

Part J. Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plans for individuals with disabilities (IWD) and individuals with targeted disabilities (IWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies must complete this Part of the MD-715 report.

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 12% goal, does your agency have a trigger involving IWD by grade cluster in the permanent workforce?	GS-1/10: Yes/No GS-11-SES: Yes/No	The rate of representation of IWD in the GS-1/10 cluster is 14.1%, over the 12% goal. The rate of representation of IWD in the GS-11-SES cluster is 7.9%, under the 12% goal.
2. Using the 2% goal, does your agency have a trigger involving IWTD by grade cluster in the permanent workforce?	GS-1/10: Yes/No GS-11-SES: Yes/No	The rate of representation of IWD in the GS-1/10 cluster is 14.1%, over the 12% goal. The rate of representation in the GS-11-SES cluster is 1%, under the 2% benchmark.
3. Describe how the agency has communicated numerical goals to hiring managers/recruiters.		Managers and supervisors take a complement of required courses when they become new supervisors, and the hiring goals related to disability are in reference material thereafter, and refresher courses are required.
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 IWD and IWTD, 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 and Competent Staffing for the Disability Program

1. Has the agency designated sufficient personnel for its disability program? If "no," describe the plan to improve staffing. Yes/No					
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	Full Time	Part Time	Coll.	Responsible Official (Office; Name; Title; Email)
	Processing applications from IWD and IWTD (number of FTE staff by status):			1	OHRM; Anthony Speights, Special Placement Program Coordinator, (202) 708-0090, anthony.speights@gsa.gov
	Answering questions from the public about disability hiring authorities:			1	OHRM; Anthony Speights, Special Placement Program Coordinator, (202) 708-0090, anthony.speights@gsa.gov

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<p>2. Identify all staff responsible for implementing the agency’s disability employment program by the office, staff employment status, and responsible official. (Continued)</p>	<p><i>Processing Reasonable Accommodation Requests from employees/applicants:</i></p>		<p>20</p>	<p><i>OHRM; Alexandra Vernacchio; Deputy Workforce Relations Division/National Employee Relations Program Manager (215) 292-0780 alexandra.vernacchio@gsa.gov</i></p>
	<p><i>Section 508 compliance:</i></p>		<p>23</p>	<p><i>OCR; Evelyn Britton; Branch Chief, External Programs; (601) 410-3594, evelyn.britton@gsa.gov</i></p>
	<p><i>Architectural Barriers Act Compliance</i></p>		<p>1</p>	<p><i>OCR; Evelyn Britton; Branch Chief, External Programs; (601) 410-3594, evelyn.britton@gsa.gov</i></p>
	<p><i>Special Emphasis Program for IWD and IWTD</i></p>		<p>1</p>	<p><i>OHRM; Anthony Speights, Special Placement Program Coordinator, (202) 501-0598, anthony.speights@gsa.gov</i></p>
<p>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 received. If “no”, describe the training planned for the upcoming year. Yes/No</p>	<p>All staff receives annual training in their fields of specialty, across program offices like human resources, information technology, and civil rights.</p>			
<p>B. Plan to Provide Sufficient Funding for the Disability Program</p>				
<p>Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If “no” describe agency’s plan to ensure the disability program has sufficient funding and resources. Yes/No</p>				
<p>Section IV: Plan to Recruit and Hire IWD</p>	<p>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 IWD and IWTD</p>			
<p>A. Plan to Identify Job Applicants with Disabilities</p>				
<p>1. Describe the programs and resources the agency uses to identify job applicants with disabilities including IWTD.</p>	<p>GSA used “Ready Cert” tools (a number of human resources strategies and methods for getting lists of qualified applicants to hiring managers quickly) to work with targeted groups of individuals eligible under disability hiring authorities in Q1. Additional resources that the HR Service Centers used included: OPM’s Shared Register of Candidates with Disabilities, Department of Labor, State Rehabilitation Centers and Centers for the Visually Impaired.</p>			
<p>2. Pursuant to 29 C.F.R. § 1614.203(a)(3), describe the agency’s use of disability hiring authorities (e.g., Schedule A) to recruit IWD and IWTD for permanent positions.</p>	<p>GSA has designated a SPPC to coordinate special placement, and when candidates are located this SPPC works with local human resources specialists to effect the hires and coordinate onboarding and accommodation coordination (when applicable).</p>			

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<p>3. When individuals apply for a position under a disability hiring authority, explain how the agency (1) determines eligibility and (2) forwards the individual's application to the hiring officials with an explanation of how/when the individual may be appointed.</p>	<p>Applicants who apply under Schedule A via USAJobs have eligibility determined 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 reviewed by a human resources specialist (locally identified by the SPPC) for the position identified, and the human resources specialist explains whether and how the hire can/will be effected and the person brought onboard.</p>
<p>1. Describe the programs and resources the agency uses to identify job applicants with disabilities including IWTD.</p>	<p>GSA used "Ready Cert" tools (a number of human resources strategies and methods for getting lists of qualified applicants to hiring managers quickly) to work with targeted groups of individuals eligible under disability hiring authorities in Q1. Additional resources that the HR Service Centers used included: OPM's Shared Register of Candidates with Disabilities, Department of Labor, State Rehabilitation Centers and Centers for the Visually Impaired.</p>
<p>4. Has the agency provided training to all hiring managers on use of disability hiring authorities? If yes, describe the type(s) of training and frequency. If no, describe the plan to provide this training. Yes/No</p>	<p>Managers and supervisors take a complement of required courses when they become new supervisors, and the hiring goals related to disability are in reference material thereafter, in a course titled "Hiring, Retaining, and Including People with Disabilities," which is required for managers to complete every two years.</p>

B. Plan to Establish Contacts with Disability Employment Organizations

<p>Describe the agency's efforts to establish and maintain contacts with orgs that assist IWD/TD securing/maintaining employment.</p>	<p>GSA maintains a disability SEP/affinity group with an SES champion to serve as an advocate at the senior level to act as catalyst for change and to advise. GSA will continue to engage executive champions by implementing a diversity and inclusion council. The council will focus on GSA's internal policies and practices, talent recruitment and development, education and training, identifying barriers, building partnerships with rehab agencies, measuring the effectiveness of the diversity initiative process, and ensuring transparency of its operations.</p>
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C. Progression Towards Goals (Recruitment and Hiring)

<p>1. Using goals of 12% for IWD and 2% for ITWD as the benchmarks, do triggers exist among the new hires? If yes, describe.</p>	<p>IWD: Yes/No IWTD: Yes/No</p>	
<p>2. Do triggers exist for IWD/IWTD among the new hires for any of the major occupations? If yes, describe.</p>	<p>IWD: Yes/No IWTD: Yes/No</p>	<p>Application and hire rates for IWD in all major occupations are under the 12% benchmark except the Financial Admin/Program series (0501). Application and hire rates for IWTD in all major occupations are under the 12% benchmark except the Financial Admin/Program series (0501).</p>
<p>3. Do triggers exist for IWD/IWTD among qualified internal applicants for any of the major occupations? If yes, describe.</p>	<p>IWD: Yes/No IWTD: Yes/No</p>	<p>Only the Management/Program Analyst series (0343) reached the internal benchmark for IWD. Only the Management/Program Analyst series (0343) reached the internal benchmark for IWD.</p>
<p>4. Do triggers exist for IWD/IWTD among employees promoted to any of the major occupations? If "yes," describe.</p>	<p>IWD: Yes/No IWTD: Yes/No</p>	<p>Only the Management/Program Analyst series (0343) reached the internal benchmark for IWD. Only the Management/Program Analyst series (0343) reached the internal benchmark for IWTD.</p>

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<p>Section IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities</p>	<p>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.</p>		
<p>A. Advancement Program Plan</p>			
<p>Describe the agency’s plan to ensure IWD/TD have equal opportunities for advancement.</p>	<p>GSA ensures its HR and OCR staff works in concert to produce FEORP and MD-715 analyses and evaluations related to hiring and promotion; EEO complaint information is promulgated among all GSA employees to describe remedies; hiring managers have required training related to civil rights and merit principles, and selecting officials are provided with reference tools to encourage neutral hiring and promotion practices.</p>		
<p>B. Career Development Opportunities</p>			
<p>1. Describe agency’s plan to ensure IWD/TD have EEO for career development.</p>	<p>GSA ensures its HR staff works in concert to produce FEORP and MD-715 analyses and evaluations related to career development; EEO complaint information is promulgated.</p>		
<p>2. Please provide the data for career developmental opportunities that require competition and/or approval to participate.</p>	<p><i>Total: 166</i></p> <p><i>Applicants = 403</i></p> <p><i>Selected = 166</i></p>	<p><i>IWD: 22</i></p> <p><i>Applicants = 22</i></p> <p><i>Selected = 5</i></p>	<p><i>IWTD: 4</i></p> <p><i>Applicants = 4</i></p> <p><i>Selected = 0</i></p>
<p>3. Do triggers exist for IWD among the applicants/selectees for career development programs? If “yes”, describe.</p>	<p>Applicants: Yes/No</p> <p>Selectees: Yes/No</p>	<p>Applicant percentages 5.9/4.4, under 9.3/5.2 relevant pools; no trigger in 15/SES.</p> <p>Selectee percentages 4.4/1.9, under 9.3/5.2/4 pools; no trigger in 15/SES.</p>	
<p>4. Do triggers exist for IWTD among the applicants/selectees for career development programs? If yes, describe.</p>	<p>Applicants: Yes/No</p> <p>Selectees: Yes/No</p>	<p>Applicant percentages in middle band 1/0, under 1.1; no trigger in 5-12 or SES.</p> <p>No selections among IWTD.</p>	
<p>C. Awards</p>			
<p>Does your agency have a trigger involving IWD/IWTD for time-off awards, bonuses, or other incentives? If “yes,” please describe.</p>	<p>IWD: Yes/No</p> <p>IWTD: Yes/No</p>	<p>Blind employees’ cash awards average 1k less; but this is tied to salary, and two IWTD lower the average in this category, while the other five awards are on par.</p>	
<p>D. Promotions/Hires</p>			
<p>1. Does your agency have a trigger involving <u>IWD</u> among the qualified internal applicants/selectees for promotions to the senior grade levels?</p>			
<p>a. ...SES positions (and related senior executive-level positions)? If yes, describe.</p>	<p>Qualified: Yes/No</p> <p>Selected: Yes/No</p>		
<p>b. ...Grade 15 positions? If yes, describe.</p>	<p>Qualified: Yes/No</p> <p>Selected: Yes/No</p>		

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c. ...Grade 14 positions? If yes, describe.	Qualified: Yes/ No Selected: Yes/ No	
d. ...Grade 13 positions? If yes, describe.	Qualified: Yes/ No Selected: Yes/ No	

2. Does your agency have a trigger involving IWTD among the qualified internal applicants/selectees for promotions to the senior grade levels?

a. ...SES positions? If yes, please describe the trigger(s).	Qualified: Yes/ No Selected: Yes/ No	
b. ...Grade 15 positions? If yes, please describe the trigger(s).	Qualified: Yes/ No Selected: Yes/ No	
c. ...Grade 14 positions? If yes, please describe the trigger(s).	Qualified: Yes/ No Selected: Yes/ No	
d. ...Grade 13 positions? If yes, please describe the trigger(s).	Qualified: Yes/ No Selected: Yes/ No	

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving LWD among new hires to senior grade levels?

a. ...SES positions? If yes, describe.	Qualified: Yes/ No Selected: Yes/ No	
b. ...Grade 15 positions? If yes, describe.	Qualified: Yes/ No Selected: Yes/ No	
c. ...Grade 14 positions? If yes, describe.	Qualified: Yes/ No Selected: Yes/ No	
d. ...Grade 13 positions? If yes, describe.	Qualified: Yes/ No Selected: Yes/ No	

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4. Using the qualified applicant pool, does your agency have a trigger involving IWTD among the new hires to the senior grade levels?

a. ...SES positions? If yes, please describe.	Qualified: Yes/ No	
	Selected: Yes/ No	
b. ...Grade 15 positions? If yes, describe.	Qualified: Yes/ No	
	Selected: Yes/ No	
c. ...Grade 14 positions? If yes, describe.	Qualified: Yes/ No	
	Selected: Yes/ No	
d. ...Grade 13 positions? If yes, describe.	Qualified: Yes/ No	
	Selected: Yes/ No	

5. Does your agency have a trigger involving IWD among the qualified internal applicants/selectees for promotions to supervisory positions?

a. ...SES positions (and related senior executive-level positions)? If yes, please describe the trigger(s).	Qualified: Yes/ No	
	Selected: Yes/ No	
b. ...Supervisors? If yes, please describe.	Qualified: Yes/ No	
	Selected: Yes/ No	

6. Does your agency have a trigger involving IWTD among qualified internal applicants/selectees for promotions to supervisory positions?

a. ... SES positions (and related senior executive-level positions)? If yes, please describe the trigger(s).	Qualified: Yes/ No	
	Selected: Yes/ No	
b. ...Supervisors? If yes, please describe the trigger(s).	Qualified: Yes/ No	
	Selected: Yes/ No	

7. Using the qualified applicant pool, does your agency have a trigger involving IWD among selectees for new hires to supervisory positions?

a. ... SES positions (and related senior executive-level positions)? If yes, please describe the trigger(s).	Qualified: Yes/ No	
	Selected: Yes/ No	
b. ...Supervisors? If yes, please describe the trigger(s).	Qualified: Yes/ No	
	Selected: Yes/ No	

8. Using the qualified applicant pool, does your agency have a trigger involving IWTD among selectees for new hires to supervisory positions?

<p>a. ... SES positions (and related senior executive-level positions)? If yes, please describe the trigger(s).</p>	<p>Qualified: Yes/No</p>	
	<p>Selected: Yes/No</p>	
<p>b. ...Supervisors? If yes, please describe the trigger(s).</p>	<p>Qualified: Yes/No</p>	
	<p>Selected: Yes/No</p>	
<p>Section V: Plan to Improve Retention of Persons with Disabilities</p>	<p>To be a model employer for IWD, 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; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the RA program and workplace PAS.</p>	
<p>A. Voluntary and Involuntary Separations</p>		
<p>1. In this reporting period, did the agency convert all eligible Schedule A employees 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. Yes/No</p>	<p>No; two of the persons eligible under Schedule A were not converted. They were not performing at a level to qualify as even minimally successful, and they were terminated during their probationary period. All other persons eligible under this authority were performing at an acceptable level and they were converted to permanent/competitive status.</p>	
<p>2. Using inclusion rate as a benchmark, did the percentage of IWD among separations exceed that of persons without disabilities? If yes, please describe the trigger(s).</p>	<p>Voluntary: Yes/No</p> <p>Invol.: Yes/No</p>	<p>29.6% of terminations were persons with disabilities, far over the 8.8 % participation rate for this group.</p>
<p>3. Using inclusion rate as a benchmark, did the percentage of IWTD among separations exceed that of persons without disabilities? If yes, please describe the trigger(s).</p>	<p>Voluntary: Yes/No</p> <p>Invol.: Yes/No</p>	<p>5.6% of involuntary separations (3 persons) were IWTD, yet they only comprise 1.2% of the population.</p>
<p>4. If a trigger exists involving the separation rate of IWD and/or IWTD, please explain why they left the agency using exit interview results and other data sources.</p>	<p>GSA, like virtually all agencies, does not solicit exit interview information from persons who are terminated or otherwise involuntarily separated; as for exit interview statements from persons with disabilities, positive responses are slightly higher among persons with disabilities, though the nature of any correlation there is not readily discernible.</p>	
<p>B. Accessibility of Technology and Facilities</p>	<p>Pursuant to 29 C.F.R. § 1614.203(d)(4), agencies are required to inform applicants/employees of their rights under Section 508 of the Rehab 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.</p>	
<p>1. Provide internet address on the agency’s public site for notice explaining employees/ applicants’ rights under Sect. 508, including how to file a complaint.</p>	<p>https://www.gsa.gov/policy-regulations/policy/information-integrity-and-access/it-accessibilitysection-508 (printout attached)</p>	
<p>2. Provide internet address on the agency’s public site for notice explaining employees/ applicants’ rights under the Architectural Barriers Act, including how to file a complaint.</p>	<p>https://www.gsa.gov/real-estate/design-construction/accessible-facility-design (printout attached)</p>	

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<p>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.</p>	<p>GSA's Office of Administrative Services provides the Center for IT Access (CITA), a centrally funded program that provides assistive technology needs assessments and expertise for all employees with disabilities as well as their management. CITA also maintains an inter-agency agreement with the Department of Defense's Computer Accommodation Program, which provides many kinds of assistive technology and related training. In addition, there are centralized funds provided by the Office of Administrative Services (OAS) to cover these same items when CAP unable to for any reason. OAS also provides workplace modifications when needed from a centralized budget. There is no central funding for interpreters or CART services at this time, but OCR is undertaking a proposal to create an agency-level central fund for each of the separate funding streams the agency operates under.</p> <p>OCR's External Programs Branch will partner with the Public Building Service to develop a system to assess GSA owned, managed and leased space for accessibility purposes pursuant to applicable Federal civil rights laws. Development of this system will allow building management staff to assess their building to ensure access to individuals with disabilities.</p>
<p>C. Reasonable Accommodation Program</p>	<p>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.</p>
<p>1. Provide the average timeframe for processing initial requests for reasonable accommodations during the reporting period.</p>	<p>We are unable to calculate average timeframes for provision of accommodations based on the database structure; see part I to address barriers and the issue of accommodation data management as a program deficiency.</p>
<p>2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's RA program. Some examples of an effective program include timely processing requests, timely providing accommodations, training for managers and supervisors, and monitoring for trends.</p>	<p>GSA's accommodation procedure is currently undergoing a re-write. The lack of a complete data set related to accommodation hinders the agency's ability to make definitive statements about timeliness and approval rates, or to determine 1) exactly how much/what type of medical information is requested, how often (or how it's transmitted and stored), 2) how often requests are modified/denied, or 3) what kinds of disability categories and products/services are requested, and this must be addressed in the new procedure. Training for managers and supervisors is required every other year. Complaint files and settlement/finding data indicates that issues related to RA management exist, and must be dealt with using the procedural re-write as an opportunity to address these potential barriers and the program deficiency.</p>
<p>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.</p>	<p>OCR's External Programs Branch is partnering with the Public Building Service to develop a web-based system to assess GSA owned, managed and leased space for accessibility purposes pursuant to applicable Federal civil rights laws. Development of this system will allow building management staff to assess their building to ensure access to individuals with disabilities. The Office of Administrative Services works closely with the Public Building Services to ensure compliance with all applicable accessibility standards from the requirements gathering phase through the delivery phase for all technology purchases and development.</p>
<p>D. Personal Assistance Services Allowing Employees to Participate in the Workplace.</p>	<p>Pursuant to 29 C.F.R. § 1614.203(d)(5), federal agencies 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.</p>
<p>Describe effectiveness of policies, procedures, or practices to implement PAS requirement. Some examples include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring trends.</p>	<p>The PAS requirement is understood by the cohort of RACs, and OHRM coordinated with a program analyst from OCR to obtain a sample job description/PD from another agency (one that has provided PAS as RA before it was required) as an example of a PAS/administrative assistant contract person to use at GSA when the need arises, since it is typical for such persons to be hired as specialized, contract staff and to multitask for these functions.</p>

Section VI:	
EEO Complaint Data Involving Harassment	
<i>A. EEO Complaint Data Involving Harassment</i>	
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? Yes/No	
2. During the last fiscal year, did any complaints alleging harassment based on disability result in a finding of discrimination or a settlement agreement? Yes/No	
3. Did the agency have one or more findings of discrimination alleging harassment based on disability status during the last fiscal year? If so, please describe the corrective measures taken by the agency. Yes/No	
<i>B. EEO Complaint Data Involving Reasonable Accommodation</i>	
1. During the last FY, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide RA, as compared to the government-wide average? Yes/No	
2. During the last fiscal year, did any complaints alleging failure to provide accommodation result in a finding of discrimination or settlement? Yes/No	One case settled in FY 2017; the issue was accommodation, and there was a monetary benefit of \$806 associated with the case (related to a changed appraisal and performance award), in addition to leave restoration and telework expansion.
3. Did the agency have one or more findings of discrimination involving RA during the last fiscal year? If so, please describe corrective measures taken by the agency. Yes/No	
Section VII:	<i>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.</i>
Identification and Removal of Barriers	
1. Has the agency identified any barriers that affect employment opportunities for IWD and IWTD? Yes/No	
2. Has the agency established a plan to correct the barrier(s) involving IWD and/or IWTD? Yes/No	
3. Identify each trigger and plan to remove the barrier(s), including identified barrier(s), objective(s), responsible official(s), planned activities, and where applicable, accomplishments.	
Trigger 1	At the conclusion of FY 2017, GSA had a population of IWTDs just over 1%, below the 2% employment goal established for federal agencies. IWTDs separated involuntarily at a rate over 7%, and voluntarily at a rate almost twice their overall representation rate, and these are multi-year trends. Further, IWTDs are concentrated in the lower grade cluster below GS-11 (7.9%), and although statistical analyses are far less reliable for small populations like IWTDs, and we have fairly conclusive numeric indicators from other sources like veteran hiring records associated with disability and accommodation records, these triggers still must be addressed. Persons with disabilities (overall) comprise 8.8% of the workforce, also under the 12% goal.

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Barrier(s)	Attitudinal barriers (as identified in national studies from EEOC and National Council on Disability), as well as institutional barriers (in the form of underdeveloped training with, and promotion of, the use of special hiring authorities) may be affecting the rate of IWTD hires and recruitment at GSA.	
Objective(s)	To hire approximately 100 IWTDs within two years at GSA.	
Responsible Official(s): Madeline Caliendo, Antonia T. Harris	Performance Standards Address the Plan? Yes/No	
Barrier Analysis Process Completed? Yes/No	Barrier(s) Identified? Yes/No	
Sources of Data	Reviewed? Yes/No	Identify Information Collected
Workforce Data Tables	Yes	<p>An analysis of B6 shows the extent to which job series and type of disability may influence IWTD rates, and illustrates how the GSA's jobs are non-LESO (with no fitness requirements that would exclude a number of persons with certain targeted disabilities).</p> <p>Separation rates for IWTDs, as reflected in table B14, were above their participation rates overall. The small size of the population may cause the figure to sound more significant than it actually is, from a statistical standpoint; yet it is still a trigger to be addressed. Further analyses will be conducted in FY 2017 to determine why this condition exists, including a more-comprehensive review of the results from the EVS and employee exit surveys.</p> <p>Data in the attached B7 table indicates that the agency only hired 10 IWTD for major occupations in the past year. Given that the agency needs more than one hundred IWTD hires to meet the 2% goal, current practices may not suffice. Data in this table is derived from Monster.com's application management system rather than the official CHRIS personnel system of records.</p>
Complaint Data (Trends)	Yes	Disability remains in the top EEO bases raised in FY 2018, in keeping with several years' worth of data as reported in the No FEAR Act and EEOC 462 reports.
Grievance Data (Trends)	No	
Findings (EEO/Grievance/MSPB/Anti-Harassment)	Yes	This is the first year in several years the agency has not had a finding related to disability discrimination. The trend regarding findings is discussed in Part E.
Climate Assessment Survey (e.g., FEVS)	Yes	IWD do not state differing opinions about key EEO/workplace issues like opportunity for training, promotion or intention to leave the agency; however, they are slightly less likely to state their supervisors work well with persons with different backgrounds.
Exit Interview Data	Yes	IWD actually have higher agency satisfaction rates. That said, as discussed in Part E, GSA (like essentially every other agency), does not collect exit interview data from persons who separated involuntarily.
Focus Groups	No	
Interviews	No	

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Reports (Congress, EEOC, MSPB, GAO, OPM)	Yes	OCR has reviewed results of external studies conducted by the EEOC and the National Council on Disability on common obstacles to employment faced by individuals with disabilities which suggest attitudinal barriers and managers' lack of awareness about resources for recruiting IWTDs, as well as chronic underuse of excepted hiring authorities, such as Schedule A and VRA, are typical root causes for observed disparities. These reports also suggest that reasonable accommodation processing and funding issues may explain high attrition rates just like the high rates observed at GSA. Data related to accommodation requests, kept in accordance with EEOC enforcement guidance, must be analyzed to determine: who at GSA is requesting accommodations (job title/series/grade), for what categories of disability, how much the agency is spending on RA, grant and denial rates for requests, and average time taken to inform employees about decisions and provide equipment/services.		
Other (Please Describe) RA Data Records	Yes	Deficiencies in recordkeeping were evident. GSA has overhauled the collection mechanism to track accommodation activity more completely.		
Target Date	Planned Activities	Sufficient Staff/Funding Yes	Modified Date	Completion Date
September 30, 2018	<p>Development of promotional material regarding use of Schedule A and hiring/promotion of persons with disabilities.</p> <ul style="list-style-type: none"> - OCR will submit promotional material to OHRM by July 31, 2018. - OHRM will distribute promotional material by Sep 30, 2018. <p>Modification of RA database and review of more-complete data set and RA policies.</p> <ul style="list-style-type: none"> - OHRM will modify the RA to identify key fields of the database by December 30, 2017. - OCR will conduct review the RA data and RA policies in 2018 by September 30, 2018. 			