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

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

Section I: Efforts to Reach Regulatory Goals

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

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

EAC exceeds the goal of 11.50% with representation for PWDs in the GS-1 to GS-10 cluster, however, the goal was not met for the GS-11 to SES cluster. EAC may want to do a self-identity campaign to encourage employees to accurately identify their disability. It will be important to destigmatize the process and assure all employees that the information is confidential. Since EAC is a small agency, 1 or 2 PWD hires, or employees identifying their disability, or PWD advancements to the next cluster could help the agency reach regulatory goals. EAC tends to hire individuals with elections experience and at the higher grade levels to attract them to the DC area. Focusing on hiring at the lower grade level and/or developing current PWD staff in the lower cluster for advancement to the GS-11 to SES cluster.

*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 No

EAC exceeds the goal of 2% with a 3.03% representation of PWTD in the GS-11 to SES Cluster. Again, EAC tends to hire individuals with elections experience and at the higher grade levels to attract them to the DC area. Focusing on hiring at the lower grade level and/or developing current PWD staff in the lower cluster for advancement to the GS-11 to SES cluster.

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

3. Describe how the agency has communicated the numerical goals to the hiring managers and/or recruiters.
The Human Resources (HR) Manager position was filled in March 2022. With the position now filled, the HR Manager and the agency's Equal Employment Opportunity Official (EEOO), will work on EAC's newly drafted framework for the agency's Affirmative Action Plan. During the last quarter of FY 2022, the EEOO will begin sharing workforce data through a series of monthly meetings with the HR Manager. Additionally, the EEOO will continue to communicate the PWD and PWTD employment goals with senior leadership, as well as the breakdown by demographic group as compared to the Civilian Labor Force (CLF) statistics. Once EAC creates its Disability Task Force, this data will be presented and discussed to determine any barriers that may exist and brainstorm on ways to eliminate those barriers. EAC's EEO Official will continue to communicate the agency's commitment to meeting the respective goals of 12% (PWD) and 2% for PWTD when recruiting. Collaboration with the newly hired HR Manager on recruitment strategies to increase the number of qualified disabled applicants will continue for FY 2023.

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

The HR Manager carries out all recruitment efforts and will have to make a concerted effort to increase the number and percentage of employees hired with severe/targeted disabilities and fully accommodate them to ensure that they have opportunities for career development and promotions. EAC has enough staff to begin the action planning activities for its disability program while determining the additional staffing needed to carry out these EEO responsibilities. This is still an ongoing process for EAC and will be focused on FY23 through FY24 on what can be done during the process.

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

<table>
<thead>
<tr>
<th>Disability Program Task</th>
<th># of FTE Staff By Employment Status</th>
<th>Responsible Official (Name, Title, Office Email)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Special Emphasis Program for PWD and PWTD</td>
<td>0 Full Time 0 Part Time 2 Collateral Duty</td>
<td>Robin Sargent <a href="mailto:rsargent@eac.gov">rsargent@eac.gov</a> <a href="mailto:tdixon@eac.gov">tdixon@eac.gov</a></td>
</tr>
<tr>
<td>Architectural Barriers Act Compliance</td>
<td>0 Full Time 0 Part Time 1 Collateral Duty</td>
<td>EAC offices are located in a federal building managed by GSA. Therefore, this responsibility is that of GSA and building management</td>
</tr>
<tr>
<td>Section 508 Compliance</td>
<td>1 Full Time 0 Part Time 0 Collateral Duty</td>
<td>William Jackson <a href="mailto:wjackson@eac.gov">wjackson@eac.gov</a></td>
</tr>
<tr>
<td>Processing reasonable accommodation requests from applicants and employees</td>
<td>0 Full Time 0 Part Time 1 Collateral Duty</td>
<td>Tennille Dixon, HR Manager <a href="mailto:tdixon@eac.gov">tdixon@eac.gov</a></td>
</tr>
<tr>
<td>Answering questions from the public about hiring authorities that take disability into account</td>
<td>1 Full Time 0 Part Time 0 Collateral Duty</td>
<td>Tennille Dixon, HR Manager <a href="mailto:tdixon@eac.gov">tdixon@eac.gov</a></td>
</tr>
</tbody>
</table>
Disability Program Task | # of FTE Staff By Employment Status | Responsible Official (Name, Title, Office Email)
--- | --- | ---
Processing applications from PWD and PWTD | Full Time | Part Time | Collateral Duty | Tennille Dixon, HR Manager | tdixon@eac.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 No

During the reporting period, EAC did not have a formal disability program or staff. However, EAC primarily used LRP Publications to supplement training for the EEOO. Such training included but was not limited to Reasonable Accommodation; Disability and the Law; and Mental and Emotional Disabilities. A disability program framework has been drafted in FY 2022 and a series of meetings with senior leadership, the EEOO and HRM will take place to discuss a timeline for implementation of listed activities. The framework includes training for staff at all levels of the agency.

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 No

During the reporting period, there was no funding dedicated to a disability program and as a result, EAC did not have a formal program in place. EEOC's technical assistance team issued the results of their FY 2022 meeting with EAC that encouraged the agency to develop and implement its disability program. Keeping senior leadership informed and reminding them of their commitment to diversity, equity, inclusion will encourage them to fight for the additional funding requested in the FY 2023 budget.

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.

During the reporting period, EAC relied on applicants to self-identify if they have a disability. The HR Manager will explore using OPM's Schedule A applicants and Workforce Recruitment Program for College Students with Disabilities (WRP) databases for future vacancies. Each applicant's disability would have been verified by OPM.

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

During the reporting period, EAC did not use the Schedule A hiring authority, however, the newly drafted framework for the
disability program outlines using the following Special Hiring Authorities: • Title 5, CFR, Schedule A § 213.3102(u), Appointment of persons with severe physical, intellectual, or psychiatric disabilities • Title 5, CFR, Schedule A § 213.3102(11), for hiring readers, interpreters, and personal assistants for disabled employees • Title 5, CFR § 315.604, for hiring disabled veterans who have satisfactorily completed an approved course of training prescribed by the U.S. Department of Veterans Affairs under Chapter 31, Title 38, United States Code • Title 5, CFR § 316.302(b)(4) and Title 5, CFR § 316.402(b)(4), for hiring veterans with compensable service-connected disability ratings of 30 percent or more • Title 5, CFR § 307.103, for hiring veterans under the Veterans Recruitment Appointment (VRA), an excepted authority that allows an agency to appoint an eligible veteran, non-competitive.

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.

EAC did not use a hiring authority that takes disability into account, during the reporting period. The newly drafted framework for a disability program outlines the HR Manager's responsibilities that include reviewing resumes to determine if an individual is eligible for appointment under an authority; reviewing unsolicited Schedule A resumes for qualifications; and submitting qualified applicants to the hiring manager, as appropriate. EAC will also explore the possibility of creating a database to be shared among all hiring supervisors to provide an efficient and effective method for sharing the resumes/applications of individuals qualified under Schedule A. This shared database will ultimately increase the number of Schedule A applicants being considered for positions for which they qualify throughout EAC. This is a long-range plan that will allow trained hiring officials to move forward with possible Schedule A hires without waiting for the HR Manager to provide. The HR Manager will also coordinate with hiring officials when reviewing vacant positions to determine if the job can be restructured and filled at a career-entry level in order to increase hiring opportunities for people with disabilities.

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If “yes”, describe the type(s) of training and frequency. If “no”, describe the agency’s plan to provide this training.

Answer No

As outlined in EAC’s newly drafted framework for a disability program, mandatory training will be provided to hiring managers on recruitment and hiring of people with disabilities. The training will include information on a variety of available resources, such as the Workforce Recruitment Program for College Students with Disabilities; Project ABLE; Job Accommodation Network (JAN); the Department of Defense’s Computer/Electronic Accommodations Program (CAP); OPM's Shared Register of Candidates with Disabilities; Operation Warfighter Program; On-the-Job Training Program; non-competitive appointing authorities (i.e., the Veterans Recruitment Appointment, 30 percent disabled, Schedule A § 213.3102(u), student appointments, etc.); and procedures for providing reasonable accommodations.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

Describe the agency’s efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

In FY 2021, EAC used its accessibility stakeholder database to notify its disabled stakeholders of job openings. The HR Manager will continue to identify other organizations that can be notified of EAC job announcements. EAC can also partner with larger federal agencies when they have PWD and PWTD outreach activities, including the Veterans Administration, a leader in recruiting PWD and PWTD, has many resources on its website, https://www.diversity.va.gov/programs/pwd.aspxIn. EAC has already identified contacts at GSA who are willing to assist with activities focusing on employing PWDs and PWTDs.

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  

During FY 2023 & 2024, EAC will create a Disability Recruitment Task Force, comprised of the HR Manager, EEOO, 508  
Compliance Coordinator, a Program Manager, current employees with a disability, and a hiring manager. The Task Force will meet  
quarterly to discuss and develop strategies on a variety of topics, such as: hiring and recruiting individuals with disabilities,  
identifying triggers, eliminating barriers to recruitment of individuals with disabilities, addressing challenges in providing  
reasonable accommodations, career development, and training opportunities.

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

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

   a. New Hires for MCO (PWD)  
      Answer  N/A  

   b. New Hires for MCO (PWTD)  
      Answer  N/A  

EAC does not have an applicant flow system, therefore, cannot statistically verify if triggers exist for PWD and/or PWTD among the new hires in the mission-critical occupations. However, as stated earlier, EAC tends to hire individuals with elections experience and at the higher grade levels to attract new hires to the DC area. Focusing on hiring at the lower grade level may result in more hires from the disability community. Additionally, a review of policies, practices and procedures will be conducted to verify perceived triggers and develop a plan of action to eliminate them.

<table>
<thead>
<tr>
<th>New Hires to Mission-Critical Occupations</th>
<th>Total</th>
<th>Reportable Disability</th>
<th>Targetable Disability</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(#)</td>
<td>New Hires (%)</td>
<td>New Hires (%)</td>
</tr>
<tr>
<td>Numerical Goal</td>
<td>--</td>
<td>12%</td>
<td>2%</td>
</tr>
</tbody>
</table>

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among 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. Qualified Applicants for MCO (PWD)  
      Answer  N/A  

   b. Qualified Applicants for MCO (PWTD)  
      Answer  N/A  

During this reporting period, EAC did not have any internal applicants apply for any of the mission-critical occupations (MCO).

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  N/A  

   b. Promotions for MCO (PWTD)  
      Answer  N/A  

During this reporting period, EAC did not have any internal applicants apply for any of the mission-critical occupations (MCO).
During this reporting period, EAC did not have any internal applicants promoted to a mission-critical occupations (MCO).

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.

The newly drafted framework for a disability program outlines EAC's plan to ensure PWD, including PWTD, have sufficient opportunities for advancement. EAC will ensure that employees with disabilities are made aware of various leadership development programs and have an equal opportunity to compete for all programs, including managerial, executive, and other career-enhancing programs and initiatives.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

During the reporting period, EAC continued to use an Individual Development Plan (IDP) as a means for managers and all employees to discuss, analyze and map out career development opportunities.

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

<table>
<thead>
<tr>
<th>Career Development Opportunities</th>
<th>Total Participants</th>
<th>PWD</th>
<th>PWTD</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Applicants (#)</td>
<td>Selectees (#)</td>
<td>Applicants (%)</td>
</tr>
<tr>
<td>Other Career Development Programs</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Internship Programs</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Fellowship Programs</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Mentoring Programs</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Coaching Programs</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Training Programs</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Detail Programs</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
</tbody>
</table>

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

   a. Applicants (PWD) Answer N/A

   b. Selections (PWD) Answer N/A
The new HR Manager will explore how the career development programs proposed in the draft framework for a disability program will be designed and implemented. In addition, EAC will continue to promote internal advancement opportunities for people with disabilities and targeted disabilities through proposed leadership development programs:

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  N/A
   b. Selections (PWTD)  Answer  N/A

EAC does not have career development programs.

C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.
   a. Awards, Bonuses, & Incentives (PWD)  Answer  No
   b. Awards, Bonuses, & Incentives (PWTD)  Answer  No

During the reporting period, EAC reinstated its employee recognition program. Employees identifying as disabled, received an award. PWDs accounted for 12.20% of the EAC workforce and the PWTD presentation rate was 2.44%. Both participation rates are greater than the Federal benchmarks of 12% and 2% respectively; therefore, it appears there no trigger exists with respect to PWDs and PWTDs receiving awards during FY 2021.
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

EAC did not utilize quality step increases or performance-based pay increases during the reporting period. All employees received the COLA increase in January 2021 and a performance-based award.
3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.

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

D. PROMOTIONS

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

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

The Executive Director and General Counsel positions are SES equivalent, however, these vacancies are filled, pursuant to public law, by EAC Commissioners. The HR Manager will have to implement a tracking procedure to capture this information.

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

   a. SES
     i. Qualified Internal Applicants (PWTD)  Answer  N/A
<table>
<thead>
<tr>
<th>Grade</th>
<th>Qualified Internal Applicants (PWTD)</th>
<th>Internal Selections (PWTD)</th>
</tr>
</thead>
<tbody>
<tr>
<td>b. GS-15</td>
<td>Answer N/A</td>
<td>Answer N/A</td>
</tr>
<tr>
<td>c. GS-14</td>
<td>Answer N/A</td>
<td>Answer N/A</td>
</tr>
<tr>
<td>d. GS-13</td>
<td>Answer N/A</td>
<td>Answer N/A</td>
</tr>
</tbody>
</table>

The Executive Director and General Counsel positions are SES equivalent, however, these vacancies are filled, pursuant to public law, by EAC Commissioners. EAC will have to implement a tracking procedure to capture this information.

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.

<table>
<thead>
<tr>
<th>New Hires to</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>SES (PWD)</td>
<td>N/A</td>
</tr>
<tr>
<td>GS-15 (PWD)</td>
<td>N/A</td>
</tr>
<tr>
<td>GS-14 (PWD)</td>
<td>N/A</td>
</tr>
<tr>
<td>GS-13 (PWD)</td>
<td>N/A</td>
</tr>
</tbody>
</table>

The Executive Director and General Counsel positions are SES equivalent, however, these vacancies are filled, pursuant to public law, by EAC Commissioners. EAC will have to implement a tracking procedure to capture this information.

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.

<table>
<thead>
<tr>
<th>New Hires to</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>SES (PWTD)</td>
<td>N/A</td>
</tr>
<tr>
<td>GS-15 (PWTD)</td>
<td>N/A</td>
</tr>
<tr>
<td>GS-14 (PWTD)</td>
<td>N/A</td>
</tr>
<tr>
<td>GS-13 (PWTD)</td>
<td>N/A</td>
</tr>
</tbody>
</table>

The Executive Director and General Counsel positions are SES equivalent, however, these vacancies are filled, pursuant to public law, by EAC Commissioners. EAC will have to implement a tracking procedure to capture this information.

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

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

a. Executives
   i. Qualified Internal Applicants (PWD) Answer N/A
   ii. Internal Selections (PWD) Answer N/A

b. Managers
   i. Qualified Internal Applicants (PWD) Answer N/A
   ii. Internal Selections (PWD) Answer N/A

c. Supervisors
   i. Qualified Internal Applicants (PWD) Answer N/A
   ii. Internal Selections (PWD) Answer N/A

As outlined in EAC’s newly drafted disability program, a tracking procedure to capture this information will be found.

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 N/A
   ii. Internal Selections (PWTD) Answer N/A

c. Supervisors
   i. Qualified Internal Applicants (PWTD) Answer N/A
   ii. Internal Selections (PWTD) Answer N/A

As outlined in EAC’s newly drafted disability program, a tracking procedure to capture this information will be found.

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
As outlined in EAC's newly drafted framework for a disability program, a tracking procedure to capture this information will be found.

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

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

   Answer  N/A

EAC has never hired employees under the Schedule A authority.

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

During the reporting period, EAC did not have any permanent employees voluntarily or involuntarily separate who self-identified as PWD; however, three interns separating after completing temporary appointments identified as PWD.

<table>
<thead>
<tr>
<th>Separations</th>
<th>Total #</th>
<th>Reportable Disabilities %</th>
<th>Without Reportable Disabilities %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permanent Workforce: Reduction in Force</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Permanent Workforce: Removal</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Permanent Workforce: Resignation</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Permanent Workforce: Retirement</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Permanent Workforce: Other Separations</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Permanent Workforce: Total Separations</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If “yes”, describe the trigger below.
During the reporting period, EAC did not have any employees voluntarily or involuntarily separate who self-identified as PWTD.

<table>
<thead>
<tr>
<th>Separations</th>
<th>Total #</th>
<th>Targeted Disabilities %</th>
<th>Without Targeted Disabilities %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permanent Workforce: Reduction in Force</td>
<td>0</td>
<td>0.00</td>
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<td>Permanent Workforce: Total Separations</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

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

EAC did not have any permanent employees who identified as PWD or PWTD separate from the agency during the reporting period. Three interns separating after completing temporary appointments with "Not To Exceed Dates" identified as PWD.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

https://www.eac.gov/main/privacy-statement

2. Please provide the internet address on the agency’s public website for its notice explaining employees’ and applicants’ rights under the Architectural Barriers Act, including a description of how to file a complaint.

https://www.eac.gov/main/privacy-statement

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

During the reporting period, EAC addressed ADA accessibility issues during the new office build-out, including efforts to improve accessibility of EAC’s technology. The newly drafted framework for a disability program includes training hiring managers on the different resources available for disabled employees such as the Department of Defense's Computer /Electronic Accommodations Program. The proposed Disability Recruitment Task Force will also be able to access any programs, policies or practices EAC should undertake.

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.)

During the report period, EAC did not have any requests for reasonable accommodations.

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.

During the report period, EAC did not have any requests for reasonable accommodations.

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.

During the report period, EAC did not have any requests for personal assistance services.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer No

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

Answer No

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.

EAC did not have any findings of discrimination alleging harassment based on disability status during the last fiscal year.

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 No
3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

EAC did not have any findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year.

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.

   The EAC will need to conduct a barrier analysis involving PWD and/or PWTD in order to verify perceived triggers and then develop activities. Rather than hire a consultant to perform this task, EAC staff will be trained to take on this task. A GSA contact agreed to assist with the training that will begin during the last quarter of FY 2022. The training was not provided.

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

   No activities were completed during the reporting period.

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.

   Planned improvement activities will begin with the barrier analysis training for the EEOO, human resources, hiring managers, and other Disability Recruitment Task Force members. Once trained, a knowledgeable EAC team can begin the analysis and correct the trigger(s) and/or barrier(s) found.