Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

SECTION I: EFFORTS TO REACH REGULATORY GOALS	2
SECTION II: MODEL DISABILITY PROGRAM	3
A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR DISABILITY PROGRAM	3
B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM	4
SECTION III: PROGRAM DEFICIENCIES IN THE DISABILITY PROGRAM	1 4
SECTION IV: PLAN TO RECRUIT AND HIRE INDIVIDUALS	
WITH DISABILITIES	4
A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES	
B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS	5
C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)	5
SECTION V: PLAN TO ENSURE ADVANCEMENT	
OPPORTUNITIES FOR EMPLOYEES WITH DISABILITIES	6
A. ADVANCEMENT PROGRAM PLAN	6
B. CAREER DEVELOPMENT OPPORTUNITIES	6
C. AWARDS	7
D. PROMOTIONS	8
SECTION VI: PLAN TO IMPROVE RETENTION OF PERSONS	
WITH DISABILITIES	11
A. VOLUNTARY AND INVOLUNTARY SEPARATIONS	
B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES	12
C. REASONABLE ACCOMMODATION PROGRAM	13
D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE	14
SECTION VII: EEO COMPLAINT AND FINDINGS DATA	14
A. EEO COMPLAINT DATA INVOLVING HARASSMENT	14
B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION	14
SECTION VIII: IDENTIFICATION AND REMOVAL OF BARRIERS	15

Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 C.F.R. § 1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with reportable and targeted disabilities in the federal government.

 Using the goal of 12% as the benchmark, does your agency have a trigger involving <u>PWD</u> 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

8% of employees at levels GS11-SES report a disbility. NEH has developed a disability recruitment plan with a goal to hire at least one PWD and/or PWTD per year. NEH will annually encourage employees to self-identify on the SF-256 form.

- * 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.
- Using the goal of 2% as the benchmark, does your agency have a trigger involving <u>PWTD</u> 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: Yes

1% of employees at levels GS11-SES report a targeted disability. NEH has developed a disability recruitment plan with a goal to hire at least one PWD and/or PWTD per year. NEH will annually encourage employees to self-identify on the SF-256 form.

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 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

The agnency's staffing is sufficient.

 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)	
Disability Fregram Factor	Full Time	Part Time	Collateral Duty	(Name, Fide, Office, Effall)	
Processing applications from PWD and PWTD	1	0	0	Renee Exton Human Resources Specialist rexton@neh.gov 202-606-8415	
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Renee Exton Human Resources Specialist rexton@neh.gov 202-606-8415	
Processing reasonable accommodation requests from applicants and employees	1	0	0	Renee Exton Human Resources Specialist rexton@neh.gov 202-606-8415	
Section 508 Compliance	1	0	0	Renee Exton Human Resources Specialist rexton@neh.gov 202-606-8415	
Architectural Barriers Act Compliance	1	0	0	Renee Exton Human Resources Specialist rexton@neh.gov 202-606-8415	
Special Emphasis Program for PWD and PWTD	0	0	1	Anthony Mitchell Director of Human Resources amitchell@neh.gov 202-606-8415	

3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If "yes", describe the training(s) that disability program staff have received. If "no", describe the training(s) planned for the upcoming year.

Answer: Yes

Yes, the Reasonable Accommodation/ Schedule A Coordinator has received both formal training at a previous agency and on-the-job training at the NEH. There are

plans for refresher training through EEOC.

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

The agency has not reported any program deficiencies involving the disability program.

Section IV: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. § 1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency's recruitment program plan for PWD and PWTD.

A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

 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. Selected 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: No

The NEH plans to schedule formal training for agency selecting officials.

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, goals to establish relationships with various disability employment organizations are identified as a plan for this year and the future.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

- 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

Yes, triggers exist in attracting applications from PWD and PWTD who meet the qualifications of open vacancies. Our goal is to build relationships with disability recruitment organizations to bridge the gaps and help us attract more PWD and PWTD candidates who meet the various qualifications. By reaching out to these organizations in addition to USAJobs, the agency will be able to broaden its audience and bring in more applicatiosn from PWD and PWTD.

- 2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below.
 - a. New Hires for MCO (PWD) Answer: Yes
 - b. New Hires for MCO (PWTD) Answer: Yes

Yes, triggers exist in attracting PWD and PWTD candidates that meet the required humanities-elated degree requirements for NEH's mission critical positions. Our goal is to build relationships with disability recruitment organizations to bridge the gaps and help us attract more PWD and PWTD candidates who meet the various qualifications. By reaching out to these organizations in addition to USAJobs, the agency will be able to broaden its audience and bring in more applicatiosn from PWD and PWTD.

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.

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

N/A

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below.

a. Promotions for MCO (PWD) Answer: No

b. Promotions for MCO (PWTD)

Answer: No

N/A

Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

A. ADVANCEMENT PROGRAM PLAN

Describe the agency's plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

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.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

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 (ISRD)" program and "Educational Opportunities for Career Development (EOCD)" program to all eligible employees.

The ISRD 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.

The NEH also 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.

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

a. Applicants (PWD)

Answer: No

b. Selections (PWD)

Answer: No

N/A

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

a. Applicants (PWTD)

Answer: No

b. Selections (PWTD)

Answer: No

N/A

C. AWARDS

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

a. Awards, Bonuses, & Incentives (PWD) Answer: No

b. Awards, Bonuses, & Incentives (PWTD) Answer: No

N/A

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

N/A

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If "yes", describe the employee recognition program and relevant data in the text box.

a. Other Types of Recognition (PWD)

Answer: N/A

b. Other Types of Recognition (PWTD)

Answer: N/A

N/A

D. PROMOTIONS

- 1. Does your agency have a trigger involving <u>PWD</u> among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.
 - a. SES

i. Qualified Internal Applicants (PWD) Answer: No

ii. Internal Selections (PWD)

Answer: No

b. Grade GS-15

i. Qualified Internal Applicants (PWD) Answer: No

ii. Internal Selections (PWD) Answer: No

c. Grade GS-14

i. Qualified Internal Applicants (PWD)

Answer: No

ii. Internal Selections (PWD)

Answer: No

d. Grade GS-13

i. Qualified Internal Applicants (PWD) Answer: No

ii. Internal Selections (PWD)

Answer: No

N/A

2. Does your agency have a trigger involving <u>PWTD</u> among the qualified *internal* applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

a. SES

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD)

Answer: No

b. Grade GS-15

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD)

Answer: No

c. Grade GS-14

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

d. Grade GS-13

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

N/A

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWD</u> among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

a. New Hires to SES (PWD) Answer: No

b. New Hires to GS-15 (PWD)

Answer: No

c. New Hires to GS-14 (PWD) Answer: No

d. New Hires to GS-13 (PWD)

Answer: No

N/A

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWTD</u> among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

a. New Hires to SES (PWTD)	Answer: No
b. New Hires to GS-15 (PWTD)	Answer: No
c. New Hires to GS-14 (PWTD)	Answer: No
d. New Hires to GS-13 (PWTD)	Answer: No

N/A

- 5. Does your agency have a trigger involving <u>PWD</u> among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.
 - a. Executives

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

b. Managers

i. Qualified Internal Applicants (PWD) Answer: No

ii. Internal Selections (PWD) Answer: No

c. Supervisors

i. Qualified Internal Applicants (PWD) Answer: No

ii. Internal Selections (PWD)

Answer: No

N/A

6. Does your agency have a trigger involving <u>PWTD</u> among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

a. Executives

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD)

Answer: No

b. Managers

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD)

Answer: No

c. Supervisors

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

N/A

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWD</u> among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.

a. New Hires for Executives (PWD)

Answer: No

b. New Hires for Managers (PWD)

Answer: No

c. New Hires for Supervisors (PWD)

Answer: No

N/A

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWTD</u> among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.

a. New Hires for Executives (PWTD)

Answer: No

b. New Hires for Managers (PWTD)

Answer: No

c. New Hires for Supervisors (PWTD) Answer: No

N/A

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer: Yes

All eligible Schedule A employees were converted.

 Using the inclusion rate as the benchmark, did the percentage of <u>PWD</u> among voluntary and involuntary separations exceed that of persons without disabilities? If "yes", describe the trigger below.

a. Voluntary Separations (PWD) Answer: No

b. Involuntary Separations (PWD) Answer: No

N/A

3. Using the inclusion rate as the benchmark, did the percentage of <u>PWTD</u> among voluntary and involuntary separations exceed that of persons without targeted disabilities? If "yes", describe the trigger below.

a. Voluntary Separations (PWTD) Answer: No

b. Involuntary Separations (PWTD)

Answer: No

N/A

 If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

N/A

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

https://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.

NEH does not currently have such a notice posted.

 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.

NEH will post an Architectural Barriers Act notice on the website. The NEH public website is being re-designed, and ensuring continued accessibility is part of the process.

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.

 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 for reasonable accommodations is no more than 5 business days after receipt of the request.

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

The NEH is currently updating the Reasonable Accommodations Directive. Current procedures ensure processing of a reasonable accommodation request as soon as it is made, whether or not the written confirmation has been provided. However, the written confirmation should be provided as soon as possible following the oral request. The NEH provides services through CAP. To ensure that individuals with disabilities have equal access to the information environment and opportunities in the federal government, CAP provides assistive technology, devices, and services to people with hearing, visual, dexterity, cognitive/learning or communication disabilities at various agencies, including NEH.

D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

Pursuant to 29 C.F.R. § 1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

The agency is currently developing PAS procedures as it updates the reasonable accommodation directive.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer: No

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

Answer: No

 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 has had no such findings.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

 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 has 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.

Trigger 1	Low recruitment percentages of PWD and PWTD for NEH positions, especially at higher GS levels			
Barrier(s)	Current recruitment outlets have led to difficulty attracting qualified PWD and PWTD candidates, especially at higher GS levels.			
Objective(s)	Establish relationships with rehabilitation services and disability recruitment organizations to broaden recruiting outreach.			
Responsible Official(s)		3)	Performance Standards Address the Plan? (Yes or No)	
Office of Human	Office of Human Resources		Yes	
Barrier Analysis Process Completed? (Yes or No)		npleted?	Barrier(s) Identified? (Yes or No)	
No			Yes	
Source	es of Data	Sources Reviewed? (Yes or No)	Identify Information Collected	
Workforce Data	a Tables	Yes	workforce and applicant statistics	
Complaint Data	(Trends)	Yes	any complaints based on disability	
	Grievance Data (Trends)		any grievances based on disability	
Findings from E EEO, Grievanc Harassment Pr	e, MSPB, Anti-	No		
Climate Assess FEVS)	ment Survey (e.g.,	Yes	employee perceptions of work and conditions	
Exit Interview D	Noto	Yes	any disability-related reasons for leaving	
	<i>า</i> สเส	169	any aleasinty related reacons for leaving	

-		Sources Reviewed? (Yes or No)	Identify Information Collected		
Interviews		No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)		No			
Other (Please Describe)		No			
Target Date (mm/dd/yyyy)	Planned Activities		Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
03/01/2019	Build relationships with organizations that promote hiring of individuals with disabilities and extend opportunity announcements to those institutions.		Yes		
Fiscal Year	Accomplishments				

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

The planned activities are new for FY2018.

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

The planned activities are new for FY2018. We will describe their effectiveness in the FY2018 report.

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.

The planned activities are new for FY2018.