## 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

In the permanent workforce, PWD in the GS-1 to GS-10 grade cluster, make up 14.60% of the workforce (Table B4) In the GS-11 to SES grades, the composition is 11.26%, just below the regulatory 12% goal.

\*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	No
b. Cluster GS-11 to SES (PWTD)	Answer	No

In the permanent workforce, the SBA has met the regulatory goal for PWTD in both the GS-1 to GS-10 grade cluster. GS 1-10 make up 3.98% of the workforce, and GS-11 to SES grades make up 2.14% of the workforce. (Table B4)

Grade Level Cluster(GS or Alternate Pay	Total	Reportable Disability		Targeted Disability	
Planb)	#	#	%	#	%
Numarical Goal		12%		29	%
Grades GS-1 to GS-10	226	33	14.60	9	3.98
Grades GS-11 to SES	2247	253	11.26	48	2.14

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

The Office of Human Resource Solutions (OHRS) Selective Placement Program Coordinator (SPPC) actively engages managers and supervisors during recruitment activities while reminding them of the hiring goals.

## 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.

	# of FTE	Staff By Employme	ent Status	Responsible Official
Disability Program Task	Full Time	Part Time	Collateral Duty	(Name, Title, Office Email)
Architectural Barriers Act Compliance	0	0	0	Former responsible official retired during the FY and a replacement has not been named
Processing applications from PWD and PWTD	1	0	0	Kathy Mitcham kathy.Mitcham@sba.gov
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Kathy Mitcham HR Specialist, OHRS
Processing reasonable accommodation requests from applicants and employees	1	0	0	Judette Crosbie DEPM, ODI&CR
Section 508 Compliance	1	0	0	Shawn Garner Section 508 Coordinator, OCIO
Special Emphasis Program for PWD and PWTD	1	0	0	Judette Crosbie DEPM, ODI&CR

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

The Disability Employment Program Manager attends monthly webinars hosted by the Job Accommodation Network as well as participates in the quarterly Federal Exchange on Employment and Disability (FEED) meetings, hosted by the Department of Labor.

### **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.

On May 20, 2020, SBA's Office of Human Resource Solutions (OHRS) fully deployed an agency wide National Strategic Recruitment Plan: Building the Pipeline of Future Leaders to recruit, sustain, and effectively deploy a skilled, knowledgeable, diverse, and high-performing workforce to meet the current and emerging needs of its customers. SBA guidelines state that hiring officials will first consider all applicants eligible to be appointed under special hiring authorities including qualified veterans and persons with disabilities prior to making a final selection. The Agency continued to leverage a broad-based recruiting strategy to attract a diverse pool of job applicants, including those with disabilities. One element of the strategy is to expand opportunities to hire and retain veterans through a variety of veteran-focused recruitment and retention strategies, such as the Wounded Warriors/ Operations Warfighter Program, the Veterans Affairs (VA) Non-paid Work Experience Programs, and targeted recruitment fairs. Additionally, OHRS partners with the following organizations and agencies to assist with their recruitment events: Maryland State Department of Education, Division of Rehabilitation Services; Military Spouse Hiring Authority and Educational Institutions and disability organizations; Office of Veterans Affairs Rehabilitation Services. OHRS has partnered with the Office of Personnel Management (OPM) to host workshops on Hiring in the Federal workplace to educate employees on special hiring authorities associated with persons with disabilities, 30% or more disabled veterans and how hiring managers can take advantage of these authorities. The SBA implemented the use of the Schedule A hiring authority in support of the CAREs Act to expedite temporary employee hiring (appointments of one-year with the option to extend for an additional year). The authority expires on June 30, 2022. The Agency also received a dual compensation waiver from OPM to allow re-hiring of annuitants. OHRS has reached out to various recruitment sources targeting a diverse group of candidates, including disabled veterans. OHRS Executive Resources uses an internal database with resumes for Persons with Disabilities, Peace Corp volunteers and Veterans who are 30% or more disabled. The resumes are shared with supervisors and managers on request. SBA provides advice and guidance to applicants via phone and email with respect to required documents on the Federal hiring process utilizing veterans' preference; collects veteran resumes for hiring managers using special hiring authorities; consults with applicants to provide clear guidance and assistance in resume building and job placement; and searches for highly skilled veterans through the Veterans Employment Program Office and the OPM list of persons with disabilities to meet Agency staffing needs and to support agency mission objectivities. The SBA participated in several virtual recruitment webinars including the Virtual HBCU Hiring Event, American University Virtual Recruiting, Peace Corps Virtual Job Fair, Military Spouse Program Webinar, University of Maryland Virtual Handshake Event, Department of Veterans Affairs Readiness & Employment and Microsoft Corporation virtual career fair, and the George Washington School of Business Virtual Information Session. The SBA used the hiring manager's toolkit and trained hiring managers on various hiring flexibilities (e.g., Cybersecurity direct hire authority, Schedule A, Veterans Programs, and the COVID-19 Excepted Service Hiring Authority).

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

SBA's Special Placement Program Coordinator (SPPC) utilizes all hiring authorities that cover disabilities. The SPPC coordinates the onboarding; however, there is not a process in place to ensure that PWTD completes a SF 256 reflecting their targeted disability as completion is completely voluntary. There has not been an increase in requests for Reasonable Accommodation nor any requests for Personal Assistant Services. In FY 21, workforce composed of 55 employees with disabilities and 12 employees with permanent disabilities. This represents a significant increase in employees with disabilities. There were 18 new hires with disabilities and 2 with permanent disabilities. It is also noted that of all the new hires in FY 20, there were no new hires of PWD and PWTD in the senior grades.

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.

Applicants who apply under Schedule A via USAJobs have eligibility determinations via the same evaluation process as other candidates but are placed on a separate certificate for hiring managers' consideration. Applicants who apply directly to the SPPC have their qualifications determined by a Human Resources Specialist (locally identified by the SPP) for the position identified, in which the Human Resources Specialist explains whether and how the hire can/will be affected, and the person brought on board.

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

OHRS has partnered with the Office of Personnel Management (OPM) to host workshops in the Federal workplace to educate all employees on special hiring authorities associated with persons with disabilities, 30% or more disabled veterans and how hiring managers can take advantage of these authorities. OHRS utilizes the National Strategic Recruitment Plan to educate SBA hiring managers about the wide variety of hiring flexibilities, as well as provide critical information about the full hiring life-cycle. OHRS provides on-demand training options through the Agency's Talent Management Center which allows supervisors to take staffing training based on their availability. In FY 21, SBA pushed out online content (Percipio and Manager Advantage) geared to educating managers and supervisors on employing people with disabilities. This content describes the special hiring authority and provides the steps for using Schedule A. SBA regularly provides training to agency hiring managers and human resources staff on Schedule A hiring authority. The Workforce Recruitment Program for College Students with Disabilities (WRP) is a recruitment and referral program that connects federal and private sector employers nationwide with highly motivated college students and recent graduates with disabilities who are eager to prove their abilities in the workplace through summer or permanent jobs. The training SBA conducted in September 2020 generated increased interest from managers in the WRP. As a result of the training, three hiring managers expressed interest in becoming WRP Recruiters. Two of them were selected to become Recruiters. WRP provides trainings throughout the year and SBA partners with managers to share and support use of the trainings provided.

### **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.

OHRS maintains monthly contact with the Department of Veteran's Affairs Vocational Rehabilitation Program and maintains a strong working relationship with the counselors to assist with SBA's recruitment of PWD and PWTD. SBA continues to recruit from sources such as Peace Corps, and AmeriCorps to attract candidates with disabilities. SBA also participates in the Operation Warfighter's Internship Recruitment Fair, Workforce Recruitment Program for College Students with Disabilities, Department of Veterans Affairs Non-Paid Work Experience Program, and recruitment fairs at Gallaudet University.

## C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

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

Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, there is not a trigger in the permanent workforce for new hires for PWD which is over the 12% goal at 18.32%. There is a trigger for PWTDs in the permanent workforce as the agency was at 1.53%. Although this is a small increase from FY 2,0 which was .93%, SBA is still not yet at the 2% goal.

		Reportable	Disability	Targeted Disability		
New Hires	Total	Permanent Temporary Workforce Workforce		Permanent Workforce	Temporary Workforce	
	(#)	(%)	(%)	(%)	(%)	
% of Total Applicants	4400	5.36	0.00	2.39	0.00	
% of Qualified Applicants	2257	5.18	0.00	2.04	0.00	
% of New Hires	59	5.08	0.00	0.00	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	N/A
b. New Hires for MCO (PWTD)	Answer	N/A

SBA will work with USA Staffing to obtain accurate data.

	T . ( . 1	Reportable Disability	Targetable Disability
New Hires to Mission-Critical Occupations	Total	New Hires	New Hires
	(#)	(%)	(%)
Numerical Goal		12%	2%
1101 GENERAL BUSINESS & INDUSTRY	20	5.00	0.00
1102 CONTRACTING	4	0.00	0.00
1165 LOAN SPECIALIST	13	7.69	0.00
2210 INFORMATION TECHNOLOGY MANAGEMENT	22	4.55	0.00

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

SBA will work with USA Staffing to obtain accurate data.

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.

b. Promotions for MCO (PWTD) Answer N/A	ł
a. Promotions for MCO (PWD) Answer N/A	1

SBA will work with USA Staffing to obtain accurate data.

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.

SBA uses a centralized approach to address the Agency's strategic, talent development needs. A centralized training budget and blanket purchase agreement enable SBA to provide leadership effectively and efficiently as well as address professional and technical development needs for its mission critical occupations (MCOs), which account for approximately 57% of the Agency's workforce. Leveraging a centralized training budget for core and mission critical technical training promotes the ability to achieve economies of scale by identifying and meeting talent development needs at the corporate level. The Blanket Purchase Agreement affords SBA a cost-effective contracting vehicle that streamlines the procurement process and allows for added flexibility to plan and respond to talent development needs in a timely manner. Strategies include: providing a career path tool, conducting talent needs and competency assessments and ensuring adequate development opportunities to address identified needs at all levels; developing an Individual Development Plan (IDP) in SBA's online Talent Management Center (TMC) and educating staff and managers on the use of IDPs; building program office workforce plans to assess the current state of the workforce, identify gaps, and develop Agency-wide strategies to address them; updating the Agency exit survey to capture exiting employees' perceptions on diversity and inclusion in the Agency, reasonable accommodation, whether the decision to leave was related to a disability, and whether they were given the tools to succeed at their job; creating a strategic succession planning program that aligns with the Agency Strategic Plan to address organizational needs and better identify talent pools; educating hiring managers about hiring practices and available hiring authorities via resources such as the National Strategic Recruitment Plan and the Hiring Manager's toolkit; standardizing position descriptions to ensure greater efficiency and better utilization of resources to create upward mobility for employees; utilizing the Excellence in Government Fellows program to provide developmental opportunities to 8 future leaders; administering the mentoring program with 28 mentees in FY 2021 to prepare future leaders and improve knowledge transfer.

## **B. CAREER DEVELOPMENT OPPORTUNITES**

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

SBA's Learning Management System (LMS) continues to give all employees access to on-line training on demand. Thousands of courses are available to meet employees' career and individual developmental needs. All employees can look up and register for online, and on-site training classes. SBA has also successfully leveraged the Franklin Covey All Access Pass to extend quality learning and development opportunities throughout SBA. Franklin Covey workshops and webinars continue to be a pillar in SBA's leadership development efforts. Moving forward, SBA will continue using the Leadership Learning Journeys models to provide leadership development across the SBA leader pipeline. The SBA continues to expand educational offerings and increase training, certification, cross-training, rotational opportunities, leadership development programs, coaching, and mentoring, thereby providing opportunities for employees to enhance their learning and development goals.

Correct Development	Total Par	rticipants	PWD		PWTD	
Career Development Opportunities	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	0	0
Training Programs	0	0	0	0	0	0
Detail Programs	0	0	0	0	0	0
Other Career Development Programs	0	0	0	0	0	0

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

Concer Development	Total Participants		PWD		PWTD	
Career Development Opportunities	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Fellowship Programs	14	8	12.5	0	0	0
Mentoring Programs	28	28	44.6	44.6	10.7	10.7

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

Yes, a trigger exist in the fellowship program as there were no selectees for PWD.

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

In the Fellowship Program, there were no applicants for PWTD.

### 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

Using the inclusion rate as the benchmark, there are no triggers involving PWD or PWTD for awards.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	263	9.44	11.34	3.51	10.92
Time-Off Awards 1 - 10 Hours: Total Hours	2026.25	73.78	87.18	28.07	85.15
Time-Off Awards 1 - 10 Hours: Average Hours	7.7	2.73	0.40	14.04	-0.08
Time-Off Awards 11 - 20 hours: Awards Given	193	10.14	7.35	7.02	10.92
Time-Off Awards 11 - 20 Hours: Total Hours	3128	167.13	118.53	112.28	180.79
Time-Off Awards 11 - 20 Hours: Average Hours	16.21	5.76	0.83	28.07	0.21
Time-Off Awards 21 - 30 hours: Awards Given	70	3.15	2.80	5.26	2.62

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 21 - 30 Hours: Total Hours	1705	75.52	68.37	126.32	62.88
Time-Off Awards 21 - 30 Hours: Average Hours	24.36	8.39	1.27	42.11	0.00
Time-Off Awards 31 - 40 hours: Awards Given	34	1.40	1.45	0.00	1.75
Time-Off Awards 31 - 40 Hours: Total Hours	1340	55.94	57.35	0.00	69.87
Time-Off Awards 31 - 40 Hours: Average Hours	39.41	13.99	2.05	0.00	17.47
Time-Off Awards 41 or more Hours: Awards Given	100	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	314	13.99	12.16	19.30	12.66
Cash Awards: \$501 - \$999: Total Amount	234534.72	10628.35	9077.03	13515.54	9909.70
Cash Awards: \$501 - \$999: Average Amount	746.93	265.71	38.63	1228.68	26.02
Cash Awards: \$1000 - \$1999: Awards Given	1130	38.46	47.62	35.09	39.30
Cash Awards: \$1000 - \$1999: Total Amount	1616692.19	55305.31	68309.90	47628.21	57216.21
Cash Awards: \$1000 - \$1999: Average Amount	1430.7	502.78	74.25	2381.40	35.17
Cash Awards: \$2000 - \$2999: Awards Given	903	28.32	39.65	35.09	26.64
Cash Awards: \$2000 - \$2999: Total Amount	2111815.7	65003.80	92816.27	81837.95	60813.65
Cash Awards: \$2000 - \$2999: Average Amount	2338.67	802.52	121.17	4091.89	-16.24
Cash Awards: \$3000 - \$3999: Awards Given	245	3.85	10.97	0.00	4.80
Cash Awards: \$3000 - \$3999: Total Amount	828942.39	13486.63	37062.03	0.00	16843.57
Cash Awards: \$3000 - \$3999: Average Amount	3383.44	1226.06	174.82	0.00	1531.23
Cash Awards: \$4000 - \$4999: Awards Given	72	4.55	2.85	5.26	4.37
Cash Awards: \$4000 - \$4999: Total Amount	323440.6	20394.10	12838.46	24762.95	19306.66
Cash Awards: \$4000 - \$4999: Average Amount	4492.23	1568.78	233.43	8254.32	-95.31
Cash Awards: \$5000 or more: Awards Given	92	3.15	3.78	1.75	3.49
Cash Awards: \$5000 or more: Total Amount	937753.69	19208.74	41309.77	8771.93	21806.55
Cash Awards: \$5000 or more: Average Amount	10192.97	2134.30	565.89	8771.93	482.14

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)

b. Pay Increases (PWTD)

Answer No

Answer No

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	37	0.35	1.76	0.00	0.44

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

Data reflecting the qualification of applicants was not available, therefore could not determine whether triggers exist. The Agency will work with USA Staffing to retrieve this information.

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

Data reflecting the qualification of applicants was not available, therefore could not determine whether triggers exist. The Agency will work with USA Staffing to retrieve 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.

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

Data reflecting the qualification of applicants was not available, therefore could not determine whether triggers exist. The Agency will work with USA Staffing to retrieve 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.

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

Data reflecting the qualification of applicants was not available, therefore could not determine whether triggers exist. The Agency will work with USA Staffing to retrieve 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 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

Data reflecting the qualification of applicants was not available, therefore could not determine whether triggers exist. The Agency will work with USA Staffing to retrieve this information.

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

Data reflecting the qualification of applicants was not available, therefore could not determine whether triggers exist. The Agency will work with USA Staffing to retrieve this information.

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

Data reflecting the qualification of applicants was not available, therefore could not determine whether triggers exist. The Agency will work with USA Staffing to retrieve this information.

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

Data reflecting the qualification of applicants was not available, therefore could not determine whether triggers exist. The Agency will work with USA Staffing to retrieve this information. s.

## 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 No

No. In FY 19, 24 employees were hired under the Schedule A disability hiring authority. Of those, nine were converted into the competitive service as of the end of FY 21. Eight employees are still employed with SBA but do not have a conversion action. Seven employees left SBA prior to the two-year period. OHRS' plans to initiate a disability Schedule A hires tickler report have been put on hold due to COVID and implementation of new HR information systems.

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)AnswerNob.Involuntary Separations (PWD)AnswerNo

Using the inclusion rate as the benchmark, separations of PWD did not exceed persons without disabilities in neither voluntary nor involuntary separations.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	2	0.12	0.01
Permanent Workforce: Resignation	39	0.59	0.38
Permanent Workforce: Retirement	111	1.41	1.10
Permanent Workforce: Other Separations	96	0.71	1.00
Permanent Workforce: Total Separations	248	2.83	2.49

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

a.Voluntary Separations (PWTD)	Answer	No
b.Involuntary Separations (PWTD)	Answer	No

Using the inclusion rate as the benchmark, separations of PWTD did not exceed persons without disabilities in neither voluntary nor involuntary separations.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	2	0.62	0.01
Permanent Workforce: Resignation	39	0.62	0.39
Permanent Workforce: Retirement	111	1.24	1.13
Permanent Workforce: Other Separations	96	0.62	0.98
Permanent Workforce: Total Separations	248	3.11	2.51

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.

NA

## **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.sba.gov/about-sba/open-government/about-sbagov-website/accessibility SBA is committed to making the information it delivers through its Internet site accessible for all members of the public, including individuals with disabilities. In the spirit of this commitment, the SBA strives to provide electronic and information technology that meets or exceeds the compliance requirements of Section 508 of the Rehabilitation Act of 1973, as amended. If an individual has feedback, concerns or complaints related to the accessibility of electronic and information technology provided by the SBA, including content on the web site. SBA Office of Diversity Inclusion and Civil Rights, 409 Third St. SW suite 6400, Washington, DC 20416. Individuals may also send complaints regarding Section 508 to the following address: they may contact the Section 508 Coordinator via email at: 508@sba.gov.

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.sba.gov/about-sba/open-government/about-sbagov-website/accessibility

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.

SBA occupies office space through the continental United States, in federal buildings and GSA leased spaces. The Disability Employment Program Manager works with the ABA Compliance Manager to address any accessibility concerns and take specific actions to modify spaces for employees, as a reasonable accommodation. In FY 21 there were no requests for modifications.

### 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.)

At SBA, supervisors, in consultation with the Disability Employment Program Manager, makes the decision on requests for Reasonable Accommodation. Procedurally, the requirement is within 30 business days, baring no extenuating circumstances. During FY 21 there were fewer requests for Reasonable Accommodation, which is attributed to the workforce teleworking because of the COVID-19 Pandemic. The average processing time was significantly reduced from 27.7 days the previous FY to 17.00 days. Employees were able to successful perform the essential duties of their position, responding to COVID-related actions, from the comfort of their homes under the agency's Reconstitution Plan. Using EEOC' guidance, specific language for managers to respond to reasonable accommodation training is provided on a as needed or request basis. During FY 21, no training to the workforce was provided; however, the Disability Employment Program Manager routinely provides one-on-one training to any supervisor who is unfamiliar with the agency's process. Reasonable Accommodation training is also presented to new supervisors on a quarterly basis and the Disability Employment Program Manager, along with subject matter experts from Human Resources, appear as panelist during the week-long training to answer any questions relating to variety of topics, to include reasonable accommodation.

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.

Attributed to the surge in hiring a temporary workforce under the CARES Act to respond to the COVID pandemic, there was an observable trend where employees requesting reduced work hours as an accommodation. This trend continued in FY 21 Employees hired in response to the pandemic is typically expected to work 10-hour days and on the weekends.

# 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.

## 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?
- 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?
- 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.

Government-wide average for formal complaints filed by people with disabilities for Harassment is 22.10%. During FY 21, there were no findings of discrimination alleging harassment based on disability status.

## **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?

- 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?
- 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.

Government-wide average for formal complaints filed by people with disabilities for Failure to Accommodate is Harassment is 14.33%.

## 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

Answer N/A

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

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

Answer No

Answer No

Answer

No

Answer No

C	<b>T</b>	WarlforseD						
Source of the		Workforce Data (if so identify the table)						
Specific Worl Table:	kforce Data	Workforce Da	Workforce Data Table - B8					
STATEMEN CONDITION A TRIGGER POTENTIAL	THAT WAS FOR A	New Hires of Persons with Targeted Disabilities (PWTD) in the permanent workforce fall below the required 2% goal, established by EEOC. For FY 20, of the eight (8) new hires only two (2) 93% were PWTD.						
Provide a brie describing the issue.								
How was the or recognized as barrier?								
STATEMEN		Barrier Grou	p					
BARRIER G	ROUPS:	People with I	Disabilities					
Barrier Analy Completed?:	ysis Process	N						
Barrier(s) Ide	entified?:	N						
STATEMEN		Barrier Name Description of Policy, Procedure, or Practice				ractice		
IDENTIFIED	) BARRIER:	NA		NA				
or practice that determined to of the undesired conc	t has been be the barrier							
			Objective(s)	and Dates for	EEO Plan			
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed		Obj	ective Description	on
10/01/2020	09/20/2022	Yes					res of PWTDs with the 2% by Oct 1, 2	
			Respo	onsible Officia	l(s)			
	Title		<b>x</b>	Name		S	tandards Addres	ss The Plan?
	Human Capital nan Resource So		Julie Brill				No	
		Plann	ed Activities T	oward Compl	etion of Obj	ective		
Target Dat	e		ed Activities	<b>*</b>	Suffic Staffin Fundi	rient 1g &	Modified Date	Completion Date
09/20/2021     Educate managers and hiring officials on the requirements for an effective affirmative action program for People with Disabilities.     Yes			ive affirmative		Ye	~		

	Report of Accomplishments						
Fiscal Year	Fiscal Year Accomplishment						
2021	OHRS partnered with the Office of Personnel Management (OPM) to host workshops in the Federal workplace to educate all employees on special hiring authorities associated with persons with disabilities, 30% or more disabled veterans and how hiring managers can take advantage of these authorities. OHRS utilizes the National Strategic Recruitment Plan to educate SBA hiring managers about the wide variety of hiring flexibilities, as well as provide critical information about the full hiring life-cycle.						
	SBA pushed out online content (SkillSoft and Manager Advantage) geared to educating managers and supervisors on employing people with disabilities. This content describes the special hiring authority and provides the steps for using Schedule A. SBA regularly provides training to agency hiring managers and human resources staff on Schedule A hiring authority. In September 2020, OHRS provided training to supervisors and hiring managers on the Schedule A hiring authority during a quarterly Supervisor Community of Practice. The training also included the following topics: • SBA Hiring Authorities and Goals for Hiring Persons with Disabilities and Targeted Disabilities • How to fill vacancies quickly through the use of hiring flexibilities • Recruitment flexibilities and improving the hiring of quality employees by utilizing effective assessment strategies • The importance of increasing diversity in civil servant applicant pools • Building strong teams by hiring employees with varied backgrounds so different strengths can be leveraged to tackle program operations • Orientation to SBA's National Strategic Recruitment Plan which highlights a variety of hiring flexibilities including the hiring of veterans with disabilities • Partnerships and recruitment opportunities to increase awareness of SBA vacancies and attract top talent.						

Source of the	Trigger:	Workforce Da	ta (if so identif	v the table)				
Specific Wor Table:		Workforce Data Table - B7						
CONDITION A TRIGGER	ATEMENT OF DNDITION THAT WAS TRIGGER FOR A DTENTIAL BARRIER:							
Provide a brie describing the issue.								
How was the recognized as barrier?								
STATEMEN BARRIER G		Barrier Group People with D						
Barrier Anal Completed?:	ysis Process	N						
Barrier(s) Id	entified?:	N						
STATEMEN IDENTIFIEI	T OF D BARRIER:	Barrie	er Name	D	escription of	Policy, Procedure, or Practice		
of the agency procedure or practice that	t has been be the barrier							
		•	Objective(s)	and Dates for	EEO Plan			
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed		Objective Description		
10/01/2020	09/20/2022	Yes			<ul> <li>SBA has no policy in place to require hiring ma and supervisors to achieve the targeted goals of PWD and 2% PWTD. Managers require training in regard to recruiting individuals with disabilitic creating an inclusive work environment for differabled individuals.</li> <li>Educate managers and hiring officials on the requirements for an effective affirmative action program for People with Disabilities no later that</li> </ul>			
				September 30, 2021.				
			Respo	onsible Officia	l(s)			
	Title			Name		Standards Address The Plan?		

Planned Activities Toward Completion of Objective							
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date			
09/30/2021	Educate managers and hiring officials on the requirements for an effective affirmative action program for People with Disabilities no later than September 30, 2021.	Yes					
	Report of Accomplishme	ents					
Fiscal Year Accomplishment							

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

The triggers were only identified during a review of the FY 20 workforce data and a plan was developed with a target completion date of 9/30/2022.

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

In FY 21, 24 or 18.32% of total permanent new hires were PWD. Two (2) or 1.53% of permanent total new hires were PWTD. This represents an increase of 0.59 percentage points in new hire PWTDs over FY 20.

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.

NA