

## 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 2022, the Bureau's percentage of PWD employed in the GS-01 to GS-10 (including WS-01 to WS-07) cluster was 7.2% and GS-11 to SES (including WS-08 to WS-15) cluster was .75%. 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 2022, the Bureau's percentage of PWTD employed in the GS-01 to GS-10 (including WS-01 to WS-07) cluster was 1.56% and GS-11 to SES (including WS-08 to WS-15) cluster was .14%. 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	21022	1702	8.10	366	1.74
Grades GS-11 to SES	13870	1073	7.74	222	1.60

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	
Architectural Barriers Act Compliance	1	0	0	Tiffany Sion National Reasonable Accommodation Coordinator tsion@bop.gov
Section 508 Compliance	1	0	0	Steven (Scott) Jenkins Chief sjenkins@bop.gov
Processing reasonable accommodation requests from applicants and employees	1	0	0	Tiffany Sion National Reasonable Accommodation Coordinator tsion@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
Special Emphasis Program for PWD and PWTD	0	0	128	AEP Committees maintain a Disability Special Emphasis Program Manager
Processing applications from PWD and PWTD	1	0	0	Matthew (Matt) Mangold Chief mmangold@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 7.98% and PWTD represent 1.69% 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	5145	16.31	0.00	7.74	0.00
% of Qualified Applicants	3572	16.85	0.00	7.81	0.00
% of New Hires	252	16.67	0.00	9.13	0.00

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

- a. New Hires for MCO (PWD) Answer No
- b. New Hires for MCO (PWTD) Answer No

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
0006 CORRECTIONAL INSTITUTION ADMINISTRATION	26	23.08	19.23
0007 CORRECTIONAL OFFICER	178	17.42	8.43
0101 CORRECTIONAL TREATMENT SPECIALIST	48	10.42	6.25

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

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

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; however, we did not meet the benchmarks.

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

## 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, all 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). Given the recent pandemic, staffing and vacant positions have increased dramatically which has expedited the career advancement compared to years past when vacancies were minimal.

### 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.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	1511	53	3.24%	1.9%	1.6%	0%
Training Programs						
Fellowship Programs						
Other Career Development Programs						
Detail Programs						
Coaching Programs						
Mentoring Programs	612	586	6%	5.9%	2.1%	1.1%

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

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

**C. AWARDS**

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

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

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

Answer Yes

In reviewing Workforce NFC Table B9-1: Employee Recognition and Awards triggers exist for PWD within the Time of Awards (21-30 hours and 31-40 hours), Cash Awards categories of (\$501 - \$999, \$1000-\$1999 and \$3000-\$3999). Triggers exist for PWTD within the Time of Awards (21-30 hours and 31-40 hours, 41 or more), Cash Awards categories of \$500 and/or under, \$501 - \$999, \$1000-\$1999).

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 1 - 10 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 1 - 10 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	0	0.00	0.00	0.00	0.00
Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Total Amount	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$2000 - \$2999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Average Amount	0	0.00	0.00	0.00	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	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Average Amount	0	0.00	0.00	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 Yes

In reviewing Workforce NFC Table B9-1: Employee Recognition and Awards triggers exist for PWTD within the QSI category.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	0	0.00	0.00	0.00	0.00

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

a. Other Types of Recognition (PWD) Answer N/A

b. Other Types of Recognition (PWTD) Answer N/A

**D. PROMOTIONS**

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

a. SES

i. Qualified Internal Applicants (PWD) Answer N/A

ii. Internal Selections (PWD)	Answer	N/A
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	Yes
ii. Internal Selections (PWD)	Answer	Yes

A review of data collected from our staffing section, revealed the following triggers within Internal Competitive Promotions for PWD: Supervisors (GS-13) - The percentage of the Qualified Internal Applicants and Internal selections fell below the relevant applicant pool by one or more percent.

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

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

A review of data collected from our staffing section, revealed the following triggers within Internal Competitive Promotions for PWTB: Supervisors (GS-13) - The percentage of the Qualified Internal Applicants and Internal selections fell below the relevant applicant pool by one or more percent.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the

trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires to SES (PWD) Answer N/A
- b. New Hires to GS-15 (PWD) Answer N/A
- c. New Hires to GS-14 (PWD) Answer N/A
- d. New Hires to GS-13 (PWD) Answer N/A

We will work with our staffing section to obtain this data in the future.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires to SES (PWTD) Answer N/A
- b. New Hires to GS-15 (PWTD) Answer N/A
- c. New Hires to GS-14 (PWTD) Answer N/A
- d. New Hires to GS-13 (PWTD) Answer N/A

We will work with our staffing section to obtain this data in the future.

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

- a. Executives
  - i. Qualified Internal Applicants (PWD) Answer N/A
  - ii. Internal Selections (PWD) Answer N/A
- b. Managers
  - i. Qualified Internal Applicants (PWD) Answer No
  - ii. Internal Selections (PWD) Answer No
- c. Supervisors
  - i. Qualified Internal Applicants (PWD) Answer Yes
  - ii. Internal Selections (PWD) Answer Yes

A review of data collected from our staffing section, revealed the following triggers: Supervisors (GS-13) - The percentage of the Qualified Internal Applicants and Internal selections fell below the relevant applicant pool by one or more percent.

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 N/A
  - ii. Internal Selections (PWTD) Answer N/A
- b. Managers
  - i. Qualified Internal Applicants (PWTD) Answer No
  - ii. Internal Selections (PWTD) Answer No
- c. Supervisors
  - i. Qualified Internal Applicants (PWTD) Answer Yes
  - ii. Internal Selections (PWTD) Answer Yes

A review of data collected from our staffing section, revealed the following triggers: Supervisors (GS-13) - The percentage of the Qualified Internal Applicants and Internal 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 PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- a. New Hires for Executives (PWD) Answer N/A
  - b. New Hires for Managers (PWD) Answer N/A
  - c. New Hires for Supervisors (PWD) Answer N/A

We will work with our staffing section to obtain this data in the future.

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

We will work with our staffing section to obtain this data in the future.

## Section VI: Plan to Improve Retention of Persons with Disabilities

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

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

- 1.

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

Answer Yes

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

a. Voluntary Separations (PWD) Answer Yes

b. Involuntary Separations (PWD) Answer Yes

PWD represented 2,839 employees or 8% of the total workforce. There were 3690 total separations of which 328 represented PWD.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	122	0.60	0.32
Permanent Workforce: Resignation	1289	4.40	3.58
Permanent Workforce: Retirement	1714	4.47	4.88
Permanent Workforce: Other Separations	507	1.83	1.40
Permanent Workforce: Total Separations	3632	11.31	10.17

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 Yes

b. Involuntary Separations (PWTD) Answer Yes

PWTD represented 597 employees or 1.68% of the total workforce. There were 87 PWTD separations during FY 2022.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	122	0.84	0.34
Permanent Workforce: Resignation	1289	7.04	3.58
Permanent Workforce: Retirement	1714	4.86	4.84
Permanent Workforce: Other Separations	507	1.84	1.43
Permanent Workforce: Total Separations	3632	14.57	10.19

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.

FY22 Response: The Bureau is offering training opportunities for supervisors, managers, and Reasonable Accommodation Coordinators (RAC). Also, the RA Office is awaiting a date for Union Negotiations on the RA policy.

### 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.)

FY22 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 FY22 was 80 days. For the non-reassignment cases, the average timeframe for processing initial requests is 10-days.

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

FY22 Response: The agency continues to implement the policy and procedures as it relates to the agency's reasonable accommodation program. Also, training to managers/supervisors, and human resource offices are on-going. 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.

FY22 Response: It is noted that there were no PAS requests reported during this Fiscal Year.

## 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 were two (2) findings of discrimination involving the failure to provide a reasonable accommodation based on disability status that resulted in Adverse Decisions during FY22. Corrective measures included additional training for managers regarding obligations under the Rehabilitation Act, disability discrimination training and posting findings of discrimination Notice(s). 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 annually, including but not limited to; Schedule A: Roadmap to Success, Uniformed Services Employment, Reemployment Act (USERRA) and Veteran Employment for Hiring Managers. Principles of Leadership Training is also provided to managers and incorporates Reasonable Accommodation Training as well.

### 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 (1) finding of discrimination involving the failure to provide a reasonable accommodation during FY22, that resulted in an Adverse Decision. Corrective measures included additional Reasonable Accommodation Training specifically, related to obligations, rights, and responsibilities under the Rehabilitation Act. Training related to Reasonable Accommodation and the Rehabilitation Act is also included in BOP 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 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.

• 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.

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 a 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 employs 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 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. • 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 22, 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 Affirmative Employment Office collaborated with the National Recruitment Office to conduct training Bureau Wide to enhance recruitment in underrepresented areas. • Schedule A training is being conducted throughout the Bureau to ensure all vacancy announcements and applications are processed and reviewed efficiently and correctly. • The Bureau's Diversity Council is being reinstated based on new guidance from the JMD. The meetings will be conducted 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.