

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

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

Section I: Efforts to Reach Regulatory Goals

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

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

a. Cluster GS-1 to GS-10 (PWD)

Answer No

b. Cluster GS-11 to SES (PWD)

Answer No

The percentage of PWD in GS-1 to GS-10 was 35.19%, which exceeds the 12% benchmark. The percentage of PWD in GS-11 to SES was 25.75%, which exceeds the 12% benchmark.

*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

The percentage of PWTD in GS-1 to GS-10 is 6.48%, which exceeds the 2% benchmark. The percentage of PWTD in GS-11 to SES is 3.54%, which exceeds the 2% benchmark.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10					
Grades GS-11 to SES					

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

EEO and HCO Leadership set numerical goals through discussions with key stakeholders and the Diversity and Inclusion Council, which includes managers and recruiters. Additionally, numerical goals are shared with staff through New Employee Orientation, FLETC New Supervisor Training Program and in Monthly Manager and Employee Training events. They are communicated to senior level hiring managers in annual reports to include Component Recruitment Outreach Plan (CROP), Disabled Veterans Affirmative Action Plan (DVAAP), and Federal Equal Opportunity Recruitment Program (FEORP). Recruiters are actively

involved in planning and attend various targeted outreach and recruitment events. In FY 2019, Federal disability hiring goals were also posted through FLETConnect for the DHS Campaign to Resurvey the Workforce. Human Resource personnel discuss recruitment strategies with hiring managers suggesting sources with disability in mind e.g., Schedule A direct hire authority; as well as 30% or more disabled veteran hiring sources.

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

- 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

In addition to FLETC’s Disability Program Manager, there are five EEO Specialists who process request for reasonable accommodation (RA) and Personal Assistance Services (PAS). FLETC also has designated a Section 508 Coordinator and a Disability Access Coordinator and alternate to ensure accessibility. FLETC established an assessment process for all requests for Reasonable Accommodation and PAS. This process requires that a Reasonable Accommodation Team consisting of an EEO Specialist, an Attorney from the Office of Chief Counsel and a Labor Relations Specialist from the Human Capital Office individually assess each RA requests. The Team provides advice and procedural guidance to the requestor’s supervisor to make an informed decision regarding the reasonable accommodation request. Federal Occupational Health Service physicians provide occupational medical opinions through contracted services, as needed.

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing reasonable accommodation requests from applicants and employees	5	0	0	arlene.gonzalez@fletc.dhs.gov
Processing applications from PWD and PWTD	1	0	0	malcolm.campbell@fletc.dhs.gov
Answering questions from the public about hiring authorities that take disability into account	1	0	0	malcolm.campbell@fletc.dhs.gov
Section 508 Compliance	1	0	0	rosemary.jones@fletc.dhs.gov
Architectural Barriers Act Compliance	1	0	0	Kimberly Day-Lewis Complaints Manager kimberly.day-lewis@fletc.dhs.gov
Special Emphasis Program for PWD and PWTD	1	0	0	Monte Council Equal Employment Opportunity Specialist monte.council@fletc.dhs.gov

3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If “yes”, describe the training that disability program staff have received. If “no”, describe the training planned for the upcoming year.

Answer Yes

During FY 2019, the Disability Program Manager and EEO Specialists participated in training, webinars and meetings presented by a variety of sources. The training sources included: DHS/CRCL, Disability Employment Advisory Council and Diversity Management Section and Component Meetings, Equal Employment Opportunity Commission, Job Accommodation Network, Department of Defense Computer/Electronic Accommodations Program, Federal Exchange on Employment and Disability, Department of Labor Employer Assistance & Resource Network, Department of Labor Office of Disability Employment Policy, LEAD Center and LRP Publications throughout the fiscal year.

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

All EEO, Human Capital Office staff, and Office of the Chief Counsel who participate in RA and PAS processing and employee training, section 508 and accessibility have received sufficient training and guidance to ensure timely completion of requests for these services.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC’s regulations and guidance? [see 29 CFR §1614.203(d)(3)]		
Objective	FLETC Reasonable Accommodation Procedures that are compliant with EEOC regulations and guidance.		
Target Date	Jan 18, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jan 18, 2019		Submit FLETC Reasonable Accommodation Procedures to EEOC for review and approval.
	May 1, 2019		Completion and publishing of FLETC Reasonable Accommodation Directive
	Nov 19, 2019		Final review of Reasonable Accommodation Directive from MRSD, HCO and OCC.
	Nov 25, 2019		Submission of Reasonable Accommodation Directive to the Director’s Office for the review and approval process for new FLETC Directives.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	FLETC’s Reasonable Accommodation Procedures have been updated to comply with EEOC’s regulations and guidance and was submitted to EEOC for review and approval on July 18, 2019. Additionally, the EEO office, in consultation with key stakeholders in our Mission Readiness Support Directorate, Human Capital Office and Office of Chief Counsel, has also incorporated FLETC’s Reasonable Accommodation Procedures into a draft Directive that will be under review through the FLETC Directives Review Process and projected to be complete in FY 2020.	

Brief Description of Program Deficiency	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.		
Objective	Process all accommodation requests within the timeframe set forth in its reasonable accommodation procedures.		
Target Date	Sep 30, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2020		Implement the use of ACMS SMT system to process all reasonable accommodation requests ensuring accurate real time tracking processes and timeframes. The ACMS system has been revised by DHS. FLETC staff will be trained on the new system once revisions are complete. FLETC DPM and RAC continue to monitor and maintain an internal tracking system for reasonable accommodations for students and employees.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
Objective	FLETC Reasonable Accommodation Procedures that are in compliance with EEOC regulations and guidance.		
Target Date	Jan 18, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	May 31, 2020		Final review of Reasonable Accommodation Directive from MRSD, HCO and OCC.
	Jun 15, 2020		Submission of Reasonable Accommodation Directive to the Director’s Office for the review and approval process for new FLETC Directives.
	Sep 30, 2020		Implement the use of ACMS SMT system to process all reasonable accommodation requests ensuring accurate real time tracking processes and timeframes. The ACMS system has been revised by DHS. FLETC staff will be trained on the new system once revisions are complete. FLETC DPM and RAC continue to monitor and maintain an internal tracking system for reasonable accommodations for students and employees.
	Nov 15, 2020		Completion and publishing of FLETC Reasonable Accommodation Directive.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	FLETC’s Reasonable Accommodation Procedures have been updated to comply with EEOC’s regulations and guidance and was submitted to EEOC for review and approval on July 18, 2019. Additionally, the EEO Office, in consultation with key stakeholders in our Office of Chief Counsel, has incorporated FLETC’s Reasonable Accommodation Procedures into a draft Directive that is under review through the FLETC Directives Review Process and projected to be complete in FY 2020.	

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.

Recruitment: FLETC participated in nine (9) recruitment and outreach events during FY 2019. Events covered included HBCUs, Veteran events, Women in Federal Law Enforcement (approximately 530 participants) and the at the National Organization of Black Law Enforcement Executives (approximately 1,800 participants). The recruiting team made approximately 825 individual contacts at the events, many of whom were veterans. Pre-event sessions proved productive with individuals displaying specific interest in FLETC opportunities. Recommendations and changes in attendance at future events are being reviewed to ensure continued success of FLETC recruitment efforts. FLETC maintains an open continuous voluntary applicant file for specific series and grades for candidates appointable as Schedule A and 30% or more disabled veterans. The status file is checked for all recruitments (external and internal) and names of qualified individuals are forwarded to the selecting official prior to the announcement being released. Outreach: FLETC sends vacancy announcements to representatives serving on the Brunswick Glynn County Council on Disabilities. This Committee consists of representatives from numerous disability serving institutions including LIFE – Living Independence for Everyone, Inc., National Alliance on Mental Illness, Georgia Vocational Rehabilitation Agency, Veteran's Administration, Glynn County Emergency Management Agency, and many others. Announcements are also sent to various other disability related service and support organizations, colleges and universities, and the Wounded Warrior Project. Vacancy announcements are also posted on the agency's internal and external websites and social media accounts. Vacancy announcements are also sent to the Diversity Initiative Notification Roster that includes diverse organizations, schools, etc. nationally.

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

Attendance at the Tri-Base Job Fair, in Jacksonville, Florida in March 2019. The Tri-Base Job Fair focused on veterans and disabled veterans in the Jacksonville, Kings Bay, Mayport and Brunswick areas and resulted in between 75 to 100 information seekers and approximately 45 of whom displayed serious interest in FLETC employment. FLETC maintains a voluntary applicant file for candidates eligible under Schedule A and 30% or more disabled veteran appointments. The status file is reviewed for all recruitments (external and internal) and names of qualified individuals are forwarded to the selecting official prior to the announcement being released.

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.

The GS-1801, 2210, 0201 and 1102 series are the four mission critical occupational opportunities that are offered through the automated on-line Voluntary Applicant File, which affords Schedule A applicants and disabled veterans consideration without competition for positions for which they are qualified. A 10-point preference file is also maintained to notify disabled veterans of upcoming delegated examining announcements and refers qualified 30% or more disabled veterans to the hiring managers for the possibility of non-competitive selections. These recruitment/hiring options are offered to hiring managers as a first recruitment strategy. Human Capital Office staff completes a qualifications review of all applicants placed in the status file based on the same criteria as all other veteran applicants.

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

Answer Yes

Managers receive training initially and Biennially through on-line training modules in PALMS entitled Employment of People with Disabilities: A Roadmap to Success, and through Managers Workshops. All supervisors attend FLETC New Supervisor Training Program, where information regarding the employment of individuals with disabilities and special hiring authorities is included in the training.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

The FLETC's Disability Program Manager is a member of the Brunswick Glynn County Council on Disabilities. The mission of the Committee is to improve the quality of life of persons with disabilities in the Brunswick Glynn County area by promoting opportunities to work and live in an environment free of architectural or attitudinal barriers. The Disability Program Manager shares vacancy announcements with the Council members as well as various other disability related service and support organizations, colleges and universities, and the Wounded Warrior Project. The Human Capital Office utilizes a listing of diversity and disability related contacts and sends those contacts email notification of vacancy announcements.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

- 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.

- New Hires for Permanent Workforce (PWD) Answer No
- New Hires for Permanent Workforce (PWTD) Answer No

Among the new hires in the permanent workforce, triggers do not exist for PWD (26.53%) or PWTD (2.04%), both which exceed the respective benchmark of 12% for PWD and 2% for PWTD.

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

- 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.

- New Hires for MCO (PWD) Answer Yes
- New Hires for MCO (PWTD) Answer No

In comparison to the benchmark (9.04%, (Qualified External Applicants Table B6-1)), a trigger does exist for PWD (8.51%) among the qualified external applicants for the GS-1801 series.

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

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

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

In comparison to the benchmarks (Table B6-1) for PWD (27.47%) and PWTD (3.65%), triggers do exist for PWD (12.90%) and PWTD (3.23%) among the internal applicants for the GS-1801 series.

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

- | | | |
|------------------------------|--------|----|
| a. Promotions for MCO (PWD) | Answer | No |
| b. Promotions for MCO (PWTD) | Answer | No |

In comparison to the benchmarks (Table B6-1), triggers exist for PWD (0.00%) and for PWTD (0.00%) among the employees promoted in the GS-1801 series.

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.

FLETC encourages employee participation in an assortment of career development programs and training opportunities. In FY 2019, FLETC offered opportunities to employees for self-development and improvement of job skills in PALMS through monthly Manager and Employee Workshops. Opportunities included job related training, participation in the Developmental Assignment Program, DHS Leader Development Competency Café Series, Foundation and Milestone Programs, HR Academy’s Executive Speaker Series, and Federal Leadership and Professional Development Seminar Series and other formal and informal career development programs. General training opportunities were announced throughout the year by email and postings through FLETCConnect covering a variety of subjects for employees at all grade levels. Additionally, in FY 2019, FLETC’s Human Capital Office solicited applications from both mentors and protégés to participate in the FLETC Mentoring Program, where each protégé was paired with three potential mentors. The first Mentor Open House event will begin in FY 2020. FLETC continues to make available college academic career development opportunities to permanent employees through the Tuition Assistance Program (TAP). The TAP reimburses eligible employees for mission-related college courses, helps improve job performance, and enhances needed skills for the future. The Diversity and Inclusion Council remains available for input on career development programs that support staff retention and succession planning.

B. CAREER DEVELOPMENT OPPORTUNITES

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

Developmental Assignment Program and FLETC Mentoring Program. Other training also available include, FLETC New Supervisor Training Program, Federal Executive Institute, DHS Leadership Development Program includes Leadership Bridges Cohort Program and Competency Café Series, Leadership Bridges Self-Development Program, HR Academy’s Executive Speaker Series, Federal Leadership and Professional Development Seminar Series, SES Candidate Development Program, Tuition Assistance Program, Monthly Human Capital Office Employee and Management Workshops. Additionally, all employees have access to continuing education classes available in the DHS Performance and Learning Management System.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	0	0	0	0	0	0
Mentoring Programs	12	12	16.67	16.67	0	0
Detail Programs	21	14	14.29	9.52	4.76	7.14
Fellowship Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	0	0
Training Programs	0	0	0	0	0	0
Other Career Development Programs	0	0	0	0	0	0

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 Yes
- b. Selections (PWD) Answer No

In FY 2019, triggers exist for PWD among the applicants (16.67% for the Mentoring Program and 14.29% for the Detail Program), in comparison to 26.37% for the relevant applicant pool.

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 Yes
- b. Selections (PWTD) Answer Yes

Triggers exist for PWTD in the Mentoring Program compared to the relevant applicant pool. There were no PWTD applicants for this program.

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

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %

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

a. Pay Increases (PWD) Answer No

b. Pay Increases (PWTD) Answer No

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

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

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

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

D. PROMOTIONS

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

a. SES

i. Qualified Internal Applicants (PWD) Answer No

ii. Internal Selections (PWD) Answer No

b. Grade GS-15

i. Qualified Internal Applicants (PWD) Answer Yes

ii. Internal Selections (PWD) Answer No

c. Grade GS-14

i. Qualified Internal Applicants (PWD) Answer Yes

ii. Internal Selections (PWD) Answer No

d. Grade GS-13

i. Qualified Internal Applicants (PWD) Answer Yes

ii. Internal Selections (PWD) Answer No

The application rate for PWD is below their availability in the relevant applicant pool in the GS-13 through GS-15 grade levels. A deeper analysis will be completed in FY 2019 to determine the qualified applicant pool based on the series where promotions occurred and if an actual barrier exists for PWD.

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

a. SES

i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	No

b. Grade GS-15

i. Qualified Internal Applicants (PWTD)	Answer	Yes
ii. Internal Selections (PWTD)	Answer	No

c. Grade GS-14

i. Qualified Internal Applicants (PWTD)	Answer	Yes
ii. Internal Selections (PWTD)	Answer	No

d. Grade GS-13

i. Qualified Internal Applicants (PWTD)	Answer	Yes
ii. Internal Selections (PWTD)	Answer	No

The application rate for PWTD is below their availability in the relevant applicant pool in the GS-13 through GS-15 grade levels. A deeper analysis will be completed in FY 2019 to determine the qualified applicant pool based on the series where promotions occurred and if an actual barrier exists for PWTD.

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

a. New Hires to SES (PWD)	Answer	No
b. New Hires to GS-15 (PWD)	Answer	Yes
c. New Hires to GS-14 (PWD)	Answer	No
d. New Hires to GS-13 (PWD)	Answer	No

In FY 2018, the percentage of PWD among the new hires at Grade GS-15 (0.00%) fell below the benchmark (2.70%).

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

a. New Hires to SES (PWTD)	Answer	No
b. New Hires to GS-15 (PWTD)	Answer	No
c. New Hires to GS-14 (PWTD)	Answer	No

d. New Hires to GS-13 (PWTD) Answer No

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

N/A. Unable to determine if triggers exist. Monster Government Solutions applicant flow data is not currently not broken down by Executives, Managers and Supervisors.

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

N/A. Unable to determine if triggers exist. Monster Government Solutions applicant flow data is not currently not broken down by Executives, Managers and Supervisors.

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 |

N/A. Unable to determine if triggers exist. Monster Government Solutions applicant flow data is not currently not broken down by Executives, Managers and Supervisors.

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 |

N/A. Unable to determine if triggers exist. Monster Government Solutions applicant flow data is not currently not broken down by Executives, Managers and Supervisors.

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer Yes

All eligible candidates were converted.

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 |

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
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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

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
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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.

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.fletc.gov/accessibility-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.fletc.gov/accessibility-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.

FLETC is currently preparing a Disability Access Plan for Public-Facing Programs and Activities (Non-Employment). This is a three-phase general methodology plan expected to ensure that FLETC’s public facing programs and activities are universally accessible to individuals with disabilities at the FLETC Glyncro Headquarters, FLETC Washington Office and the three FLETC Training Delivery Points (TDPs) in Artesia NM, Charleston SC, and Cheltenham MD.

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.)

In FY 2018, the average time frame for processing reasonable accommodation requests was 34 days.

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

All employees (including supervisors and managers) entering on duty during FY 2018, were briefed on the reasonable accommodation process and how to initiate a request. Additionally, reasonable accommodation training was presented in FLETC New Supervisor Training Program and a workshop was held for field site for employees (including supervisors and managers). No complaints alleging failure to accommodate were filed during FY 2018.

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.

Requests from employees with targeted disabilities who require personal assistant services (PAS) will be processed under the FLETC reasonable accommodation policy. In FY 2018, there were no requests for personal assistant 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.

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.

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

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING) • In comparison to the qualified applicant benchmark (9.04%), a trigger does exist for PWD (8.51%) among the qualified external applicants for the GS-1801 series. • In comparison to the benchmark for PWD (27.47%), a trigger does exist for PWD (12.00%) among the qualified internal applicants for the GS-1801 series.							
STATEMENT OF BARRIER GROUPS:	Barrier Group People with Disabilities							
BARRIER ANALYSIS: Provide a description of the steps taken and data analyzed to determine cause of the condition.								
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	No barrier identified. Will continue to research triggers identified in the recruitment and hiring process for PWD and PWTS in the 1801 series.							
Objective	To identify if barriers exist in the recruitment and hiring process for PWD and PWTD in the 1801 series. <table border="1" data-bbox="483 1346 1502 1491"> <tr> <td>Date Objective Initiated</td> <td>Nov 4, 2019</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Nov 4, 2022</td> </tr> </table>				Date Objective Initiated	Nov 4, 2019	Target Date For Completion Of Objective	Nov 4, 2022
Date Objective Initiated	Nov 4, 2019							
Target Date For Completion Of Objective	Nov 4, 2022							
Responsible Officials	John Weaver EEO Officer Candice Porter HCO Officer							
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)				
06/30/2020	Initiate analysis of recruitment processes for 1801 series.	Yes						
09/30/2020	Work with HR to initiate an internal metric collection tool to better track the hiring process from advertisement to hire.	Yes						
09/30/2020	Examine physical requirements for GS-1801 positions.	Yes						
Fiscal Year	Accomplishments							

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>PROMOTIONS • The percentage of PWD among the selectees for promotion at grades GS-13 (0.00%) and GS-14 (0.00%) fell below their benchmark. • The percentage of PWTD among the selectees for promotion for grades GS-13 (0.00%) and GS-14 (0.00%) fell below their benchmarks. • The percentage of PWD among the new hires at grades GS-13 (6.90%), GS-14 (0.00%) and GS-15 (0.00%) fell below their benchmarks. • The percentage of PWTD among the new hires at grades GS 13 (3.45%), GS-14 (0.00%) and GS-15 (0.00%) fell below their benchmarks.</p>
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>CAREER DEVELOPMENT OPPORTUNITIES • In FY 2019, triggers exist for PWD among the applicants (16.67% for the Mentoring Program and 14.29% for the Detail Program), in comparison to 26.37% for the relevant applicant pool. • Triggers exist for PWTD in the Mentoring Program. There were no PWTD applicants for this program.</p>
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>AWARDS • Using the inclusion rate as the benchmark (Table B9-1), FLETC identified triggers involving the percentage of PWD (24.02%, which is -7.56% lower than Non-PWD) and PWTD (17.07%, which is -14.51% lower than Non-PWTD) who received Time off awards; and PWD (125.81%, which is -8.47% lower than Non-PWD) and PWTD (134.15%, which is -0.13% lower than Non-PWTD) for Cash awards. • Using the inclusion rate as the benchmark (Table B9-1), FLETC identified triggers involving of the percentage of PWTD (2.44%, which is -2.18% lower than Non-PWTD) who received Quality step increases.</p>
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>SEPARATIONS • Using the inclusion rate, triggers exist for PWD (3.23%) who involuntarily separated from the agency, as compared to the rate of persons without disabilities (1.80%).</p>
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p>

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

N/A

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

N/A

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

N/A