

## 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 |

The Commission has 20% PWD in grade cluster GS-1 to GS-10 equivalent levels and 10% PWD in grade cluster GS-11 to SES equivalent levels. It did not meet the target for PWD in grade cluster GS-11 to SES equivalent levels. The Commission notes the incredibly small sample size in the PWD in grade cluster GS-11 to SES equivalent levels category and continues its dedication to increasing its percentage of PWD in all grades.

\*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

- |                                 |            |
|---------------------------------|------------|
| a. Cluster GS-1 to GS-10 (PWTD) | Answer Yes |
| b. Cluster GS-11 to SES (PWTD)  | Answer Yes |

The Commission has 0% PWTD in its workforce. The Commission notes the incredibly small sample size with 70 total non-political employees at the agency. The Commission continues its commitment to recruiting and retaining PWTD in its permanent workforce.

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

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

The Commission's HR team communicates the numerical goals for persons with disabilities to all hiring managers across the Commission for every vacancy. These targets are addressed in the Commission's robust Schedule A hiring process as well as in the EEO training for managers and supervisors.

## Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

### A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If “no”, describe the agency’s plan to improve the staffing for the upcoming year.

Answer Yes

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	

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

Disability program staff receive training via policy review and updates, and take continued training courses as appropriate over the course of the 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

## Section III: Program Deficiencies In The Disability Program

<b>Brief Description of Program Deficiency</b>	B.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]		
<b>Objective</b>	The Commission has multiple activities planned over the next two fiscal years, including issuing updated workplace harassment and EEO policies, issuing a new Gender Transition Policy and Use of Gender-neutral Pronoun Policy, additional training to cover Schedule A hiring, and training its volunteer SEP managers to establish additional programs.		
<b>Target Date</b>	Sep 30, 2023		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Mar 1, 2020	March 1, 2020	Gather volunteers, including senior managers, to establish a D&I Committee. Research SEP programs, SEP manager duties and responsibilities. Designate volunteer collateral duty SEP managers in the upcoming fiscal year.
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	Sep 30, 2022		The Commission has identified special emphasis program managers for the Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program. The SEP managers have volunteered to not only serve in the SEP manager role as collateral duty but also are assisting with creating and implementing the programs within the Commission. In FY 2022, the Commission is working to establish the Federal Women’s Program and is currently acquiring training for its SEP managers.
	Sep 30, 2022		The Commission has identified special emphasis program managers for the Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program. The SEP managers have volunteered to not only serve in the SEP manager role as collateral duty but also are assisting with creating and implementing the programs within the Commission. In FY 2022, the Commission is working to establish the Federal Women’s Program and is currently acquiring training for its SEP managers.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2022	In FY 2022, the Commission established the Federal Women’s Program, and the special emphasis program manager began outreach with other government agencies on best practices and training opportunities.	
	2020	In March 2020, the Commission established a Diversity and Inclusion (D&I) Committee consisting of volunteer staff representing all departments within the Commission, including senior managers. The D&I Committee has been gathering information regarding the SEP duties and responsibilities required of SEP managers and requirements of individual SEP programs.	

## 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 PWTB

**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.

The Commission's Human Resources (HR) function is the centralized hub for all Commission hiring, and the HR Manager serves as the primary staff resource to identify job applicants with disabilities. HR maintains a separate file of applications received that indicate Schedule A eligibility that is digitally searchable prior to posting a vacancy. The Commission also uses the shared list of disabilities available on max.gov to locate qualified applicants with disabilities, including targeted disabilities. Prior to publicly posting a vacancy, HR sends a disability awareness email to the hiring manager advising them that prior to posting a job vacancy, they will need to review the Commission's list of Schedule A applicants as well as the OPM shared list.

2. Pursuant to 29 C.F.R. §1614.203(a)(3), describe the agency’s use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce

The Commission uses Schedule A hiring authority as the first step in its recruitment process for vacancies. The Chairman of the Commission directed all hiring managers to first use Schedule A hiring authority for Commission vacancies. As a result of this direction, the HR Manager oversees this required utilization of Schedule A, ensures that hiring managers comply with the Chairman's directive, and documents the result for each vacancy. Prior to posting those vacancies, hiring managers review the file of Schedule A candidates maintained by the HR Manager and search the OPM shared list. If the hiring official identifies a candidate from the Schedule A list, the candidate is then scheduled for an interview and if successful, the candidate is offered the position prior to the position being posted.

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 HR Manager reviews all Schedule A applications and provides the applications to the hiring manager. When a hiring manager is interested in a hiring authority eligible candidate, the HR Manager coordinates the use of the applicable appointment authority.

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

The Commission provides specific training during the in-person biennial EEO/No FEAR Act training. The HR Manager has received specific training from the online OPM training offerings and prior to posting a vacancy, the HR Manager reviews the Schedule A process with the hiring manager and provides guidance.

**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.

During FY 2023, the Commission continued its outreach to establish relationships with organizations that assist PWD, including PWTD, and established relationships with the American Dream Employment Network (ADEN), Gallaudet University, and the National Employment Team (NET) led by the Council of State Administrators of Vocational Rehabilitation (CSVAR). For these organizations, the Commission has requested resumes for their Schedule A candidates and posts vacancy announcement to their job boards.

**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

The Commission exceeded its target for new hires for permanent workforce, with 19% of the new permanent hires representing PWD. The Commission did not meet the target for PWTD.

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

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

The Commission's applicant pools reveal that the vast majority of applicants select (01) and do not identify disability either in the affirmative or negative. With this lack of substantive data, the Commission is unable to determine whether triggers exist. Out of the sixteen hires in FY 2023, three hires were PWD.

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

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

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

In FY 2023, the Commission had no vacancies filled by an internal applicant.

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

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

The Commission did not have any promotions for MCO in FY 2023.

## Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

### A. ADVANCEMENT PROGRAM PLAN

Describe the agency’s plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

The Commission is committed to using disability as a positive factor when advancement opportunities arise within the organization. The Commission is a very small agency and is a relatively flat organization with limited opportunities for advancement. In recognition of this limitation, the Commission developed career ladders through its grade system for mission critical occupations (MCOs), to ensure that all employees in MCOs, including PWD and PWTD, have an identified advancement path. The Commission also offers tuition reimbursement and specialized training for all employees so they can improve their skills and develop their careers during their time at the Commission. The Commission is working on strengthening its internal training program to provide training opportunities to all employees and focus on managerial training to understand how to provide and support advancement opportunities for employees with disabilities.

### B. CAREER DEVELOPMENT OPPORTUNITES

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

The Commission is committed to the development and training of all employees to enable them to acquire knowledge and skills relevant to their current position, prepare them for greater responsibilities, and advance their careers. While the Commission does not have a formal career development program, it provides individual training opportunities to develop its employees. The Commission provides budgetary resources for training and encourages staff to take training throughout the year. In FY 2023, the Commission provided a Learning Management System to all employees with thousands of training courses. The Commission identified career development as part of its new Strategic Plan for 2023-2028 and intends to create a more robust and structured career development program.

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 (%)
Mentoring Programs	0	0	0	0	0	0
Fellowship Programs	0	0	0	0	0	0
Other Career Development Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	0	0
Training Programs	0	0	0	0	0	0
Internship Programs	0	0	0	0	0	0
Detail 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 N/A
- b. Selections (PWD) Answer N/A

The Commission does not have internal career development programs but provides training opportunities to all employees.

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

The Commission does not have internal career development programs but provides training opportunities to all employees.

**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

The Commission applies a merit-based compensation policy that provides time-off awards and spot awards (bonuses) to all employees.

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

The Commission applies a merit-based compensation policy that provides performance-based increases to all employees.

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

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

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

The Commission had no other recognition program in FY 2023.

**D. PROMOTIONS**

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

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

The Commission did not have any internal promotions in FY 2023.

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

- a. SES
  - i. Qualified Internal Applicants (PWTD) Answer N/A
  - 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

The Commission did not have any internal promotions in FY 2023.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- a. New Hires to SES (PWD) Answer Yes
  - b. New Hires to GS-15 (PWD) Answer No
  - c. New Hires to GS-14 (PWD) Answer No
  - d. New Hires to GS-13 (PWD) Answer Yes

As the qualified internal applicant pool does not meet the benchmark, the Commission identifies a trigger for PWD among the new hires to the senior grade levels with the exception of new hires to GS-14 and GS-15.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- a. New Hires to SES (PWTD) Answer Yes
  - b. New Hires to GS-15 (PWTD) Answer Yes
  - c. New Hires to GS-14 (PWTD) Answer Yes
  - d. New Hires to GS-13 (PWTD) Answer Yes

As the qualified internal applicant pool does not meet the benchmark, the Commission identifies a trigger for PWTD among the new hires to the senior grade levels.

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

The Commission did not have any internal promotions in FY 2023.

6. Does your agency have a trigger involving PWTB among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- a. Executives
    - i. Qualified Internal Applicants (PWTB) Answer N/A
    - ii. Internal Selections (PWTB) Answer N/A
  - b. Managers
    - i. Qualified Internal Applicants (PWTB) Answer N/A
    - ii. Internal Selections (PWTB) Answer N/A
  - c. Supervisors
    - i. Qualified Internal Applicants (PWTB) Answer N/A
    - ii. Internal Selections (PWTB) Answer N/A

The Commission did not have any internal promotions in FY 2023.

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 Yes
  - b. New Hires for Managers (PWD) Answer No
  - c. New Hires for Supervisors (PWD) Answer N/A

The one new hire in FY 2023 in the executive category did not identify as a PWD. Of the two new hires in FY 2023 in the Manager category, one identified as a PWD. The Commission did not have new hires to supervisory positions in FY 2023.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- a. New Hires for Executives (PWTB) Answer No
  - b. New Hires for Managers (PWTB) Answer No
  - c. New Hires for Supervisors (PWTB) Answer N/A

The Commission did not have new hires to supervisory positions in FY 2023. None of the new hires to executive or manager positions identified as PWTD in FY 2023.

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

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

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer N/A

The Commission is an excepted service agency and all Schedule A employees have "career" status.

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

Seperations	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

Seperations	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.

There is no trigger for the separation of PWD and/or PWTD.

### 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.prc.gov/accessibility>

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.prc.gov/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.

The Commission is located in a LEED Gold-certified, privately-owned building that meets all accessibility requirements. In FY 2019, the property owner renovated both main entrances. This renovation included updates to accessibility points. In FY 2021, the Commission continued to update its government furnished equipment for employees, including accessibility options for remote work. In FY 2022, the Commission's Diversity and Inclusion Committee reviewed accessibility of Commission meeting rooms and hearing space prior to the return to the physical workspace. The Commission also plans to conduct an ADA assessment of its facilities in FY 2024.

### 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.)

The average time frame for processing initial requests for reasonable accommodation is 2 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.

The Commission's reasonable accommodation program processed all requests in a timely fashion, provided requested accommodation in a timely fashion, monitored accommodation requests for trends and worked with IT and accounting to obtain needed equipment based on the requests.

### 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.

The Commission has a separate PAS procedure and follows procedures for PAS requests in a similar manner to reasonable accommodation requests. The Commission did not receive any requests during FY 2023.

## 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 N/A

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 N/A

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 N/A

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 N/A

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 Yes

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

Answer Yes

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

<b>Source of the Trigger:</b>	Workforce Data (if so identify the table)				
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B1				
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	The Commission did not meet the 12% target for PWD. The Commission has 10% PWD in its workforce. This condition was recognized as a potential barrier through analysis of the Commission's workforce demographics.				
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i> People with Disabilities				
<b>Barrier Analysis Process Completed?:</b>	Y				
<b>Barrier(s) Identified?:</b>	Y				
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b>		<b>Description of Policy, Procedure, or Practice</b>		
	Lack of Applicant Data		The Commission collects applicant demographic data by including the OMB- issued Demographic Information on Applicant form with each vacancy announcement. However, the Commission previously did not have access to the results from this data collection that was collected by USA staffing as a result of applicants filing out the form, limiting insight into potential remedies to this barrier. In late FY 2020, the Commission gained access to this data and will be better able to assess potential barriers in the future.		
	Lack of PWD in applicant pool		In late FY 2020, the Commission was able to gain access to its applicant demographic data and has been able to analyze the data for the small number of vacancies in FY 2021. Assessment of this data revealed an issue with applicant reporting, where the majority of applicants select code 01 when responding to a vacancy notice. This makes it difficult for the Commission to determine the success of its targeted recruitment efforts of PWD.		
Lack of PWD in applicant pool		In late FY 2020, the Commission was able to gain access to its applicant demographic data and has been able to analyze the data for the small number of vacancies. Assessment of this data revealed an issue with applicant reporting, where the majority of applicants select code 01 when responding to a vacancy notice. This makes it difficult for the Commission to determine the success of its targeted recruitment efforts of PWD.			
<b>Objective(s) and Dates for EEO Plan</b>					
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>
04/22/2020	09/30/2020	Yes	07/01/2020		Improved ability to analyze the applicant pool by gaining access to applicant demographic data collected by USA staffing.
03/13/2020	09/30/2020	Yes	04/01/2020		Improve the diversity of the applicant pool by increasing outreach.

Responsible Official(s)				
Title	Name	Standards Address The Plan?		
HR Manager	Sherri Proctor	Yes		
Secretary and CAO	Erica Barker	Yes		
Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2020	Collaborate with USA staffing to gain an understanding of how to utilize existing tools, specifically access to the results from the applicant demographic data form, to gain visibility and analyze the applicant pool. Implement the selected tool(s).	Yes		04/01/2020
09/30/2020	Establish and implement a standard recruitment practice for outreach to ensure persons from underrepresented groups are aware of and encouraged to apply to Commission vacancies. The Commission will specifically reach out to America Job Centers, State Vocational Rehabilitation Agencies, the Veterans' Vocational Rehabilitation and Employment Program, Centers for Independent Living, and Employment Network Service providers.	Yes		12/01/2021
Report of Accomplishments				
Fiscal Year	Accomplishment			
2023	During FY 2023, the Commission hired sixteen individuals, three individuals were PWD. The Commission continues to increase its emphasis on Schedule A hiring for its vacancies and provided assistance to hiring officials in their search for qualified candidates and has had great success quickly onboarding talented individuals using this Schedule A hiring. The Chairman of the Commission directed all hiring managers to first use Schedule A hiring authority for Commission vacancies. The HR Manager oversees this required utilization of Schedule A, ensures that hiring managers comply with the Chairman's directive, and tracks and documents the result for each vacancy.			

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

The Commission completed its planned activities to increase its outreach and gain access to its applicant data.

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

The Commission will be better able to assess potential barriers to employment for targeted groups by analyzing applicant data. Prior to FY 2020, the Commission had no insight into demographic data from applicants to its vacancies and was unable to assess whether its recruitment efforts were effective. As the Commission is a very small agency and has few vacancies available, it will take time to gather sufficient data to analyze potential barriers. As it has conducted reviews of the applicant data, the majority of the applicants select (01) and do not identify disability either in the affirmative or negative. With this lack of substantive data, the Commission is unable to determine whether triggers exist. However, the Commission continues to use Schedule A hiring as a foundational source for its hiring efforts. Out of the sixteen new hires in FY 2023, three hires were PWD.

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.

It is difficult for the Commission to determine whether barriers actually exist based on the Commission's very small sample size. The Commission believes that Schedule A hiring program, which requires Schedule A review prior to posting a vacancy, is a very strong program that has successfully recruited candidates over the past few years. In addition, out of the sixteen hires in FY 2023, three hires were PWD.