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

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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.

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving <u>PWD</u> 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)   Yes 0   **No X**
   b. Cluster GS-11 to SES (PWD)   **Yes X**   No 0

   > The percentage of PWD in the GS-11 to SES cluster was 8.71% in FY 2017, which falls below the goal of 12%.

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving <u>PWTD</u> 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)   Yes 0   **No X**
   b. Cluster GS-11 to SES (PWTD)   **Yes X**   No 0

   > The percentage of PWTD in the GS-11 to SES cluster was 1.27% in FY 2017, which falls below the goal of 2%.

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

   > During FY 2017, an Agency EEO Assessment was presented to the Agency's Senior Leadership regarding the workforce profile of the Agency, EEO complaints status, and EEOC's proposed Affirmative Action Plan (*New Rule*) including numerical goals.

Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must make available 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 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.

Yes X   No X

During FY 2017, OPM staff included Reasonable Accommodation Coordinators (RACs) and a Disability Program Manager (DPM). Additionally, the *Feds with Disabilities* (FWD) Employee Resource Group (ERG) provided input to the RACs and DPM concerning hiring and retention of PWDs and assisted OPM by helping to disseminate more broadly information about employment opportunities.

2. Identify all staff responsible for implementing the agency's disability employment program by the office, staff employment status, and responsible official.[1]

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				Not available at this time.
Answering questions from the public about hiring authorities that take disability into account				OPM public website, under "Policy" and Disability Employment FAQ's. Also email DisabilityEmployment@opm.gov
Processing reasonable accommodation requests from applicants and employees	3			Makeem Hill, HR Specialist, Employee/Labor Relations, makeem.hill@opm.gov
Section 508 Compliance	1			Bethany Letalien, Management Analyst, CIO, Accessibility Team. bethany.letalien@opm.gov

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[1] Katherine Toth, OPM employee coordinated input and suggestions from the PWD and PWTD Employee Resources Group (ERG) which provided additional useful information.

Architectural Barriers Act Compliance				Mariano Aquino, Director, Facilities Management; mariano.aquino@opm.gov

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

<div align="center">

Yes X   No X

</div>

> In FY 2017, OPM engaged in activities designed to increase the knowledge and skills among the workforce to include reasonable accommodation training and special hiring authorities. Leadership in both HR and EEO offices, in partnership with the PWDs' ERG (Fed with Disabilities (FWD), hosted "Lunch and Learn" activities discussing EEOC's affirmative action plan effective January 2018, and its specific requirements.

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.

<div align="center">

Yes 0   **No X**

</div>

> The agency was unable to get additional funding and staff in FY 2017. The hiring freeze and cuts to the agency's overall budget hampered the agency's ability to backfill several positions since FY 2016. Currently, OPM has one person who is responsible for IT 508 compliance as well as other duties related to information and record retention. Notwithstanding, OPM has a positive trend with PWD and PWTD with percentage levels just under EEOC's benchmarks. OPM is committed to progressive efforts to continue this trend with existing resources.

Section III: Program Deficiencies in the Disability Program

(FedSEP will provide the program deficiencies from the current Part G. We highlighted the Part G questions in green. In the chart below, please list the highlighted Part G questions with "No" answers and provide the agencies' comments, if any.

If there are no program deficiencies, please state "The agency has not reported any program deficiencies involving the disability program.")

In Part G of its FY 2017 MD-715 report, the agency identified the following program deficiencies involving its disability program:

Program Deficiencies	Agency Comments
N/A	

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 APPLICANTS WITH DISABILITIES

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

Over the last fiscal year, the agency utilized a variety of recruitment strategies designed to increase the number of qualified applicants with disabilities and applicants with targeted disabilities within the major occupations. Currently, the agency has exceeded the 12% goal for PWD and the 2% sub-goal for PWTD at the GS-10 level and below. However, the agency falls below the goals set forth in the final rule for senior grade level positions or positions that have upward mobility into the senior grades (8.9% for PWD and 1.42% for PWTD). Under the 2018-2022 Strategic Plan (Goal 1), OPM aims to improve the hiring process:

- Effectively utilize approved non-competitive appointments or hiring authorities such as Schedule A.

- Improve assessment practices to better evaluate applicants against job requirements.

- Prepare HR professionals and hiring managers to collaborate effectively to improve quality hires.

- Collaborate with Federal, non-profit, and academic partners to attract a diverse, talented candidate pool.

Additionally, HR enlists the assistance of FWD to widely disseminate career and training opportunities to employees who are PWDs and PWTDs, in addition to the agency's own recruitment efforts.

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 for individuals with certain disabilities) to recruit PWD and PWTD for positions in the permanent workforce.

During the course of fiscal year 2017, OPM Human Resources (HR) Office worked with hiring managers across the agency to attract and retain highly qualified candidates/applicants. The strategic recruitment discussion included identifying necessary competencies for vacant positions and the locations. During this strategic recruitment meeting, the servicing HR Specialist discussed non-competitive eligibility (e.g., Schedule A for individuals with certain disabilities and 30% service-connected disability hiring authorities) as a hiring resource.

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.

In FY 2017, hiring managers were given the opportunity to use/see noncompetitive eligible individuals by their servicing HR Specialist prior to announcing all positions. The servicing HR Specialist reviewed the vacancy announcement (an open continuous posting) for CPS 30% disabled veterans to see if there were any qualified applicants. In certain cases, the servicing HR Specialist partnered with the USAJOBS team to do targeted resume mining for non-competitive eligible individuals as well.

All OPM vacancies are advertised on USAJOBS. As part of the agency announcement templates, information is provided and applicants are given the opportunity to use their non-competitive eligibility to apply. In addition, OPM's website provided relevant and timely veteran and PWD-specific employment information.

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.

Yes X   No 0   N/A 0

OPM HR reinforced the value of hiring and maintaining veterans and PWDs in the workforce with supervisors and leadership through education and training at various forums, including the new supervisory boot camp.

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.

In FY 2017, OPM was an active member of the Federal Exchange on Employment & Disability (FEED) group sponsored by the U.S. Department of Labor (DOL). FEED is an interagency working group focused on information sharing, best practices and collaborative partnerships designed to make the Federal Government a model employer of people with disabilities. Additionally, USAJOBS offers applicants who are disabled information regarding hiring authorities and DOL and Department of Defense (DoD) Workforce Recruitment Programs (WRP) are recruitment and referral programs that connect Federal sector employers nationwide with highly motivated college students and recent graduates with disabilities.

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)   **Yes X**   No 0
   b. New Hires for Permanent Workforce (PWTD)   **Yes X**   No 0

Among the new hires in the permanent workforce, triggers exist for PWD (9.90%) and PWTD (1.78%), both of which fall below the respective benchmark of 12% for PWD and 2% for PWTD.

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.

   a. New Hires for MCO (PWD)   **Yes X**   No 0
   b. New Hires for MCO (PWTD)   **Yes X**   No 0

As of FY 2017, OPM's applicant flow data does not include enough specificity to identify applicants who sought to be considered pursuant to the above-referenced Schedule A authority; however, of the 89,509 applicants who "Voluntary Identified" as disabled, 5841 or 6.53% were PWDs and 2251 or 2.51% were PWTDs; 4.90% (46) and 0.71% of the total hires (1126) were PWDs and PWTDs, respectively.

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.

   a. Qualified Applicants for MCO (PWD)   **Yes X**   No 0
   b. Qualified Applicants for MCO (PWTD)   **Yes X**   No 0

In comparison to the benchmarks (31 (8.75%) PSWD applicants for 0201 series and 9 (8.25%) for 1810 series), triggers exist for PWD (0.0% hired) and PWTD (0.0% hired) among the qualified *internal applicants* for the 0210 (human resources) and 1810 (investigator) series position in FY 2017 (at grades GS13 and above).

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.

   a. Promotions for MCO (PWD)   Yes 0   No 0
   b. Promotions for MCO (PWTD)   Yes 0   No 0

Undetermined. To date, OPM has not been able to track the data for mission critical occupations for PWDs or PWTDs.

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.

OPM's recruitment and outreach efforts include expanding the role of its ERGs in promoting the recruitment and retention of a diverse OPM workforce. Each week, the groups receive OPM's job opportunity announcements to distribute to their constituents, contacts, etc., in order to expose our job/advancement opportunities to a wider, more diverse applicant pool. HR also conducted internal outreach with managers who were in the process of filling vacant positions, offering managers tools, guidance and assistance to attract well-qualified, diverse candidates.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

OPM Learning, part of OPM Human Resources is OPM's Agency-wide training and development team. Its programs and services are designed to advance the performance of

> OPM's mission and goals by addressing employee's and leadership's development needs. All OPM Federal staff, including PWDs and PWTDs, can access *OPM Learning* programs and services.

2. Do triggers exist for <u>PWD</u> 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.

   a. Applicants (PWD)   Yes 0 No 0
   b. Selections (PWD)   Yes 0 No 0

> Undetermined. There is no data available for this item (Tables A/B-12).

3. Do triggers exist for <u>PWTD</u> 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.

   a. Applicants (PWTD)   Yes 0   **No X**
   b. Selections (PWTD)   Yes 0   **No X**

> Undetermined. There is no data available for this item (Tables A/B-12).

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)   Yes 0   **No X**
   b. Awards, Bonuses, & Incentives (PWTD)   Yes 0   **No X**

> N/A

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)   Yes 0   **No X**
   b. Pay Increases (PWTD)   Yes 0   **No X**

N/A

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)   Yes 0   No 0   **N/A X**

   b. Other Types of Recognition (PWTD) Yes 0   No 0   **N/A X**

N/A

D. PROMOTIONS

1. Does your agency have a trigger involving <u>PWD</u> 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.

   a. SES

      i. Qualified Internal Applicants (PWD)   Yes 0   **No X**

      ii. Internal Selections (PWD)   Yes 0   **No X**

   b. Grade GS-15

      i. Qualified Internal Applicants (PWD)   Yes 0   **No X**

      ii. Internal Selections (PWD)   Yes 0   **No X**

   c. Grade GS-14

      i. Qualified Internal Applicants (PWD)   Yes 0   **No X**

      ii. Internal Selections (PWD)   Yes 0   **No X**

   d. Grade GS-13

      i. Qualified Internal Applicants (PWD)   Yes 0   **No X**

      ii. Internal Selections (PWD)   Yes 0   **No X**

Selections for internal competitive promotions for major occupations are not tracked in OPM.

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2. Does your agency have a trigger involving <u>PWTD</u> 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.

   a. SES

      i. Qualified Internal Applicants (PWTD)   Yes 0   **No X**

      ii. Internal Selections (PWTD)   Yes 0   **No X**

   b. Grade GS-15

      i. Qualified Internal Applicants (PWTD)   Yes 0   **No X**

      ii. Internal Selections (PWTD)   Yes 0   **No X**

   c. Grade GS-14

      i. Qualified Internal Applicants (PWTD)   Yes 0   **No X**

      ii. Internal Selections (PWTD)   Yes 0   **No X**

   d. Grade GS-13

      i. Qualified Internal Applicants (PWTD)   Yes 0   **No X**

      ii. Internal Selections (PWTD)   Yes 0   **No X**

Not tracked at this time.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWD</u> 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.

   a. New Hires to SES (PWD)   Yes 0   **No X**

   b. New Hires to GS-15 (PWD)   Yes 0   **No X**

   c. New Hires to GS-14 (PWD)   Yes 0   **No X**

   d. New Hires to GS-13 (PWD)   Yes 0   **No X**

No information available.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWTD</u> 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.

   a. New Hires to SES (PWTD)   Yes 0   **No X**

   b. New Hires to GS-15 (PWTD)   Yes 0   **No X**

   c. New Hires to GS-14 (PWTD)   Yes 0   **No X**

   d. New Hires to GS- 13 (PWTD)   Yes 0   **No X**

No information available.

5. Does your agency have a trigger involving <u>PWD</u> 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.

a. Executives

  i. Qualified Internal Applicants (PWD)   Yes 0   **No X**

b. Internal Selections (PWD)   Yes 0   **No X**

c. Supervisors

  i. Qualified Internal Applicants (PWD)   Yes 0   **No X**

  ii. Internal Selections (PWD)   Yes 0   **No X**

No information available.

6. Does your agency have a trigger involving <u>PWTD</u> 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.

  a. Executives

    i. Qualified Internal Applicants (PWTD)   Yes 0   **No X**

    ii. Internal Selections (PWTD)   Yes 0   **No X**

  b. Managers

    i. Qualified Internal Applicants (PWTD)   Yes 0   **No X**

  c. Internal Selections (PWTD)   Yes 0   **No X**

  d. Supervisors

    i. Qualified Internal Applicants (PWTD)   Yes 0   **No X**

    ii. Internal Selections (PWTD)   Yes 0   **No X**

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWD</u> among the selectees for new hires to supervisory positions? If "yes," describe the trigger(s) in the text box.

No information available.

a. New Hires for Executives (PWD)   Yes 0   **No X**

b. New Hires for Managers (PWD)   Yes 0   **No X**

c. New Hires for Supervisors (PWD)   Yes 0   **No X**

Information not available.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWTD</u> among the selectees for new hires to supervisory positions? If "yes," describe the trigger(s) in the text box.

    a. New Hires for Executives (PWTD)   Yes 0   **No X**

    b. New Hires for Managers (PWTD)   Yes 0   **No X**

    c. New Hires for Supervisors (PWTD)   Yes 0   **No X**

Information 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.

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1. In this reporting period, did the agency convert all of the eligible Schedule A employees appointed under the authority for individuals with certain disabilities ty 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.

                Yes 0   **No X**   N/A 0

Schedule A conversion into the competitive service is at the discretion of the manager/supervisor, based on performance and job suitability

2. Using the inclusion rate as the benchmark, did the percentage of <u>PWD</u> among voluntary and involuntary separations exceed that of persons without disabilities? If "yes," describe the trigger below.

   a. Voluntary Separations (PWD)   Yes 0   **No X**

   b. Involuntary Separations (PWD)   Yes 0   **No X**

N/A

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3. Using the inclusion rate as the benchmark, did the percentage of <u>PWTD</u> among voluntary and involuntary separations exceed that of persons without targeted disabilities? If "yes," describe the trigger below.

   c. Voluntary Separations (PWTD)   Yes 0   **No X**

   a. Involuntary Separations (PWTD)   Yes 0   **No X**

N/A

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4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

N/A

B. 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.

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.

The agency has not yet issued such a notice of rights pursuant to 29 C.F.R. § 1614.203(d)(4); however, it will have a draft notice circulated and approved to post on its public website at www.opm.gov by end of FY 2018.

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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.

> The agency has not yet issued such a notice of rights pursuant to 29 C.F.R. § 1614.203(d)(4); however, it will have a draft notice circulated and approved to post on its public website at www.opm.gov by end of FY 2018, and at that time we will supply the address.

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 agency did not implement any projects to improve accessibility of facilities or technology during the reporting period.

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 timeframe 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 timeframe to process a reasonable accommodation request was 18 days for FY 2017.

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.

> OPM's reasonable accommodation policy provides step by step procedures for employees on how to request a reasonable accommodation. Supervisor training is provided to new supervisors twice a year. OPM has identified multiple Reasonable Accommodation Managers (RAMs) to facilitate the accommodation process. This team of RAMs interacts frequently with employees seeking an accommodation(s). Applicants are also provided accommodations via the reasonable

accommodation program e.g. sign language interpreters. The reasonable accommodation process includes medical review from licensed physicians.

D. 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.

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, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

OPM does not have any employees who are receiving PAS at this time.

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?

          Yes 0   **No X**   N/A 0

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?

          Yes 0   **No X**   N/A 0

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.

N/A

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 Governmentwide average?

    Yes 0   No 0   **N/A X**

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?

    Yes 0   **No X**   N/A 0

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.

N/A

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?

    Yes 0   **No X**

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

    Yes 0   No 0   **N/A X**

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.

Trigger 1	The lower than expected participation rate (1.42 %) of persons with targeted disabilities (PWTD) in the agency's total workforce, as compared to the goal of 2%.
Barrier(s)	Self-identification, while not a barrier, impedes accurate reporting. At this time there were no policies, practices, or procedures identified as barriers.

Objective(s)					
Responsible Official(s)			**Performance Standards Address the Plan?** (Yes or No)		
Target Date (mm/dd/yyyy)	**Planned Activities**		**Sufficient Staffing & Funding** (Yes or No)	**Modified Date** (mm/dd/yyyy)	**Completion Date** (mm/dd/yyyy)
Fiscal Year	**Accomplishments**				

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

N/A

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

N/A

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

N/A