

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 |

No. FLETC has no trigger involving PWD by grade level in the permanent workforce. The groups exceed the 12% benchmark (GS-1 to GS-10 is 34.45% and GS-11 to SES is 24.40%)

*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 |

No. FLETC has no trigger involving PWTD by grade level in the permanent workforce. The groups exceed the 12% benchmark (GS-1 to GS-10 is 6.72% and GS-11 to SES is 3.17%)

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	118	41	34.75	8	6.78
Grades GS-11 to SES	914	223	24.40	29	3.17

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

The numerical goals are communicated to key stake holders at meetings of the FLETC Diversity and Inclusion Council and the DHS Strategic Recruitment Diversity and Inclusion Council (SRDI). Annual preparation of the Component Recruitment Outreach Plan (CROP), Disabled Veterans Affirmative Action Plan (DVAAP), and Federal Equal Opportunity Recruitment Program (FEORP) reports provide the opportunity to communicate the numerical goals to senior level hiring managers and recruiters. Recruiters are actively involved in planning and attendance at various targeted outreach events in support of the identified

numerical goals. Training sessions for managers are conducted throughout the year regarding recruitment methods to reach numerical goals. Recruiters 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

Yes. FLETC has a Disability Program Manager position and four EEO Specialist positions who process requests for reasonable accommodation. Additionally, FLETC has a Section 508 Coordinator and a Disability Access Coordinator and alternate. Each reasonable accommodation request is individually assessed by 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. Federal Occupational Health Service physicians provide occupational medical opinions through contracted services.

- 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 applications from PWD and PWTD	1	0	0	malcolm.campbell@fletc.dl
Answering questions from the public about hiring authorities that take disability into account	1	0	0	malcolm.campbell@fletc.dl
Processing reasonable accommodation requests from applicants and employees	5	0	0	Jennifer Hair Equal Employment Opportunity Specialist jennifer.hair@fletc.dhs.gov
Section 508 Compliance	1	0	0	rosemary.jones@fletc.dhs.g
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

- 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

Yes. The Disability Program Manager and EEO staff members participated in training, webinars and meetings presented by DHS/CRCL, 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

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	Update FLETC's Reasonable Accommodation Procedures to meet the new requirements under 29 CFR 1614.203.		
Target Date	May 3, 2019		
Completion Date	May 3, 2019		
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2018	On May 3, 2019 FLETC submitted updated Reasonable Accommodation Procedures to DHS/CRCL for review and approval and will then submit the procedures to EEOC.	

Brief Description of Program Deficiency	C.2.b.2. Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]		
Objective	Establish a firewall between the Reasonable Accommodation Program Manager and the EEO Director.		
Target Date	May 1, 2019		
Completion Date	May 20, 2019		
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2018	FLETC has a reasonable accommodation process that separates the decision-making, which lies with the supervisor/manager, from the consultation that informs the decision-maker. The consultation is a team approach with input from EEO, HCO and OCC. The RA team receives the medical information, and reviews it within the context of the job analysis and the interactive process with the individual involved. There is separation in the sense that should an EEO complaint arise out of a RA decision, the EEO Specialist involved in the consultation process would not be involved in processing the EEO complaint.	

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>
	Mar 29, 2019		Implement a reasonable accommodation tracking system. FLETC is working with DHS/OAST to implement using the ACMS Reasonable Accommodation Tracking System in FY 2019.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	

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.

In FY 2018, FLETC utilized a variety of recruitment strategies designed to increase the number of qualified applicants with disabilities and applicants with targeted disabilities. Currently, FLETC exceeds the 12% goal (GS-1 to GS-10 is 34.45% and GS-11 to SES is 24.40%) for PWD and the 2% sub-goal (GS-1 to GS-10 is 6.72% and GS-11 to SES is 3.17%) for PWTD. • Recruitment: In FY 2018, FLETC participated in recruitment events to include the DHS Veterans Hiring and Recruitment Event, Navy Tri-Base Job Fair, National Organization of Black Law Enforcement Executives Conference, National Asian Peace Officers’ Association Conference, Savannah State University Career Fair, College of Coastal Georgia’s Spring Job Fair, Soldier for Life Transition Program and Hire GI and the Gallaudet University Internship Career Fair. FLETC maintains an open continuous voluntary applicant file for specific series and grades of high-volume recruitment positions for those candidates appointable as Schedule A and 30% or more disabled veterans. • Outreach: Vacancy announcements were sent to representatives serving on the Brunswick Glynn County Council on Disabilities. This Committee consists of representatives from LIFE – Living Independence for Everyone, Inc., National Alliance on Mental Illness, Gateway Behavioral Health Services, Georgia Vocational Rehabilitation Agency, Veteran’s Administration, Glynn County Emergency Management Agency, SHARE – Speech, Hearing & Rehabilitation Enterprises, Aging and Disability Resource Connection, Goodwill Southeast Industries, Special Olympics of Coastal Georgia, St. Simons By-The-Sea, brainReconnect, Memory Matters, and Coastal Regional Coaches. 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.

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 agency used all available and appropriate hiring authorities to recruit and hire PWD and PWTD. Recruitment efforts include: • Attendance at the DHS Veterans Hiring and Recruitment Event that had over 2,500 attendees, including disabled veterans. This event used pre-scheduled interviews through OPM’s Agency Talent Portal Resume Mining that targeted veterans that were non-competitively appointable as 30% or more disabled veterans. • Attendance at the Tri-Base Job Fair, in Jacksonville, Florida in April 2018. The Tri-Base Job Fair is open to veterans and disabled veterans in the Jacksonville, Kings Bay, Mayport and Brunswick areas. • FLETC maintains a voluntary applicant file for those candidates eligible for Schedule A and 30% or more disabled veteran appointments. • FLETC promotes use of the Workforce Recruitment Program (WRP) as a recruitment strategy for filling positions.

- 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, and 1102 series are the three 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.

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

Yes. Managers receive the training initially through on-line training modules and Managers Workshops

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. This Committee consists of representatives from LIFE – Living Independence for Everyone, Inc., National Alliance on Mental Illness, Gateway Behavioral Health Services, Georgia Vocational Rehabilitation Agency, Veteran’s Administration, Glynn County Emergency Management Agency, SHARE – Speech, Hearing & Rehabilitation Enterprises, Aging and Disability Resource Connection, Goodwill Southeast Industries, Special Olympics of Coastal Georgia, St. Simons By-The-Sea, brainReconnect, Memory Matters, and Coastal Regional Coaches. 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.

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 No

No, the groups exceed the benchmarks (PWD 32.69% and PWTD 3.85%).

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	6990	3.62	3.08	1.42	1.30
% of Qualified Applicants	5015	3.17	3.23	1.06	1.14

% of New Hires	95	2.11	7.37	1.05	1.05
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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 Yes
- b. New Hires for MCO (PWTD) Answer Yes

Based on a review of B7 Applications and Hires using Monster analytics, triggers exist for:1801-Law Enforcement Specialist (Instructor): In comparison to the benchmark, a trigger exists for PWD GS-1801 new hires Qualified 6.47%; Selections 3.51%. NOTE: there are physical requirements for GS-1801 positions. (You must be able to meet job-related medical and/or fitness standards. You will be subject to an initial and annual physical examination that measures your visual, hearing, and physical acuity).

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	
1801GENERAL INSPECTION, INVESTIGATION & COMPLIANCE	3744	4.25	0.05	1.42	0.03

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

N/A. Monster is currently not integrated with NFC and is unable to distinguish qualified “internal”, from “external” applicants for GS-1801 positions. NOTE: there are physical requirements for GS-1801 positions. (You must be able to meet job-related medical and/or fitness standards. You will be subject to an initial and annual physical examination that measures your visual, hearing, and physical acuity).

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

No. There were 25 GS-1801 Promotions (NOAC 702). Of the 25, seven or 28.00% were PWD and four or 16.00% were PWTD.

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 2018, FLETC offered opportunities to employees for self-development and improvement of job skills. General training opportunities were announced throughout the year. This was accomplished through job related training, temporary assignments and other formal and informal career development programs. Training notices are routinely announced covering a variety of subjects for employees at all grade levels. FLETC continued 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.

The following career development opportunities are available for employees: Developmental Assignment Program, FLETC New Supervisor Training Program, Federal Executive Institute, Leading Edge Program, SES Candidate Development Program, Tuition Assistance Program, Monthly HCO 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	483	5	40.00	40.00	3.11	40.00
Fellowship Programs	0	0	0	0	0	0
Mentoring Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	0	0
Training Programs	0	0	0	0	0	0
Detail Programs	14	7	14.29	14.29	14.29	14.29
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 No
- b. Selections (PWD) Answer No

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 No
- b. Selections (PWTD) Answer No

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 %
Time-Off Awards: 1-9 hours : Total Time-Off Awards Given	207	28.99	71.01	6.28	22.71
Time-Off Awards: 9+ hours : Total Time-Off Awards Given	38	23.68	76.32	5.26	18.42

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$100 - \$500: Total Cash Awards Given	220	26.36	73.64	4.55	21.82
Cash Awards: \$501+: Total Cash Awards Given	1099	22.84	77.16	3.73	19.11

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 %
Quality Step Increases (QSI): Total QSIs Awarded	52	21.15	78.85	5.77	15.38
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

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permenant Workforce	1082	25.14	74.86
Total Separations	86	29.07	70.93
Voluntary Separations	82	28.05	71.95
Involuntary Separations	4	50.00	50.00

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 %
Permenant Workforce	1082	3.60	96.40
Total Separations	86	3.49	96.51
Voluntary Separations	82	3.66	96.34
Involuntary Separations	4	0.00	100.00

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 Glynco 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

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

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

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.
