FY 2019 Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

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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 C.F.R. § 1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with reportable and targeted disabilities in the federal government.

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.

Cluster GS-1 to GS-10 (PWD)   Answer: **No**

Cluster GS-11 to SES (PWD) Answer: **No**

The participation rate of PWDs in the GS-1 to GS-10 cluster is 13.41% as compared to the federal goal of 12%. The participation rate of PWDs in the GS-11 to SES cluster is 9.68% as compared to the 12% federal goal.

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

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.

Cluster GS-1 to GS-10 (PWTD) Answer: **No**

Cluster GS-11 to SES (PWTD)   Answer: **No**

Explanation:

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

Explanation:
In addition to the Disability Employment Program Manager communicating the requirements to the Office of Human Resource Solutions (OHRS) Selective Placement Program Coordinator (SPPC), managers and supervisors are also reminded of the hiring goals in training materials.

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

Plan to Provide Sufficient & Competent Staffing for 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**

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 with Full Time Employment Status*	Responsible Official (Name, Title, Office, Email)
Processing applications from PWD and PWTD	1	Kathy Mitcham, HR Specialist, OHRS. Kathy.Mitcham@sba.gov
Answering questions from the public about hiring authorities that take disability into account	1	Kathy Mitcham, HR Specialist, OHRS. Kathy.Mitcham@sba.gov and Aquila
Processing reasonable accommodation requests from applicants and employees	1	Judette Crosbie, Disability Employment Program Manager, ODI&CR Judette.Crosbie@sba.gov
Section 508 Compliance	1	Shawn Garmer, Section 508 Program Manager, OCIO. Shawn.Garmer@sba.gov
Architectural Barriers Act Compliance	1	Kenneth Etheridge, Director of Administrative Services Kenneth.Etheridge@sba.gov
Special Emphasis Program for PWD and PWTD	1	Judette Crosbie, Disability Employment Manager, ODI&CR. Judette.Crosbie@sba.gov

*SBA had no FTE Staff with Part Time or Collateral Duty Employment Status.

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

Answer: **Yes**

Explanation: The Disability Employment Program Manager. participated in various Webinars offered by the Employee Assistance and Resource Network on Disability Inclusion (EARN) and the Job Accommodation Network (JAN). Attended quarterly scheduled Federal Exchange on Employment and Disability (FEED) meetings. Participated in DoD CAP 2019 Joint Disability & Reasonable Accommodations Summit.

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**

Explanation: Not Available

Section III: Program Deficiencies in the Disability Program

The agency reported a program deficiency reflecting that the Reasonable Accommodation procedures and Personal Assistance Services was not posted on the external website. Procedures will be posted once the Equal Employment Opportunity Commission approves the updated procedures as this is a new requirement for the review process.

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.

Plan to Identify Job Applicants with Disabilities

Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.

Explanation: OHRS Executive Resources created an internal database which contains resumes for Persons with Disabilities, Peace Corp volunteers and Veterans who are 30% or more disabled. The resumes are shared with supervisors and managers upon request. Additionally, OHRS partners with the following organizations and agencies to assist with their recruitment events: •Maryland State Department of Education, Division of Rehabilitation Services •Military Spouse Hiring Authority and Educational Institutions and disability organizations (SBA entered into a written partnership agreement on 1/13/20) •The Office of Veterans Affairs Rehabilitation Services.

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.

Explanation: SBA's Special Placement Program Coordinator (SPPC) utilizes all hiring authorities that cover disabilities. The SPPC coordinates the onboarding and refers the new hire to the Disability Employment Program Manager to coordinate accommodations (when applicable). The use of the Schedule A hiring authority under 5 CFR 213.3102(u) for hiring people with severe physical disabilities, psychiatric disabilities, and intellectual disabilities indicated a 57% (21) increase during FY19.This was nine more that were hired under the same authority in FY18.

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.

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

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**

Explanation: OHRS has partnered with the Office of Personnel Management (OPM) to host workshops in the Federal work place to educate all employees on special hiring authorities associated with persons with disabilities, 30% or more disabled veterans and how hiring

managers can take advantage of these authorities. OHRS has created a National Strategic Recruitment Plan which will educate SBA hiring managers about the wide variety of hiring flexibilities, as well as provide critical information about the full hiring life cycle. In FY 2020, SBA will push out online content (SkillSoft and Manager Advantage) geared to educating managers and supervisors on employing people with disabilities. This content describes the special hiring authority and provides the steps for using Schedule A.

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.

Explanation: OHRS maintains monthly contact with the Department of Veteran's Affairs Vocational Rehabilitation Program and maintains a strong working relationship with the counselors to assist with SBA's recruitment of PWD and PWTD. As a result of SBA's participation in the VA Non-Paid Work Experience Program, SBA hired a disabled volunteer in July 2019. SBA continues to recruit from sources such as Peace Corps, and AmeriCorps to attract candidates with disabilities. SBA also participates in the Operation Warfighter's Internship Recruitment Fair, and recruitment fairs at Gallaudet University.

Progression Towards Goals (Recruitment and Hiring)

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

New Hires for Permanent Workforce (PWD)   Answer: **No**

New Hires for Permanent Workforce (PWTD)   Answer: **Yes**

Explanation: Using the benchmarks of 12% for PWD and 2% for PWTD, there are no triggers The new hire rate for this group was 12.07%. Using the 2% benchmark goal for new hires for

PWTD, one trigger was identified. The new hire rate for this group was 1.78%. This is based on voluntary identification and not actual status.

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.

New Hires for MCO (PWD)   Answer: **Yes**

New Hires for MCO (PWTD)   Answer: **Yes**

Explanation: Using the qualified applicant pool as the benchmark, triggers exist in the 1165 and 2210 occupational series as they fell slightly below the benchmark. There was one individual hired who had a targeted disability; however, this individual was not hired in one

of the mission-critical occupations. For the 1101 series, the selection rate was 5.50% for PwD

and for PwTD it was 2.52%; for the 1165 series, the selection rate was 4.35% PwD and 1.90% PwTD; and for the 2210 series, the selection rate was 1.56% for PwD and 0% for PwTD

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.

Qualified Applicants for MCO (PWD)   Answer: **No**

Qualified Applicants for MCO (PWTD)   Answer: **No**

Explanation: Using the internal applicant pool for mission critical occupations, a review of the qualified candidates indicates that there were no triggers in the internal qualified applicant pool.

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.

Promotions for MCO (PWD)   Answer: **No**

Promotions for MCO (PWTD)   Answer: **No**

Explanation: The data that was provided was incomplete; therefore, a conclusion could not be drawn. Going forward, OHRS plans to update the personnel system for retrieving data for the FY20 MD-715 report.

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.

Advancement Program Plan

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

Explanation: SBA uses a centralized approach to address the Agency's strategic, talent development needs. A centralized training budget and blanket purchase agreement enable SBA to provide leadership effectively and efficiently, professional and technical development needs for its mission critical occupations (MCOs), which account for more than 80% of the Agency's workforce. Leveraging a centralized training budget for core and mission critical, technical training promotes the ability to achieve economies of scale by identifying and

meeting talent development needs at the corporate level. The Blanket Purchase Agreement affords SBA a cost- effective contracting vehicle that streamlines the procurement process and allows for added flexibility to plan and respond to talent development needs in a timely manner. Strategies include: • Conducting talent needs and competency assessments and ensuring adequate development opportunities to address identified needs at all levels • Developing an Individual Development Plan in SBA's online Talent Management Center and educating staff and managers on the use of Individual Development Plans • Building workforce plans to assess the current state of the workforce, identify gaps, and develop strategies to address them • Creating a strategic succession planning program that aligns with the Agency Strategic Plan to address organizational needs and better identify talent pools • Educating hiring managers about hiring practices and available hiring authorities via resources such as the National Strategic Recruitment Plan and the Hiring Manager's toolkit. • Standardizing position descriptions to ensure greater efficiency and better utilization of resources to create upward mobility for employees • Utilizing the President's Management Council Interagency Rotation program, Excellence in Government Fellows program, Treasury Executive Institute, CXO Fellows, and the White House Leadership Development program to provide developmental opportunities to more than 70 future leaders • Establishing and administering a new mentoring program with more than 50 participants to prepare future leaders and improve knowledge transfer.

Career Development Opportunities

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

Explanation: SBA's Learning Management System (LMS) continues to give all employees access to on-line training on demand. Thousands of courses are available to meet employees' career and individual developmental needs. All employees have the ability to look up an register for online, and on-site training classes. SBA has also successfully leveraged the Franklin Covey All Access Pass to extend quality learning and development opportunities throughout SBA. Franklin Covey workshops and webinars continue to be a pillar in SBA's leadership development efforts. Moving forward, SBA will use Franklin Covey's All Access Pass's Leadership Learning Journeys to provide leadership development across the SBA leader pipeline**.**

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 applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

Applicants (PWD)   Answer:**NA**

 Selections (PWD)   Answer: **NA**

Explanation: The data that was provided was incomplete; therefore, a conclusion could not be drawn. Outreach is being coordinated with the Chief Learning Office, Office of Human

Resources to determine a resolution for retrieving data for the FY20 MD-715 report

Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

Applicants (PWTD)   Answer: **No**

Selections (PWTD)   Answer: **No**

Explanation: The data that was provided was incomplete; therefore, a conclusion could not be drawn. Outreach is being coordinated with the Chief Learning Office, Office of Human Resources to determine a resolution for retrieving data for the FY20 MD-715 report

Awards

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.

Awards, Bonuses, & Incentives (PWD) Answer: **No**

Awards, Bonuses, & Incentives (PWTD) Answer: **No**

Explanation: Not Applicable.

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.

Pay Increases (PWD) Answer: **No Pay**

Increases (PWTD)   Answer: **No**

Explanation: Not Applicable.

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.

Other Types of Recognition (PWD) Answer: **N/A**

Other Types of Recognition (PWTD) Answer: **N/A**

Explanation: Not Applicable

Promotions

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.

SES

> **Qualified Internal Applicants (PWD)**   Answer: **No**
>
> **Internal Selections (PWD)**   Answer: **No**

Grade GS-15

> **Qualified Internal Applicants (PWD)**   Answer: **No**
>
> **Internal Selections (PWD)**   Answer: **No**

Grade GS-14

> **Qualified Internal Applicants (PWD)**   Answer: **No**
>
> **Internal Selections (PWD)**   Answer: **No**

Grade GS-13

> **Qualified Internal Applicants (PWD)**   Answer: **No**
>
> **Internal Selections (PWD)**   Answer: **No**

Explanation: Data on SES positions was not available. For the GS13, 14 and 15 grade levels, no triggers were identified.

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.

SES

> **Qualified Internal Applicants (PWTD)**   Answer: **No**
>
> **Internal Selections (PWTD)**   Answer: **No**

Grade GS-15

> **Qualified Internal Applicants (PWTD)**   Answer: **No**
>
> **Internal Selections (PWTD)**   Answer: **No**

Grade GS-14

> **Qualified Internal Applicants (PWTD)**   Answer: **No**
>
> **Internal Selections (PWTD)**   Answer: **No**

Grade GS-13

> **Qualified Internal Applicants (PWTD)**   Answer: **No**

Internal Selections (PWTD)   Answer: **No**

Explanation: Data on SES positions was unavailable. For the GS13, 14 and 15 grade levels, no triggers were identified.

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.

New Hires to SES (PWD)   Answer: **NA**

Hires to GS-15 (PWD) Answer: **NA.**

Hires to GS-14 (PWD) Answer: **NA.**

Hires to GS-13 (PWD) Answer: **NA.**

Explanation: Undetermined, as this data was not available.

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.

New Hires to SES (PWTD)   Answer: **NA**

New Hires to GS-15 (PWTD) Answer: **NA**

New Hires to GS-14 (PWTD) Answer: **NA**

New Hires to GS-13 (PWTD) Answer: **NA**

Explanation: Undetermined, as the data was not available.

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.

Executives

    Qualified Internal Applicants (PWD)   Answer: **NA**

    Internal Selections (PWD)   Answer: **NA**

Managers

    Qualified Internal Applicants (PWD)   Answer: **NA**

    Internal Selections (PWD)   Answer: **NA**

Supervisors

    Qualified Internal Applicants (PWD)   Answer: **NA**

    Internal Selections (PWD)   Answer: **NA**

Explanation: Undetermined as the data was not available.

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.

Executives

    Qualified Internal Applicants (PWTD)   Answer: **No**

    Internal Selections (PWTD)   Answer: **NA**

Managers

    Qualified Internal Applicants (PWTD)   Answer: **NA**

    Internal Selections (PWTD)   Answer: **NA**

Supervisors

    Qualified Internal Applicants (PWTD)   Answer: **NA**

    Internal Selections (PWTD)   Answer: **NA**

Explanation: Undetermined as the data was not available.

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.

New Hires for Executives (PWD)   Answer: **NA**

New Hires for Managers (PWD)   Answer: **NA**

New Hires for Supervisors (PWD)   Answer: **NA**

Explanation: Undetermined as the data was not available.

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.

New Hires for Executives (PWTD) Answer: **No**

New Hires for Managers (PWTD) Answer: **No**

New Hires for Supervisors (PWTD) Answer: **No**

Explanation: Undetermined as the data was not available.

Section VI: Plan to Improve Retention of Persons with Disabilities

To be a 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 personal assistance services.

Voluntary and Involuntary Separations

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

Answer: **No**

Explanation: Using the benchmark of individuals hired under the Schedule A appointment authority during the past two FYs, one individual was terminated during the probationary period, two individuals resigned, and one transferred to another agency. There were six individuals who have not yet been converted – only one of which is not eligible until September 18, 2020. Data is not available on the remaining five as there was no reliable way to tell whether it was due to a performance issue, or whether the manager/supervisor decided not to convert.

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.

Voluntary Separations (PWD) Answer: **No**

Involuntary Separations (PWD) Answer: **No**

Explanation: PWD separation rates, both voluntary and involuntary, did not exceed that of persons without disabilities.

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.

Voluntary Separations (PWTD) Answer: **No**

Involuntary Separations (PWTD) Answer: **No**

Explanation: PWTTD separation rates, both voluntary and involuntary, did not exceed that of persons without disabilities.

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.

Explanation: Not Applicable.

Accessibility of Technology and Facilities

Pursuant to 29 C.F.R. § 1614.203(d)(4), federal agencies are required to inform job 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.

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.

Explanation: https://www.sba.gov/about-sba/open-government/about-sbagov-website/accessibility

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.

Explanation: https://www.sba.gov/about-sba/open-government/about-sbagov-website/accessibility.

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.

Explanation: NA.

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.

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).

Explanation: At SBA, supervisors, in consultation with the Disability Employment Program Manager, jakes decision on requests for Reasonable Accommodation. Procedurally, the requirement is within 30 business days, baring no extenuating circumstances. During FY19, the average processing time was 27.7 days.

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.

Explanation: SBA's accommodation procedures were revised for a few reasons and still pending review by EEOC. First, ease of accessibility. Previously, the procedures were embedded in the EEO Program SOP, thus making it difficult to conduct a search for it. Second, the procedures were rewritten to incorporate Personal Assistant Procedures.

Personal Assistance Services Allowing Employees to Participate in the Workplace

Pursuant to 29 C.F.R. § 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, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

Explanation: During FY19 there were no requests to provide PAS. Procedures; however, the DEPM is identifying resources for services.

Section VII: EEO Complaint and Findings Data

EEO Complaint Data Involving Harassment

During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the government-wide average?

Answer: **No**

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**

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.

Explanation: Not Applicable.

EEO Complaint Data Involving Reasonable Accommodation

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**

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**

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.

Explanation: Not Available

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.

Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Answer: **No**

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

Answer: **NA**

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.

Explanation: NA

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

Explanation: NA.

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

Explanation: NA.

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.