

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

**Office of Special Counsel - FY 2025**

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

## Section I: Efforts to Reach Regulatory Goals

*EEOC regulations (29 CFR §1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with targeted disabilities in the federal government.*

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

- a. Cluster GS-1 to GS-10 (PWD) Answer: No
- b. Cluster GS-11 to SES (PWD) Answer: No

\* 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: Yes

Representation in the GS-11-SES cluster dropped to 1 Percent, which falls below the goal of 2 Percent.

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

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

The EEO Director verbally communicated this information to the Special Counsel's designee.

## Section II: Model Disability Program

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

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

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

Answer: Yes

OSC has a dedicated disability program manager who works closely with HR and management.

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

Disability Program Task	Total Full Time	Total Part Time	Total Collateral Duty	Responsible Official (Name, Title, Office Email)
Processing reasonable accommodation requests from applicants and employees	0	0	1	Jamie Stapler Human Resources Specialist jstapler@osc.gov
Architectural Barriers Act Compliance	0	0	1	Anthony Eleftherion Chief Financial Officer aeleftherion@osc.gov
Answering questions from the public about hiring authorities that take disability into account	0	0	1	Jamie Stapler Human Resources Specialist jstapler@osc.gov
Special Emphasis Program for PWD and PWTD	0	0	0	N/A
Section 508 Compliance	0	0	1	Shola Kalejaiye IT Specialist skalejaiye@osc.gov
Processing applications from PWD and PWTD	0	0	1	Jamie Stapler Human Resources Specialist jstapler@osc.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 that disability program staff have received. If "no", describe the training planned for the upcoming year.

Answer: Yes

Yes, staff received training on the reasonable accommodation process and methods for hiring applicants with disabilities.

### B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If "no", describe the agency's plan to ensure all aspects of the disability program have sufficient funding and other resources.

Answer: Yes

## **Section III: Program Deficiencies In The Disability Program**

## Section IV: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency's recruitment program plan for PWD and PWTD.

### A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

OSC's Human Resources Office opens all external vacancy announcement to individuals with disabilities by accepting non-competitive Schedule A candidate for consideration.

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 utilizes appropriate hiring authorities that take disability into account, e.g., Schedule A.

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.

(1) The CHCO ensures that the Schedule A authority is appropriate.

(2) The Human Capital Office routes all unsolicited requests for Schedule A appoints directly to the Senior Executive Service (SES), and the SES make relevant referrals to hiring managers. OSC is looking to make Schedule A applications available for hiring managers on a shared drive.

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If "yes", describe the type(s) of training and frequency. If "no", describe the agency's plan to provide this training.

Answer: Yes

The CHCO and DPM advise managers on the Schedule A authorities.

### B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

Describe the agency's efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

The agency has implemented a procedure to post vacancy announcements at a variety of organizations, including organizations that serve individuals 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", describe the trigger(s) below.

a. New Hires for Permanent Workforce (PWD)

Answer: Yes

b. New Hires for Permanent Workforce (PWTD)

Answer: Yes

The percentage of PWD among new hires (identified) was 11.1 Percent. The percentage of PWTD among new hires (identified) was 0 Percent.

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

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

- a. New Hires for MCO (PWD) Answer: Yes
- b. New Hires for MCO (PWTD) Answer: Yes

OSC reviewed the applicant flow data provided by the Office of Personnel Management and concluded that a trigger existed in FY24 for PWD and PWTD. OSC received a tiny pool of applicants who identified as having a disability and referred to OSC for consideration. None of the applicants were selected for Mission Critical Positions.

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

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

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

While OPM collects disability information for internal and external applicants and provides that information to OSC, the data provided does not distinguish between internal and external candidates. The EEO Director and CHCO have initiated discussions to determine how best to capture that data internally.

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

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

We are working on an internal process and SOP to capture that relevant information so we can conduct a thorough barrier analysis. As part of that process, we will initiate the first steps in the next couple of weeks where we collect updated demographic data from all staff, voluntarily.

## 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.

OSC is committed to providing career development opportunities for our diverse and highly talented workforce. OSC provides a range of training opportunities to all employees, including PWD and PWTD, to increase their knowledge and skills. We also utilize the intranet to announce upcoming conference and training opportunities that appeal to all employees.

### B. CAREER DEVELOPMENT OPPORTUNITIES

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

OSC's training plan provides that managers shall (1) set forth consistent guidelines for training requests; (2) ensure transparency when allocating training resources; (3) improve individual employee and organizational performance; and (4) assist in achieving the agency's mission and performance goals. The plan will, in turn, better enable all employees, including PWD and PWTD, to develop their careers through education and training opportunities, and ensure that these groups of employees are well represented during the disbursement of training funds. OSC's Mentoring Program and Law Clerk Program also provide developmental opportunities for employees seeking to develop critical leadership skills. Last, OSC utilizes internal and external details to promote workforce and development efforts.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate.

Career Development Opportunities	Total Participants Applicants (Percentage)	Total Participants Selectees (Percentage)	PWD Applicants (Percentage)	PWD Selectees (Percentage)	PWTD Applicants (Percentage)	PWTD Selectees (Percentage)
Internship Programs	0	0	0	0	0	0
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
Other Career Development Programs	0	0	0	0	0	0
Detail Programs	0	0	0	0	0	0

3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Applicants (PWD)

Answer: N/A

b. Selections (PWD)

Answer: N/A

Currently, OSC does not have any development programs that require competition.

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWTD) Answer: N/A
- b. Selections (PWTD) Answer: N/A

See above.

### C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If "yes", please describe the trigger(s) in the text box.

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

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

  

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

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If "yes", describe the trigger(s) below.

- a. Awards, Bonuses, & Incentives (PWTD) Answer: Yes
- b. Pay Increases (PWTD) Answer: Yes

In FY24, OSC was not in the position to provide any quality step increases or performance-based pay increases.

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

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If "yes", describe the employee recognition program and relevant data in the text box.

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

OSC recognizes all employees, regardless of disability status, for other employee recognition programs such as the Special Counsel Awards. However, the number of employees receiving these awards is small compared with the overall workforce. The class of award recipients is statistically insufficient to assess for potential triggers involving PWD and PWTD.

### D. PROMOTIONS

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

- a. SES

- |   |             |
|---|-------------|
| i. Qualified Internal Applicants (PWTD) | Answer: N/A |
| ii. Internal Selections (PWTD)          | Answer: N/A |
| b. Grade GS-15                          |             |
| i. Qualified Internal Applicants (PWTD) | Answer: N/A |
| ii. Internal Selections (PWTD)          | Answer: N/A |
| c. Grade GS-14                          |             |
| i. Qualified Internal Applicants (PWTD) | Answer: N/A |
| ii. Internal Selections (PWTD)          | Answer: N/A |
| d. Grade GS-13                          |             |
| i. Qualified Internal Applicants (PWTD) | Answer: N/A |
| ii. Internal Selections (PWTD)          | Answer: N/A |

Please see responses above regarding possibility of collecting such internal data. Once we establish an SOP and collect the relevant demographic data, we will be able to conduct an appropriate analysis.

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

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

Please see response above.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- |                             |             |
|-----------------------------|-------------|
| a. New Hires to SES (PWD)   | Answer: Yes |
| b. New Hires to GS-15 (PWD) | Answer: Yes |
| c. New Hires to GS-14 (PWD) | Answer: Yes |
| d. New Hires to GS-13 (PWD) | Answer: Yes |

The applicant flow data provided by OPM does not capture all the external hirings conducted by OSC in FY24. The limited data suggests that OSC does have a barrier. In addition to determining how to best capture accurate applicant flow data, we also plan to process for hiring applicants at the senior grade levels.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTd among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires to SES (PWTd) Answer: Yes
- b. New Hires to GS-15 (PWTd) Answer: Yes
- c. New Hires to GS-14 (PWTd) Answer: Yes
- d. New Hires to GS-13 (PWTd) Answer: Yes

Please see above.

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

Please see responses above regarding efforts to capture the relevant data.

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

Please see responses above regarding efforts to capture the relevant data.

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

The applicant flow data provided by OPM does not capture all the external hirings conducted by OSC in FY24. The limited data suggests that OSC does have a barrier.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for Executives (PWTD) Answer: Yes
- b. New Hires for Managers (PWTD) Answer: Yes
- c. New Hires for Supervisors (PWTD) Answer: Yes

The applicant flow data provided by OPM does not capture all the external hirings conducted by OSC in FY24. The limited data suggests that OSC does have a barrier.

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

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

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer: N/A

In FY24, OSC did not have any Schedule A employees who were eligible for conversion to a permanent appointment.

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

a. Voluntary Separations (PWD) Answer: No

b. Involuntary Separations (PWD) Answer: No

Separations	Total (Number)	Reportable Disabilities (Percentage)	Without Reportable Disabilities (Percentage)

3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If "yes", describe the trigger(s) in the text box.

a. Voluntary Separations (PWTD) Answer: No

b. Involuntary Separations (PWTD) Answer: No

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

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

N/A

### 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://osc.gov/Accessibility>

2. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

<https://osc.gov/Accessibility>

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to

improve accessibility of agency facilities and/or technology.

OSC continues to monitor other small agencies for additional resources to ensure that the agency is aware of the latest equipment innovations to meet the needs of PWD and PWTD.

### **C. REASONABLE ACCOMMODATION PROGRAM**

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

The agency's Procedures for Accommodation of Persons with Disabilities state that requests shall be processed and the accommodation, if approved, shall be provided in 20 business days from receipt of request, or sooner, if possible. In FY24, the average processing time was approximately 14 business 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.

OSC's Procedures for Accommodation of Persons with Disabilities including the EEOC's minimum requirements are shared with everyone. The consolidated directive provides extensive direction and precise guidelines for supervisors, employees, and applicants for employment. The effectiveness of the agency's reasonable accommodation program is demonstrated by the responsive and timely processing of requests and approved accommodations.

### **D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE**

Pursuant to 29 CFR §1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.

1. Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

The agency has not yet received a request for PAS; however, the consolidated directive provides extensive direction and precise guidelines for supervisors and employees.

## 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. Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.

If barriers were found, the EEO Director would meet with senior staff to implement changes.

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

Please see the above response.

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.

Please see the above response.