Objective</b>		Hire at least one PWD and/or PWTD in FY2019		
		<b>Date Objective Initiated</b>	Oct 1, 2018	
		<b>Target Date For Completion Of Objective</b>	Sep 30, 2019	
<b>Responsible Officials</b>		Anthony Mitchell Director of Human Resources		
<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
09/30/2019	Outreach to organizations that encourage and facilitate employment of PWD and PWTD.	Yes		
<b>Fiscal Year</b>	<b>Accomplishments</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.			

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 FY2019, the agency exceeded its goal of hiring one PWD/PWTD. Outreach activities were crucial in achieving this goal and helping the agency reach underserved populations. We achieved the goal of at least 2% PWD 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 but will continue to move in the right direction.