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

**Postal Regulatory Commission - FY 2025**

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

   There are 9.33 Percent of PWD represented in the GS-11 to SES equivalent cluster.

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

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

   a. Cluster GS-1 to GS-10 (PWTD) Answer: Yes

   b. Cluster GS-11 to SES (PWTD) Answer: Yes

   There are 0 Percent of PWTD in the workforce in cluster GS-1 to GS-10 and 1.33 Percent of PWTD in cluster GS-11 to SES.

| Grade Level Cluster (GS or Alternate Pay Planb) | Total | Reportable Disability Total | Reportable Disability Percentage (Numerical Goal 12 Percent) | Targeted Disability Total | Targeted Disability Percentage (Numerical Goal 2 Percent) |
|---|---|---|---|---|---|
| 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 during the hiring process.

# 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 | Total Full Time | Total Part Time | Total Collateral Duty | Responsible Official (Name, Title, Office Email) |
|---|---|---|---|---|
| Special Emphasis Program for PWD and PWTD | 0 | 0 | 1 | Erica Barker<br>Secretary and CAO |
| Architectural Barriers Act Compliance | 0 | 0 | 1 | Erica Barker<br>Secretary and CAO |
| Processing applications from PWD and PWTD | 1 | 0 | 0 | Sherri Proctor<br>HR Manager |
| Section 508 Compliance | 0 | 0 | 1 | Erica Barker<br>Secretary and CAO |
| Processing reasonable accommodation requests from applicants and employees | 1 | 0 | 0 | Sherri Proctor<br>HR Manager |
| Answering questions from the public about hiring authorities that take disability into account | 0 | 0 | 1 | Sherri Proctor<br>HR Manager |

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

# 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.

   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 usajobs.gov to locate qualified applicants with disabilities, including targeted disabilities.

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 to recruit PWD and PWTD for positions in the permanent workforce. Hiring managers review the file of Schedule A candidates maintained by the HR Manager and search the OPM shared list.

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 for eligibility 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 as appropriate.

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 required biennial EEO/No FEAR Act training. The HR Manager has received specific training from the online OPM training offerings on Schedule A.

## 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 agency previously established outreach with various organizations that assist PWD, including PWTD, and 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", describe the trigger(s) below.

   a. New Hires for Permanent Workforce (PWD) Answer: Yes

   b. New Hires for Permanent Workforce (PWTD) Answer: No

   Out of the seven new hires, 0 Percent identified as PWD while 14.29 Percent identified as PWTD.

| New Hires | Total (Number) | Reportable Disability Permanent Workforce (Percentage) | Reportable Disability Temporary Workforce (Percentage) | Targeted Disability Permanent Workforce (Percentage) | Targeted Disability Temporary Workforce (Percentage) |
|---|---|---|---|---|---|
| **% 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.

| New Hires to Mission-Critical Occupations | Total (Number) | Reportable Disability New Hires (Percentage) | Targetable Disability New Hires (Percentage) |
|---|---|---|---|
| **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. 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 2025, 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 2025.

# 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 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.

## B. CAREER DEVELOPMENT OPPORTUNITIES

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.

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 Applicants (Percentage) | Total Participants Selectees (Percentage) | PWD Applicants (Percentage) | PWD Selectees (Percentage) | PWTD Applicants (Percentage) | PWTD Selectees (Percentage) |
|---|---|---|---|---|---|---|
| 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

| Time-Off Awards | Total (Number) | Reportable Disability (Percentage) | Without Reportable Disability (Percentage) | Targeted Disability (Percentage) | Without Targeted Disability (Percentage) |
|---|---|---|---|---|---|

| Cash Awards | Total (Number) | Reportable Disability (Percentage) | Without Reportable Disability (Percentage) | Targeted Disability (Percentage) | Without Targeted Disability (Percentage) |
|---|---|---|---|---|---|

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", describe the trigger(s) below.

    a. Awards, Bonuses, & Incentives (PWTD) Answer: No

    b. Pay Increases (PWTD) Answer: No

| Other Awards | Total (Number) | Reportable Disability (Percentage) | Without Reportable Disability (Percentage) | Targeted Disability (Percentage) | Without Targeted Disability (Percentage) |
|---|---|---|---|---|---|

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 (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

There were no internal promotions in 2025.

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

There were no internal promotions in 2025.

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: Yes

c. New Hires to GS-14 (PWD) Answer: N/A

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. There were no new hires to GS-14.

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: N/A

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. There were no new hires to GS-14.

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 2025.

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

The Commission did not have any internal promotions in FY 2025.

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: N/A

   c. New Hires for Supervisors (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 supervisory positions.

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: Yes |
| b. New Hires for Managers (PWTD) | Answer: N/A |
| c. New Hires for Supervisors (PWTD) | 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 supervisory positions.

# 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 does not have competitive service employees.

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 (Number) | Reportable Disabilities (Percentage) | Without Reportable Disabilities (Percentage) |
|---|---|---|---|

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(s) in the text box.

   a.Voluntary Separations (PWTD) Answer: No

   b.Involuntary Separations (PWTD) Answer: No

| Separations | Total (Number) | Targeted Disabilities (Percentage) | Without Targeted Disabilities (Percentage) |
|---|---|---|---|

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 o 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 fully meets all accessibility requirements.

## 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.

1. 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 policy that processes PAS requests in a similar manner to reasonable accommodation requests. The Commission did not receive any requests during FY 2025.

# 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 describ 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 accommodatior 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: 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

| **Source of the Trigger 1 (Workforce Data Table, Complaints data, FEVS, or other sources)** | |
|---|---|
| **Source** | Workforce Data (if so identify the table) |
| **Specific Workforce Data Table** | Workforce Data Table - B1 |
| **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? | The target for PWTD was not met. |
| **Barrier Analysis Process Completed?** | Y |
| **Barrier(s) Identified?** | N |

**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.

| **Description of Policy, Procedure, or Practice** | |
|---|---|

| **Objective(s) and Dates for EEO Plan** | |
|---|---|
| **Date Initiated** | 04/22/2020 |
| **Target Date** | 09/30/2020 |
| **Sufficient Funding / Staffing?** | Yes |
| **Date Modified** | 04/01/2020 |
| **Date Completed** | 03/01/2021 |
| **Objective Description** | Improved ability to analyze the applicant pool by gaining access to applicant demographic data collected by USA staffing. |

| **Responsible Official(s)** | |
|---|---|
| **Title** | HR Manager |
| **Name** | Sherri Proctor |
| **Standards Address The Plan?** | Yes |
| **Title** | Secretary and CAO |
| **Name** | Erica Barker |
| **Standards Address The Plan?** | Yes |

**Planned Activities Toward Completion of Objective**

| | |
|---|---|
| **Target Date** | 09/30/2020 |
| **Planned Activities** | 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.<br>Implement the selected tool(s). |
| **Sufficient Staffing & Funding?** | Yes |
| **Modified Date** | |
| **Completion Date** | 04/01/2020 |

**Report of Accomplishments**

| | |
|---|---|
| **Fiscal Year** | 2021 |
| **Accomplishment** | Achieved access to USA staffing tools for applicant data retrieval. |

4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities. Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.

   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. Based on these 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.

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 will continue to monitor this trigger by analyzing applicant data.