

## 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 |

\*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 in total is slightly above the 2% goal for PWTD. The agency has just come off a hiring freeze, and there is 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					
Grades GS-11 to SES					

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

During FY 2019, NASS focused on the recruitment, hiring and retention of employees with disabilities in an effort to increase the numbers within its workforce. A hiring manager course on reasonable accommodations' provisions was again scheduled during the year by the NASS Office of Civil Rights.. This course included review of the use of special hiring authorities. Senior leaders and hiring managers are briefed quarterly through the use of an MD-715 Executive Summary. These senior staff also receive the full quarterly and annual MD-715 reports. NASS has in the past participated in the Workforce Recruitment Program, and participates

fully with the interagency working group, Federal Exchange on Employment and Disability (FEED). The NASS 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 the Mid-Atlantic ADA Center “Stay Calm – Supporting Individuals with Emotional or Behavioral Disorders”. NASS Staff attended the FEED Meeting and Webinar produced by the EO Workgroup (OPM, EEOC, the Department of Labor’s Office of Disability Employment Policy (ODEP) and EARN) which introduced the newly updated "Federal Agency Employment Strategies: A Framework for Disability Inclusion", and the FEED presentation on issues related to communications access for federal employees who are deaf or hard of hearing, and an “Opioid Use & Addiction Under the ADA/Rehab Act” webinar. NASS staff also attended the USDA Forest Service two-day Resiliency and Mindfulness Summit and the FEED meeting: "Using Special Hiring Authorities to Advance Federal Employment of People with Disabilities" and USDA FPAC’s webinar “Working with You is Tough”. NASS staff also participated in the Institute on Employment and Disability webinar “Connecting Practices to Outcomes”, which described how specific practices described in MD 715 relate to observed employment outcomes for individuals with disabilities. The NASS Civil Rights Office prepares a quarterly MD 715 Executive Summary for the SES team that highlights the PWD and PWTD goals.

## 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

NASS did conduct a disability recertification initiative in FY 2018 and sent out reminder emails to recertify in 2019. NASS staff were notified that the CRO currently 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 National Finance Center (NFC) Employee Personal Page.

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 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
Processing reasonable accommodation requests from applicants and employees	1	0	0	Tonya Morris ARS AFM
Special Emphasis Program for PWD and PWTD	1	0	0	June Turner NASS Civil Rights Office

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
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

Program staff regularly attend seminars sponsored by FEED, EARN, and JAN. OPM has also sponsored training sessions on disability hiring and retention, which NASS staff have 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 2019.): NASS will 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 is piloting a new system (USA Staffing) to get better analyses tables for applicant flow. To demonstrate NASS’s continuing commitment to an inclusive workforce, the Office of Civil Rights hosted a webinar, “Balancing Work and Cancer. The training was presented by the non-profit organization called Cancer and Careers. Their mission is to “empower and educate people with cancer to thrive in their workplace, by providing expert advice, interactive tools and educational events”. NASS management staff were invited to attend the webinar, “The Intersection of ADA, FMLA, and Workers' Compensation”, which discussed how to draft leave policies that comply with the Americans with Disabilities Act. Often when FMLA or Workers Compensation are also involved, confusion about how each law applies is understandable. The webinar explored best practices to set up employers and employees for success. The webinar, “Opioid Use & Addiction Under the ADA/Rehab Act” was 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**

**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 PWTDD

**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.

While USDA is still recovering from a hiring freeze, current budget conditions have added constraints which have slowed NASS's ability to hire. 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 participates in the program by sending a recruiter 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 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

Hiring managers and Senior leadership receive annual reasonable accommodation training which includes Special Hiring Authorities overview and review of the application process.

**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 partner 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, NASS staff are planning a site visit in Spring, 2020, to meet face to face and develop a working relationship with JAN staff. 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 No

NASS had seven (7) permanent new hires for FY 2019. This new hires self-reported as 28.6% PWTB and 14.3% with targeted disabilities. Currently, in the NASS Mission Critical Occupation series (GS 1529, 1530, and 2210), the Agency has a rate of 15.1% PWD and 1.7% PWTB in these three job series – improved from the FY 2018 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.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	0				
% of Qualified Applicants	0				
% of New Hires	0				

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTB 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 (PWTB) Answer No

With only seven new hires for FY 2019, there is not enough data to answer this question. It is worth noting again that the NASS new hires who self-identified as a PWTB are above the 12% target.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTB 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 (PWTB) Answer No

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTB 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 (PWTB) 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 Civil Rights Office prepares both quarterly and an annual MD-715. 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.

### 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 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 2019 for Disabilities Awareness Month: Understanding Reasonable Accommodation and a guided tour of the South Building TARGET Center. NASS staff attended the USDA, Office of Human Resources Management, National Disability Employment Awareness Month observance. 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						
Other Career Development Programs	15	5	13.3	6.7		
Mentoring Programs						
Detail Programs						
Fellowship Programs						
Training Programs						

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 %
Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %

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 %
Performance Based Pay Increase	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

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

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

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 PWTB 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 (PWTB) Answer No

ii. Internal Selections (PWTB) Answer No

b. Managers

i. Qualified Internal Applicants (PWTB) Answer No

ii. Internal Selections (PWTB) Answer No

c. Supervisors

i. Qualified Internal Applicants (PWTB) Answer No

ii. Internal Selections (PWTB) 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 PWTB 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 (PWTB) Answer No

b. New Hires for Managers (PWTB) Answer No

c. New Hires for Supervisors (PWTB) 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 %
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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 %
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4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

**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> 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 through the regular EEO complaint process. The Office of the Assistant Secretary for Civil Rights is also not equipped to handle Section 508 complaints, but is currently reviewing and mediating complaints based on Section 504 of the Rehabilitation Act.

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.ocio.usda.gov/policy-directives-records-forms/section-508> This file can be accessed on the NASS website homepage through the USDA Policies Link/USDA Accessibility Statements.

- 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 – the 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 is creating a personal assistance services (PAS) training presentation that will be made 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.
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## 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.
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## 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

<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>Low participation in the target disabilities (GS-11 – SES)</p>							
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p>							
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>Currently, the Agency is under budgetary restraints an environment similar to a hiring freeze. NASS has low turnover at senior levels. In addition the mission critical position (statistical/mathematical series) are difficult to fill.</p>							
<p><b>Objective</b></p>	<p>Train, mentor and coach the mission critical employees that are in the GS 1 – 10 (4% of employees in this category have PWTB) for succession and candidate pool building to rise into the GS-11-SES slots.</p> <table border="1" data-bbox="440 961 1513 1108"> <tr> <td data-bbox="440 961 646 1024"><b>Date Objective Initiated</b></td> <td data-bbox="646 961 1513 1024">Feb 1, 2019</td> </tr> <tr> <td data-bbox="440 1024 646 1108"><b>Target Date For Completion Of Objective</b></td> <td data-bbox="646 1024 1513 1108">Dec 31, 2022</td> </tr> </table>				<b>Date Objective Initiated</b>	Feb 1, 2019	<b>Target Date For Completion Of Objective</b>	Dec 31, 2022
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<p><b>Responsible Officials</b></p>	<p>June Turner NASS Civil Rights Office</p>							
<p><b>Target Date (mm/dd/yyyy)</b></p>	<p><b>Planned Activities</b></p>	<p><b>Sufficient Staffing &amp; Funding (Yes or No)</b></p>	<p><b>Modified Date (mm/dd/yyyy)</b></p>	<p><b>Completion Date (mm/dd/yyyy)</b></p>				
<p><b>Fiscal Year</b></p> <p>2019</p>	<p><b>Accomplishments</b></p> <p>Training for supervisors on handling reasonable accommodations efficiently and effectively and Training for hiring managers on use of special hiring authorities.</p>							

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

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

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.