

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

## U.S. Environmental Protection Agency Fiscal Year 2019

*To capture federal agencies' affirmative action plans 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 plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.*

### Section I: Efforts to Reach Regulatory Goals

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

1. Using the 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)	Yes 0	No X
b. Cluster GS-11 to SES (PWD)	Yes X	No 0

PWD in GS-11 to SES Cluster of the permanent workforce participate at 7.8% or 1000 employees out of 12843. This is a lower rate than the expected 12% benchmark. Indicating a trigger.

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)	Yes 0	No X
b. Cluster GS-11 to SES (PWTD)	Yes 0	No X

No triggers identified.

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

The Agency utilizes EEOC's 12% PWD and 2% PWTD benchmarks for PWD as the goal.

The Office of Civil Rights (OCR) made the increased use of the Schedule A Hiring Authority a national priority and through this effort has communicated the hiring goals to management. Engagement on the hiring goals has happened at all management levels and with EPA senior leadership. Additionally, the Office of Human Resources (OHR) has provided briefings and other resources on the hiring goals and use of the Schedule A Hiring Authority.

### 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.

Yes X      No 0

N/A
-----

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	30	0	0	<p>Jerome Bonner, Director, Cincinnati Shared Service Center, Office of Mission Support (OMS) <a href="mailto:bonner.jerome@epa.gov">bonner.jerome@epa.gov</a></p> <p>Jeremy Taylor, Director, Research Triangle Park Shared Service Center, OMS <a href="mailto:taylor.jeremy@epa.gov">taylor.jeremy@epa.gov</a></p> <p>The 30 full time employees include staff within the Shared Service Centers who are responsible for processing applications.</p>
Answering questions from the public about hiring authorities that take disability into account	13	0	0	<p>Anthony Napoli, Diversity and Inclusion Manager, DRESO, Office of human resources (OHR) <a href="mailto:napoli.anthony@epa.gov">napoli.anthony@epa.gov</a></p> <p>Christopher Emanuel, EEO Manager, National Disability Employment Program Manager, Office of Civil Rights (OCR) <a href="mailto:emanuel.christopher@epa.gov">emanuel.christopher@epa.gov</a></p> <p>This includes 11 EEO Officers.</p>
Processing reasonable accommodation requests from applicants and employees	2	0	14	<p>Amanda Sweda, Senior National Reasonable Accommodation Coordinator, OCR <a href="mailto:sweda.amanda@epa.gov">sweda.amanda@epa.gov</a></p> <p>Kristin Tropp, National Reasonable Accommodation Coordinator, OCR <a href="mailto:tropp.kristin@epa.gov">tropp.kristin@epa.gov</a></p> <p>This includes 14 collateral duty Local Reasonable Accommodations Coordinators (LORACs) in EPA’s regional offices.</p>

Section 508 Compliance	4	0	15	<p>Solymer Grecco, Section 508 Coordinator, OMS <a href="mailto:solymer.grecco@epa.gov">solymer.grecco@epa.gov</a></p> <p>Sarah Sorathia, Assistant Section 508 Coordinator, OMS <a href="mailto:sorathia.sarah@epa.gov">sorathia.sarah@epa.gov</a></p> <p>Giselle Jasmin, Section 508, OMS <a href="mailto:jasmin.giselle@epa.gov">jasmin.giselle@epa.gov</a></p> <p>Jonda Byrd, Section 508, OMS <a href="mailto:Byrd.jonda@epa.gov">Byrd.jonda@epa.gov</a></p> <p>This includes 10 collateral duty 508 Compliance advisors in EPA regional offices.</p>
Architectural Barriers Act Compliance	0	1	0	<p>Amanda Sweda, Senior National Reasonable Accommodation Coordinator, OCR <a href="mailto:sweda.amanda@epa.gov">sweda.amanda@epa.gov</a></p>
Special Emphasis Program for PWD and PWTB	2	0	12	<p>Christopher Emanuel, National Disability Program Manager, OCR <a href="mailto:emanuel.christopher@epa.gov">emanuel.christopher@epa.gov</a></p> <p>Anthony Napoli, Diversity and Inclusion Manager, DRES, OHR <a href="mailto:napoli.anthony@epa.gov">napoli.anthony@epa.gov</a></p>

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

Yes  No

In FY19, EPA provided ongoing disability training to its disability program staff using various educational methods, such as online training, on-the-job training, and engagement on regular EEOC-facilitated Federal Exchange on Employment and Disability (FEED) calls.

Training topics included:

- EEOC Section 501 Affirmative Action Plan for the Employment of Individuals with Disabilities / Targeted Disabilities; Instruction Guidance
- Section 508 training on assistive technologies
- "EEO and Preventing Discrimination in the Workplace"
- SEPM training (two sessions), Schedule A, resources for job applicants, Computer/Electronic Accommodation Program (CAP), Workforce Recruitment Program (WRP)

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

1. 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.

Yes  No

N/A

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

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

### **A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES**

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

In FY19, the Agency utilized a variety of programs and resources to identify qualified job applicants with disabilities, including those with targeted disabilities. These included, but were not limited to:

- Veteran Employment Programs (e.g., Operations Warfighter, Wounded Warrior, Safe Harbor)
- Workforce Recruitment Program for college students with disabilities
- Special Emphasis Program Managers (SEPMs) and Disability Employment Advisory Council
- Volunteer Student Programs specifically targeting PWD/PWTD students
- SPPCs/Disability Employment Program Managers
- Careers and Disability Job Fairs
- Pathways-Presidential Management Fellows (PMF) Program
- Green Interns Program
- Pathways-Interns/Recent Graduates
- Disability Employment Program Advisory Council Monthly Meetings
- Memorandum of Understanding (MOU) Partnerships

2. Pursuant to 29 C.F.R. § 1614.203(a)(3), describe the agency's use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce.

The Agency uses all available and appropriate hiring authorities to recruit and hire. Examples where PWD and PWTD are considered:

- Excepted Service, Schedule A: 5 Code of Federal Regulations (C.F.R.) section 213.3102(u)
- Disabled Veterans Affirmative Action Program (DVAAP)
- Veterans Recruitment Appointments (VRA)
- Pathways Programs
- Internal/External Outreach Programs/Activities and Career Fairs

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.

EPA determines eligibility for individuals who apply using special hiring authorities, such as Schedule A or the 30% or more hiring authority for disabled veterans. The following process is used:

- Shared Service Centers (SSCs) review all incoming applicants who submit documentation designating their disability status pursuant to special hiring authority Schedule A (5 C.F.R. § 213.3102(u)).
- SSCs screen all applicants for minimum qualifications/selective factors to determine eligibility for noncompetitive, Schedule A appointments. A qualified person must have an intellectual disability, a severe physical disability, or a psychiatric disability. The Agency accepts, as proof of disability, appropriate documentation (e.g., records, statements, or other appropriate information) issued by a licensed medical professional (e.g., a physician or other medical professional duly certified by a state, the District of Columbia, or a U.S. territory, to practice medicine); a licensed vocational rehabilitation specialist (state or private); or any federal agency, state agency, or an agency of the District of Columbia or a U.S. territory that issues or provides disability benefits. For permanent or time-limited appointments, EPA also determines whether the individual is likely to succeed in the performance of the duties of the position for which he or she is applying.
- Disabled veterans with disability ratings of 30% or more may be considered under 30% or More Disabled Veteran Authority. <https://www.fedshirevets.gov/job-seekers/special-hiring-authorities/>
- Once eligibility is determined, the HR specialist notifies the hiring manager in accordance with applicable regulations for further consideration. SSC and HR specialists, along with SPPC, work closely with each hiring official using various communication methods to ensure that all pre- and post-appointment procedures are carried out and that applicants meet all legal and regulatory requirements for EPA position(s).
- Candidates may be selected and appointed with or without the typical formal interview process.
- Sometimes managers find Schedule A candidates on their own using the Workforce Recruitment Program or similar databases or by reaching out to local colleges, universities or disability resource centers. They can reach out and speak with candidates without the need of posting the position on USAJobs. In this case, the SSC will make a qualification determination after the interview before extending a formal offer. In addition, managers are encouraged to work with their Local and Senior National Reasonable Accommodation Coordinators as appropriate to ensure that any necessary accommodations are in place before the employee arrives on the job. The hiring manager notifies SSC of their selection. SSC extends an official offer based on the vacancy's selection factors and determines a start date based on dialogue with the manager and selectee. Prior to the entry-on-duty, a manager discusses and verifies the need for any accommodation with the selected individual.
- A hiring manager may fill the position based on the applicant's ability to perform the duties of the position as described in the position description. Applicants can be hired on 1) a temporary position with a Not to Exceed (NTE) date; 2) a non-temporary position with an NTE date; or 3) a non-temporary excepted service position. After two years of successful performance on the job, they may be non-competitively converted to a permanent appointment.

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

Yes X                      No 0                      N/A 0

In FY19, the Agency hosted two agency-wide training sessions: "Leveraging the Schedule A Hiring Authority for People with Disabilities," and "Ways to Mitigate Unconscious Bias about People with Disabilities in the Federal Workforce." The Schedule A hiring session was delivered by the Agency's Diversity and Inclusion Manager. A guest speaker, Michael Murray, Director, Employer Policy Team, Office of Disability Employment Policy, U.S. Department of Labor, delivered the session on unconscious bias. Both sessions discussed ways to utilize hiring authorities for persons with disabilities and combat unconscious biases and stereotypes to broaden positive perspectives. The training sessions were made available remotely, in-person, and were recorded. The videos are currently available on the Agency intranet site for all EPA employees. In addition, EPA regions and AAships conduct their own Disability, Reasonable Accommodation and Schedule A trainings and recognition activities.

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

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

In FY19, EPA, Gallaudet University (GU), and the Rochester Institute of Technology/National Technical Institute for the Deaf (RIT/NTID) continued to operate on established Memorandums of Understanding. Through these MOUs, EPA continues to collaborate on the advancement of environmental education to improve awareness of national employment opportunities and other opportunities for individuals with disabilities. Students will also be given notice of publicly available career opportunities at EPA, such as paid and unpaid internships. Additional MOUs are being established for FY 20 to increase nation-wide partnerships.

Additionally, the Agency partnered with the U.S. State Department and Starbucks Coffee Company's Global Accessibility Office to facilitate an educational and inspirational workshop event. The purpose of the event with the State Department was to educate hiring managers and staff on best practices associated with working with individuals with disabilities.

EPA continues to work collaboratively with the Equal Employment Opportunity Commission, the Virginia Department of Vocational Rehabilitation and the Federal Exchange on Employment & Disability (FEED). EPA's Diversity and Inclusion Manager served on a panel during the June 2019 FEED meeting on "Communication Access to Federal Employees who are Deaf or Hard of Hearing". The panelists shared promising practices for hiring and retaining individuals who are deaf or hard of hearing, including the provision of reasonable accommodation to FEED participants, so employers can use the wealth of information and knowledge to recruit, hire, advance, and retain PWD in the federal workforce.

The Agency also maintains the use of additional resources, such as the Workforce Recruitment Program and shares best practices on the use of this program with Agency management throughout the year.

**C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)**

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

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

Table B-8: NEW HIRES by Type of Appointment

There were 13 PWTD hired in FY19, representing 1.6% of the total new hires. This indicates a trigger when compared to the 2% benchmark.

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

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

For FY19, EPA utilized Table B7: Application and Hires for Major Occupations by Disability. In FY20, EPA will continue to make reasonable efforts to collect data on the Agency’s Mission Critical Occupations.

PWD, triggers were identified in the following Major Occupation series:

- **Environmental Protection Specialist (0028):** Selection at 2.27% is less than expected compared to the qualified applicant pool rate of 5.52%.
- **Misc. Administration and Program Specialist (0301):** Selection at 4.00% is less than expected compared to the qualified applicant pool rate of 8.98%.
- **Management/Program Analyst (0343):** Selection at 1.89% is less than expected compared to the qualified applicant pool rate of 8.44%.
- **General Biological Science (0401):** Selection at 1.45% is less than expected compared to the qualified applicant pool rate of 4.25%.
- **Environmental Engineer (0819):** Selection at 0.00% is less than expected compared to the qualified applicant pool rate of 3.01%.

PWTD, triggers were identified in the following Major Occupation series:

- **Environmental Protection Specialist (0028):** Selection at 2.27% is less than expected compared to the qualified applicant pool rate of 2.87%.
- **Misc. Administration and Program Specialist (0301):** Selection at 0.00% is less than expected compared to the qualified applicant pool rate of 4.28%.
- **Management/Program Analyst (0343):** Selection at 0.00% is less than expected compared to the qualified applicant pool rate of 3.71%.
- **General Biological Science (0401):** Selection at 0.48% is less than expected compared to the qualified applicant pool rate of 2.02%.
- **Environmental Engineer (0819):** Selection at 0.00% is less than expected compared to the qualified applicant pool rate of 1.91%.

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified *internal* applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

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

Table B-9: RELEVANT APPLICANT POOL for Major/Mission Critical Occupations by Disability

PWD, triggers were identified in the following Major Occupation series:

- **Misc. Administration and Program Specialist (0301):** PWD Qualified Internal Applicants at 4.08% is less than expected compared to the PWD Applications Received at 8.25%.
- **Management/Program Analyst (0343):** PWD Qualified Internal Applicants at 3.02% is less than expected compared to the PWD Applications Received at 5.50%.
- **General Biological Science (0401):** PWD Qualified Internal Applicants at 1.51% is less than expected compared to the PWD Applications Received at 3.10%.
- **Environmental Engineer (0819):** PWD Qualified Internal Applicants at 3.50% is less than expected compared to the PWD Applications Received at 3.61%.
- **Physical Scientist/Environmental Scientist (1301):** PWD Qualified Internal Applicants at 1.74% is less than expected compared to the PWD Applications Received at 1.87%.

PWTD, triggers were identified in the following Major Occupation series:

- **Misc. Administration and Program Specialist (0301):** PWTD Qualified Internal Applicants at 4.08% is less than expected compared to the PWTD Applications Received at 4.12%.
- **Management/Program Analyst (0343):** PWTD Qualified Internal Applicants at 0.30% is less than expected compared to the PWTD Applications Received at 2.14%.
- **General Biological Science (0401):** PWTD Qualified Internal Applicants at 0.60% is less than expected compared to the PWTD Applications Received at 0.72%.

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

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

Table B-9: QUALIFIED APPLICANT POOL for Major Occupations by Disability

EPA utilized Table B9: Promoted for Internal Competitive Promotions for MCO. The qualified applicant pool was used as the Benchmark for the following:

PWD, triggers were identified in the following Major Occupation series:

- **Environmental Protection Specialist (0028):** PWD Promoted at 2.70% is less than expected compared to Qualified Benchmark of 4.56%. This is a Trigger.
- **Misc. Administration and Program Specialist (0301):** PWD Promoted at 0.00% is less than expected compared to Qualified Benchmark of 4.08%. This is a Trigger.
- **Management Analyst (0343):** PWD Promoted at 1.89% is less than expected compared to Qualified Benchmark of 3.02%. This is a Trigger.
- **Biologist (0401):** PWD Promoted at 1.04% is less than expected compared to Qualified Benchmark of 1.51%. This is a Trigger.
- **Environmental Engineer (0819):** PWD Promoted at 0.00% is less than expected compared to Qualified Benchmark of 3.50%. This is a Trigger.
- **Physical Scientist/Environmental Scientist (1301):** PWD Promoted at 0.00% is less than expected compared to Qualified Benchmark of 1.74%. This is a Trigger.

PWTD, triggers were identified in the following Major Occupation series:

- **Misc. Administration and Program Specialist (0301):** PWTD Promoted at 0.00% is less than expected compared to Qualified Benchmark of 4.08%. This is a Trigger.
- **Management Analyst (0343):** PWTD Promoted at 0.00% is less than expected compared to Qualified Benchmark of 0.30%. This is a Trigger.
- **Biologist (0401):** PWTD Promoted at 0.00% is less than expected compared to Qualified Benchmark of 0.60%. This is a Trigger.
- **Environmental Engineer (0819):** PWTD Promoted at 0.00% is less than expected compared to Qualified Benchmark of 2.80%. This is a Trigger.
- **Physical Scientist/Environmental Scientist (1301):** PWTD Promoted at 0.00% is less than expected compared to Qualified Benchmark of 0.58%. This is a Trigger.

## Section IV: 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

1. Describe the agency's plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

EPA informs all employees of advancement opportunities through 1) the Talent Hub website (a centralized experiential learning resource that promotes a range of career development opportunities available across the Agency); 2) job sharing; and 3) fee/non-fee based in-person/ online training. Opportunities are marketed through email to all users, office announcements, intranet postings, and newsletters. Additional opportunities may include fee/non-fee based in person/online training. Employees are encouraged to participate in skill-building trainings and courses related to federal employment such as how to search through USAJOBS, resume writing, and improving interviewing skills are available.

**Technical Assistance Visits:** OCR plans to schedule visits to various program offices and regions in FY20. These visits will serve to educate managers on how they may support opportunities for advancement and retain employees with disabilities, provide information on the Schedule A hiring authority, and stress the importance of timely conversion for those participating in the program.

**Opportunities to Implement Strategies to Mitigate Unconscious Bias:** In FY18, EPA finalized its 2018-2022 Strategy for Mitigating Unconscious Bias (MUB) in the human resources selection process. MUB includes any human resources process or decision made regarding recruitment, hiring, promotion, awards, development, advancement, and retention, including PWD and PWTD. The MUB Strategy aligns with EPA's 2017-2021 Diversity and Inclusion Strategic Plan; Executive Order 13583 – Establishing a Coordinated Government-wide Initiative to Promote Diversity and Inclusion in the Federal Workforce, and the 2016 Report on Reducing the Impact of Bias in the STEM Workforces (released jointly by the OPM and the White House Office of Science & Technology Policy).

The MUB Strategy will help EPA employees: 1) recognize and mitigate potential unconscious bias that may exist in the workplace; 2) raise awareness among EPA leaders, managers, supervisors, and EPA personnel about the presence and impact of unconscious bias; and 3) offer a toolkit of proven strategies to mitigate unconscious bias.

The overarching goals of the EPA's MUB include: 1) reducing unconscious bias in the HR selections process; 2) building unconscious bias awareness and mitigation skills among employees; 3) identifying and measuring the effectiveness of strategies to mitigate unconscious bias to determine the success of the strategy. The scope of this strategy is specifically focused on HR selections.

**Diversity and Inclusion Strategic Plan:** EPA's 2017-2021 Diversity and Inclusion Strategic Plan (DISP) guides the Agency's efforts in creating and maintaining a high-performing workforce that embraces diversity and inclusion and empowers all employees to achieve their full potential. The multi-year plan outlines goals, priorities, specific action items and measures that were developed by senior leadership and the EPA Human Resources community. The DISP received concurrence from EPA's Diversity and Inclusion Advisory Committee (DIAC), a subcommittee of the Human Resources Council. DISP goals are outlined below.

**Goal 1:** Diversify the federal workforce through active engagement of leadership: a) senior leaders will conduct regular informational sessions open to all employees to share information on training and career development opportunities and resources; b) Office Mission Support (OMS) will ensure that all hiring managers receive training on the use of appropriate hiring authorities and flexibilities; c) review of participation in leadership development programs and develop strategies to eliminate any potential barriers to participation will be conducted.

**Goal 2:** Include and engage everyone in the workplace: senior leadership and managers will use Talent Hub to promote and encourage all employees to apply for temporary, full-time detail assignments, part-time projects/special assignments, temporary promotions, SES rotations, and other developmental assignments.

**Goal 3:** Optimize inclusive diversity efforts using data-driven approaches: a) utilize the MD715 reports, applicant flow data, and focus groups to identify actions that can be taken to address any

potential barriers to career development and advancement identified by the Agency; b) senior leaders will use the results of the annual Employee Viewpoint Surveys and other workforce feedback to be responsive to employees' concerns regarding opportunities for employee training, development and advancement.

**Stepping Up to Supervision:** Continue to offer this training to all employees interested in learning about the roles and responsibilities of formal leadership. Each participant receives formal feedback through a multi-rater 360 assessment and is encouraged to build a development plan to help map their learning plans towards their career goals and objectives.

**EPA's Successful Leader's Program:** Mandatory program for newly-promoted or hired supervisors and managers. The program contains information regarding the various hiring authorities (such as Schedule A), the Disability Hiring Tool such as the WRP as a means to broaden recruitment efforts, Computer/Electronic Accommodations Program (CAP), as well as training on the Reasonable Accommodation procedures.

**Miscellaneous:** EPA's Fed Talent system, a learning management system that interfaces with the Agency's HR system of record, allows EPA to track selectees in its training and coaching programs and allow offices to report the type of employee learning opportunities afforded to staff career development.

**B. CAREER DEVELOPMENT OPPORTUNITIES**

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

EPA supports the career development of its employees through the following programs:

- Fellowship Programs
- Mentoring Programs
- Coaching Programs
- Leadership Development Training Programs
- Professional Development Training Programs
- Detail Program

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

EPA does not currently capture data for Career Development Opportunities (CDOs) that require competition and/or supervisory recommendation/approval to participate. This is a National Priority for EPA.

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Fellowship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Mentoring Programs	N/A	N/A	N/A	N/A	N/A	N/A
Coaching Programs	N/A	N/A	N/A	N/A	N/A	N/A
Leadership Development Training Programs	N/A	N/A	N/A	N/A	N/A	N/A

Detail Programs	N/A	N/A	N/A	N/A	N/A	N/A
Professional Development Training Programs	N/A	N/A	N/A	N/A	N/A	N/A

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.

a. Applicants (PWD) Yes 0 No 0 N/A X  
b. Selections (PWD) Yes 0 No 0 N/A X

Data is not available for FY19. EPA will make reasonable efforts to address this in FY20.

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

a. Applicants (PWTD) Yes 0 No 0 N/A X  
b. Selections (PWTD) Yes 0 No 0 N/A X

Data is not available for FY19. EPA will make reasonable efforts to address this in FY20.

**C. AWARDS**

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

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

Comparing Time-off awards of 1-9 hours for PWD/PWTD (Table B13) to Total Workforce for PWD/PWTD (Table B1), there are triggers in the following Awards, Bonuses and Incentives categories:  
**Time-off Awards 1-9 hours:** PWD received awards at 22.54% compared to people without disabilities at 23.32%.

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

a. Pay Increases (PWD) Yes X No 0  
b. Pay Increases (PWTD) Yes X No 0

Comparing Employee Recognition and Awards for PWD/PWTD (Table 13) to Total Workforce for PWD (Table B1), there are triggers in the following Awards, Bonuses and Incentives categories:  
**Qualify Step Increase:** PWD received awards at 2.11% compared to people without disabilities at 2.47%.  
PWTD received awards at 1.60% compared to people without disabilities at 2.46%.

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

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

Comparing Employee Recognition and Awards for PWD/PWTD (Table 13) to Total Workforce for PWOD (Table B1), there are triggers in the following Awards, Bonuses and Incentives categories:

**Cash Awards \$501 +:** PWD received awards at 82.63% compared to people without disabilities at 89.62%.

PWTD received awards at 80.77% compared to people without disabilities at 89.23%.

**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. Applicant flow data for the SES is not currently collect along with GS-13, 14, and 15 data. The Agency will continue to make reasonable efforts to collect this data in the future.

a. SES			
i. Qualified Internal Applicants (PWD)	Yes 0	No 0	N/A X
ii. Internal Selections (PWD)	Yes 0	No 0	N/A X
b. Grade GS-15			
i. Qualified Internal Applicants (PWD)	Yes X	No 0	N/A 0
ii. Internal Selections (PWD)	Yes X	No 0	N/A 0
c. Grade GS-14			
i. Qualified Internal Applicants (PWD)	Yes X	No 0	N/A 0
ii. Internal Selections (PWD)	Yes X	No 0	N/A 0
d. Grade GS-13			
i. Qualified Internal Applicants (PWD)	Yes X	No 0	N/A 0
ii. Internal Selections (PWD)	Yes X	No 0	N/A 0

For FY19, EPA utilized Table B11: Internal Selections for Senior Level (GS-13, 14, 15) Positions by Disability. Applicant flow data for the SES is not currently collect along with GS-13, 14, and 15 data. In FY20, EPA will continue to make reasonable efforts to collect data on the Agency’s Major Occupations.

Using PWD Applications Received when analyzing the applicant flow of internal applicants and/or selections for promotions by grade (Table B11), the following triggers are identified for GS-13 thru GS-15:

- **GS-13:** PWD Qualified Internal Applicants at 2.48% is less than expected compared to the PWD Applications Received at 5.28%.  
PWD Selected Internal Applicants at 2.44% is less than expected compared to the qualified Applicants at 2.48%.
- **GS-14:** PWD Qualified Internal Applicants at 2.64% is less than expected compared to the PWD Applications Received at 3.44%.  
PWD Selected Internal Applicants at 0.68% is less than expected compared to the Qualified Applicants at 2.64%. This indicates a trigger.

- **GS-15:** PWD Qualified Internal Applicants at 2.80% is less than expected compared to the PWD Applications Received at 4.36%. This indicates a trigger.  
PWD Selected Internal Applicants at 0.00% is less than expected compared to the Qualified Applicants at 2.80%. This indicates a trigger.

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.

Applicant flow data for the SES is not currently collect along with GS-13, 14, and 15 data. The Agency will continue to make reasonable efforts to collect this data in the future.

a. SES				
i. Qualified Internal Applicants (PWTD)	Yes	0	No	0
ii. Internal Selections (PWTD)	Yes	0	No	0
b. Grade GS-15				
i. Qualified Internal Applicants (PWTD)	Yes	X	No	0
ii. Internal Selections (PWTD)	Yes	X	No	0
c. Grade GS-14				
i. Qualified Internal Applicants (PWTD)	Yes	X	No	0
ii. Internal Selections (PWTD)	Yes	X	No	0
d. Grade GS-13				
i. Qualified Internal Applicants (PWTD)	Yes	X	No	0
ii. Internal Selections (PWTD)	Yes	X	No	0

EPA used Table B11: Internal Selections for Senior Level Positions, to analyze the applicant flow of internal applicants and/or selections for promotions by grade for PWTD. The senior level analysis includes grades 13-15. The SES is excluded from this analysis because relevant data was not collected for this series in FY19. EPA will make reasonable efforts to collect this data in FY20.

- **GS-13:** PWTD Qualified Internal Applicants at 1.49% is less than expected compared to the PWTD Applications Received at 2.16%. This indicates a trigger.

PWTD Selected Internal Applicants at 1.22% is less than expected compared to the Qualified Applicants at 1.49%. This indicates a trigger.

- **GS-14:** PWTD Qualified Internal Applicants at 1.13% is less than expected compared to the PWTD Applications Received at 1.33%. This indicates a trigger.

PWTD Selected Internal Applicants at 0.00% is less than expected compared to the Qualified Applicants at 1.13%. This indicates a trigger.

- **GS-15:** PWTD Qualified Internal Applicants at 0.51% is less than expected compared to the PWTD Applications Received at 1.01%. This indicates a trigger.

PWTD Selected Internal Applicants at 0.00% is less than expected compared to the Qualified Applicants at 0.51%. This indicates a trigger.

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. (Table B11 and B8)

a. New Hires to SES (PWD)	Yes 0	No 0	N/A X
b. New Hires to GS-15 (PWD)	Yes 0	No 0	N/A X
c. New Hires to GS-14 (PWD)	Yes 0	No 0	N/A X
d. New Hires to GS-13 (PWD)	Yes 0	No 0	N/A X

EPA’S official EEO FY19 workforce tables do not provide information on New Hires of PWD in the senior grades. Thus, analysis for FY19 could not be conducted.

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. (Table B11 and B8)

a. New Hires to SES (PWTD)	Yes 0	No 0	N/A X
b. New Hires to GS-15 (PWTD)	Yes 0	No 0	N/A X
c. New Hires to GS-14 (PWTD)	Yes 0	No 0	N/A X
d. New Hires to GS-13 (PWTD)	Yes 0	No 0	N/A X

EPA’s official EEO FY19 workforce tables do not provide information on New Hires of PWTD in the senior grades. Thus, analysis for FY19 could not be conducted.

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.

a. Executives			
i. Qualified Internal Applicants (PWD)	Yes 0	No 0	N/A X
ii. Internal Selections (PWD)	Yes 0	No 0	N/A X
b. Managers			
i. Qualified Internal Applicants (PWD)	Yes 0	No 0	N/A X
ii. Internal Selections (PWD)	Yes 0	No 0	N/A X
c. Supervisors			
i. Qualified Internal Applicants (PWD)	Yes 0	No 0	N/A X
ii. Internal Selections (PWD)	Yes 0	No 0	N/A X

EPA’s official EEO FY19 workforce data tables do not provide information on PWD internal applicants and/or selectees for promotions to supervisory positions. Thus, analysis for FY19 could not be conducted.

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.

- a. Executives
  - i. Qualified Internal Applicants (PWTD)      Yes 0   No 0   N/A X
  - ii. Internal Selections (PWTD)                Yes 0   No 0   N/A X
- b. Managers
  - i. Qualified Internal Applicants (PWTD)      Yes 0   No 0   N/A X
  - ii. Internal Selections (PWTD)                Yes 0   No 0   N/A X
- c. Supervisors
  - i. Qualified Internal Applicants (PWTD)      Yes 0   No 0   N/A X
  - ii. Internal Selections (PWTD)                Yes 0   No 0   N/A X

EPA's official EEO FY19 workforce data tables do not provide information on PWTD internal applicants and/or selectees for promotions to supervisory positions. Thus, analysis for FY19 could not be conducted.

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.

- a. New Hires for Executives (PWD)                Yes 0   No 0   N/A X
- b. New Hires for Managers (PWD)                Yes 0   No 0   N/A X
- c. New Hires for Supervisors (PWD)              Yes 0   No 0   N/A X

EPA's official EEO FY19 workforce data tables do not provide information on PWD selections of New Hires to supervisory positions. Thus, analysis for FY19 could not be conducted.

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.

- a. New Hires for Executives (PWTD)              Yes 0   No 0   N/A X
- b. New Hires for Managers (PWTD)              Yes 0   No 0   N/A X
- c. New Hires for Supervisors (PWTD)            Yes 0   No 0   N/A X

EPA's official EEO FY19 workforce data tables do not provide information on PWTD selections of New Hires to supervisory positions. Thus, analysis for FY19 could not be conducted.

## **Section V: Plan to Improve Retention of Persons with Disabilities**

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

### **A. VOLUNTARY AND INVOLUNTARY SEPARATIONS**

1. In this reporting period, did the agency convert all 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.

Yes 0                      No X                      N/A 0

In FY19, EPA had four (4) Schedule A employees who were eligible for conversion to the competitive service but have not yet been converted. The office of Civil Rights will investigate why these conversions have not occurred.

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

PWD Voluntary Separations (Table B1 and B14): The PWD inclusion rate for Voluntary Separations is 7.63%. The People Without Disabilities inclusion rate for Voluntary Separations is 6.54%. The PWD inclusion rate is greater than the People Without Disability inclusion rate. This indicates a trigger.

PWD Involuntary Separations (Tables B1 and B14): The PWD inclusion rate for Involuntary Separations is 0.61%. The People Without Disabilities inclusion rate for Involuntary Separations is 0.09%. The PWD inclusion rate is greater than the People Without Disability inclusion rate. This indicates a trigger.

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)   | Yes X | No 0 |
| b. Involuntary Separations (PWTD) | Yes X | No 0 |

PWTD Voluntary Separations (Tables B1 and B14): The PWTD inclusion rate for Voluntary Separations is 7.69%. The People Without Targeted Disabilities inclusion rate for Voluntary Separations is 6.61%. The PWTD inclusion rate is greater than the People Without Targeted Disabilities inclusion rate. This indicates a trigger.

PWTD Involuntary Separations (Tables B1 and B14): The PWTD inclusion rate for Involuntary Separations is 0.64%. The People Without Targeted Disabilities inclusion rate for Involuntary Separations is 0.12%. The PWTD inclusion rate is greater than the People Without Targeted Disabilities inclusion rate. This indicates a trigger.

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.

Data table B14: Separations demonstrate that the majority of PWD/PWTD separations were voluntary. OCR and OHR will make reasonable efforts to collect and review exit interview data in FY20.

## **B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES**

*Pursuant to 29 C.F.R. § 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.

The Accessibility Statement explains employees' and applicants' rights under Section 508 of the Rehabilitation Act. EPA's Accessibility Statement can be found on EPA's website: <https://www.epa.gov/accessibility/epa-accessibility-statement>

EPA follows the same process for Section 508 complaints as for other complaints related to disability discrimination. Details can be found on EPA's website: <https://www.epa.gov/ocr/employment-complaint-resolutions>

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.

EPA's website: <https://www.epa.gov/accessibility> provides a link to the United States Access Board (<https://www.access-board.gov>) which provides information on employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

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.

EPA has revised its Section 508 Policy and Procedures for Compliance to address the Section 508 Refresh. These directives are currently undergoing a final technical review. These revised set of procedures will focus on the acquisition, testing and exceptions processes. EPA anticipates submitting all for Agency-wide review within FY20.

**EPA Compliance Assessment and Remediation Plan:** EPA's Compliance Assessment and Remediation Plan (CARP) aims to help EPA assess and enhance the accessibility of its existing Information and Communication Technology (ICT), develop a baseline from which to measure improvements, and report bi-annually to the Office of Management and Budget (OMB). CARP takes a phased approach with each phase focusing on certain types of ICT. Activities include:

- Conduct an inventory of EPA's ICT and prioritize ICT for assessments.
- Assess the inventoried ICTs' compliance.
- Develop and implement remediation plans to address concerns identified during the assessments.
- Report compliance within EPA and to OMB.

In FY19 the inventory of internal enterprise systems was completed, and system owners began assessing for Section 508 Compliance. In FY20, EPA will complete the inventory of internal non-enterprise systems and applications and begin the assessment of those systems. Also, as part of the CARP effort the EPA Section 508 Program has developed and piloted a formal process for reviewing Accessible Conformance Reports (ACR). This process can be used to assess the level of conformance to Section 508 claimed by the vendors before purchasing.

**EPA Accessibility Forum (Section 508 Training Campaign):** In FY19, the EPA Section 508 conducted 14 live webinars for EPA employees on topics ranging from an introduction to Section 508 to Advanced Accessible PDF Creation. In FY20 the 508 Program plans to expand our training curriculum to include specific role-based trainings. These trainings would be targeted at employees who play specific roles in the acquisition, development, use or maintenance of Information Communications Technology ICT.

### **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.)

In FY19, the Agency processed and concluded 508 of the 516 request (or 98.4%) within the time frames identified in EPA Reasonable Accommodation (RA) Procedures with an average processing time of 20.5 days. The 516 requests are the number of FY19 requests that were completed during FY19 and 107 requests were not concluded in FY19 and carried over into FY20 to be concluded.

The Agency has attained a 90% or greater processing rate for nine consecutive years.

The most requested items or types of accommodations made in FY 2019 were:

1. Telework (episodic, full-time, additional day, etc.) with 237 requests
2. Sit/stand desks with 77 requests
3. Assistive desks equipment as well as ergonomic equipment such as ergonomic keyboards (combined) with 69 requests
4. Modified or flexible work schedule (start/end times) with 52 requests
5. Facilities related requests such as small refrigerators, space heaters, workspace modification, and changes to lighting with 49 requests

The National Reasonable Accommodation Coordinator (NRAC) and Assistant NRAC delivered 20 training sessions to a total of 746 participants including employees and management. The 20 training sessions included Agency-Wide trainings delivered in person and via teleconference meeting software, as well as trainings for Region 9, Region 10, Cincinnati, Office of Enforcement and Compliance Assurance (OECA), Office of Chemical Safety and Pollution Prevention (OCSPP), Office of Land and Emergency Management (OLEM) and Office of General Counsel (OCR).

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.

FY19 was a record year for the Reasonable Accommodation (RA) program as a total of 665 requests were processed, an increase of 44.8% from the previous fiscal year. Of the 665 total requests, 623 were initiated in FY19 and 42 were initiated in FY18. The requests initiated in FY18 were in pending status on September 30, 2018 and were completed in FY19.

The following is a summary and analysis of the FY19 RA request. Of the 623 FY2019 requests:

- 516 requests were initiated, processed, and concluded in FY19
- 457 requests were approved
- 13 requests were denied
- 31 requests were withdrawn by the employer
- 2 requests were denied under reasonable accommodation (RA) but offered some relief outside of the RA process
- 13 requests were closed due to the employees who made the request passing away, retiring, or separating from the Agency before the reasonable accommodation process was concluded

Additionally, of the 623 FY19 request, four (4) were from new employees and one (1) was from an applicant. 107 requests remain in pending status and have been carried over to FY20 to continue processing.

Reasonable Accommodation training for managers and supervisors for FY19 is listed below:  
There were 20 Trainings conducted for 746 people.

EPA has revised its Section 508 Policy and Procedures for Compliance to address the Section 508 Refresh. These directives are currently undergoing a final technical review. These revised set of procedures will focus on the acquisition, testing and exceptions processes. EPA anticipates submitting all for Agency-wide review within FY20.

EPA Compliance Assessment and Remediation Plan: EPA's Compliance Assessment and Remediation Plan (CARP) aims to help EPA assess and enhance the accessibility of its existing Information and Communication Technology (ICT), develop a baseline from which to measure improvements, and report bi-annually to the Office of Management and Budget (OMB). CARP takes a phased approach with each phase focusing on certain types of ICT. Activities include:

- Conduct an inventory of EPA's ICT and prioritize ICT for assessments.
- Assess the inventoried ICTs' compliance.
- Develop and implement remediation plans to address concerns identified during the assessments.
- Report compliance within EPA and to OMB.

In FY19 the inventory of internal enterprise systems was completed, and system owners began assessing for Section 508 Compliance. In FY20, EPA will complete the inventory of internal non-enterprise systems and applications and begin the assessment of those systems. Also, as part of the CARP effort the EPA Section 508 Program has developed and piloted a formal process for reviewing Accessible Conformance Reports (ACR). This process can be used to assess the level of conformance to Section 508 claimed by the vendors before purchasing.

EPA Accessibility Forum (Section 508 Training Campaign): In FY19, the EPA Section 508 conducted 14 live webinars for EPA employees on topics ranging from an introduction to Section 508 to Advanced Accessible PDF Creation. In FY20 the 508 Program plans to expand our training curriculum to include specific role-based trainings. These trainings would be targeted at employees who play specific roles in the acquisition, development, use or maintenance of Information Communications Technology ICT.

Trainer	Date	Audience	Locations Included	Method	Number Attended
NRAC	10/23/2018	Employees	Region 10	In Person	10
NRAC	10/23/2018	Managers / Supervisors	Region 10	In Person	40
NRAC	10/24/2018	Employees	Region 10	In Person	10
NRAC	10/24/2018	Managers / Supervisors	Region 10	In Person	20
NRAC/ANRAC	10/29/2018	Employees	Region 9	VTC	6
NRAC/ANRAC	12/12/2018	Managers / Supervisors	Agency-wide	All forms: VTC, Adobe Connect, In person	80
NRAC/ANRAC	3/13/2019	Employees	Agency-wide	All forms: VTC, Adobe Connect, In person	111
NRAC/ANRAC	3/19/2019	Managers / Supervisors	Agency-wide	All forms: VTC, Adobe Connect, In person	16
NRAC	4/24/2019	Managers / Supervisors	OECA	In Person	10
NRAC/ANRAC	5/7/2019	Managers / Supervisors	OCSP	In Person	9
NRAC/ANRAC	5/8/2019	Managers / Supervisors	OCSP	In Person	14
NRAC/ANRAC	5/15/2019	Employees	Agency-wide	All forms: VTC, Adobe Connect, In person	92
NRAC/Agency Privacy Officer	5/23/2019	Agency Information Security Officers (ISOs)	Agency-wide	All forms: VTC, Adobe Connect, In person	60
NRAC/ANRAC	7/17/2019	Managers / Supervisors	Agency-wide	All forms: VTC, Adobe Connect, In person	76
NRAC	7/31/2019	Employees	Cincinnati	In Person	25
NRAC	7/31/2019	Managers / Supervisors	Cincinnati	In Person	16
NRAC	9/10/2019	Managers / Supervisors	FLAG (First Line Supervisors Advisory Group)	All forms: VTC, Adobe Connect, In person	15
NRAC/ANRAC	9/11/2019	Employees	Agency-wide	All forms: VTC, Adobe Connect, In person	80
NRAC/ANRAC /OCR	9/18/2019	Managers / Supervisors	OLEM	In Person/Skype	21
NRAC	9/24/2019	OGC	OGC	In Person	35
<b>FY19 Total Trainings Sessions: 20</b>					
<b>Total Number of Persons Trained: 746</b>					

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

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

1. Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing

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

FY2019, was the first year that EPA tracked Personal Assistance Services (PAS) requests. There were two (2) PAS requests for travel assistance. The Office of Civil Rights also coordinated a workgroup to develop clear guidelines to assist decision makers and others involved with PAS processing to ensure greater efficiency and efficacy in delivering this service.

**E. 2019 CAP ANNUAL STAKEHOLDERS REPORT AND AGENCY ACCOMMODATIONS PROFILE**

EPA has had a memorandum of understanding (MOU) with the Department of Defense and the Computer/Electronics Accommodation Program (CAP) since September 20, 2001. During FY19, CAP provided 78 reasonable accommodations (assistive technology, training, needs assessments, etc.) to 37 EPA employees. The total costs of the accommodations were \$50,853.07 and were provided free of charge to EPA. CAP has provided 1697 reasonable accommodations to EPA totaling \$1,198,370.04 worth during this 19-year partnership.

**Section VI: 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 government-wide average?

Yes 0                  No X                  N/A 0

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Yes X                  No 0                  N/A 0

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

Agency had to pay \$8000 in nonpecuniary compensatory damages and restore 20 hours of annual leave and 16 hours of sick leave to the Complainant and required 8 hours of training for the Responsible Management Official (RMO).

**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?

Yes 0                  No X                  N/A 0

2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?

Yes X                  No 0                  N/A 0

- 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.

Case #1 – Required 8 hours of training for RMO on responsibilities and obligations under the Rehabilitation Act to provide reasonable accommodation to qualified Agency employees with disabilities, and required to create a uniform and simplified process to request and administer in-person interpretive services.

Case #2 – Agency to pay \$8000 in nonpecuniary compensatory damages and restore 20 hours of annual leave and 16 hours of sick leave to the Complainant and required 8 hours of training for the RMO on her responsibilities and obligations under the Rehabilitation Act to provide reasonable accommodation to qualified Agency employees with disabilities.

## Section VII: 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.*

- Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Yes 0                      No X

Although the Agency has not yet identified the specific barrier(s), EPA has developed a formal **Barrier Analysis Plan on Improving the Use of the Schedule A Appointing Authority**, which was approved by EPA Management, and EPA is working towards identifying and addressing any barriers.

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

Yes 0                      No X                      N/A 0

- 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.

<b>Triggers</b>	<p>There were several triggers identified that led us to look at the hiring of individuals with disabilities and the use of the Schedule A hiring authority in major occupations including:</p> <ol style="list-style-type: none"> <li>1) Less than expected representation of people with disabilities and targeted disabilities in the Agency, particularly in Major Occupations.</li> <li>2) The overall representation of people with targeted disabilities has fallen from 2.6% in FY 2015 falling each of the last four years down to 2.3% for FY 2019.</li> <li>3) Agency data on the use of the Schedule A (Disability) hiring authority gathered through our analysis suggested that it was utilized infrequently. In FY 2019, only 2.2% of positions were filled using the Schedule A Disability hiring authority (22 out of 982 total).</li> <li>4) Data shows that most EPA regions and AAships also did not actively utilize the Schedule A (Disability) hiring authority in FY 2017 or FY 2018.</li> <li>5) Preliminary data suggests that many managers have not heard about Schedule A and its many benefits, and that many senior managers and servicing human resources processing representatives are not actively marketing or promoting the use of the Schedule A (Disability) authority.</li> </ol>
-----------------	---

<p><b>Barriers</b></p>	<p>Preliminary data suggests there are barriers. We will continue investigating and are working to investigate the matter as part of a formal Agency-wide barrier analysis. Here are some of the principle questions that we will work to examine:</p> <ol style="list-style-type: none"> <li>1) Is there a lack of knowledge among managers and hiring officials about the Schedule A program and its benefits?</li> <li>2) Are there any hiring and appointment processes in place that do not support or encourage the use of hiring people with disabilities through Schedule A?</li> <li>3) Are there attitudinal barriers about people with disabilities?</li> <li>4) Is there a consistent message from the Office of Civil Rights, Office of Human Resources, and Shared Service Centers about the Schedule A program?</li> <li>5) Are Senior Leaders, EEO Officers, Human Resource Directors, and Special Emphasis Program Managers in regions adequately knowledgeable and involved into the program as advocates for the program?</li> <li>6) Does the Agency give recognition to regions/AAships that do a good job in this area?</li> <li>7) Does the Agency ensure strong measures are taken that foster the success of Schedule A candidates (e.g. reasonable accommodations already in place and a mentor assigned)?</li> <li>8) Are there technological challenges among potential hiring officials and their respective designees that are inhibiting the use of Schedule A to include areas such as utilizing the Workforce Recruitment Program Website, Handshake application, and other similar technology-driven online processing system utilized by many colleges and university disability program offices for posting jobs and internships?</li> <li>9) Are managers aware of the Agency's hiring priorities and increasing the use of Schedule A?</li> <li>10) Do managers and hiring officials receive training on Schedule A?</li> </ol>
<p><b>Objective(s)</b></p>	<p>To increase the EPA's utilization of the Schedule A appointing authority for individuals with disabilities selected as permanent employees in major occupations.</p>

<p><b>Responsible Official(s): EPA Senior Leaders and EPA Managers</b></p>	
<p><b>David Gray</b>, R6 Deputy Regional Administrator, Executive Champion  <b>Vicki Simons</b>, OCR Director, Process Owner  <b>Michael Butkovich</b>, R7 EEO Officer and OCR Special Assistant, Project Lead  <b>Kevin Bailey</b>, OCR Deputy Director, Coach  <b>Wendy Lubbe</b>, R7 Senior Manager, Team Member  <b>Anthony Napoli</b>, OHR Diversity and Inclusion Manager, Team Member  <b>Alice Martinson</b>, SSC HR Specialist, Team Member  <b>Chris Emanuel</b>, OCR EEO Manager, National Disability Employment Program Manager</p>	
<p><b>Performance Standards Address the Plan? (Yes or No)</b></p>	<p>Yes</p>

<b>Barrier Analysis Process Completed? (Yes or No)</b>		In Progress
<b>Barrier(s) Identified? (Yes or No)</b>		In Progress
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	Low participation rates in overall workforce and in major occupations.
Complaint Data (Trends)	Yes	Considered when identifying triggers to focus on for barrier analysis. No triggers were identified from this area.
Grievance Data (Trends)	Yes	Considered when identifying triggers to focus on for barrier analysis. No triggers were identified.
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	Considered when identifying triggers to focus on for barrier analysis. No triggers were identified.
Climate Assessment Survey (e.g., FEVS)	Yes	No triggers were identified for this area.
Exit Interview Data	No	The Agency Office of Civil Rights does not currently review exit interview data.
Focus Groups	In progress	In progress.
Interviews	In progress	In progress.
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Completed major benchmarking analysis of 13 major EEO programs across government entitled, "Enhancing EPA's Office of Civil Rights: A Benchmarking Analysis of Mid-Sized Federal Agency Civil Rights Programs." Reviewed Schedule A Best Practices. Additional reviews are in progress.
Other (Please Describe)	No	We also solicited best practices from throughout EPA and from other federal agencies.

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
09/30/2019	<b>Step One: Establish Workgroup and Barrier Plan</b> (establish team and develop barrier analysis plan)	YES	07/01/2019	09/30/2019
03/31/2020	<b>Step Two: Identify Triggers and Collect Data</b> (gather workforce data, conduct interviews and review surveys, and conduct benchmarking of other agencies)	YES	07/01/2019	In Progress  Target: March 2020

07/31/2020	<b>Step Three: Investigate Data</b> (review and investigate data and brainstorm triggers and identify possible barriers)	YES	07/01/2019	Target: July 2020
09/30/2020	<b>Step Four: Identify Specific Barriers and Plan to Eliminate</b> (prioritize list and determine specific barriers and focus areas)	YES	07/01/2019	Target: September 2020
03/31/2021	<b>Step Five: Eliminate Barriers</b> (create specific plan to address barrier(s), identify stakeholders, goals, and metrics and implement plan)	YES	07/01/2019	Target: March 2021
09/30/2021	<b>Step Six: Measure Results</b> (review action items as part of A3 plan, report results on MD 715 Report and to Senior Management)	YES	07/01/2019	Target: September 2021
<b>Fiscal Year</b>	<b>Accomplishments</b>			
2019	Established Formal " <b>Barrier Analysis: Use of Schedule A Hiring Authority</b> " which was approved by EPA's management team. This constitutes EPA's first formal barrier analysis plan. The objective of the barrier analysis is to increase EPA's utilization of the Schedule A appointing authority for individuals with disabilities selected as permanent employees in major occupations.			

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

EPA developed a Barrier Analysis Plan in FY 2019 which sets forth a blueprint for identifying and addressing barriers. Last year's planned activity for FY 2019 has been broken into steps and Step One was completed in FY19. The Agency is utilizing an A3 major project tracking tool to chart and carefully monitor progress on next steps, and a Senior Executive Champion has been assigned.

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

A barrier analysis team has been established, lead by two SES-level Executive Champions. A specific plan has been developed and approved by EPA management, and the team is making progress and is on track to meet its goals for FY 2020.

5. 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.

The Agency's Barrier Analysis plan implementation is in progress.