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

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

Section I: Efforts to Reach Regulatory Goals

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

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

    a. Cluster GS-1 to GS-10 (PWD)   Answer   No

    b. Cluster GS-11 to SES (PWD)   Answer   No

> There is a higher percent of PWD in the GS1-10 cluster than in the GS 11-SES cluster. The percent of PWD for those in the GS 11-SES positions is above the 12% benchmark, whereas the GS 1-10 cluster is more than double the GS 1-10 percentage. NASS has made strides to increase its permanent workforce statistics for PWD and PWTD. In FY 2020, NASS increased the percent for PWD for the GS1-10 cluster to 32.6% for PWD and fell slightly to 8.5% for PWTD in the GS1-10 cluster. NASS also showed slow progress and improved the Agency's PWD percent to 15.0% and the PWTD percent to 1.7% in the GS 11-SES cluster, relatively unchanged from FY2019.

*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

> There is a higher percent of PWTD in the GS1-10 cluster than in the GS 11-SES cluster. The percent of PWTD for those in the GS 11-SES positions is very close to the 2% benchmark, whereas the GS 1-10 cluster is above the goal. The agency collectively is above the 2% goal for PWTD, currently reporting 2.7%. While Covid-19 has been a factor, nonetheless, the agency has just opened up hiring in FY 2020. NASS typically has low turnover rate, but efforts continue to recruit and retain both PWD and PWTD.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical Goal	--	12%		2%	
Grades GS-1 to GS-10	129	28	21.71	10	7.75
Grades GS-11 to SES	662	75	11.33	11	1.66

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

The NASS Civil Rights Office prepares a quarterly MD 715 Executive Summary for the SES team that highlights the Agency performance in meeting the Federal PWD and PWTD goals. Directors then relay information to managers and supervisors. During FY 2020, NASS focused on the goals for recruitment, hiring and retention of employees with disabilities in an effort to increase the numbers within its workforce. The NASS Civil Rights Office (CRO) offered mandatory training for hiring managers that addressed the use and procedures of special hiring authorities. The Mission Area HR Specialist conducted a second training, which also addressed the use of special hiring authorities. Senior leaders and hiring managers are briefed quarterly through the use of an MD-715 Executive Summary. They also receive the full quarterly and annual MD-715 reports during the year. A hiring manager training course on reasonable accommodations provisions was conducted by the NASS CRO for the Agency and later another course was offered by the Department. These courses reviewed the new Departmental Reasonable Accommodations and Personal Assistance Services policies as well as offering Reasonable Accommodation Guidance for REE Employees at Higher Risk. The Civil Rights Director conducted four EEO sessions tailored for managers and supervisors that covered a mix of civil rights issues and concerns in the workplace, including mixed motives, contractor employees defined, severe vs. pervasive, English speaking only rule, and removal for performance.

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.

<div align="center">Answer   Yes</div>

The NASS CRO sent an email to all staff to encourage review of each individual's disability status recorded in the National Finance Center (NFC) Employee Personal Page (EPP). The message explained that the CRO collects, monitors, and analyzes workforce statistics to ensure the Agency is making progress in the recruitment, advancement, and retention of women, minorities, and individuals with disabilities. Staff were advised that OPM had recently updated the Federal list of disability and serious health conditions codes; and this presented a good opportunity to have staff review current disability status and update codes if necessary using the self-service feature in the NFC EPP site. It was initially demonstrated that after the recertification effort, the needle moved slightly with changes in percent of PWD and PWTD. NASS has a very active Disability Employment Special Emphasis program. The NASS Civil Rights Director and the NASS Disability Employment Special Emphasis Program managers ran a virtual seminar for all staff titled, "Working with Employees with Possible Hidden Disabilities" through the Department's Target Center. NASS offered three separate training sessions on Reasonable Accommodations and Personal Assistance Services for managers and then a fourth for all staff. During Disabilities Awareness Month, NASS sponsored the webinar: Conscious Self-Care and The Healing Power of Music. There were seven additional webinars hosted by the USDA TARGET Center through the month. The NASS Employee Assistance Program offered a webinar called Maintaining Emotional Well-being During COVID-19 Outbreak .NASS Special Emphasis Program Managers Training for SEPMS was conducted for all SEPMs. USDA sent out guidance memos: "Reasonable Accommodation Guidance for REE Employees at Higher Risk to COVID-19".

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	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing reasonable accommodation requests from applicants and employees	1	0	0	Tonya Morris ARS AFM

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	5	0	0	Agricultural Resource Service (ARS) Human Resource Managers
Section 508 Compliance	1	0	0	Sue King NASS Public Affairs Office
Special Emphasis Program for PWD and PWTD	1	0	0	June Turner NASS Civil Rights Office
Answering questions from the public about hiring authorities that take disability into account	5	0	0	Agricultural Resource Service (ARS) Human Resource Managers
Architectural Barriers Act Compliance	1	0	0	USDA Departmental Management

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

The NASS Civil Rights Office sponsored training sessions on disability hiring and retention, which many NASS staff attended. NASS staff participate in the Workforce Recruitment Program, and participates fully with the interagency working group, FEED. CRO also circulated agency-wide the U.S. Department of Labor memo looking for federal employees to act as volunteer recruiters for the Workforce Recruitment Program (WRP). NASS staff attended several FEED meetings (See Section I for a list of meetings and webinars attended in FY 2020. NASS continues to have challenges analyzing some of the data until the Department resolves the issues of producing accurate and useful applicant flow tables. In FY 2019, the Department piloted a new applicant flow data query system (USA Staffing) to get better analyses tables for applicant flow, but there are still gaping inconsistencies between the USA Staffing output and workforce data tables produced by NFC. It is challenging to reconcile data between the two systems, especially since the NFC system does not produce any values except for those selected for promotions or as new hires. To demonstrate NASS's continuing commitment to an inclusive workforce, the Office of Civil Rights hosted and/or sponsored four webinars based on review and reintroduction of the Department's Reasonable Accommodations and the newly revised Personal Assistance Services procedures. Sessions offered were both supervisor/manager specific or tailored for all staff. NASS management staff were invited to attend the webinar, "Increasing Access & Opportunity: Advancement & Retention of Federal Employees with Disabilities", which was a panel discussion highlighting effective programs across government. The webinar explored mentoring as a means to increasing access and opportunity, highlighting specific initiatives including the FBI's Mentoring Program and the Department of Labor's Repository of Opportunities, Assignments & Details (ROAD) program. The webinar explored best practices to set up employers and employees for success. The webinar, "Maintaining Emotional Well-being During COVID-19 Outbreak" was very well attended.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer   Yes

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]		
Objective	USDA had a contractor in place who was creating a Department-wide exit interview that will be administered under the OneUSDA initiative. Currently, the exit interviews are to be administered at the mission area level. NASS and the exit interview project manager are working closely to ensure that the questions prescribed by EEOC during the Technical Assistance visit with NASS will be integrated in the exit survey in order to address this deficiency.		
Target Date	Sep 30, 2021		
Completion Date			
Planned Activities	*Target Date*	*Completion Date*	*Planned Activity*
	Sep 30, 2021		NASS will follow up with the ARS to review the EEOC recommended changes to the exit interview and certify that appropriate changes were made to confirm compliance, as per the EEOC Technical Guidance meeting with NASS and the Department.
Accomplishments	*Fiscal Year*	*Accomplishment*	
	2020	This deficiency was recently brought to NASS's attention mid-November 2020, during a technical review with EEOC staff. Those involved in the creation of the Mission Area exit interview were briefed on the changes that needed to be incorporated into the survey. Every effort will be made to bring the revised Mission Area-wide exit interview questions into compliance.	

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.

The current hiring tool, USA Jobs, has added process constraints, which have slowed NASS's ability to hire in a timely fashion. NASS does use the Schedule A Hiring Authority to appoint eligible people and Veterans with disabilities into positions when available at the agency. NASS is also involved yearly with the WRP. The agency hiring managers actively participated in both in-person and virtual recruitment programs by sending recruiters to various colleges and university to interview recent graduates and college students with disabilities for summer and permanent jobs.

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

Managers with hiring authority both in Headquarters and in the 12 Regional Field Offices attend numerous job and career fairs at colleges and universities in-person and virtually, throughout the year to recruit potential candidates for employment. Many of these institutions have Veterans and students with disabilities. As mentioned in the previous question, NASS participations in the Office of Personnel Management's (OPM) Workforce Recruitment Program as well as, working closely with the agency's Disability Program Manager to help identify resources to hiring people with disabilities.

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.

NASS predominately uses OPM's USA Jobs to recruit potential candidates and works closely with its Human Resource Office to determine Schedule A eligibility if people and veterans with disabilities apply. These lists of qualified Schedule A applicants are referred to management when positions become available.

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

NASS has trained hiring managers and senior leaders annually for Special Hiring Authorities, Reasonable Accommodations, Personal Assistance Services, and IDP preparation,

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.

NASS will continue to collaborate with various colleges and universities to recruit qualified persons with disabilities. In addition, the agency will continue to participate in the Workforce Recruitment Program, which targets students and recent graduates with disabilities and the disabled veterans. NASS has also begun to plan to work more closely with both EARN and JAN. Since JAN is headquartered in WV, the NASS staff had planned a site visit in Spring, 2020, to meet face to face and develop a working relationship with JAN staff. However, due to Covid-19, this visit had to be cancelled and will be rescheduled once face-to-face meetings are again safe. Information and resources shared at FEED meetings has also beneficial.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

a. New Hires for Permanent Workforce (PWD)   Answer   No

b. New Hires for Permanent Workforce (PWTD)   Answer   Yes

NASS had 45 permanent new hires in FY 2020 and 19 temporary hires. The permanent new hires self-reported as 26.3% PWD but there were no new hires reporting targeted disabilities. Currently, in the NASS Mission Critical Occupation series (GS 1529, 1530, and 2210), the Agency has a rate of 15.3% PWD and 1.6% PWTD in these three job series – relatively unchanged from the FY 2019 levels. Hiring officials in the 12 Regional Field Offices have been instructed to make contact with their State Vocational Rehabilitation agencies and create dialog in the hopes that NASS can have more hiring opportunities in the future. On the NASS website, there is a tab titled, "Career Opportunities". Within that tab there is a link called, "Disability Accommodations." See next: https://www.nass.usda.gov/About_NASS/Opportunities/index.php#Accomodation

New Hires	Total	Reportable Disability		Targeted Disability	
		Permanent Workforce	Temporary Workforce	Permanent Workforce	Temporary Workforce
	(#)	(%)	(%)	(%)	(%)
% of Total Applicants	981	4.28	0.00	2.75	0.00
% of Qualified Applicants	572	4.20	0.00	1.75	0.00

% of New Hires	40	12.50	0.00	5.00	0.00

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 No

        b. New Hires for MCO (PWTD)   Answer No

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	
1529MATHEMATIC STATISTICS	1	300.00	100.00	100.00	0.00
1530STATISTICS	2	850.00	200.00	350.00	100.00
2210INFORMATION TECHNOLOGY MANAGEMENT	1	400.00	0.00	200.00	0.00

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

        a. Qualified Applicants for MCO (PWD)   Answer No

        b. Qualified Applicants for MCO (PWTD)   Answer No

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

        a. Promotions for MCO (PWD)   Answer No

        b. Promotions for MCO (PWTD)   Answer No

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.

Through the use of the MD-715 B Table analyses, NASS monitors the recruitment, retention, and advancement of those employees self-identifying as PWD and PWTD. The NASS CRO prepares both quarterly and annual MD-715 reports. From this report, a special briefing is prepared for the Senior Executive Team. Contained within this briefing are highlights of findings, analyses of trends both negative and positive, and triggers that might have been identified that could cause barriers to employment or advancement. Both A Tables and B Table findings are summarized in the briefing. NASS staff attended the USDA/AMS Mentoring Program, "Overcoming Barriers to Employment - Resume Building" webinar workshop that provided techniques and skills on improving resume writing, the federal resume template, and interviewing techniques for applying to federal jobs. Most of the NASS development programs (new employees, survey and estimation Basic training, professional development, etc.) are based on occupational series/time with the Agency; therefore a representative cross section of staff are given the equal opportunity to attend.

B. CAREER DEVELOPMENT OPPORTUNITES

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

NASS convened a Career Path Team, which in turn created Career Path Guides for the first three mission critical occupational series, followed by seven additional job series. These guides describe suggested career paths for each series within NASS. Each guide provides a "roadmap to success" to help employees plan their professional development and achieve career goals within the agency. NASS also promotes intra-and inter-Agency details for employees as a tool for career enhancement when considering the training and developmental aspects of the assignment. The mission of the NASS Mentoring Program is to enhance employees' careers by providing a program that fosters working relationships so that they may benefit from other's experiences and wisdom. The NASS Mentoring Program helps employees establish informal networks and gain access to other NASS employees willing to help them better understand NASS, do their jobs better, and prepare for advancement within the Agency. The program is open to ALL employees throughout NASS. Mentors can support, counsel, and coach employees and help them plan and realize their career goals. While employees are always free to seek out mentors on their own, the NASS Mentoring Program provides the Agency support for establishing mentor-mentee relationships. The current NASS Performance Plan Goal for Training includes the following objectives: recommending, developing and conducting training to improve employees' knowledge, skills and abilities to carry out the NASS mission; assessing training needs annually, and recommending appropriate activities and resources to meet these needs; designing and conducting training workshops; monitoring employee training histories in AgLearn; providing information to employees on Core Technical Skills Requirements, upcoming training events, and available training resources; and developing, testing and using Distance Learning Capabilities such as Computer Based Training, Net Conferencing, and Video Conferencing. Each employee in NASS is required to have an approved IDP on record. Each employee and their supervisor annually update the IDP to reflect the mutual needs of the employee and the Agency. Training and development needs and objectives, and career goals and aspirations of the employee are coordinated with Agency career opportunities and staffing needs. Training plans vary widely and range from college courses and other formal training programs to "none" for employees who are fully competent in their current position. Employees are encouraged to take training beyond what is sponsored within the Agency, including computer software, statistics, survey methodology, project management, technical and administrative, and personal development courses. NASS management authorizes funding (budget permitting) of all reasonable requests that are included on an approved IDP. The goal of this policy is to enable all employees to improve their knowledge, skills, and abilities in areas related to the Agency's mission. These courses can be taken in a traditional classroom or on-line. Courses are often taken on the employee's own time (non-duty hours), but may be taken during duty hours if approved by management. NASS offers three graduate educational training programs designed to provide employees with at least 1 year of graduate level academic education. These programs include Mathematical Statistician -designed to provide education for agricultural and mathematical statisticians in advanced statistics and statistical theory to become highly trained mathematical statisticians and Survey Methodology, a program designed for agricultural statisticians and mathematical statisticians to receive advanced training in survey methodology. Participants generally attend the Joint Program for Survey Methodology (JPSM) at the University of Maryland or the University of Michigan. The University of Nebraska also offers a graduate program in Survey Methodology. The third graduate educational training program is in the field of Information Technology: This program is designed primarily for information technology specialists to receive at least 1 year of full-time graduate training in software engineering, telecommunications, or management information systems. The program is also open to agricultural statisticians and mathematical statisticians who have a strong interest and background in computer systems and information technology. The NASS Disability Employment Special Emphasis Program Manager position is a 10% collateral duty assignment, with a focus on inclusion. Two programs were sponsored by NASS during FY 2020 for Disabilities Awareness Month. NASS staff attended the USDA, Office of Human Resources Management, National Disability Employment Awareness Month observance. Conscious Self-Care and The Healing Power of Music. Staff were also invited to attend seven webinars hosted by the TARGET Center as well as a guided tour of the South Building TARGET Center throughout National Disability Employment Awareness Month. All NASS staff were invited to attend OPM's training session, The Executive Core Qualifications - Preparing for Application to the Senior Executive Service, which targeted Agency employees aspiring and preparing to apply to the SES, as

well as those applying to the SES Candidate Development Program (CDP) candidates preparing their ECQs for review.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs						
Coaching Programs						
Detail Programs						
Fellowship Programs						
Training Programs						
Mentoring Programs	15	5	13.3	6.7		
Other Career Development Programs	5	3	20.0	33.3		

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

      a. Applicants (PWD)   Answer No

      b. Selections (PWD)   Answer No

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

      a. Applicants (PWTD)   Answer No

      b. Selections (PWTD)   Answer No

C. AWARDS

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

      a. Awards, Bonuses, & Incentives (PWD)   Answer No

      b. Awards, Bonuses, & Incentives (PWTD)   Answer No

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	37	7.77	4.15	4.76	8.54

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 Hours: Total Hours	268	62.14	29.54	0.00	78.05
Time-Off Awards 1 - 10 Hours: Average Hours	7.24	7.77	1.09	0.00	9.76
Time-Off Awards 11 - 20 hours: Awards Given	6	1.94	0.62	0.00	2.44
Time-Off Awards 11 - 20 Hours: Total Hours	100	34.95	9.85	0.00	43.90
Time-Off Awards 11 - 20 Hours: Average Hours	16.67	17.48	2.46	0.00	21.95
Time-Off Awards 21 - 30 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 hours: Awards Given	1	0.00	0.15	0.00	0.00
Time-Off Awards 31 - 40 Hours: Total Hours	40	0.00	6.15	0.00	0.00
Time-Off Awards 31 - 40 Hours: Average Hours	40	0.00	6.15	0.00	0.00
Time-Off Awards 41 or more Hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: $501 - $999: Awards Given	382	48.54	48.00	42.86	50.00
Cash Awards: $501 - $999: Total Amount	271193	34516.50	34043.54	30714.29	35490.24
Cash Awards: $501 - $999: Average Amount	709.93	690.33	109.11	3412.71	-6.87
Cash Awards: $1000 - $1999: Awards Given	170	28.16	20.31	33.33	26.83
Cash Awards: $1000 - $1999: Total Amount	170274	28155.34	21342.15	33333.33	26829.27
Cash Awards: $1000 - $1999: Average Amount	1001.61	970.87	161.68	4761.90	0.00
Cash Awards: $2000 - $2999: Awards Given	27	2.91	3.69	4.76	2.44
Cash Awards: $2000 - $2999: Total Amount	67000	7281.55	9153.85	11904.76	6097.56
Cash Awards: $2000 - $2999: Average Amount	2481.48	2427.18	381.41	11904.76	0.00
Cash Awards: $3000 - $3999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: $3000 - $3999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: $3000 - $3999: Average Amount	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: $4000 - $4999: Awards Given	1	0.00	0.15	0.00	0.00
Cash Awards: $4000 - $4999: Total Amount	4952	0.00	0.00	0.00	0.00
Cash Awards: $4000 - $4999: Average Amount	4952	0.00	0.00	0.00	0.00
Cash Awards: $5000 or more: Awards Given	1	0.00	0.15	0.00	0.00
Cash Awards: $5000 or more: Total Amount	10000	0.00	1538.46	0.00	0.00
Cash Awards: $5000 or more: Average Amount	10000	0.00	1538.46	0.00	0.00

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

      a. Pay Increases (PWD)   Answer   No

      b. Pay Increases (PWTD)   Answer   No

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	0	0.00	0.00	0.00	0.00

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

      a. Other Types of Recognition (PWD)   Answer   No

      b. Other Types of Recognition (PWTD)   Answer   No

D. PROMOTIONS

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

      a. SES

            i. Qualified Internal Applicants (PWD)   Answer   No

            ii. Internal Selections (PWD)   Answer   No

      b. Grade GS-15

            i. Qualified Internal Applicants (PWD)   Answer   No

            ii. Internal Selections (PWD)   Answer   No

      c. Grade GS-14

    i. Qualified Internal Applicants (PWD)   Answer   No

    ii. Internal Selections (PWD)   Answer   No

d. Grade GS-13

    i. Qualified Internal Applicants (PWD)   Answer   No

    ii. Internal Selections (PWD)   Answer   No

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

    a. SES

      i. Qualified Internal Applicants (PWTD)   Answer   No

      ii. Internal Selections (PWTD)   Answer   No

    b. Grade GS-15

      i. Qualified Internal Applicants (PWTD)   Answer   No

      ii. Internal Selections (PWTD)   Answer   No

    c. Grade GS-14

      i. Qualified Internal Applicants (PWTD)   Answer   No

      ii. Internal Selections (PWTD)   Answer   No

    d. Grade GS-13

      i. Qualified Internal Applicants (PWTD)   Answer   No

      ii. Internal Selections (PWTD)   Answer   No

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

    a. New Hires to SES (PWD)   Answer   No

    b. New Hires to GS-15 (PWD)   Answer   No

    c. New Hires to GS-14 (PWD)   Answer   No

    d. New Hires to GS-13 (PWD)   Answer   No

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4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe

the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

       a. New Hires to SES (PWTD)   Answer   No

       b. New Hires to GS-15 (PWTD)   Answer   No

       c. New Hires to GS-14 (PWTD)   Answer   No

       d. New Hires to GS-13 (PWTD)   Answer   No

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory
positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

    a. Executives

        i. Qualified Internal Applicants (PWD)   Answer   No

        ii. Internal Selections (PWD)   Answer   No

    b. Managers

        i. Qualified Internal Applicants (PWD)   Answer   No

        ii. Internal Selections (PWD)   Answer   No

    c. Supervisors

        i. Qualified Internal Applicants (PWD)   Answer   No

        ii. Internal Selections (PWD)   Answer   No

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   No

        ii. Internal Selections (PWTD)   Answer   No

    b. Managers

        i. Qualified Internal Applicants (PWTD)   Answer   No

        ii. Internal Selections (PWTD)   Answer   No

    c. Supervisors

        i. Qualified Internal Applicants (PWTD)   Answer   No

        ii. Internal Selections (PWTD)   Answer   No

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   No

        b. New Hires for Managers (PWD)   Answer   No

        c. New Hires for Supervisors (PWD)   Answer   No

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   No

        b. New Hires for Managers (PWTD)   Answer   No

        c. New Hires for Supervisors (PWTD)   Answer   No

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

                                                            Answer   Yes

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

        a.Voluntary Separations (PWD)   Answer   No

        b.Involuntary Separations (PWD)   Answer   No

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	0	0.00	0.00
Permanent Workforce: Resignation	7	1.92	0.71
Permanent Workforce: Retirement	30	3.85	3.67

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Other Separations	18	0.96	2.40
Permanent Workforce: Total Separations	55	6.73	6.77

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

a. Voluntary Separations (PWTD) Answer No

b. Involuntary Separations (PWTD) Answer No

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	0	0.00	0.00
Permanent Workforce: Resignation	7	0.00	0.88
Permanent Workforce: Retirement	30	0.00	3.79
Permanent Workforce: Other Separations	18	4.76	2.15
Permanent Workforce: Total Separations	55	4.76	6.82

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.

No trigger

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 CFR §1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b)), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

https://www.ocio.usda.gov/policy-directives-records-forms/section-508 https://www.usda.gov/accessibility-statement https://www.usda.gov/ra/toolkit/document-library https://www.usda.gov/oascr/filing-discrimination-complaint-usda-employee NASS currently defers to the Departmental Section 508 Regulation. While there is no formal Section 508 complaint process within USDA, these complaints would be referred thought the regular EEO complaint process.

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

https://www.usda.gov/ra/toolkit/document-library https://www.access-board.gov/law/aba.html This file can be accessed on the NASS website homepage through the About NASS/Civil Rights/ Accessibility/Document Library link.

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.

At this time, the Agency has not needed to improve accessibility to any facilities. Any facilities that NASS occupies either fall under USDA or rented GSA facilities which are compliant.

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.)

NASS does have a policy in place and the average processing time is two days. Upon receipt, all supervisors review reasonable accommodation requests immediately. Once approved, these requests are forwarded to USDA ARS AFM, Tonya Morris, Reasonable Accommodations Manager, which is the Agency that handles HR functions for the REE Mission Area under which NASS is organized.

2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

All reasonable accommodations requests are processed and implemented in a timely fashion.

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

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

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

NASS created a personal assistance services (PAS) training presentation that was available for all employees during FY 2020. The nature and family culture of most of the employees at NASS ensures that personal services would be offered to those in need regardless of an official PAS request. The Agency is covered by the mission area RA/PAS policy statement. NASS is adhering to the ARS approved RA/PAS plan submitted for the mission area.

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   Yes

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

   Answer   Yes

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

Source of the Trigger:	Workforce Data (if so identify the table)
Specific Workforce Data Table:	Workforce Data Table - B4
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Low participation in the target disabilities in the GS-11 – SES cluster.

STATEMENT OF BARRIER GROUPS:	*Barrier Group*
	People with Disabilities

Barrier Analysis Process Completed?:	Y
Barrier(s) Identified?:	Y

STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	**Barrier Name**	**Description of Policy, Procedure, or Practice**
	Low participation in the target disabilities (GS-11 – SES)	NASS has low turnover at senior levels. In addition the mission critical position (statistical/mathematical series) are difficult to fill.

Objective(s) and Dates for EEO Plan					
Date Initiated	**Target Date**	**Sufficient Funding / Staffing?**	**Date Modified**	**Date Completed**	**Objective Description**
02/01/2019	12/31/2022	Yes			Train, mentor and coach the mission critical employees that are in the GS 1 – 10 (4% of employees in this category have PWTD) for succession and candidate pool building to rise into the GS-11-SES slots.
01/01/2020	12/31/2021	Yes			Ensure that the newly formed NASS Strategic Planning Office has a focus on NASS career development opportunities addressing all positions at NASS, employee development opportunities, as well as technical GS-14 and GS-15 positions.
01/01/2020	12/31/2020	Yes			NASS will continue to participate in the Workforce Recruitment Program, and participate fully with the interagency working group, Federal Exchange on Employment and Disability (FEED).
01/01/2020	12/31/2021	Yes		09/30/2020	Encourage supervisors and managers to utilize special hiring authorities where applicable.

Objective(s) and Dates for EEO Plan					
Date Initiated	**Target Date**	**Sufficient Funding / Staffing?**	**Date Modified**	**Date Completed**	**Objective Description**
01/01/2020	12/31/2021	Yes		09/30/2020	Encourage development and use of mid- and senior level IDPs for NASS's major occupations in order to develop a pipeline of future managers, supervisors and SES leadership.

Responsible Official(s)		
Title	**Name**	**Standards Address The Plan?**
NASS Civil Rights Office	June Turner	Yes

Planned Activities Toward Completion of Objective				
Target Date	**Planned Activities**	**Sufficient Staffing & Funding?**	**Modified Date**	**Completion Date**
12/31/2021	A training needs assessment revealed that there is still a need for more training initiatives and leadership development programs. With many top-level managers eligible to retire, there will be many opportunities to fill supervisory and executive level positions within the agency in the near future. NASS Training Office, Civil Rights Office, and the Office of the Administrator will continue to offer training sessions for managers and supervisors.	Yes		
12/31/2021	Promote the NASS Mentoring Program to all staff. - The mission of the NASS Mentoring Program is to enhance employees' careers by providing a program that fosters working relationships so that they may benefit from other's experiences and wisdom. The NASS Mentoring Program helps employees establish informal networks and gain access to other NASS employees willing to help them better understand NASS, do their jobs better, and prepare for advancement within the Agency. The program is open to ALL employees throughout NASS. Mentors can support, counsel, and coach employees and help them plan and realize their career goals. While employees are always free to seek out mentors on their own, the NASS Mentoring Program provides the Agency support for establishing mentor-mentee relationships.	Yes		
12/31/2021	Employees are encouraged to take training beyond what is sponsored within the Agency, including computer software, statistics, survey methodology, project management, technical and administrative, and personal development courses. NASS management authorizes funding (budget permitting) of all reasonable requests that are included on an approved IDP. The goal of this policy is to enable all employees to improve their knowledge, skills, and abilities in areas related to the Agency's mission. These courses can be taken in a traditional classroom or on-line. Courses are often taken on the employee's own time (non-duty hours), but may be taken during duty hours if approved by management.	Yes		

Report of Accomplishments	
Fiscal Year	**Accomplishment**
2020	NASS revamped the Mentoring Program. The mission of the NASS Mentoring Program is to enhance employees' careers by providing a program that fosters working relationships so that they may benefit from other's experiences and wisdom. The NASS Mentoring Program helps employees establish informal networks and gain access to other NASS employees willing to help them better understand NASS, do their jobs better, and prepare for advancement within the Agency. The program is open to ALL employees throughout NASS. Mentors can support, counsel, and coach employees and help them plan and realize their career goals. While employees are always free to seek out mentors on their own, the NASS Mentoring Program provides the Agency support for establishing mentor-mentee relationships.
2020	The NASS Career Paths Team, which consists of Agency Human Resource specialists and employees from several agency units representing various job series and grade levels. The team developed very comprehensive career path guides designed to help employees understand what knowledge, skills, personal characteristics, and experiences are required to progress in their career. The career path guides identify the competencies needed to be successful in a job series; serve as a resource to develop skills for advancement; and provide the tools for communication with managers to set career goals and set realistic expectations when making career decisions. The guides act also as a tool for manager to help clarify expectations and proficiency standards for each career level; and provides a resource to help managers and employees discuss career goals and set reasonable expectations. The guide provides a clear picture of the various job opportunities within in each job series and across the agency.
2020	All NASS staff were invited to attend OPM's training session, The Executive Core Qualifications - Preparing for Application to the Senior Executive Service, which targeted Agency employees aspiring and preparing to apply to the SES, as well as those applying to the SES Candidate Development Program (CDP) candidates preparing their ECQs for review.
2020	The NASS Disability Employment Special Emphasis Program Manager position is a 10% collateral duty assignment, with a focus on inclusion. Two programs were sponsored by NASS during FY 2020 for Disabilities Awareness Month. NASS staff attended the USDA, Office of Human Resources Management, National Disability Employment Awareness Month observance. Conscious Self-Care and The Healing Power of Music. Staff were also invited to attend seven webinars hosted by the TARGET Center as well as a guided tour of the South Building TARGET Center throughout National Disability Employment Awareness Month.
2020	Each employee in NASS is required to have an approved IDP on record. Each employee and their supervisor annually update the IDP to reflect the mutual needs of the employee and the Agency. Training and development needs and objectives, and career goals and aspirations of the employee are coordinated with Agency career opportunities and staffing needs. Training plans vary widely and range from college courses and other formal training programs to "none" for employees who are fully competent in their current position.
2020	Employees are encouraged to take training beyond what is sponsored within the Agency, including computer software, statistics, survey methodology, project management, technical and administrative, and personal development courses. NASS management authorizes funding (budget permitting) of all reasonable requests that are included on an approved IDP. The goal of this policy is to enable all employees to improve their knowledge, skills, and abilities in areas related to the Agency's mission. These courses can be taken in a traditional classroom or on-line. Courses are often taken on the employee's own time (non-duty hours), but may be taken during duty hours if approved by management.
2020	In FY 2020, NASS held several leadership development-training opportunities for all staff and some directly for supervisors looking for upward mobility. NASS revamped its mentoring program, responsibility for which was moved under the Agency's training division, located in the National Operations Center in St. Louis, MO. In addition, NASS senior staff are encouraging more women, minorities and individuals with disabilities to consider these leadership positions as they become available.
2020	NASS is working diligently to have included in the mission area exit survey the five questions cited in the Agency's Technical Assistance letter (November, 2020). The five questions will be added exactly as the example sent to us by EEOC. This revised exit interview should be available before the end of the fiscal year and should give the Agency more data to study for retention analysis.

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

>

There are many ongoing initiatives.

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

> There is not a disproportionate number of PWD or PWTD separating.

    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.

> Planned activities helped correct the trigger