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

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

Section I: Efforts to Reach Regulatory Goals

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

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If “yes”, describe the trigger(s) in the text box.
   
   a. Cluster GS-1 to GS-10 (PWD)
   , Answer: No
   
   b. Cluster GS-11 to SES (PWD)
   , Answer: No

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

*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.*

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

<table>
<thead>
<tr>
<th>Grade Level Cluster(GS or Alternate Pay Plan(b))</th>
<th>Total #</th>
<th>Reportable Disability #</th>
<th>%</th>
<th>Targeted Disability #</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Numerical Goal</td>
<td>--</td>
<td>12%</td>
<td></td>
<td>2%</td>
<td></td>
</tr>
<tr>
<td>Grades GS-1 to GS-10</td>
<td>0</td>
<td>0</td>
<td>0.00</td>
<td>0</td>
<td>0.00</td>
</tr>
<tr>
<td>Grades GS-11 to SES</td>
<td>13</td>
<td>0</td>
<td>0.00</td>
<td>0</td>
<td>0.00</td>
</tr>
</tbody>
</table>

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

N/A

2. Identify all staff responsible for implementing the agency's disability employment program by the office, staff employment status, and responsible official.

<table>
<thead>
<tr>
<th>Disability Program Task</th>
<th># of FTE Staff By Employment Status</th>
<th>Responsible Official (Name, Title, Office Email)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Processing applications from PWD and PWTD</td>
<td>0 Full Time, 0 Part Time, 1 Collateral Duty</td>
<td>Harry Seidman, Chief Financial &amp; Operations Officer/ <a href="mailto:hseidman@acus.gov">hseidman@acus.gov</a></td>
</tr>
<tr>
<td>Answering questions from the public about hiring authorities that take disability into account</td>
<td>0 Full Time, 0 Part Time, 1 Collateral Duty</td>
<td>Harry Seidman, Chief Financial &amp; Operations Officer/ <a href="mailto:hseidman@acus.gov">hseidman@acus.gov</a></td>
</tr>
<tr>
<td>Processing reasonable accommodation requests from applicants and employees</td>
<td>0 Full Time, 0 Part Time, 1 Collateral Duty</td>
<td>Harry Seidman, Chief Financial &amp; Operations Officer/ <a href="mailto:hseidman@acus.gov">hseidman@acus.gov</a></td>
</tr>
<tr>
<td>Section 508 Compliance</td>
<td>0 Full Time, 0 Part Time, 1 Collateral Duty</td>
<td>Shawne McGibbon, General Counsel, <a href="mailto:smcgibbon@acus.gov">smcgibbon@acus.gov</a></td>
</tr>
<tr>
<td>Architectural Barriers Act Compliance</td>
<td>0 Full Time, 0 Part Time, 1 Collateral Duty</td>
<td>Shawne McGibbon, General Counsel, <a href="mailto:smcgibbon@acus.gov">smcgibbon@acus.gov</a></td>
</tr>
<tr>
<td>Special Emphasis Program for PWD and PWTD</td>
<td>0 Full Time, 0 Part Time, 1 Collateral Duty</td>
<td>Shawne McGibbon, General Counsel, <a href="mailto:smcgibbon@acus.gov">smcgibbon@acus.gov</a></td>
</tr>
</tbody>
</table>

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 No

The agency will seek third-party assistance to provide training.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

Page 2
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

N/A

Section III: Program Deficiencies In The Disability Program

<table>
<thead>
<tr>
<th>Brief Description of Program Deficiency</th>
<th>C.3.b.6. Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Objective</th>
<th>Draft, finalize, and post agency's affirmative action plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Date</td>
<td>Sep 30, 2021</td>
</tr>
<tr>
<td>Completion Date</td>
<td></td>
</tr>
<tr>
<td>Planned Activities</td>
<td>Target Date</td>
</tr>
<tr>
<td>Sep 30, 2021</td>
<td>Draft, finalize, and post agency's affirmative action plan. The agency may consider hiring an outside contractor for this and other EEO requirements.</td>
</tr>
</tbody>
</table>

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.

Notifications on the agency's website regarding equal opportunity in hiring, etc.

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

ACUS has not yet had the opportunity to use special hiring authorities to hire individuals with disabilities.

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.

ACUS has not yet had the opportunity to use Schedule A authority to hire individuals with disabilities.
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

Schedule A is the primary mechanism used by the agency in hiring, albeit primarily for skilled employees such as lawyers. Agency managers are well-versed in its application.

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.

No efforts have been taken in this regard to date.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If “yes”, please describe the triggers below.

   a. New Hires for Permanent Workforce (PWD)   Answer   No

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

N/A

<table>
<thead>
<tr>
<th>New Hires</th>
<th>Total (#)</th>
<th>Reportable Disability</th>
<th>Targeted Disability</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Permanent Workforce (%)</td>
<td>Temporary Workforce (%)</td>
</tr>
<tr>
<td>% of Total Applicants</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>% of Qualified Applicants</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>% of New Hires</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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   No

   b. New Hires for MCO (PWTD)   Answer   No

N/A

<table>
<thead>
<tr>
<th>New Hires to Mission-Critical Occupations</th>
<th>Total (#)</th>
<th>Reportable Disability</th>
<th>Targetable Disability</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>New Hires (%)</td>
<td>New Hires (%)</td>
</tr>
<tr>
<td>Numerical Goal</td>
<td>--</td>
<td>12%</td>
<td>2%</td>
</tr>
</tbody>
</table>
3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
   a. Qualified Applicants for MCO (PWD) Answer: No
   b. Qualified Applicants for MCO (PWTD) Answer: No

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. 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: 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.

PWDs and PWTDs have an equal opportunity for advancement. The primary issue is that there are few opportunities for advancement generally at an agency with approximately 11 to 13 FTEs in total.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

The agency encourages bar association programs and training related to administrative law—the field of law on which ACUS focuses. The agency also encourages staff participation in interagency working groups, and details to/from other agencies when feasible. The agency encourages research and writing reports that serve as the basis of official ACUS recommendations. The agency has a robust legal internship program for students and fellowships for experts in the administrative law field. Participation in these programs is encouraged regardless of disability status.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/ approval to participate.

<table>
<thead>
<tr>
<th>Career Development Opportunities</th>
<th>Total Participants</th>
<th>PWD</th>
<th>PWTD</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Applicants (#)</td>
<td>Selectees (#)</td>
<td>Applicants (%)</td>
</tr>
<tr>
<td>Internship Programs</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Fellowship Programs</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
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  No
   b. Selections (PWD)  Answer  No

N/A

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  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
<table>
<thead>
<tr>
<th>Time-Off Awards</th>
<th>Total (#)</th>
<th>Reportable Disability %</th>
<th>Without Reportable Disability %</th>
<th>Targeted Disability %</th>
<th>Without Targeted Disability %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Time-Off Awards 11 - 20 Hours: Total Hours</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
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<tr>
<td>Time-Off Awards 11 - 20 Hours: Average Hours</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Time-Off Awards 21 - 30 hours: Awards Given</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
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<tr>
<td>Time-Off Awards 21 - 30 Hours: Total Hours</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Time-Off Awards 21 - 30 Hours: Average Hours</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Time-Off Awards 31 - 40 hours: Awards Given</td>
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<td>0.00</td>
<td>0.00</td>
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<tr>
<td>Time-Off Awards 31 - 40 Hours: Total Hours</td>
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<td>0.00</td>
<td>0.00</td>
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<tr>
<td>Time-Off Awards 31 - 40 Hours: Average Hours</td>
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<td>0.00</td>
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<tr>
<td>Time-Off Awards 41 or more Hours: Awards Given</td>
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<td>0.00</td>
<td>0.00</td>
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<tr>
<td>Time-Off Awards 41 or more Hours: Total Hours</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Time-Off Awards 41 or more Hours: Average Hours</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
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</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Cash Awards</th>
<th>Total (#)</th>
<th>Reportable Disability %</th>
<th>Without Reportable Disability %</th>
<th>Targeted Disability %</th>
<th>Without Targeted Disability %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash Awards: $501 - $999: Awards Given</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Cash Awards: $501 - $999: Total Amount</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
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<td>0.00</td>
</tr>
<tr>
<td>Cash Awards: $501 - $999: Average Amount</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Cash Awards: $1000 - $1999: Awards Given</td>
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</tr>
<tr>
<td>Cash Awards: $1000 - $1999: Total Amount</td>
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<tr>
<td>Cash Awards: $1000 - $1999: Average Amount</td>
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<tr>
<td>Cash Awards: $2000 - $2999: Awards Given</td>
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<tr>
<td>Cash Awards: $2000 - $2999: Total Amount</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Cash Awards: $2000 - $2999: Average Amount</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Cash Awards: $3000 - $3999: Awards Given</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Cash Awards: $3000 - $3999: Total Amount</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Cash Awards: $3000 - $3999: Average Amount</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
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</tr>
<tr>
<td>Cash Awards: $4000 - $4999: Awards Given</td>
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<td>0.00</td>
<td>0.00</td>
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<tr>
<td>Cash Awards: $4000 - $4999: Total Amount</td>
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<td>0.00</td>
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<tr>
<td>Cash Awards: $4000 - $4999: Average Amount</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>
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 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: 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

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 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

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 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

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 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 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 No
   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 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 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 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  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 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  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 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

N/A

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

a. Voluntary Separations (PWD)  

Answer  No

b. Involuntary Separations (PWD)  

Answer  No

N/A
### Administrative Conference of the United States

<table>
<thead>
<tr>
<th>Separations</th>
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<th>Reportable Disabilities %</th>
<th>Without Reportable Disabilities %</th>
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<tr>
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<td>Permanent Workforce: Total Separations</td>
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</tr>
</tbody>
</table>

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

   a. Voluntary Separations (PWTD)  
      Answer: No

   b. Involuntary Separations (PWTD)  
      Answer: No

N/A

<table>
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<tr>
<th>Separations</th>
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<th>Targeted Disabilities %</th>
<th>Without Targeted Disabilities %</th>
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</table>

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

N/A

### B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 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.

N/A

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.

N/A

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.
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.)

There have been no formal requests for reasonable accommodation in recent history. However, even if an individual makes an informal request for any type of accommodation to make their work environment more comfortable or efficient, regardless of any legal disability, (e.g., ergonomic chairs, keyboards, or lighting, telework while recuperating from a medical procedure), it is promptly provided.

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.

Again, there have been no formal requests for reasonable accommodation. See responses in item 1 above.

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.

The agency has personal assistance policies. However, the agency has had no requests for, or opportunity to provide, personal assistance services.

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.

   There have never been any formal complaints of disability-based harassment in the agency’s 12-year history; therefore, there have
There have never been any allegations of failure to provide reasonable accommodation in the agency's 11-year history; therefore, there have been no findings of discrimination.

Section VIII: Identification and Removal of Barriers

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

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?
   Answer: No

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

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

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

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

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.
   N/A