

## 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 Yes
- b. Cluster GS-11 to SES (PWD) Answer Yes

In FY 2021, the Bureau's percentage of PWD employed in the GS-01 to GS-10 (including WS-01 to WS-07) cluster was 5.81% and GS-11 to SES (including WS-08 to WS-15) cluster was 1.99%. Both cluster groups fell below the benchmark of 12%.

\*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 Yes
- b. Cluster GS-11 to SES (PWTD) Answer Yes

In FY 2021, the Bureau's percentage of PWTD employed in the GS-01 to GS-10 (including WS-01 to WS-07) cluster was 1.31% and GS-11 to SES (including WS-08 to WS-15) cluster was .40%. Both cluster groups fell below the benchmark of 2%.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical Goal	--	12%		2%	
Grades GS-1 to GS-10	22603	1806	7.99	396	1.75
Grades GS-11 to SES	9622	734	7.63	149	1.55

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

The Bureau communicated the PWD and PWTD goals throughout the Agency via annual reporting, Performance Work Plans, Recruitment Sub-committee meetings, Regional Affirmative Employment Program Administrators teleconferences and Executive Staff training.

### 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	Matthew (Matt) Mangold Chief mmangold@bop.gov
Special Emphasis Program for PWD and PWTB	0	0	128	AEP Committees maintain a Disability Special Emphasis Program Manager
Section 508 Compliance	1	0	0	Steven (Scott) Jenkins Chief sjenkins@bop.gov
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Robin L.Burk Affirmative Employment Programs Officer/ Selective Placement Program Coordinator Rlburk@bop.gov
Processing reasonable accommodation requests from applicants and employees	1	0	0	Tiffany Sion National Reasonable Accommodation Coordinator tsion@bop.gov
Architectural Barriers Act Compliance	1	0	0	Tiffany Sion National Reasonable Accommodation Coordinator tsion@bop.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

All managers and supervisors are required to complete mandatory training including Schedule A: Roadmap to Success within 60 days of entry to position; Uniformed Services Employment and Reemployment Act (USERRA) and Veteran Employment for Hiring Managers within 60 days of entry to position and annually thereafter. Principles of Leadership training also incorporates Reasonable Accommodation Training.

**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

## 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.

In accordance with policy, each Affirmative Employment Programs (AEP) Committee must submit a Disabled Veterans Affirmative Action Program (DVAAP) Accomplishment Report annually. The DVAAP focuses on the reporting of methods used to recruit and employ disabled veterans, especially those who are 30 percent or more disabled, as well as improvement of internal advancement opportunities for disabled veterans. Each AEP Committee must submit an annual Federal Equal Opportunity Recruitment Program (FEORP) Plan. The FEORP establishes targeted recruitment efforts to reach underrepresented groups including PWD and PWTD. The Bureau's public website and vacancy announcements on the USAJOBS website provide information on Reasonable Accommodation and Personal Assistance Services.

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 Bureau uses all available and appropriate hiring authorities to recruit and hire PWD and PWTD: Schedule A, Veterans Recruitment Appointment (VRA), 30% or More Disabled Veteran, Veterans Employment Opportunities Act of 1998, as amended (VEOA) and Pathways Programs.

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.

For Schedule A, the Bureau's Selective Placement Program Coordinator reviews the applicant's disability medical documentation. Upon verifying the applicant is a person with an intellectual disability, severe physical disability or a psychiatric disability, documentation of eligibility for employment under Schedule A is then forwarded to the appropriate Institution Human Resource Office and Human Resource Services Center, Consolidated Staffing Unit, for adjudication of position qualifications.

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

Managers and supervisors complete mandatory training requirements including Schedule A: Roadmap to Success within 60 days of

entry to position; Uniformed Services Employment and Reemployment Act (USERRA) and Veteran Employment for Hiring Managers within 60 days of entry to position and annually thereafter. Principles of Leadership Training also incorporates Reasonable Accommodation 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.

Each Affirmative Employment Programs Committee maintains a Disability Employment Special Emphasis Program Manager who is responsible for engaging in community outreach efforts, such as developing working relationships with representatives of the Department of Veterans Affairs (VA) Vet Centers, Veterans Career Centers and military installations. In addition, annually, each Bureau facility prepares a FEORP Plan to recruit and build a more inclusive workplace for under-represented groups including PWD and PWTD.

**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 Yes

The Bureau is committed to meeting established goals set forth under Section 501 for employment of PWD and PWTD. In reviewing Table B-1: Total Workforce Table, PWD represent 7.89% and PWTD represent 1.72% of the Bureau's total permanent workforce.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	0				
% of Qualified Applicants	0				
% of New Hires	0				

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

In reviewing applicants and hires for Mission Critical Occupations, PWD and PWTD qualified and were selected as new hires for MCO's within the series of 0006, 0007, and 0101.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%

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

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

In reviewing selections for internal competitive promotions for Mission Critical Occupations (MCO), data indicated PWD and PWTD applied, were qualified & selected for internal selections for MCO's within the series of 0006, 0007 and 0101.

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

A review of Table B6-1: Selections for Internal Competitive Promotions for Major Occupations, data indicated PWD and PWTD applied and were selected for internal selections for MCO's within the series of 0006, 0007 and 0101.

## 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.

Annually, Bureau employees are provided with the opportunity to complete an Individual Training Needs Assessment in which strategic planning initiatives, implementation of new technology, mission changes, mandatory training standards, audits/reviews, performance improvements identified during the performance appraisal process may be included for incorporation in the Annual Training Plan and completion during the FY. Employees may also apply to Training Opportunity Announcements for specialty programs provided throughout the year. In addition, there are a myriad number of professional development initiatives available via self-studies, computer-based training modules and distance learning courses available (Cross Development Courses, Graduate School, OPM, ACA self-study courses, FEMA, NIC, BLU web-based courses).

### B. CAREER DEVELOPMENT OPPORTUNITES

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

The Bureau offers mandatory training which is positional in nature. Mentoring Training is offered at Bureau facilities. Many locations provide leadership development via various forums. Annually, Bureau employees are provided with the opportunity to

complete an Individual Training Needs Assessment in which strategic planning initiatives, implementation of new technology, mission changes, mandatory training standards, audits/reviews, performance improvements identified during the performance appraisal process may be included for incorporation in the Annual Training Plan and completion during the FY. Employees may also apply to Training Opportunity Announcements for select programs provided throughout the year. In addition, there are a myriad number of self-studies, computer-based training modules and distance learning courses available (Cross Development Courses, Graduate School, OPM, ACA self-study courses, FEMA, NIC, BLU web-based courses), which are available to employees.

- 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 (%)
Internship Programs	765	54	6.41%	1.85%	3.14%	0%
Training Programs						
Fellowship Programs						
Other Career Development Programs						
Detail Programs						
Coaching Programs						
Mentoring Programs						

- 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 N/A

b. Selections (PWD) Answer N/A

The Bureau's technological systems currently allow for extraction of completion data for professional development programs. However, because of compartmentalization of specialty training provided on an ongoing basis at field locations, applicant flow data is not available.

- 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 N/A

b. Selections (PWTD) Answer N/A

The Bureau's technological systems currently allow for extraction of completion data for professional development programs. However, because of compartmentalization of specialty training provided on an ongoing basis at field locations, applicant flow data is not available.

**C. AWARDS**

- 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, &amp; Incentives (PWD)

Answer Yes

b. Awards, Bonuses, &amp; Incentives (PWTD)

Answer No

In reviewing Workforce NFC Table B9-1: Employee Recognition and Awards triggers exist for PWD within the Cash Awards categories of \$501 - \$999, \$1000-\$1999 and \$2000-\$2999 and in the Other Awards category for Quality Step Increases (QSI)

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	15568	43.44	41.92	43.13	43.53
Time-Off Awards 1 - 10 Hours: Total Hours	119927	333.61	323.04	333.75	333.57
Time-Off Awards 1 - 10 Hours: Average Hours	7.7	0.26	0.02	1.21	0.00
Time-Off Awards 11 - 20 hours: Awards Given	14555	37.33	39.37	38.75	36.93
Time-Off Awards 11 - 20 Hours: Total Hours	232135	594.88	627.87	615.63	589.07
Time-Off Awards 11 - 20 Hours: Average Hours	15.95	0.54	0.05	2.48	0.00
Time-Off Awards 21 - 30 hours: Awards Given	4377	10.31	11.94	11.56	9.97
Time-Off Awards 21 - 30 Hours: Total Hours	105281	247.88	287.14	277.81	239.51
Time-Off Awards 21 - 30 Hours: Average Hours	24.05	0.82	0.07	3.75	0.00
Time-Off Awards 31 - 40 hours: Awards Given	3321	8.13	9.07	9.69	7.69
Time-Off Awards 31 - 40 Hours: Total Hours	127118	312.43	347.25	376.25	294.58
Time-Off Awards 31 - 40 Hours: Average Hours	38.28	1.31	0.12	6.07	-0.02
Time-Off Awards 41 or more Hours: Awards Given	9	0.07	0.02	0.00	0.09
Time-Off Awards 41 or more Hours: Total Hours	704	4.37	1.75	0.00	5.59
Time-Off Awards 41 or more Hours: Average Hours	78.22	2.19	0.25	0.00	2.80

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	7217	14.69	20.03	12.34	15.34
Cash Awards: \$501 - \$999: Total Amount	5339061	10879.78	14825.47	9246.09	11336.76
Cash Awards: \$501 - \$999: Average Amount	739.79	25.30	2.25	117.04	-0.36
Cash Awards: \$1000 - \$1999: Awards Given	5867	13.42	16.22	12.97	13.55
Cash Awards: \$1000 - \$1999: Total Amount	6413080	14537.23	17754.03	13906.25	14713.72
Cash Awards: \$1000 - \$1999: Average Amount	1093.08	36.99	3.33	167.55	0.47
Cash Awards: \$2000 - \$2999: Awards Given	87	0.10	0.25	0.31	0.04
Cash Awards: \$2000 - \$2999: Total Amount	198900	235.66	578.18	687.50	109.27

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$2000 - \$2999: Average Amount	2286.21	78.55	6.97	343.75	4.37
Cash Awards: \$3000 - \$3999: Awards Given	33	0.10	0.09	0.16	0.09
Cash Awards: \$3000 - \$3999: Total Amount	100700	307.38	279.05	468.75	262.24
Cash Awards: \$3000 - \$3999: Average Amount	3051.52	102.46	9.30	468.75	0.00
Cash Awards: \$4000 - \$4999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Awards Given	2	0.00	0.01	0.00	0.00
Cash Awards: \$5000 or more: Total Amount	12500	0.00	38.04	0.00	0.00
Cash Awards: \$5000 or more: Average Amount	6250	0.00	19.02	0.00	0.00

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance- based pay increases? If “yes”, please describe the trigger(s) in the text box.

a. Pay Increases (PWD) Answer No

b. Pay Increases (PWTD) Answer No

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	69	0.07	0.20	0.00	0.09

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

The Bureau does not have any other types of employee recognition programs.

**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	Yes
d. Grade GS-13		
i. Qualified Internal Applicants (PWD)	Answer	No
ii. Internal Selections (PWD)	Answer	Yes

Review of NEW NFC Table B8-1, revealed the following triggers within Internal Competitive Promotions for PWD: Managers (GS-14) - The percentage of selections fell below the relevant applicant pool by one or more percent. Supervisors (GS-13) - The percentage of selections fell below the relevant applicant pool by one or more percent. There were 541 PWD Promotions (7.3% TWF), during this rating period.

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	Yes
ii. Internal Selections (PWTD)	Answer	Yes
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

Review of Table NEW NFC B8-1, revealed the following triggers within Internal Competitive Promotions for PWTD: Executives (SES and GS-15) No internal applications were received. There were 36 PWTD promotions (.5% of TWF), during this rating period.

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 Yes
- b. New Hires to GS-15 (PWD) Answer Yes
- c. New Hires to GS-14 (PWD) Answer Yes
- d. New Hires to GS-13 (PWD) Answer Yes

Review of NEW NFC Table B8-1, revealed the following triggers within New Hires for PWD: Executives (SES and GS-15) - The percentage of qualified external applicants fell below the relevant applicant pool and no selections were made for these positions from the qualified applicant pool. Managers (GS-14) - The percentage of qualified external applicants and selections fell below the relevant applicant pool by one or more percent. Supervisors (GS-13) - The percentage of qualified external applicants fell below the relevant applicant pool and no selections were made for these positions from the qualified applicant pool.

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 Yes
- b. New Hires to GS-15 (PWTD) Answer Yes
- c. New Hires to GS-14 (PWTD) Answer Yes
- d. New Hires to GS-13 (PWTD) Answer Yes

Review of NEW NFC Table B8-1, revealed the following triggers within New Hires for PWTD: Executives (SES and GS-15) - The percentage of qualified external applicants fell below the relevant applicant pool and no selections were made for these positions from the qualified applicant pool. Managers (GS-14) - The percentage of qualified external applicants and selections fell below the relevant applicant pool by one or more percent. Supervisors (GS-13) - The percentage of qualified external applicants fell below the relevant applicant pool and no selections were made for these positions from the qualified applicant pool.

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 Yes
  - ii. Internal Selections (PWD) Answer Yes

Review of NEW NFC Table B8-1, revealed the following triggers within Internal Competitive Promotions for PWD: Managers (GS-14) - The percentage of selections fell below the relevant applicant pool by one or more percent. Supervisors (GS-13) - The percentage of selections fell below the relevant applicant pool by one or more percent.

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 No
    - ii. Internal Selections (PWTB) Answer No
  - b. Managers
    - i. Qualified Internal Applicants (PWTB) Answer Yes
    - ii. Internal Selections (PWTB) Answer No
  - c. Supervisors
    - i. Qualified Internal Applicants (PWTB) Answer Yes
    - ii. Internal Selections (PWTB) Answer Yes

Review of NEW NFC Table B8-1, revealed the following triggers within Internal Competitive Promotions for PWTB: Executives (SES and GS-15) - No internal applications were received. Managers (GS-14) - The percentage of selections fell below the relevant applicant pool by one or more percent. Supervisors (GS-13) - The percentage of selections fell below the relevant applicant pool by one or more percent.

7. 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 (PWTB) Answer Yes
  - b. New Hires for Managers (PWTB) Answer Yes
  - c. New Hires for Supervisors (PWTB) Answer Yes

Review of NEW NFC Table B8-1, revealed the following triggers within New Hires for PWTB: Executives (SES and GS-15) - The percentage of qualified external applicants fell below the relevant applicant pool and no selections were made for these positions from the qualified applicant pool. Managers (GS-14) - The percentage of qualified external applicants and selections fell below the relevant applicant pool by one or more percent. Supervisors (GS-13) - The percentage of qualified external applicants fell below the relevant applicant pool and no selections were made for these positions from the qualified applicant pool.

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

Review of NEW NFC Table B8-1, revealed the following triggers within New Hires for PWTDD: Executives (SES and GS-15) - The percentage of qualified external applicants fell below the relevant applicant pool and no selections were made for these positions from the qualified applicant pool. Managers (GS-14) - The percentage of qualified external applicants and selections fell below the relevant applicant pool by one or more percent. Supervisors (GS-13) - The percentage of qualified external applicants fell below the relevant applicant pool and no selections were made for these positions from the qualified applicant pool.

## 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 No

b. Involuntary Separations (PWD)

Answer No

PWD represented 2,951 employees or 7.89% of the total workforce. There were 3138 total separations of which 281 represented PWD.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	0	0.00	0.00
Permanent Workforce: Resignation	0	0.00	0.00
Permanent Workforce: Retirement	0	0.00	0.00
Permanent Workforce: Other Separations	0	0.00	0.00
Permanent Workforce: Total Separations	0	0.00	0.00

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

a. Voluntary Separations (PWTDD)

Answer No

b. Involuntary Separations (PWTDD)

Answer No

PWTDD represented 642 employees or 1.72% of the total workforce. There were 25 PWTDD separations during FY 2021.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	0	0.00	0.00

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Resignation	0	0.00	0.00
Permanent Workforce: Retirement	0	0.00	0.00
Permanent Workforce: Other Separations	0	0.00	0.00
Permanent Workforce: Total Separations	0	0.00	0.00

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.

In reviewing separations for permanent employees by Nature of Action Codes (NOA), numerically, the top reasons for PWD separating were: Retirement, and Resignation.

**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.

The Bureau's public website and intranet contains information for applicants and employees of their rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint; the link is provided below: [https://www.bop.gov/resources/employee\\_support.jsp#eeo](https://www.bop.gov/resources/employee_support.jsp#eeo)

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.

The Bureau's public website and intranet contains information for applicants and employees of their rights under the Architectural Barriers Act, including a description of how to file a complaint; the link is provided below: [https:// www.bop.gov/resources/employee\\_support.jsp#eeo](https://www.bop.gov/resources/employee_support.jsp#eeo)

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.

FY21 Response: The Agency’s National Reasonable Accommodation Coordinator (NRAC) has been conducting market research and working with various vendors to test electronic reporting systems that demonstrate the capability to store data and content for the RA process in addition to presenting trends and ad hoc reports. In addition, the Reasonable Accommodation (RA) Resource intra-agency webpage includes the Reasonable Accommodation policy and various resource links. The webpage also contains information about accessibility of agency technology, Section 508 contact information and accessibility standards issued under the Architectural Barriers Act of 1968 (ABA).

**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.)

FY21 Response: When reassignment is determined to be appropriate, employees receive a letter explaining the process, and as a standard practice, the Bureau works with employees for (60) days in an effort to assist them in finding another position. For purposes of calculating the average processing timeframes, the reassignment cases are evaluated separately. The average timeframe for processing a reassignment case in FY21 was 83 days. For the non-reassignment cases, the average timeframe for processing initial requests is 15.

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.

FY21 Response: Events related to the National COVID 19 Pandemic impacted the processing time frames during this reporting period. From the onset of the pandemic, much information was not known about the virus and how it would operationally impact workforce personnel, resources and programs. The Agency's Occupational Safety & Health Branch, worked and continues to work in alignment with the CDC for various medical issues that had been noted by the employee that may be impacted by COVID while at the same time considering the mission of the Agency. From the onset, responses to some requests took longer to process until it could be determined what flexibilities could be extended to align with the publication of OPM policy and procedural guidance. Safety and security requirements are significant in a penal setting and the supervision of offenders who are congregated in communal living settings continue to be paramount. As CDC guidance is updated, the Bureau's directives are often modified, where applicable, to conform to CDC standards. The ability to continue delivering in person reasonable accommodation training that was implemented in FY 2019 was also impacted. In-person training and routine travel was suspended at the on-set of the pandemic. With the exception of the Introduction to Correctional Techniques mandatory training course, all of the mandatory training and travel remains suspended. The agency continues to utilize alternate forms of training delivery methods (e.g., WebEx training sessions, video teleconference calls and telephonic conference calls to provide outreach and advisory services to identified workforce recipients).

## **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.

FY21 Response: The Bureau of Prisons has established a process for employees to make a request for Personal Assistance Services (PAS), for those who request them due to a targeted disability through the Reasonable Accommodation Program. The PAS procedures are transparent and visible to the Bureau's workforce who are in need of such services. An employee may request PAS by informing their supervisor, or the Human Resource Office, that he/she needs assistance with daily living activities because of a medical condition. The Agency's National Reasonable Accommodation Coordinator (NRAC), may be consulted to assist with PAS related information. It is noted that there were no PAS requests reported during this Fiscal Year, however, the NRAC will continue to monitor requests for any related trends.

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

### **A. EEO COMPLAINT DATA INVOLVING HARASSMENT**

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

Answer No

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

Answer Yes

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 was one finding of discrimination involving the failure to provide a reasonable accommodation during FY21, which is well below the government-wide average. Corrective measures included additional training for managers, and posting of a notice of discrimination findings. Reasonable Accommodation Training is provided to new employees during orientation training and to all employees annually thereafter. In addition, managers and supervisors complete mandatory training requirements including Schedule A: Roadmap to Success within 60 days of entry to position; Uniformed Services Employment and Reemployment Act (USERRA) and Veteran Employment for Hiring Managers within 60 days of entry to position and annually thereafter; Principles of Leadership Training also incorporates Reasonable Accommodation Training.

## B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?

Answer No

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

Answer Yes

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.

There was one finding of discrimination involving the failure to provide a reasonable accommodation during FY21, that resulted in a settlement agreement. Additional Reasonable Accommodation Training; specifically, related to the Pregnancy Discrimination Act (PDA), 42, is included in annual training sessions.

## 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 No

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.

• As a law enforcement agency whose mission-critical positions, such as the positions located directly in our institutions, have some physical requirements, recruitment of new applicants has defined parameters. These physical requirements include the ability to climb stairs, run to emergency situations, and walk and stand for prolonged periods of time. • The agency's robust security investigation process includes drug testing and a credit report check along with other clearance requirements not normally indicative

of non-law enforcement agencies. • Implementation of COVID-19 pandemic guidance and procedures impacted business management strategies and limited recruitment opportunities.

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

• Managers and supervisors are evaluated on their commitment to agency EEO policies and principles. Performance plans incorporated language for commitment to EEO principles and practices in the workplace, including quantifiable benchmarks for recruitment and retention of PWD and PWTD. • The Bureau encouraged employees to review the Standard Form 256, Self-Identification of Disability and voluntarily self-identify or update their disability status. • The Affirmative Employment Programs Office (AEPO) communicated with Regional Affirmative Employment Administrators (RAEA) located throughout the agency, to share information about the Bureau's strategic approaches to support the employment needs of our nation's veterans, PWD and PWTD. • AEPO created more intelligent, innovating reporting tools for use by Regional Offices, Training Centers and Bureau facilities, which allows for streamlined reporting, visually appealing data analysis, better comprehension of findings and ultimately better development of targeted strategies to increase employment of individuals from under-represented groups including PWD and PWTD. • The Bureau employed a full time National Recruitment Coordinator and National Reasonable Accommodation Coordinator who both facilitated ongoing efforts towards recruiting, promoting and retaining persons with disabilities. • In partnership with Accenture, the Bureau launched a national branding and marketing project to attract qualified applicants, including PWD and PWTD. • Human Resources Management employees, Disability Employment Program Managers (DEPMs), Recruitment and Outreach Program Coordinators (ROPCs) and other Bureau staff interacted with applicants via telephone, internet, job fairs, community events, and other face-to-face and virtual activities. Applicants were informed of the on-line application process via the Bureau's public website for a variety of disciplines. • DEPMs and Diversity Instructors provided physical/virtual presentations throughout the year to promote and highlight the diversity and talent of our nation's disabled veterans, and PWD. • ROPCs and Special Emphasis Program Managers (SEPMs) actively communicated with veterans' service organizations throughout the country, state and district employment services, One Stop Career Centers, and representatives from national employment services for referrals of disabled veterans. • Managers and supervisors joined in supporting the employment of veterans and participated fully in our continued efforts to improve the recruitment and advancement of disabled veterans wherever it was possible to do so. • Informational packets were sent to military bases throughout the country, focusing on disability employment and disabled veterans organizations. • Human Resource staff monitored compliance under Section 508 of the Rehabilitation Act of 1973 to ensure employees with disabilities, including disabled veterans, had equal access to training and information. • Human Resource Services Center staff provided training to SEPMs on veteran employment and special hiring authorities. • Supervisors and management level employees were required to take the online Uniform Services Employment and Reemployment Rights Act training annually. • The AEPO provided updates on the status of targeted initiatives for disabled veterans and people with disabilities on the agency intranet and via the electronic mail system. • DEPMs and Human Resource staff provided briefings for managers and supervisors on the responsibility of employing and retaining disabled veterans. • The AEPO monitored personnel policies and practices to limit barriers in employment opportunities for disabled veterans. • Staff were notified of opportunities to participate in and/or attend programs hosted by the Office of Personnel Management (OPM) and Department of Justice (DOJ) covering areas such as Team Building and Leadership, Diversity and Inclusion, and Executive Management Development Seminars and Programs. • The Bureau offered details for training in various occupations in an effort to provide staff opportunities to gain experience through temporary work assignments in other disciplines that would otherwise not be afforded to them through their current work assignments. • The Staff Mentoring Program provided employees with opportunities to augment their personal growth by enhancing their knowledge, skills, abilities, and professional development. • The Bureau maintained an automated learning management systems which provides all learners with access to online content, enhanced completion of mandatory and professional development initiatives. • All employees, including disabled veterans, were notified of vacancies and provided with information about procedures to follow in order to be considered for positions. • Limited site visits were conducted by Program Review Examiners to evaluate the effectiveness of programs and plans at Bureau facilities. Feedback was provided to the Chief Executive Officers, along with recommendations on corrective measures and/or program enhancements. • Quarterly, the AEPO and RAEAs monitored statistical information on new hires, promotions, and separations of disabled veterans through information retrieved from the National Finance Reporting Center. • The AEPO monitored reports submitted by the RAEAs. A national report was compiled on program accomplishments and concerns related to the employment of disabled veterans. • RAEAs provided training to institution Affirmative Employment Committee members. Emphasis continued to be placed on effective recruitment strategies, policy updates and the effective development of affirmative employment initiatives. • During FY 21, Bureau staff participated in physical/virtual recruitment and outreach fairs, many of which were located on or near military bases, and targeted disabled veterans' organizations. After Action Reports detailing these recruitment activities were completed and forwarded to the Central Office for monitoring, review and evaluation.



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 Bureau's Diversity Council resumed meetings virtually on a regular basis to provide advice and recommendations to the Director and senior leadership on diversity and inclusion issues affecting workforce strategies, measurement and evaluation, communication and outreach, and training and education. • Managers and supervisors will continue to be evaluated on their commitment to agency EEO policies and principles. Performance plans incorporate language for commitment to EEO principles and practices in the workplace, including quantifiable benchmarks to measure the success for recruitment and retention of PWD and PWTD in the workplace. • The Bureau will continue to encourage employees to review the Standard Form 256, Self-Identification of Disability, and voluntarily self-identify or update their disability status in order to be more reflective of employment of PWD and PWTD within the workplace. • The Bureau will resume national training for Special Emphasis Program Managers to ensure affirmative steps are taken at all levels of the organization to provide equal opportunity to minorities, women, and PWD and PWTD in all areas of employment. • Evaluate communication strategies (correspondence, training, national meetings, strategic planning) to further emphasize program goals throughout the organization. • Investigate other agencies' initiatives and best practices to improve the recruitment and advancement of PWD and PWTD.