

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

PART A Department or Agency Identifying Information	1. Agency	1. Environmental Protection Agency		
	1.a 2nd level reporting component			
	2. Address	2. 1200 Pennsylvania Avenue, NW		
	3. City, State, Zip Code	3. Washington, DC 20460		
	4. Agency Code 5. FIPS code(s)	4. EP00	5. 6800	

PART B Total Employment	1. Enter total number of permanent full-time and part-time employees	1. 14241
	2. Enter total number of temporary employees	2. 705
	3. TOTAL EMPLOYMENT [add lines B 1 through 2]	4. 14946

PART C	Title Type	Name	Title
Agency Official(s) Responsible For Oversight of EEO Program(s)	Head of Agency	Michael S. Regan	Administrator
	Head of Agency Designee	Janet McCabe	Deputy Administrator
	Principal EEO Director/Official	Kevin J. Bailey	Deputy Director
	Principal EEO Director/Official	JuanCarlos Hunt	Director, Office of Civil Rights
	Affirmative Employment Program Manager	Michael Nieves	Assistant Director, Affirmative Employment, Analysis, & Accountability Staff (AEAA), OCR
	Complaint Processing Program Manager	Cynthia Darden	Assistant Director Employee Complaint Resolution Staff, Title VI
	Diversity & Inclusion Officer	Linda Datcher	Director, Diversity, Outreach & Employee Services Division
	Hispanic Program Manager (SEPM)	Tiffany Houser	EEO Manager/ National Hispanic Employment Program
	Women's Program Manager (SEPM)	Margaret Gérardin	EEO Manager / National Federal Women's Employment Program, Women in Science & Engineering
	Disability Program Manager (SEPM)	Christopher Emanuel	EEO Manager/ National Disability Employment Program
	Special Placement Program Coordinator (Individuals with Disabilities)	Christopher Emanuel	EEO Manager/ National Disability Employment Program
	Reasonable Accommodation Program Manager	Amanda Sweeda	Senior National Reasonable Accommodations Coordinator
	Anti-Harassment Program Manager	Shaundrelle Watson	Program Manager, "Order 4711" Anti-Harassment
	ADR Program Manager	Norwood Dennis	OCR ADR Coordinator
	Principal MD-715 Preparer	Michael Nieves	Assistant Director, Affirmative Employment, Analysis, & Accountability Staff
Other EEO Staff	Kristin Tropp	National Reasonable Accommodations Coordinator	
Other EEO Staff	Renee Clark	EEO Specialist/Team Lead, Title VI	

For period covering October 1, 2020 to September 30, 2021

PART D
List of Subordinate Components Covered in
This Report

Subordinate Component and Location (City/State)	Country	Agency Code
Environmental Protection Agency Washington, DC	United States	EP00
Environmental Protection Agency Washington, DC	United States	EP00
Environmental Protection Agency Washington, DC	United States	EP00
Environmental Protection Agency Washington, DC	United States	EP00
Environmental Protection Agency New York City, NY	United States	EP00
Environmental Protection Agency Washington, DC	United States	EP00
Environmental Protection Agency Washington, DC	United States	EP00
Environmental Protection Agency Denver, CO	United States	EP00
Environmental Protection Agency San Francisco, CA	United States	EP00
Environmental Protection Agency Washington, DC	United States	EP00
Environmental Protection Agency Washington, DC	United States	EP00
Environmental Protection Agency Washington, DC	United States	EP00
Environmental Protection Agency Washington, DC	United States	EP00
Environmental Protection Agency Boston, MA	United States	EP00
Environmental Protection Agency Atlanta, GA	United States	EP00
Environmental Protection Agency Chicago, IL	United States	EP00
Environmental Protection Agency Seattle, WA	United States	EP00
Environmental Protection Agency Washington, DC	United States	EP00
Environmental Protection Agency Washington, DC	United States	EP00
Environmental Protection Agency Philadelphia, PA	United States	EP00
Environmental Protection Agency Dallas, TX	United States	EP00
Environmental Protection Agency Lenexa, KS	United States	EP00

EEOC FORMS and Documents	Required	Uploaded
EEO Policy Statement	Y	Y
Agency Strategic Plan	Y	Y
Anti-Harassment Policy and Procedures	Y	Y
Reasonable Accommodation Procedure	Y	Y
Personal Assistance Services Procedures	Y	Y

For period covering October 1, 2020 to September 30, 2021

EEOC FORMS and Documents	Required	Uploaded	
Alternative Dispute Resolution Procedures	Y	Y	
Organization Chart	Y	Y	
Diversity Policy Statement	N	N	
Federal Equal Opportunity Recruitment Program (FEORP) Report	N	Y	
Disabled Veterans Affirmative Action Program (DVAAP) Report	N	Y	
Human Capital Strategic Plan	N	Y	
EEO Strategic Plan	N	Y	
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	N	N	

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

EXECUTIVE SUMMARY: MISSION

Introduction

This Equal Employment Opportunity (EEO) program report outlines the status of the U.S. Environmental Protection Agency's (EPA or agency) fiscal year 2021 (FY21) Equal Employment Opportunity Program activities, as required by the U.S. Equal Employment Opportunity Commission's (EEOC) Management Directive 715 (MD-715). This report highlights EPA's accomplishments in establishing and maintaining a model EEO program based on the six essential elements outlined by the EEOC:

- Demonstrated Commitment from Agency Leadership
- Integration of EEO into the Agency's Strategic Plan
- Management and Program Accountability
- Proactive Prevention of Unlawful Discrimination
- Efficiency
- Responsiveness and Legal Compliance

EPA reviewed its FY21 program activities against these six essential elements. Where it identified deficiencies, it developed planned activities to address them.

The U.S. Environmental Protection Agency

The mission of the EPA is "to protect human health and the environment." EPA works to deliver a cleaner, safer, and healthier environment by administering and enforcing federal laws. The agency works to achieve its environmental and human health objectives through collaboration with its external partners, such as states, tribal governments, and the regulated community. Fostering and maintaining a diverse, equitable, inclusive, accessible, highly skilled, and engaged workforce consistent with EEO and merit system principles is essential to fulfilling EPA's mission.

The Office of Civil Rights

EPA's Office of Civil Rights (OCR) provides leadership, direction, and guidance in carrying out the agency's EEO program. OCR ensures compliance with federal nondiscrimination employment laws, regulations, and executive orders. EPA's senior leadership has established EEO as one of its top priorities by recognizing that to fulfill the agency's mission it is important to build and support a talented workforce and to promote and ensure a work environment that is diverse, equitable, inclusive, and accessible.

OCR's mission statement is as follows: "To create a model civil rights program that improves the employment experience at EPA." To fulfill this mission, OCR utilizes six guiding principles:

- Outstanding Customer Experience
- Collaboration
- Expertise
- Timeliness
- Innovation
- Accountability

OCR developed these principles as guideposts for it to follow. These principles reflect the commitment of the program to achieve its various objectives.

Finally, OCR has adopted the motto, "All in Against Discrimination," which reflects OCR's message to agency employees, supervisors, and managers that we all must work to promote and advance EEO principles; it is not only the job of OCR to do so.

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

Model EEO Program – Essential Elements

As noted above, EPA reviewed its program activities from FY21 against the six essential elements of a model civil rights program as prescribed by the EEOC. The sections below provide examples of EPA's accomplishments under each of the six elements. Additional information can be found in Part G, the agency's self-assessment towards a model EEO program.

Essential Element A – Demonstrated Commitment from Agency Leadership

In April 2021, shortly upon his confirmation as EPA Administrator, the EPA Administrator issued both the agency's EEO Policy Statement and Anti-Harassment Statement to all agency email users, including all employees, student volunteers, and anyone else who has an EPA email address. The statements reaffirmed the agency leadership's commitment to EEO and to a workplace free of discrimination. EPA posted the statements on its public website.

Prior to submitting last year's MD-715 report, the new OCR Director delivered the agency's annual "State of EEO" briefing to the Administrator and senior leadership. In addition, after submitting the report, the OCR Director held the agency's first-ever "State of EEO" presentation for agency employees. The briefings to employees and leadership presented information on the agency's workforce demographics and progress reports on several national priority efforts that OCR managed. Throughout FY21, OCR leadership also provided progress reports to senior leadership on EEO activities and initiatives.

Additional details and examples of demonstrated commitment from agency leadership to EEO include:

- The Deputy Civil Rights Officials (DCROs) continued to be fully engaged in the agency's EEO efforts. The DCRO role, established through EPA Order 4700 in 2013, created collateral-duty civil rights responsibilities for Senior Executive Service (SES) members within the various programs and regions. DCRO engagement continued in FY21.
- DCROs served as National Executive Champions for EPA's ten Special Emphasis Programs (SEPs) and EPA's MD-715 national priorities: 1) Increased Use of the Schedule A Hiring Authority for Persons with Disabilities (PWD); and 2) Upward Mobility of Hispanics.
- DCROs also engaged agency staff through listening sessions and programs on a variety of issues, which included the following: racism and civility in the workplace; discrimination and harassment targeted at Asians and Pacific Islanders; gender inclusion; increasing the participation rate of employee demographic groups with less than expected participation rates; increasing the use of the Schedule A Hiring Authority to assist in reaching the EEOC's target that 12% of an agency's workforce consist of PWD; and, diversity, equity, inclusion, and accessibility in general.
- Several headquarters (HQ) office senior management teams invited OCR management to present "State of EEO" briefings tailored to their specific organizations. These briefings allowed OCR to provide a granular level assessment of the organization's efforts to address EEO issues and allowed OCR to provide advice on how the organization's leadership could focus their EEO efforts on the agency's national priorities.
- The OCR Director continued to accept invitations to present on EEO issues to region and program office managers and supervisors. The OCR Director also spoke at an SES orientation training session for newly hired executives. The training session focused on the "State of EEO" and profiled several SES leaders actively supporting the agency's EEO activities. The presentation profiles highlighted the SES member, their office, and their national priority project.
- OCR continued to present at the agency's Executive Management Council (EMC) meetings. The EMC is comprised of the most senior EPA career leadership and meets throughout the year on management and policy matters. Among other issues, OCR provided EMC members with briefings and progress updates on EEO and civil rights issues, including: barrier analysis; national priorities; EPA's MD-715 Fiscal Year 2020 Report; expanding EEO personnel in headquarter offices; increasing use of the Schedule A Hiring Authority; addressing discrimination and hate directed at Asians and Pacific Islanders; Executive Order 13988, Combating and Preventing Discrimination on the Basis of Gender Identity and Sexual Orientation; Executive Order 14035 Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce; and, developing an agency metric to assist it in reaching the EEOC's target to have PWD constitute 12% of its workforce.

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

- OCR created the Accessibility Workgroup as the result of feedback received from employees who experienced accessibility challenges when moving to a virtual work environment during the COVID-19 pandemic. The workgroup consisted of subject matter experts on EPA's accessibility obligations, employees whose offices are routinely involved in ensuring that EPA meets these obligations, and employees impacted by accessibility challenges. The workgroup met regularly to discuss, problem-solve, and develop and implement recommendations to improve accessibility for all. The workgroup's efforts led to improved access to information and communication technology (ICT); strengthening EPA's Section 508 Program; development of general accessibility options the agency would provide for national level programs; establishing consistent language in mass mailers regarding accessibility in national programs; and OCR's decision to contract with an outside provider to develop nationwide listening sessions on accessibility issues. OCR established the workgroup *before* the issuance of Executive Order 14035 and the work of this workgroup was instrumental to the subsequent work of the Executive Order 14035 DEIA Implementation Team (IT) Accessibility Workgroup.
- Within EPA, every member of the SES has had a performance standard related to equal employment opportunity and diversity in the workplace for several years. At the end of every performance cycle, between the Performance Review Board and the Executive Resources Board, both of which include the OCR Director as a member, EPA reviews every Senior Executive Service member's self-assessment to verify that the respective rating for the EEO performance standard reflects the accomplishments listed and that the accomplishments align with the performance standard.
- Awarding of the *Suzanne E. Olive Award for Exemplary Leadership in National EEO*. This is the agency's highest award honoring EEO. The award recognizes individuals and/or groups for their significant contributions to EEO, civil rights, and diversity and inclusion. Additionally, individual offices recognized and presented EEO/diversity and inclusion awards at their respective employee awards ceremonies.

Essential Element B – Integration of EEO into the Agency's Strategic Mission

EPA integrates Equal Employment Opportunity into its strategic mission through the support of agency leadership and their engagement in the EEO program. The OCR Director is a member of the agency's senior leadership cadre, and, at senior level meetings, the OCR Director discusses EEO issues, advises senior agency leadership (including the Administrator) on EEO matters, and requests that senior leadership continue to engage in EEO activities.

The agency has prioritized including EEO in its strategic plan. Several Equal Employment Opportunity functions align with Goal 3, Objective 3.5 of EPA's Strategic Plan, 2018-2022: *Improve Efficiency and Effectiveness*. Objective 3.5 states that "EPA will modernize and improve business processes and operations to promote transparency, efficiency, and effectiveness; enhance collaborative, results-driven partnerships with internal and external business partners; recruit, develop, and maintain a highly-skilled, diverse, and engaged workforce."

Additional examples of how the agency has integrated EEO into its strategic mission include the following:

- OCR Director provided "State of EEO" briefings to key audiences including the Administrator, senior leadership, OCR key partners (i.e., the Office of Mission Support (OMS) and the Office of General Counsel), and new Senior Executive Service (SES) leaders. The briefings provided information on the agency's demographics and national priorities efforts.
- OCR included EPA senior leadership and other management in the implementation of the EEO program. OCR continues to seek input from Deputy Civil Rights Officials on high-level policy decisions. DCRO's also continued to support OCR's EEO national priorities efforts, led listening sessions, and supported the SEPs. Consistent with Strategic Goal 3, Objective 3.5, to improve efficiency and effectiveness, OCR also provided training to managers on the EEO complaints process.
- OCR consulted with the agency's EEO Officers (full-time civil rights employees stationed in each of EPA's ten regions) who report directly to their respective DCRO, on several priorities and programmatic improvements. The EEO Officers continually provide advice to OCR management on how to improve the efficiency and effectiveness of agency-wide EEO efforts throughout the EPA's region offices.
- OCR and senior managers in OMS, Office of Human Resources (OHR) routinely met to identify areas of collaboration on EEO and diversity and inclusion efforts, including outreach and recruitment strategies.
- Implementation of EPA's *Diversity and Inclusion Strategic Plan FY17-FY21 (DISP)* has specific goals and objectives aimed at meeting the agency's EEO and diversity and inclusion objectives to foster and maintain a diverse, highly skilled, and engaged workforce. OHR and OCR collaborated to develop an annual workplan and identified specific DISP activities where both offices could work synergistically to improve the workplace environment.

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

- The OCR Director is an ex-officio member of the agency's Diversity and Inclusion Advisory Committee (DIAC). EPA established the DIAC as part of the National Human Resources Council (HRC). The primary role of the DIAC is to provide advice and recommendations to the HRC on the effectiveness of the agency's efforts to expand workplace diversity and inclusion. The OCR Director and OCR staff attended, presented, and participated at the DIAC meetings.
- In August 2021, EPA's Deputy Administrator announced the creation of the agency's DEIA IT. This team is responsible for leading the development of an overarching strategy to implement the tasks of *Executive Order 14035: Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*. The OCR Director and Deputy Director were members of the Tiger Team and are members of the DEIA IT. The OCR Director also serves at the DEIA IT liaison for two of the seven workgroups and the OCR Deputy Director serves as the liaison for another one of the seven workgroups.

Essential Element C – Management and Program Accountability

OCR remained clear in its messaging to EPA's management on their responsibilities to support the agency's EEO program. OCR informed agency leadership and management on EPA's EEO Program activities and offered opportunities to actively participate in activities, which included training sessions, listening sessions, and presentations on workplace demographics.

EPA re-issued policies and procedures related to EEO, anti-harassment, and reasonable accommodations. The agency made EEO information widely available on its internal and external websites. Additionally, the agency posted EEO-related materials throughout EPA headquarters, regions, and labs. OCR regularly provided information about its programs, policies, and practices during new employee orientation. Other ways OCR demonstrated management and program accountability include the following:

- The National SEPM Training Workgroup includes EEO Officers (EEOOs), Program Management Officers (PMOs), OCR and OHR staff, and Special Emphasis Program Managers (SEPMs). SEPMs assist management in promoting EEO, diversity, equity, inclusion, and accessibility in the workplace. The workgroup delivered two 2-hour trainings in FY21 to approximately 350 EEO practitioners, managers, supervisors, and OHR diversity and inclusion staff. "How to Be an Effective SEPM" and "Unconscious Biases/Micro-Aggressions" trainings were delivered via MS Teams.
- OCR launched the *SEPM 100 Initiative* in mid-FY20 with the goal of filling 100% of SEPM vacancies. At the initiative's launch, approximately 30% of the SEPM slots were vacant. By the end of FY20, vacancies had dropped to 20%. By the end of FY21, the vacancy rate dropped to 5.9% and approximately 95% of the SEPM positions stay filled. Due to the SEPMs' two-year collateral-duty revolving cycles, filling vacancies is an ongoing effort.
- In FY21, the Reasonable Accommodation (RA) program processed a total of 316 requests. Of the 316 requests, 28 were requests initiated in FY20. These 28 requests were in pending status on September 30, 2020, carried over into FY21, and completed in FY21. The other 288 requests were new requests that the agency received in FY21. OCR completed 243 of these requests in FY21. Combined with the 28 FY20 requests, EPA processed and completed 271 requests in FY21, and OCR completed all 271 of them (100%) within the timeframes identified in EPA RA Procedures. EPA has attained a 90% or greater processing rate for eleven consecutive years.
- Average processing time for a RA request in FY21 was 17 days.
- In FY21, OCR increased the number of employees and managers trained on RA with a total of 1,345 persons trained compared to 280 persons trained in FY20. The OCR Director issued an agency-wide memo to announce four RA training sessions (two each for employees and managers). Additionally, Region 5, Region 9, Office of Research and Development (ORD), and Office of Chief Financial Officer (OCFO) requested RA training for their managers and/or employees. OCR conducted trainings for six new Local Reasonable Accommodation Coordinators (LORACs) in FY21.
- EPA, the Department of Defense (DOD), and the Computer/Electronics Accommodation Program (CAP) have had a Memorandum of Understanding (MOU) since September 2001. During FY21, CAP provided two Reasonable Accommodations to two EPA employees. The total costs of the accommodations were \$2,000. CAP has provided 1,734 Reasonable Accommodation to EPA totaling \$1,212,535.16 during this 20-year partnership. Please note that as of FY21, CAP is no longer providing non-DOD agencies with assistive technology. However, CAP continues to provide needs assessments and consultations for EPA employees with disabilities, upon request.

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

- The agency's "Hispanic Initiatives" workgroup, which consists of Hispanic Senior Executive Service (SES), OCR/OHR staff, and SEPMS, continued to address issues impacting Hispanic employment throughout FY21. The workgroup successfully hosted the "Hispanic Forum 2021"—two half-day programs that were open to all EPA employees. During the forum, the OCR Director presented a "State of EEO" that focused on the agency's Hispanic employment demographics and the Assistant Director moderated another session. Sessions included a Latina panel discussion on less than expected participation rates and career advancement, Hispanic recruitment and outreach efforts, and a flash mentoring session with forum participants; some of the mentors included the Deputy Administrator, OCR's Director, and several DCROs.
- During FY21, OCR began conducting a barrier analysis on the Upward Mobility of Hispanics in the Federal Workforce that includes trigger analysis of GS-13 to the Senior Executive Service (SES) levels. OCR expects to finalize this barrier analysis and issue its report in FY22.
- EPA continued to focus on building partnerships with professional organizations and minority-serving institutions (MSIs). Through the MSI program, the agency continued to establish strong ties with MSIs as part of its broad-based outreach efforts to raise awareness of EPA's mission and to potentially increase the diversity of the future agency applicant pool.
- The agency continued to implement established Memoranda of Understanding (MOU) with Gallaudet University (GU), Rochester Institute of Technology/National Technical Institute for the Deaf (RIT/NTID) and Texas School for the Deaf (TSD). EPA has entered into several MOUs with institutions of higher education, most of which are MSIs. In FY21, the Northwest Indian College (NWIC), an MSI, signed an MOU with EPA. Through MOUs, EPA continues to collaborate on the advancement of environmental education, increase interest in careers related to protecting human health and the environment, and improve awareness of national employment opportunities and other opportunities for individuals with disabilities. Through the established MOUs with the institutions, students are given notice of publicly available career opportunities at EPA through paid and unpaid internships.
- The increased use of the Schedule A Hiring Authority is a national priority for EPA. EEOC's targets for PWD and Persons with Targeted Disabilities (PWTD) have been communicated to agency management through a combination of briefings and training sessions. OHR and OCR provided five training sessions to approximately 200 managers and employees in FY21. The training sessions focused on two topics, the "Effective Use of the Schedule A Hiring Authority" and "How to Utilize the Workforce Recruitment Program (WRP) Database." Additionally, in FY21, OCR finalized a barrier analysis and issued the Barrier Analysis Report: Increasing the Use of the Schedule A (Disability) Hiring Authority. The agency adopted the findings in FY21, and the agency will implement recommendations from the report in FY22.
- In FY21, OCR conducted a recruitment for new collateral duty Equal Employment Opportunity Counselors. OCR appointed 29 new EEO Counselors during the fiscal year. Each new EEO Counselor received 32 hours of training. Existing EEO Counselors received the required 8-hour refresher training to maintain their certification as an EEO Counselor in accordance with EEOC Management Directive 110.

Essential Element D – Proactive Prevention of Unlawful Discrimination

The annual EEO Policy Statement, released in April 2021, reiterated EPA's unequivocal commitment to a workplace free of discrimination and to the principles of EEO. All EPA employees, including managers and staff, must take responsibility for reporting and addressing discriminatory conduct and preventing all types of discrimination, including workplace harassment.

OCR trained supervisors and managers on the procedures associated with providing accommodations to qualified PWD and PWTD. The National Reasonable Accommodation Coordinators (NRACs) delivered 27 training sessions to 1,345 employees. Four agency-wide training sessions were delivered virtually. Additionally, training sessions were conducted by the following regions and program offices:

- Region 3 (Philadelphia)
- Region 5 (Chicago)
- Region 9 (San Francisco)
- Region 10 (Seattle)
- Office of the Administrator (AO)
- Office of the Chief Financial Officer (OCFO)
- Office of Enforcement and Compliance Assurance (OECA)
- Office of Research and Development (ORD)

OCR, along with the regions and program offices, reviewed the responses to the Federal Employee Viewpoint Survey (FEVS)

EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

to identify and address areas of concern that could impede agency efforts to achieve a model EEO program. Subsequently, agency program offices and regions reviewed and considered the FEVS when developing their respective EEO Action Plans.

During FY21, OCR conducted Technical Assistance Visits (TAVs) with various agency program offices and regions to offer tailored assistance to meet each components' EEO goals and priorities. OCR is committed to providing training and technical assistance to employees to help them understand their organization's role in Equal Employment Opportunity at EPA. OCR conducted TAVs in the following program offices and regions in FY21:

- Office of Compliance Assurance (OECA)
- Office of the Administrator (AO)
- Region 3 (Philadelphia)
- Region 10 (Seattle)

EEO subject matter experts addressed several areas during the TAVs. These training sessions included:

- How to Identify and Prevent Harassment and Retaliation
- Reasonable Accommodation Basics for Employees and Supervisors/Managers
- Management Directive 715 Basics for Employees and Supervisors/Managers

Essential Element E – Efficiency

EPA continued to focus on efficiently resolving deficiencies identified under compliance indicator E.1: maintaining an efficient, fair, and impartial complaint resolution process. Specifically, E.1.h addresses the timely issuance of Final Agency Decisions (FADs).

EPA ended the fiscal year with a 98% timeliness completion rate for EEO investigations. The agency continued to utilize EPA's Lean Management System (ELMS) methodology to track investigations and identify and alleviate potential barriers to the timely completion of investigations.

In FY21, OCR evaluated its Standard Operating Procedures related to contractor performance and products. A review and consultation was conducted with the investigative contractor, United States Postal Service (USPS), on its Statement of Work. OCR conducted a quality assurance meeting with USPS. The meeting resulted in adjustments to procedures to promote efficiency and mitigate potential delays with the goal of continuous improvement in completing investigations thoroughly within the regulatory time frame requirement.

During FY21, the agency reduced the time it took to issue final agency actions (without a hearing) from 204 days in FY20 to 92 days in FY21, a 45% reduction. This significant improvement in processing time is attributed to OCR streamlining the processing of these actions. OCR also hired a second attorney-advisor in the second half of FY 2021, who was able to assist in drafting some of these actions. Finally, OCR also used a contractor to draft some of these actions. OCR expects that processes it has put in place will result in a further reduction in processing time in FY 2022.

OCR exceeded EEOC's target for using Alternative Dispute Resolution (ADR) to resolve complaints in FY21. The ADR targeted participation rate is 50% in the pre-complaint stage. The Employee Complaints Resolution Staff (ECRS) made 52 offers for ADR in 64 informal EEO complaints. There were 27 acceptances, which is a 52% participation rate. Agency managers are required to participate in agency-approved ADR efforts to resolve EEO complaints, absent extraordinary circumstances, as determined by the OCR Director. With increased awareness about ADR, resource allocation, and the support of senior leadership, OCR expects to continue to improve ADR usage rates during the informal stage of the complaint process.

OCR and OHR management teams held regular meetings to discuss and collaborate on intersecting projects focused on EEO and diversity and inclusion efforts. OCR attended, presented, and participated in the OHR DIAC meetings.

Essential Element F – Responsiveness and Legal Compliance

EPA remained focused on compliance with EEOC regulations, policies, and directives. Further, OCR remained committed to creating efficiencies that maintain and/or improve its timeliness rate for investigations.

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

EPA timely complies with orders from EEOC Administrative Judges. Timely compliance with court orders is a factor in the performance standard of OCR's Assistant Director for Employment Complaints Resolution Staff (ECRS). Additionally, EPA has established systems to ensure that the agency timely initiates relief, including monetary relief.

In FY21, OCR conducted thorough reviews of our complaint database, internal tracking logs, and EEOC's Federal Sector EEO Portal (FedSEP). OCR will continue to conduct similar audits annually to ensure all contact information is accurate and the agency is timely notified of all orders and decisions.

Of the 46 EEO complaint investigations in FY20, EPA completed 42 timely. The average time to complete unamended complaint investigations was 154 days, which was below the EEOC regulatory target. The average time to complete amended complaint investigations was 241 days, which was below the EEOC regulatory target.

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

EXECUTIVE SUMMARY: WORKFORCE ANALYSES

Workforce Analysis

NOTE: Due to table/graphic uploading limitations in FEDSEP, EPA was not able to insert its complete Part E in this section. Part E.3 Workforce Analysis (with tables) has been added as a Supplemental Document for FY2021.

Part F – Certification of Establishment of Continuing Equal Employment Opportunity (EEO) Programs

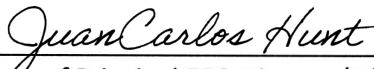
Certification of Establishment of Continuing Equal Employment Opportunity (EEO) Programs

I, JuanCarlos M. Hunt, Director of the Office of Civil Rights, am the Principal EEO Director/Official for the U.S. Environmental Protection Agency.

The agency has completed its annual self-assessment of its programs relative to Section 717 of the Civil Rights Act of 1964 and Section 501 of the Rehabilitation Act of 1973 against the essential elements, as prescribed by the Management Directive 715 (MD-715). Where an essential element was not fully compliant with MD-715 standards, the agency conducted a subsequent evaluation. As appropriate, the agency has included its plans for attaining the essential elements of a model Equal Employment Opportunity (EEO) program with this Federal Agency Annual EEO Program Status Report.

The agency has also analyzed its workforce profiles and will conduct barrier analyses aimed at detecting whether any management or personnel policy, procedure, or practice is operating to disadvantage any group based on race, national origin, gender, or disability. The agency has included EEO Plans to eliminate identified barriers, as appropriate, with this federal agency annual EEO Program Status Report.

I certify that the agency has proper documentation of this assessment in place, which it maintains for U.S. Equal Employment Opportunity Commission (EEOC) review upon request.



Signature of Principal EEO Director/Official
Certifies that this Federal Agency Annual EEO Program
Status Report is in compliance with EEOC MD-715

May 18, 2022

Date



Signature of Agency Head or Agency Head Designee

MAY 13 2022



Date

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist



Essential Element: A Demonstrated Commitment From agency Leadership

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	A.1. The agency issues an effective, up-to-date EEO policy statement.				
	A.1.a. Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "Yes", please provide the annual issuance date in the comments column. [see MD-715, II(A)]	X			Issued: April 14, 2021 https://www.epa.gov/ocr/eoo-policy-statement-2021-4/14/2021
	A.1.b. Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)] If the EEO policy statement covers any additional bases (e.g., marital status, veteran status and political affiliation), please list them in the comments column.	X			

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	A.2. The agency has communicated EEO policies and procedures to all employees.				
A.2.a. Does the agency disseminate the following policies and procedures to all employees:					
A.2.a.1. Anti-harassment policy? [see MD 715, II(A)]		X			
A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]		X			
A.2.b. Does the agency prominently post the following information throughout the workplace and on its public website:					
A.2.b.1. The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]		X			
A.2.b.2. Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 CFR §1614.102(b)(5)]		X			
A.2.b.3. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.		X			https://www.epa.gov/ocr/reasonable-accommodation#re
A.2.c. Does the agency inform its employees about the following topics:					
A.2.c.1. EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If "yes", please provide how often and the means by which such training is delivered.		X			Annually. The agency distributes EEO and Anti-Harassment Policy Statements to all employees, which addresses the EEO complaint process. The agency also provides the EEO complaint process on its internet and intranet pages and discusses it at agency EEO trainings. Example: https://www.epa.gov/ocr/employment-complaint-resolutions

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist

<p>A.2.c.2. ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.</p>	<p>X</p>		<p>Annually. The agency distributes the EEO policy to all employees, which addresses ADR. The agency also addresses ADR on its intranet and internet pages and discusses ADR in EEO trainings. Example: https://www.epa.gov/ocr/employment-complaint-resolutions##alterr</p>
<p>A.2.c.3. Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.</p>	<p>X</p>		<p>The agency offers training on the reasonable accommodation program several times throughout the year. The agency also provides reasonable accommodation information on its intranet and internet pages. Example: https://www.epa.gov/ocr/reasonable-accommodation</p>
<p>A.2.c.4. Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.</p>	<p>X</p>		<p>EPA annually distributes its Anti-Harassment policy to employees and provides the policy/ procedures on the web: https://www.epa.gov/ocr/anti-harassment-policy-statement-2021 and https://www.epa.gov/sites/production/files/2016-01/documents/epa_order_4711_w_LER_office provides an all-day training for Supervisors/ Managers specifically addressing harassment.</p>

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist

A.2.c.5. Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR §2635.101(b)] If "yes", please provide how often.



X

In addition to the policies and trainings referenced in A.2.c.4, EPA requires that new employees take Ethics Training within 90 days of hire. This training addresses inappropriate behavior in the workplace that could result in disciplinary action. The agency also provides detailed information on conduct and disciplinary actions in EPA Order 3120.1, available on EPA's intranet. See Appendix.

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	A.3. The agency assesses and ensures EEO principles are part of its culture.				
	A.3.a. Does the agency provide recognition to employees, supervisors, managers and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a)(9)] If "yes", provide one or two examples in the comments section. .	X			EPA recognizes demonstrated EEO leadership and accomplishments in various ways including the following: distinguished award - Susan E. Olive National Award for Exemplary Leadership in Equal Employment Opportunity; superior award - monetary and time off awards; and employee, supervisor, manager, unit EEO accomplishments are announced during meetings/ programs.
	A.3.b. Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	X			

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021



Agency Self-Assessment Checklist

Essential Element: B Integration of EEO into the agency's Strategic Mission

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	B.1. The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.				
	B.1.a. Is the agency head the immediate supervisor of the person ("EEO Director") who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]	X			EEO Director reports to agency head and has access to agency head at any time. However, for much of fiscal year, EEO Director met monthly with Deputy Chief of Staff (COS) and/or COS, and Deputy COS held EEO Director's mid-year review. After new EEO Director expressed concerns, EEO Director now meets with Deputy Administrator monthly and she conducted his performance appraisal.
	B.1.a.1. If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If "yes," please provide the title of the agency head designee in the comments.			X	The EEO Director reports to the agency head and has access to the Administrator at any time. For day to day operations, the EEO Director meets regularly with the Deputy Administrator and has scheduled monthly briefings with her.
	B.1.a.2. Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	X			https://www.epa.gov/aboutepa/epa-organization-chart
	B.1.b. Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]	X			



Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist

<p>B.1.c. During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comments column.</p>	X			<p>"State of EEO" presentations: - 4/8/21 two for senior leadership - 4/15/21 "for agency head - 5/6/21 to Senior Executive Service, Senior Level, and Scientific & Professional People of Color. "State of EEO at EPA" presentation: - 6/30/21 open to all EPA employees (a first for EPA).</p>
--	---	--	--	--

<p>B.1.d. Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]</p>	X			
--	---	--	--	--

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	<p>B.2. The EEO Director controls all aspects of the EEO program.</p>				

<p>B.2.a. Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)] If not, identify the office with this authority in the comments column.</p>	X			
---	---	--	--	--

<p>B.2.b. Is the EEO Director responsible for overseeing the completion of EEO counseling? [see 29 CFR §1614.102(c)(4)]</p>	X			
---	---	--	--	--

<p>B.2.c. Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]</p>	X			
--	---	--	--	--

<p>B.2.d. Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]</p>	X			
--	---	--	--	--

<p>B.2.e. Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]</p>	X			
---	---	--	--	--



<p>B.2.f. Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]</p>	X			
---	---	--	--	--

<p>B.2.g. If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2); (c)(3)]</p>	X			
--	---	--	--	--

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021


Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	B.3. The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.				
	B.3.a. Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]	X			
	B.3.b. Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.	X			EPA's Strategic Plan does not reference EEO/DEIA. EEO office, OHR, and agency leadership have advocated for such references in FY22 Strategic Plan. OCR's Strategic Plan was modeled after the 6 essential elements of a model civil rights program and FY22 Strategic Plan will also. The 2017-2021 Diversity & Inclusion Plan contains EEO goals. EPA is working on a DEIA Strategic Plan due in March 2022.

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021





Agency Self-Assessment Checklist

 Compliance Indicator	Measures	Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
	B.4. The agency has sufficient budget and staffing to support the success of its EEO program.				
	B.4.a. Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:				
	B.4.a.1. to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	X			
	B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]	X			
	B.4.a.11. to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	X			
	B.4.a.2. to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	X			
	B.4.a.3. to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR §§ 1614.102(c)(5); 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	X			
	B.4.a.4. to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.	X			
	B.4.a.5. to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]	X			
	B.4.a.6. to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	X			
	B.4.a.7. to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)] If not, please identify the systems with insufficient funding in the comments section.	X			
	B.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]	X			
	B.4.a.9. to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I; EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C. 1]	X			
	B.4.b. Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	X			
	B.4.c. Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	X			
	B.4.d. Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II) (A) of MD-110?	X			
	B.4.e. Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	X			

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	B.5. The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills				
	B.5.a. Pursuant to 29 CFR §1614.102(a)(5), have all managers and supervisors received orientation, training, and advice on their responsibilities under the following areas under the agency EEO program:				
	B.5.a.1. EEO complaint process? [see MD-715(II)(B)]	X			
	B.5.a.2. Reasonable Accommodation Procedures? [see 29 CFR § 1614.102(d)(3)]	X			
	B.5.a.3. Anti-harassment policy? [see MD-715(II)(B)]	X			
	B.5.a.4. Supervisory, managerial, communication and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	X			
	B.5.a.5. ADR, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	X			
 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	B.6. The agency involves managers in the implementation of its EEO program.				
	B.6.a. Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	X			
	B.6.b. Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	X			
	B.6.c. When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	X			
	B.6.d. Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR §1614.102(a)(5)]	X			

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021



Agency Self-Assessment Checklist

Essential Element: C Management and Program Accountability

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	C.1. The agency conducts regular internal audits of its component and field offices.				
	C.1.a. Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	X			Agency components are required to complete Parts G and H of the MD-715 annual report. The Office of Civil Rights (OCR) conducts periodic Technical Assistance Visits (TAVs) to program and regional offices to evaluate their EEO programs. OCR completed four TAVs in FY21, two in program offices and two in regional offices and intends to increase that by 50% in FY22.
	C.1.b. Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	X			EPA engages all program/regional offices during the annual self-assessment to identify potential triggers in the workplace. Through an FY21 barrier analysis, EPA found that the limited use of Schedule A Hiring Authority for people with disabilities was a barrier. Implementation of the report recommendations has begun. EPA is finalizing a barrier analysis focused on Hispanic upward mobility.

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist



C.1.c. Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]

X

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	C.2. The agency has established procedures to prevent all forms of EEO discrimination.				
	C.2.a. Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	X			
	C.2.a.1. Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	X			
	C.2.a.2. Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	X			
	C.2.a.3. Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	X			
	C.2.a.4. Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [See Enforcement Guidance, V.C.]	X			
	C.2.a.5. Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see Complainant v. Dep't of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Dep't of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.	X			
	C.2.a.6. Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR §1614.203(d)(2)]	X			
	C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR §1614.203(d)(3)]	X			
	C.2.b.1. Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR §1614.203(d)(3)(D)]	X			
	C.2.b.2. Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	X			
	C.2.b.3. Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR §1614.203(d)(1)(ii)(B)]	X			
	C.2.b.4. Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR §1614.203(d)(3)(i)(M)]	X			
	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.	X			
	C.2.c. Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR §1614.203(d)(6)]	X			

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist

C.2.c.1. Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR §1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column.



X

[https://www.epa.gov/ocr/reasonable-accommodation-procedures-and-form-reasonable-accommodation-requests PAS reference guide:](https://www.epa.gov/ocr/reasonable-accommodation-procedures-and-form-reasonable-accommodation-requests-PAS-reference-guide)
https://www.epa.gov/sites/production/files/2020-09/documents/pas_reference_guide

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021



Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	C.3. The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.				
	C.3.a. Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	X			
	C.3.b. Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:				
	C.3.b.1. Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]	X			
	C.3.b.2. Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	X			
	C.3.b.3. Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	X			
	C.3.b.4. Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	X			
	C.3.b.5. Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	X			
	C.3.b.6. Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]	X			
	C.3.b.7. Support the EEO program in identifying and removing barriers to equal opportunity?. [see MD-715, II(C)]	X			
	C.3.b.8. Support the anti-harassment program in investigating and correcting harassing conduct?. [see Enforcement Guidance, V.C.2]	X			
	C.3.b.9. Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	X			
	C.3.c. Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	X			
	C.3.d. When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	X			

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021



Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	C.4. The agency ensures effective coordination between its EEO program and Human Resources (HR) program.				
	C.4.a. Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	X			This year, the new EEO Director and HR Director agreed to establish monthly meetings and the two meet monthly.
	C.4.b. Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]	X			
	C.4.c. Does the EEO office have timely access to accurate and complete data (e.g., demographic data for the workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]		X		See H-2.
	C.4.d. Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	X			
	C.4.e. Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:				
	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	X			
	C.4.e.2. Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	X			
	C.4.e.3. Develop and/or provide training for managers and employees? [see MD-715, II(C)]	X			
	C.4.e.4. Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	X			
	C.4.e.5. Assist in preparing the MD-715 report? [see MD-715, II(C)]	X			

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021



Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	C.5. Following a finding of discrimination, the agency explores whether it should take a disciplinary action.				
	C.5.a. Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR §1614.102(a)(6); see also Douglas v. Veterans Administration, 5 MSPR 280 (1981)]	X			
	C.5.b. When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If "yes", please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	X			No managers or employees were found to have engaged in discriminatory conduct; therefore, no managers or employees were disciplined/sanctioned during FY21 for discriminatory conduct.
	C.5.c. If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct (e.g., post mortem to discuss lessons learned)? [see MD-715, II(C)]	X			Information is provided to the appropriate agency management.

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist



 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	C.6. The EEO office advises managers/supervisors on EEO matters.				
	C.6.a. Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If "yes", please identify the frequency of the EEO updates in the comments column.	X			OCR provided updates during management meetings, including the DAA/DRA every 6 weeks and the EMC twice a year. OCR held monthly meetings with regional EEO Officers and Program Management Officials. OCR presented "State of EEO" to several groups including one for all employees. OCR provided updates during other meetings, TAVs, and trainings. OCR posted No Fear Act, 462, and MD-715 reports online.
	C.6.b. Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [see MD-715 Instructions, Sec. I]	X			

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist





Essential Element: D Proactive Prevention

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	D.1. The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.				
D.1.a. Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]		X			
D.1.b. Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; and/or external special interest groups? [see MD-715 Instructions, Sec. I]		X			
D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]		X			

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021



Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	D.2. The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)				
	D.2.a. Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	X			
	D.2.b. Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	X			
	D.2.c. Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	X			
	D.2.d. Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, and/or external special interest groups? [see MD-715 Instructions, Sec. I]] If "yes", please identify the data sources in the comments column.	X			The agency uses a number of sources to identify potential barriers, such as Federal Employee Viewpoint Survey (FEVS), EPA Form 462, discrimination complaint data, reasonable accommodation (RA) program data, TAVs, Special Emphasis Programs, advisory councils, affinity groups, and program evaluations.
 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures	D.3. The agency establishes appropriate action plans to remove identified barriers.	Yes	No	N/A	
	D.3.a. Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	X			
	D.3.b. If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	X			
	D.3.c. Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	X			

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist



 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	D.4. The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.				
	D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.	X			https://www.epa.gov/ocr/affirmative-action-plan-fy-2020 For information on the Architectural Barriers Act (ABA), see: https://www.epa.gov/ocr/affirmative-employment-analysis-and-accountability#arcl
	D.4.b. Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR §1614.203(d)(1)(i)]	X			
	D.4.c. Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR §1614.203(d)(1)(ii)(A)]	X			
	D.4.d. Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR §1614.203(d)(7)(ii)]	X			

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist



Essential Element: E Efficiency

 Compliance Indicator	 Measures	Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
	E.1. The agency maintains an efficient, fair, and impartial complaint resolution process.				
E.1.a. Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?		X			
E.1.b. Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?		X			
E.1.c. Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?		X			
E.1.d. Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments.		X			Acceptance/dismissal letters are issued an average 56 days after receipt of the written EEO Counselor report.
E.1.e. Does the agency ensure that all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?		X			
E.1.f. Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?		X			
E.1.g. If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?		X			
E.1.h. When the complainant did not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?			X		See Part H-1. However, timeframes are trending downward due to the practices identified in H-1.
E.1.i. Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?		X			
E.1.j. If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comments column.		X			If EPA receives a work product of poor quality, EPA returns it to the contractor to address noted deficiencies. EPA also meets with contract representatives quarterly.
E.1.k. If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]		X			
E.1.l. Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]		X			

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	E.2. The agency has a neutral EEO process.				
E.2.a. Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)] If "yes", please explain.		X			The EEO compliant program is in OCR. The defensive function of the agency is within the General Law Office (GLO) in the Office of General Counsel (OGC).
E.2.b. When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If "yes", please identify the source/ location of the attorney who conducts the legal sufficiency review in the comments column.		X			OCR had two attorneys in its office during the reporting period. In addition, the Civil Rights and Finance Law Office (CRFLO), in the Office of General Counsel, conducts legal sufficiency reviews. CRFLO is separate from the agency representative, which is the General Law Office (GLO) in the Office of the General Counsel. CRFLO and GLO do not report to the same Associate General Counsel.

Environmental Protection Agency



For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist

E.2.c. If the EEO office relies on the agency's defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]			X	The EEO office uses its own attorneys and works in conjunction with OGC's Civil Rights & Finance Law Office. OGC's General Law Office performs the defensive functions. There is a firewall between them with a different Associate General Counsel (AGC) and Deputy AGC. Also, the EEO office Director, who is an attorney, conducts the final LSR.
--	--	--	---	--

E.2.d. Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]	X			
---	---	--	--	--

E.2.e. If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004)]	X			
--	---	--	--	--

 Compliance Indicator	E.3. The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	

E.3.a. Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	X			
---	---	--	--	--

E.3.b. Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	X			
--	---	--	--	--

E.3.c. Does the Agency encourage all employees to use ADR, where ADR is appropriate? [See MD-110, Ch. 3(IV)(C)]	X			
---	---	--	--	--

E.3.d. Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	X			
---	---	--	--	--



E.3.e. Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	X			
---	---	--	--	--

E.3.f. Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	X			
---	---	--	--	--

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021



Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	E.4. The agency has effective and accurate data collection systems in place to evaluate its EEO program.				
E.4.a. Does the agency have systems in place to accurately collect, monitor, and analyze the following data:					
E.4.a.1. Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]		X			
E.4.a.2. The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]		X			
E.4.a.3. Recruitment activities? [see MD-715, II(E)]		X			
E.4.a.4. External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]		X			
E.4.a.5. The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(4)]		X			
E.4.a.6. The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]		X			
E.4.b. Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]		X			

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	E.5. The agency identifies and disseminates significant trends and best practices in its EEO program.				
E.5.a. Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If "yes", provide an example in the comments.		X			OCR's ECRS reviewed 462 data, Reasonable Accommodations (RA) reviewed RA data, and AEAA reviewed MD-715 employee data for trends. OCR reviewed AAship/region/EPA trend analysis and shared data during TAVs and trainings. FY21 EEO complaint trends: 29% alleged harassment; 64% alleged retaliation. Also, noting drop in SEPMS, OCR began the SEPMS 100 initiative, which increased SEPMS from 70% to 95%.

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist

E.5.b. Does the agency review other agencies' best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If "yes", provide an example in the comments.

X

A Department of Commerce barrier analysis helped EPA finalize its first national barrier analysis report. Region 9 also used it as part of a barrier analysis project. Also, OCR reviewed the work of three agencies in drafting an SOP for reassignment to supplement RA procedures. OCR Director also attended EEOC Quarterly meetings where agencies presented best practices that have guided EPA.

E.5.c. Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]





X

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist



Essential Element: F Responsiveness and Legal Compliance

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	F.1. The agency has processes in place to ensure timely and full compliance with EEOC orders and settlement agreements.				
	F.1.a. Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	X			
	F.1.b. Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	X			
	F.1.c. Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	X			
	F.1.d. Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	X			
	F.1.e. When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX) (H)]	X			
 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	F.2.a. Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	X			
	F.2.a.1. When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]	X			
	F.2.a.2. When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]	X			
	F.2.a.3. When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 CFR §1614.403(e)]	X			
	F.2.a.4. Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	X			

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			
 Measures		Yes	No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
	F.3. The agency reports to EEOC its program efforts and accomplishments.				
	F.3.a. Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	X			
	F.3.b. Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	X			

Essential Element: Other

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Plan to Attain Essential Elements

PART H.1

Brief Description of Program Deficiency:	C.4.c. Does the EEO office have timely access to accurate and complete data (e.g., demographic data for the workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]
--	---

H-2: Part G Compliance Indicator C.4.c (Part G: Q, 86): Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? The current human resources (HR) data management systems used by EPA do not capture all the data required to prepare the MD-715 workforce data tables.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
09/30/2020	09/30/2023			Identify and address data deficiencies in the current human resources data management systems.

Responsible Officials

Title	Name	Standards Address the Plan?
Director, Office of Mission Support (OMS)	Lynnanne Hitchens	No
Director, Office of Civil Rights (OCR)	JuanCarlos Hunt	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
10/20/2020	OCR staff to join the Department of the Interior Business Center (IBC) workgroup, which addresses HR data management issues.	Yes		10/20/2020
04/30/2022	OCR coordinates with the Equal Employment Opportunity Commission (EEOC) and the Office of Mission Support (OMS), Office of Human Resources (OHR) to identify data gaps in HR data management systems that EPA needs to complete for the annual MD-715 report.	Yes		
09/30/2023	OCR and OHR coordinate with IBC, Monster Government Solutions, and EEOC to ensure that the HR data management systems used by the agency are collecting the required MD-715 data.	Yes		

Accomplishments

Fiscal Year	Accomplishment
2020	OCR has initiated discussions with the Department of the Interior to coordinate OCR joining the IBC workgroup.

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Plan to Attain Essential Elements

PART H.2

Brief Description of Program Deficiency:	E.1.h. When the complainant did not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?
--	---

H-1: Part G Compliance Indicator E.1.h (Part G: Q. 119) - When the complainant does not request a hearing, does the Agency timely issue the Final Agency Decision (FAD), pursuant to 29 CFR §1614.110(b)? Some FADs were not timely issued in FY21.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
03/01/2011	09/30/2022			To ensure EPA completes timely and legally sufficient FADs.

Responsible Officials

Title	Name	Standards Address the Plan?
Director, Office of Civil Rights	JuanCarlos Hunt	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2022	OCR will continue to look for opportunities to improve the timeliness of issuing FADs and will continue to reduce FAD processing times while ensuring FADs remain legally sufficient.	Yes		

Accomplishments

Fiscal Year	Accomplishment
2021	OCR continues to strive to reduce the processing time for issuing FADs. OCR continues to use EPA Lean Management System (ELMS) tools to evaluate and streamline the FAD issuance process which include the use of templates and processing milestones. In FY21, OCR hired an additional Attorney-Adviser to draft FADs. OCR conducted a thorough audit of FADs issued this fiscal year to identify areas where we can be more efficient. OCR also utilized the FAD writing services offered by the current EEO contractor to assist with drafting FADs. Further, OCR sent its two Attorney-Advisers, who work on FADs, to EEOC's FAD Writing Training course. At the same time, the new OCR Director also imposed new standards on the content and structure of the FADs. When it was all said and done, OCR reduced processing times by 23% in FY21. OCR anticipates a further reduction in processing times in FY22 and intends to hold all OCR staff that work on FADs, including the Director, accountable for decreasing FAD processing times. OCR intends to do so by including specific performance measurements to the standards for the Attorney-Advisers, Deputy Assistant Director, Assistant Director, and Deputy Director responsible for issuing FADs, in addition to maintaining a specific performance measurement for the Director.

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Plan to Eliminate Identified Barriers

PART I1

Source of the Trigger:	Workforce Data (if so identify the table)				
Specific Workforce Data Table:	Workforce Data Table - A1				
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	ANALYSIS II: A review of the FY20 workforce data (Table A4-1) indicates lower than expected participation rates for Hispanic/Latino employees (Males and Females) in certain categories in the senior grades (GS-13 through SES levels). This barrier analysis is a national priority based on a memorandum issued by EEOC and OPM on Hispanic employment. https://www.eeoc.gov/federal-sector/management-directive/memorandum-heads-executive-departments-and-agencies .				
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> Hispanic or Latino Males Hispanic or Latino Females				
Barrier Analysis Process Completed?:	N				
Barrier(s) Identified?:	N				
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<table border="1"> <thead> <tr> <th>Barrier Name</th> <th>Description of Policy, Procedure, or Practice</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> </tr> </tbody> </table>	Barrier Name	Description of Policy, Procedure, or Practice		
Barrier Name	Description of Policy, Procedure, or Practice				

Objective(s) and Dates for EEO Plan

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
03/01/2019	09/30/2021	Yes	06/30/2022		Conduct analysis of Agency policies, practices, or procedures that may create potential barriers to the upward mobility of Hispanic/Latino employees from GS-13 through SES.

Responsible Official(s)

Title	Name	Standards Address The Plan?
Director, Office of Human Resources (OHR)	Mara Kamen	No
Director, Office of Civil Rights (OCR)	JuanCarlos Hunt	Yes

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Plan to Eliminate Identified Barriers

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2020	Identify an Executive Champion who will participate in an intra-agency committee focusing on the issue of Hispanic/Latino upward mobility.	Yes		04/11/2019
09/30/2021	Conduct internal employee survey with employees at EPA to solicit input on their experiences with hiring and career development opportunities. Survey results will allow for analysis of responses from Hispanic employees.	Yes	03/31/2021	
09/30/2020	Review FEVS data, complaints data, and Upward Mobility Survey results to identify potential barriers to upward mobility.	Yes	09/30/2021	
06/30/2022	Complete Barrier Analysis report and present findings to agency senior management.	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments
2020	<ul style="list-style-type: none"> The Office of Civil Rights created an Upward Mobility Survey to issue to all Agency employees in FY21.
2019	<ul style="list-style-type: none"> A National Executive Champion was identified to provide guidance on the Agency's efforts to review the upward mobility of Hispanics from the GS-13 to GS-15 levels into the Senior Executive Service. Subject Matter Experts were identified from the Office of Human Resources, Hispanic Special Emphasis Program, and the Office of General Counsel to provide advice and guidance on the upward mobility analysis. The Office of Civil Rights began analysis of workforce data from fiscal years 2017, 2018, and 2019 to conduct trend analysis on the upward mobility of Hispanics in the GS-13 to SES levels and in the Major Occupations that can lead to SES.
2021	<ul style="list-style-type: none"> Conducted agency-wide survey on upward mobility as part of data collection for barrier analysis. Review FEVS data, EEO complaints data, and Upward Mobility Survey data to identify potential barriers to upward mobility.

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Plan to Eliminate Identified Barriers

PART I.2

Source of the Trigger:	Workforce Data (if so identify the table)				
Specific Workforce Data Table:	Workforce Data Table - A4				
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	ANALYSIS I: A review of the FY21 workforce data (GS-12 through SES) indicates lower than expected participation rates in certain categories based on race and sex.				
STATEMENT OF BARRIER GROUPS:	<p><i>Barrier Group</i></p> <p>White Males White Females Black or African American Males Black or African American Females Asian Males Asian Females Native Hawaiian or Other Pacific Islander Males Native Hawaiian or Other Pacific Islander Females American Indian or Alaska Native Males American Indian or Alaska Native Females Two or More Races Males Two or more Races Females</p>				
Barrier Analysis Process Completed?:	N				
Barrier(s) Identified?:	N				
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	Barrier Name	Description of Policy, Procedure, or Practice			
Objective(s) and Dates for EEO Plan					
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
06/11/2021	09/30/0023	Yes			Under an expanded national priority, conduct analysis of agency policies, practices, or procedures that may create potential barriers to the upward mobility of affected EEO groups from GS-12 to SES.

Environmental Protection Agency

For period covering October 1, 2020 to September 30, 2021

Plan to Eliminate Identified Barriers

Responsible Official(s)

Title	Name	Standards Address The Plan?
Director, Office of Civil Rights (OCR)	JuanCarlos Hunt	Yes
Director, Office of Human Resources (OHR)	Mara Kamen	No

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2020	As part of a national priority focused on upward mobility GS-15 to SES, complete review of FY17 to FY19 EPA SES demographics.	Yes		03/10/2020
04/30/2020	As part of a national priority focused on upward mobility GS-15 to SES, initiate discussion with OMS Shared Service Center to examine availability of Applicant Flow Data on SES.	Yes		06/24/2020
11/30/2020	As part of a national priority focused on upward mobility GS-15 to SES, complete review of FY20 EPA SES total workforce population demographics.	Yes		12/02/2020
01/31/2022	As part of an expanded national priority focused on upward mobility GS-12 to SES, collect and analyze FY19, FY20, FY21 (sex/race) workforce data.	Yes		
01/31/2022	As part of an expanded national priority focused on upward mobility GS-12 to SES, collect FY19, FY20, FY21 SES Applicant Flow Data. This data is managed by OHR's Executive Resources Staff.	Yes		
06/30/2022	As part of an expanded national priority focused on upward mobility GS-12 to SES, review FEVS, EEO complaints, and additional data sources (e.g., survey data) to identify potential barriers to upward mobility.	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments
2020	Accomplishments associated with the original national priority focused on upward mobility GS-15 to SES: <ul style="list-style-type: none"> • FY17 to FY19 EPA SES Demographics Trend Analysis. • Initiated discussion with OMS Shared Service Center to examine availability of Applicant Flow Data on SES.
2021	Accomplishments associated with the expanded national priority focused on upward mobility GS-12 to SES: <ul style="list-style-type: none"> • Launched an expanded national priority focused on upward mobility (sex/race) from GS-12 to SES. • Identified Executive Champion and Equal Employment Opportunity Officers (EEOOs) to lead the expanded effort. • Invited region and program offices to join the expanded national priority effort and conduct barrier analysis for their respective organizations.

MD-715 – Part J
Special Program 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 | Yes |

Table B-4 Participation Rates for General Schedule Grades - Permanent PWD in GS-11 to SES cluster of the permanent workforce participate at 9.18% or 1,206 PWD employees out of 13,123 Total Workforce, which is lower than the 12% benchmark goal.

*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 | No |

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

The Office of Civil Rights (OCR) has communicated the EEOC's 12% PWD and 2% PWTD hiring goals to hiring officials and agency managers, supervisors, and leadership at meetings and presentations. The agency also completed a national barrier analysis that identified the limited use of the Schedule A Hiring Authority as a barrier to hire PWD. Engagement on the hiring goals has happened at all management levels including EPA senior leadership. OCR also is implementing a measure for regions and AA-ships to increase the percentage of PWD and requiring regions and AA-ships to identify how each intends to do so in FY22, which resulted in OCR further communicating the numeric goals during the end of the FY21. Additionally, the increased use of the Schedule A Hiring Authority is a national priority for EPA. Hiring goals have been communicated to agency management through a combination of briefings and training sessions. OHR and OCR provided five training sessions to approximately 200 managers and employees in FY21. The training sessions focused on two topics, the “Effective Use of the Schedule A Hiring Authority” and “How to Utilize the Workforce Recruitment Program (WRP) Database.”

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.

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	
Section 508 Compliance	3	0	58	David Segovia, Libraries and Accessibility Division Director, OMS segovia.david@epa.gov Sarah Sorathia, Assistant Section 508 Program Manager, OMS sorathia.sarah@epa.gov This includes 58 collateral duty 508 Liaisons Agency-wide: program offices (39) and (19).
Architectural Barriers Act Compliance	1	0	1	Yvette Jackson, Director Office of Admission Support, OMS Jackson.yvette@epa.gov
Special Emphasis Program for PWD and PWTDD	2	0	32	Tiffany Houser, National Disability Employment Program Manager, OCR houser.tiffany@epa.gov Anthony Napoli, Diversity and Inclusion Manager, DRESO, OHR napoli.anthony@epa.gov
Answering questions from the public about hiring authorities that take disability into account	13	0	12	Anthony Napoli, Diversity and Inclusion Manager, DRESO, OHR napoli.anthony@epa.gov Tiffany Houser, EEO Manager, National Disability Employment Program Manager, OCR houser.tiffany@epa.gov There are also 12 Program Management Officers (PMOs), one for each program office at headquarters, who perform this function as a collateral duty.
Processing reasonable accommodation requests from applicants and employees	2	0	27	Amanda Sweda, Senior National Reasonable Accommodation Coordinator, OCR sweda.amanda@epa.gov Kristin Tropp, National Reasonable Accommodation Coordinator, OCR tropp.kristin@epa.gov
Processing applications from PWD and PWTDD	30	0	0	Jerome Bonner, Director, Cincinnati Shared Service Center, Office of Mission Support OMS bonner.jerome@epa.gov The 30 full time employees include staff within the Shared Service Centers who are responsible for processing applications.

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.

In FY21, 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 EEOC-facilitated Federal Exchange on Employment and Disability (FEED) calls. Training topics included: • EEO and Preventing Discrimination in the Workplace • SEPM training (three presentations): How to Use the Workforce Recruitment Program (WRP) database, State of Disability Hiring at the EPA, and the Computer/Electronic Accommodation Program (CAP) • Section 508 training on assistive technologies • Effective Use of Schedule A Hiring Authority and How to Utilize the Workforce Recruitment Program Database training (5 training sessions)

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: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

In FY21, 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: • Office of Personnel Management’s web page identifying the Bender Consulting firm’s list of Schedule A applicants • OPM’s Shared List of People with Disabilities page via MAX.gov • Veteran Employment Programs (e.g., Operations Warfighter, Wounded Warrior, Safe Harbor) • Workforce Recruitment Program • USAJOBS Agency Talent Portal • Special Emphasis Program Managers (SEPMs) and Disability Employment Advisory Council • National and Local Disability Employment Program Managers • Virtual Careers and Disability Job Fairs • Pathways-Presidential Management Fellows (PMF) Program • Pathways-Interns/Recent Graduates • Office of Environmental Information, Section 508 – Assistive Technology Program • Disability Employment Program Advisory Council Monthly Meetings • Memorandum of Understanding (MOU) Partnerships • Internal/External Outreach Programs/Activities

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 including: • 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) • 30 Percent or More Disabled Veterans • Pathways Programs

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 and the 30% or More Disabled Veteran Authority using the following processes: Schedule A Hiring EPA's Shared Service Center Human Resource Management Division announced the development and upcoming rollout of our own EPA Schedule A Repository. The Schedule A Repository will host resumes and writing samples from Schedule A Disability-eligible candidates and the agency will share it with Regions and Offices to streamline and increase our hiring managers' use of the Schedule A hiring authority. This new repository is on track to debut in calendar year in 2022 and the agency will be providing additional information on how to submit and access Schedule A Repository application materials.

- 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 seeking to be hired through Schedule A for minimum qualifications / selective factors to determine eligibility for noncompetitive, Schedule A appointments.
- An eligible 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, a state agency, or an agency of the District of Columbia or a U.S. territory issuing or provides disability benefits.
- An agency may make permanent or time-limited appointments, where an applicant supplies proof of disability, and the agency determines that the individual is likely to succeed in the performance of the duties of the position for which he or she is applying. In determining whether the individual is likely to succeed in performing the duties of the position, the agency may rely upon the applicant's employment, educational, or other relevant experience, including but not limited to service under another type of appointment in the competitive or excepted services.
- Individuals who apply and are certified for a Merit Promotion (MP) External announcement (i.e., open government-wide) are referred to the hiring official through the EZHire/Monster platform. Certificates of qualified individuals are reviewed electronically.
- Candidates are appointed following SSC onboarding procedures. After a tentative offer is extended, the selectee is processed through Personnel Security for background investigations (if applicable) and suitability determinations. Once Personnel Security has approved the candidate for employment, the SSC establishes a start date, issues a firm offer letter, and provides new hire documentation for the candidate to complete before onboarding. Veterans Hiring Eligibility is determined based on the guidelines provided in OPM's Vet Guide for HR Professionals. Candidates are referred on the appropriate certificate of eligibles after their veteran authority eligibility is determined, and their qualifications are verified. Individuals who apply and are certified for Delegated Examining (DE) announcement (i.e., open to the public) and are found to have veterans' preference are referred to the hiring official through the EZHire/Monster platform if they are in the highest quality category. Individuals who apply and are certified for a Merit Promotion (MP) External announcement (i.e., open government-wide) are referred to the hiring official through the EZHire/Monster platform. The certificate they are referred on is determined by their veteran authority eligibility (e.g., Compensable Disability Preference (CPS) eligible veterans are referred on the CPS-30% disabled certificate, while Veterans Recruitment Appointment (VRA) eligible individuals are referred on the VRA certificate). Certificates of qualified individuals are reviewed electronically. Hiring managers may receive applications for non-competitive appointments, meaning the applicant is eligible for a hiring authority that does not require public notice (i.e., an announcement on USAJobs) and provide those selections to the SSC for review. In this case, the hiring manager is providing the application to the SSC who then determines eligibility and qualifications.
- Disabled veterans with disability ratings of 30% or more may be considered under 30% or More Disabled Veteran Authority (5

CFR § 315.707)). Once eligibility for the 30% or More Disabled Veteran Authority is determined, the HR specialist notifies the hiring manager following applicable regulations for further consideration. SSC and HR specialists, along with Selective Placement Program Coordinators (SPPC), work closely with each hiring manager to ensure all pre-and post-appointment procedures are carried out and 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. 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. 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. Before the entry-on-duty, a manager discusses and verifies the need for any accommodation with the selected individual. • Veterans Recruitment Appointment (VRA) Authority (5 CFR Part 307) is a special hiring authority allowing for the appointment of eligible veterans into excepted service positions at any grade level through GS-11 or equivalent, without competition. Candidates must meet basic qualification requirements to be accepted into the excepted service. To be converted to competitive service, the candidate must complete two years of significant, continuous service in a position under VRA and receive a satisfactory job performance rating.

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

In FY21, the agency hosted several agency-wide training sessions for various EPA region and program offices. The increased use of the Schedule A Hiring Authority is a national priority for EPA. Hiring goals have been communicated to agency management through a combination of briefings and training sessions. OHR and OCR provided five training sessions to approximately 200 managers and employees in FY21. The training sessions focused on two topics, the “Effective Use of the Schedule A Hiring Authority” and “How to Utilize the Workforce Recruitment Program (WRP) Database.” The training sessions were conducted virtually and recorded because of the Covid-19 pandemic. The videos are currently available on the agency intranet site and on Microsoft Teams video system for all EPA employees to view. In addition, EPA regions and program offices conducted their own Disability Employment Awareness, Reasonable Accommodation, and Schedule A Hiring Authority training sessions.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

- The agency continued to implement established Memoranda of Understanding (MOU) with Gallaudet University (GU), Rochester Institute of Technology/National Technical Institute for the Deaf (RIT/NTID), and Texas School for the Deaf (TSD).
- EPA and Northwest Indian College (NWIC) signed an MOU in FY21. NWIC is a minority serving institution (MSI). The MOU focuses on collaboration to increase interest in careers related to protecting human health and the environment and awareness about publicly available recruitment and environmental education opportunities.
- In FY21, EPA HQ and EPA Region 4 were in ongoing discussions to identify an organization to initiate another MOU.
- Through the 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. Through the established MOUs with the institutions, students are given notice of publicly available career opportunities at EPA, through paid and unpaid internships. In FY21, the agency conducted virtual mock interviews with GU students.
- OMS encourages the use of the Workforce Recruitment Program (WRP) and the Agency Talent Portal (ATP) and shares information on the WRP and the ATP with the region and program offices.
- In FY21, Louis Orslene, Director of the Employer and Workplace Policy Team, Office of Disability Employment Policy, U.S. Department of Labor was the keynote speaker for EPA’s People with Disabilities Observance event to share the priorities of the Federal Government for people with disabilities.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

- | | | |
|---|--------|----|
| a. New Hires for Permanent Workforce (PWD) | Answer | No |
| b. New Hires for Permanent Workforce (PWTD) | Answer | No |

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

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

Table B-7 Monster: Application and Hires for Major Occupations by Disability. PWD triggers were identified in the following Major Occupation series: • General Biological Science (0401): Selection at 6.90% is less than expected compared to the qualified applicant pool rate of 9.68%. • Environmental Engineer (0819): Selection at 4.00% is less than expected compared to the qualified applicant pool rate of 10.13%. • Environmental Engineer (1301): Selection at 6.67% is less than expected compared to the qualified applicant pool rate of 9.89%. • Attorney Advisor (0905): Selection at 0.00 % is less than expected compared to the qualified applicant pool rate of 13.20%. PWTD triggers were identified in the following Major Occupation series: • General Biological Science (0401): Selection at 1.72% is less than expected compared to the qualified applicant pool rate of 5.03%. • Environmental Engineer (0819): Selection at 4.00% is less than expected compared to the qualified applicant pool rate of 5.19%. • Physical/Environmental Scientist (1301): Selection at 2.67% is less than expected compared to the qualified applicant pool rate of 5.79%. • Attorney Advisor (0905): Selection at 0.00 % is less than expected compared to the qualified applicant pool rate of 6.16%.

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

- a. Qualified Applicants for MCO (PWD) Answer Yes
- b. Qualified Applicants for MCO (PWTD) Answer Yes

Table B-9 Monster – Selections for Internal Competitive Promotions for Major Occupations by Disability. EPA utilized Table B9: Qualified Internal Applicants for MCO. The total applications received were used as the benchmark for the following. PWD triggers were identified in the following Major Occupation series: • Environmental Protection Specialist (0028): PWD Qualified Internal Applicants at 2.11% is less than expected compared to the PWD Applications Received at 3.90%. • Management/Program Analyst (0343): PWD Qualified Internal Applicants at 3.06% is less than expected compared to PWD Applications Received at 4.57%. • General Biological Science (0401): PWD Qualified Internal Applicants at 2.55% is less than expected compared to the PWTD Applications Received at 4.35%. • Environmental Engineer (0819): PWD Qualified Internal Applicants at 5.26% is less than expected compared to the PWD Applications Received at 6.98%. • Physical Scientist/Environmental Scientist (1301): PWD Qualified Internal Applicants at 2.33% is less than expected compared to the PWD Applications Received at 2.94%. PWTD triggers were identified in the following Major Occupation series: • Environmental Protection Specialist (0028): PWTD Qualified Internal Applicants at 1.41% is less than expected compared to the PWTD Applications Received at 2.84%. • Management/Program Analyst (0343): PWTD Qualified Internal Applicants at 0.51% is less than expected compared to PWTD Applications Received at 1.62%. • General Biological Science (0401): PWTD Qualified Internal Applicants at 0.51% is less than expected compared to the PWTD Applications Received at 1.52%. • Environmental Engineer (0819): PWTD Qualified Internal Applicants at 1.32% is less than expected compared to the PWD Applications Received at 2.33%.

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

- a. Promotions for MCO (PWD) Answer Yes
- b. Promotions for MCO (PWTD) Answer Yes

Table B-9 Monster– Selections for Internal Competitive Promotions for Major Occupations by Disability: EPA utilized Table B9: Selections 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: • Misc. Administration and Program Specialist (0301): PWD Promoted at 0.00% is less than expected compared to Qualified Benchmark of 3.90%. This is a trigger. • Biologist/Life Scientist (0401): PWD Promoted at 2.55% is less than expected compared to Qualified Benchmark of 0.00%. This is a trigger. • Environmental Engineer (0819): PWD Promoted at 5.26% is less than expected compared to the PWD Applications Received at 2.33%. PWTD, triggers were identified in the following Major Occupation series: • Environmental Protection Specialist (0028): PWTD Promoted at 0.00% is less than expected compared to Qualified Benchmark of 1.41%. This is a trigger. • Management Analyst (0343): PWTD Promoted at 0.00% is less than expected compared to Qualified Benchmark of 0.51%. This is a trigger. Environmental Engineer (0819): PWTD Promoted at 0.00% is less than expected compared to the PWD Applications Received at 1.32%.

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

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

Increased communication. EPA informs all employees of advancement opportunities through 1) the Talent Hub website (a centralized experiential learning resource promoting a range of career development opportunities available across the agency); 2) broadcasting open vacancy announcements; 3) fee/non-fee based in-person/online training. Opportunities are marketed through email to all users, office announcements, intranet postings, and newsletters. Employees are encouraged to participate in skill-building trainings and courses related to federal employment, such as how to search USAJOBS, resume writing, and improving interviewing skills. Technical Assistance Visits: OCR conducted visits to two regions and two program offices in FY21. These visits served, in part, to educate managers on how to support opportunities for advancement and retention of employees with disabilities, provide information on the Schedule A hiring authority, and stress the importance of timely conversion for those participating in the program. Diversity and Inclusion Strategic Plan: EPA's 2017-2021 Diversity and Inclusion Strategic Plan (DISP) guides the agency's efforts in sustaining EPA as a leader in creating and maintaining a high-performing workforce embracing diversity and inclusion and empowers all employees to achieve their full potential to advance the agency's mission. The multi-year plan outlines goals, priorities, specific action items, and measures 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 conducted regular informational sessions open to all employees to share information on training and career development opportunities and resources; b) OMS ensured all hiring managers received training on the use of appropriate hiring authorities and flexibilities. • Goal 2: Include and engage all agency employees: senior leadership and managers used 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) utilized the MD-715 reports, applicant flow data, and focus groups to identify actions taken to address any potential barriers to career development and advancement identified by the agency; b) senior leaders used the results of the annual Employee Viewpoint Surveys and other workforce feedback to respond to employee concerns regarding opportunities for employee training, development, and advancement. The DISP expired at the end of FY21, and the agency is in the process of drafting a new DISP. OCR has proposed the new DISP specifically address the agency's lower than expected participation rate for persons with disabilities. This concern will be addressed in the new DISP per Executive Order (EO) 14035 Diversity, Equity, Inclusion, and Accessibility (DEIA) in the Federal Workforce. EPA's Successful Leaders Program: Mandatory year-long program for newly promoted or hired supervisors and managers. The program contains information regarding the various hiring authorities (such as Schedule A) to reach a wide range of candidates training on the Disability Hiring Tool such as the WRP, CAP, as well as training on how to manage Reasonable Accommodation requests. The agency restructured the course to be entirely virtual, effective FY2022. Miscellaneous: The agency launched FedTalent in FY18 and continues to use this learning management system interfacing with the agency's HR system of record (FPPS). The interface allows EPA to track selectees in its training and coaching programs and allows offices to provide information on the robust learning opportunities afforded on career development within the FedTalent course library.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

Employee career development is available through a variety of programs. Training is designed to promote professional and personal development. Entry Level: Mindful EPA; EPA Coaching; New Hire Onboarding; Talent Hub & Skills Marketplace Details; Leaders & Learners Mentoring Program. Mid-Career: Individual Development Plan Support; LEGIS-Capital Hill Fellowship; President's Management Council Rotational Program; Stepping-up to Supervision; Treasury Executive Institute; Talent Development Programs. Supervisors/Managers & Senior Level: Skillsoft Leader Development Program; Successful Leaders Program; Strategic Start; Coaching (TEI); OPM & EPA's SES Orientation; Executive Rotations for SES. - FedTalent/Skillsoft: 15,084 courses - Skillsoft books/videos: 30,000 - Mandatory Training -Support for Individual/Executive Development Plans

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 (#)
Mentoring Programs	N/A	N/A	N/A	N/A	N/A	N/A
Training 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
Fellowship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Other Career Development Programs	N/A	N/A	N/A	N/A	N/A	N/A
Internship 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

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

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

EPA does not currently capture data for Career Development Opportunities (CDOs) that require competition and/or supervisory recommendation/approval to participate. OCR is coordinating with OHR to develop a process that will collect applicant flow data from training program applicants.

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

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

EPA does not currently capture data for Career Development Opportunities (CDOs) that require competition and/or supervisory recommendation/approval to participate. OCR continues to coordinate with OHR to develop a process that will collect applicant flow data from training program applicants.

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 Yes
- b. Awards, Bonuses, & Incentives (PWTD) Answer Yes

Comparing Time-off Awards of 1-9 hours for PWD/PWTD (Table B-13) to Total Workforce for PWD/PWTD (Table B1), there are triggers in the following Awards, Bonuses, and Incentives categories. PWD Time-off Awards 1-9 hours: PWD received awards at 25.5%, which is less than expected compared to people without disabilities at 26.8%. This is a trigger. PWTD Time-off Awards 1-9 hours: PWTD received awards at 11.9%, which is less than expected compared to people without disabilities at 27.0%. This is a trigger. PWTD Time-off Awards 9+ hours: PWTD received awards at 17.6%, which is less than expected compared to people without disabilities at 28.6%. This is a trigger. Comparing Cash Awards \$100 -\$500 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 \$100 - \$500: • PWTD received awards at 15.3%, which is less than expected compared to people without disabilities at 23.2%. This is a trigger. Cash Awards \$501+: • PWD received awards at 87.6%, which is less than expected compared to people without disabilities at 95.1%. This is a trigger. Cash Awards \$501+: • PWTD received awards at 54.5%, which is less than expected compared to people without disabilities at 95.4%. This is a trigger. Senior Executive Service Performance Awards: • PWTD received awards at 0.0%, which is less than expected compared to people without disabilities at 100.0%. This is a trigger.

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 Yes
- b. Pay Increases (PWTD) Answer Yes

Comparing Employee Recognition and Awards for PWD/PWTD (Table B-13 Employee Recognition Awards) to Total Workforce for PWOD (Table B1 - Total Workforce - Permanent), there are triggers in the following Awards, Bonuses, and Incentives categories: PWD Qualify Step Increase (QSI): PWD received awards at 1.9%, which is less than expected compared to people without disabilities at 2.6%. This is a trigger. PWTD Qualify Step Increase (QSI): PWTD received awards at 1.1%, which is less than expected compared to people without disabilities at 2.5%. This is a trigger.

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 Yes
- b. Other Types of Recognition (PWTD) Answer Yes

The Other Awards category is broad-based and includes a variety of awards (see list below). PWD Other Awards: PWD received awards at 3.6%, which is less than expected compared to people without disabilities at 4.7%. This is a trigger. • Other Awards for PWD consist of (code-award): 815/ Recruitment Incentive 841/ Group Cash Award CH 45 847/ Group Time Off Award 889/ Group Award - Other PWTD Other Awards: PWTD received awards at 3.7%, which is less than expected compared to people without disabilities at 4.5%. This is a trigger. • Other Awards for PWTD consist of (code-award): 815/ Recruitment Incentive 841/ Group Cash Award CH 45 847/ Group Time Off Award 889/ Group Award – Other

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 N/A
 - ii. Internal Selections (PWD) Answer N/A
- b. Grade GS-15
 - i. Qualified Internal Applicants (PWD) Answer Yes

ii. Internal Selections (PWD)	Answer	No
c. Grade GS-14		
i. Qualified Internal Applicants (PWD)	Answer	Yes
ii. Internal Selections (PWD)	Answer	Yes
d. Grade GS-13		
i. Qualified Internal Applicants (PWD)	Answer	Yes
ii. Internal Selections (PWD)	Answer	Yes

SES PWD promotion data is not available. OCR continues to coordinate with OMS to create a process to collect the required data. For FY21, EPA utilized Monster Table B11 – Internal Selections for Senior Level Positions. Using the 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. PWD GS-13: • Qualified Internal Applicants at 3.02% is less than expected compared to the PWD Applicants Received at 5.66%. This is a trigger. • PWD Selected Internal Applications at 1.69% is less than expected compared to the Qualified Applications at 3.02%. This is a trigger. GS-14: • Qualified Internal Applicants at 2.68% is less than expected compared to the PWD Applicants Received at 3.64%. This is a trigger. • PWD Selected Internal Applications at 2.01% is less than expected compared to the Qualified Applications at 2.68%. This is a trigger. GS-15: • Qualified Internal Applicants at 3.02% is less than expected compared to the PWD Applicants Received at 4.23%. This is a trigger.

2. Does your agency have a trigger involving PWTB 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 (PWTB)	Answer	N/A
ii. Internal Selections (PWTB)	Answer	N/A
b. Grade GS-15		
i. Qualified Internal Applicants (PWTB)	Answer	Yes
ii. Internal Selections (PWTB)	Answer	No
c. Grade GS-14		
i. Qualified Internal Applicants (PWTB)	Answer	Yes
ii. Internal Selections (PWTB)	Answer	No
d. Grade GS-13		
i. Qualified Internal Applicants (PWTB)	Answer	Yes
ii. Internal Selections (PWTB)	Answer	Yes

SES PWTB promotion data is not available. OCR continues to coordinate with OMS to create a process to collect the required data. For FY21, EPA utilized Monster Table B11 – Internal Selections for Senior Level Positions. Using the PWTB 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. PWTB GS-13: • Qualified Internal Applicants at 0.34% is less than expected compared to the PWTB Applicants Received at 1.77%. This is a trigger. • PWTB Selected Internal Applications at 0.00% is less than expected compared to the Qualified Applications at 0.34%. This is a trigger. GS-14: • Qualified Internal Applicants at 0.70% is less than expected compared to the PWTB Applicants Received at 1.56%. This is a trigger. GS-15: • Qualified Internal Applicants at 1.37% is less than expected compared to the PWTB Applicants Received at 1.84%. This is 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. 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 N/A
- b. New Hires to GS-15 (PWD) Answer N/A
- c. New Hires to GS-14 (PWD) Answer N/A
- d. New Hires to GS-13 (PWD) Answer N/A

EPA's workforce tables do not provide information on New Hires of PWD in the senior grades of GS-13, 14, 15 and SES. OCR continues to coordinate with OMS to create a process to collect the required data.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB 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 (PWTB) Answer N/A
- b. New Hires to GS-15 (PWTB) Answer N/A
- c. New Hires to GS-14 (PWTB) Answer N/A
- d. New Hires to GS-13 (PWTB) Answer N/A

EPA's workforce tables do not provide information on New Hires of PWTB in the senior grades of GS-13, 14, 15 and SES. OCR continues to coordinate with OMS to create a process to collect the required data.

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

- a. Executives
 - i. Qualified Internal Applicants (PWD) Answer N/A
 - ii. Internal Selections (PWD) Answer N/A
- b. Managers
 - i. Qualified Internal Applicants (PWD) Answer N/A
 - ii. Internal Selections (PWD) Answer N/A
- c. Supervisors
 - i. Qualified Internal Applicants (PWD) Answer N/A
 - ii. Internal Selections (PWD) Answer N/A

EPA's workforce tables do not provide promotion data on PWD for executives, managers, and supervisors. OCR continues to coordinate with OMS to create a process to collect the required data.

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 N/A
 - ii. Internal Selections (PWTB) Answer N/A
- b. Managers
 - i. Qualified Internal Applicants (PWTB) Answer N/A
 - ii. Internal Selections (PWTB) Answer N/A
- c. Supervisors
 - i. Qualified Internal Applicants (PWTB) Answer N/A
 - ii. Internal Selections (PWTB) Answer N/A

EPA's workforce tables do not provide promotion data on PWTB for executives, managers, and supervisors. OCR continues to coordinate with OMS to create a process to collect the required data.

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

- a. New Hires for Executives (PWD) Answer N/A
- b. New Hires for Managers (PWD) Answer N/A
- c. New Hires for Supervisors (PWD) Answer N/A

EPA’s workforce tables do not provide information on New Hires of PWD for executives, managers, and supervisors. OCR continues to coordinate with OMS to create a process to collect the required data.

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

- a. New Hires for Executives (PWTD) Answer N/A
- b. New Hires for Managers (PWTD) Answer N/A
- c. New Hires for Supervisors (PWTD) Answer N/A

EPA’s workforce tables do not provide information on New Hires of PWTD for executives, managers, and supervisors OCR continues to coordinate with OMS to create a process to collect the required data.

Section V: 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 CFR § 213.3102(u)(6)(i))? If “no”, please explain why the agency did not convert all eligible Schedule A employees.

Answer Yes

In FY21, EPA converted all twenty-five (25) of its eligible Schedule A-Disability employees into the competitive service.

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 Yes
- b. Involuntary Separations (PWD) Answer Yes

PWD Voluntary Separations (Table B1 and B14): • The PWD inclusion rate for Voluntary Separations is 6.6%. • The People Without Disabilities inclusion rate for Voluntary Separations is 6.4%. • The PWD inclusion rate for Voluntary Separations (6.6%) is greater than the People Without Disability inclusion rate for Voluntary Separations (6.4%). This indicates a trigger. PWD Involuntary Separations (Table B1 and B14): • The PWD inclusion rate for Involuntary Separations is 0.4%. • The People Without Disabilities inclusion rate for Involuntary Separations is 0.1%. • The PWD inclusion rate for Involuntary Separations (0.4%) is greater than the People Without Disability inclusion rate for Involuntary Separations (0.1%). 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) Answer Yes
- b. Involuntary Separations (PWTD) Answer Yes

PWTD Voluntary Separations (Table B1 and B14): • The PWTD inclusion rate for Voluntary Separations is 6.5%. • The People Without Disabilities inclusion rate for Voluntary Separations is 6.4%. • The PWTD inclusion rate for Voluntary Separations (6.5%) is greater than the People Without Disability inclusion rate for Voluntary Separations (6.4%). This indicates a trigger. PWTD Involuntary Separations (Tables B1 and B14): • The PWTD inclusion rate for Involuntary Separations is 0.3%. • The People Without Disabilities inclusion rate for Involuntary Separations is 0.1%. The PWTD inclusion rate for Involuntary Separations (0.3%) is greater than the People Without Disability inclusion rate for Involuntary Separations (0.1%). 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.

Based on information available in OBIEE (Table B14): • Of the 98 PWD Separations in FY21, 92 were voluntary and 6 were involuntary. • Of the 24 PWTD Separations in FY21, 23 were voluntary and 1 was involuntary. OCR and OHR collaborated to modify the FY21 employee exit survey to include disability-specific questions. Based on information available from agency-wide employee exit survey: • In FY21, 158 exit surveys were received and of those surveys, four employees reported separation due to disability. Two employees left the agency and reported retiring due to disability; one employee responded, "Perceived barrier to career development due to my disability;" and one employee chose the "other" option, stating "Perceived failure to provide accommodations (religious or disability-related).

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.

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/employmentcomplaint-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/ocr/affirmative-employment-analysis-andaccountability#architectural> provides a link to the United States Access Board (<https://www.accessboard.gov/enforcement/>), 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 Section 508 Directives: In August 2021, the CIO signed an updated Section 508 Policy and 3 new procedures. These directives align with the Revised Section 508 Standards issued by the U.S. Access Board and establish the EPA's policy for ensuring access to the agency's Information and Communication Technology (ICT) and for complying with Section 508 of the Rehabilitation Act, as amended (29 U.S.C. § 794d). These directives take the first step to fully integrating Section 508 technical requirements into the entire IT lifecycle. The Section 508 Acquisition Procedure incorporates specific Section 508 technical requirements and acceptance criteria in the planning stage of the acquisition. The Section 508 Testing Procedure establishes a standard for how and when to test ICT for accessibility. The Section 508 Exceptions Procedure introduces the fundamental alteration exception and defines signature authority requirements for the different exceptions. These procedures include certification forms to help document how each organization integrates the 508 technical requirements as they acquire, develop, and maintain ICT. In FY22, EPA will strengthen efforts to increase awareness of these directives through the development of training, resources, and an agency-wide outreach campaign. Section 508 Training Campaign: In FY21, the 508 Program contracted with a vendor and initiated the development of role-based training courses designed to address specific requirements for the identified audiences based on their function at the agency. The training includes knowledge checks and a final quiz through FedTalent, which would allow us to measure critical takeaways to change behavior. In FY22, EPA will work to publish the role-based training to the agency's learning management systems and launch a communication and awareness campaign to promote the training. Section 508 Compliance Process for Mandatory training at EPA: EPA's Section 508 Program is providing guidance and support to the Office of Human Resources (OHR) to identify the requirements for ensuring that all mandatory training provided by the agency is 508 compliant. In FY22, EPA will focus on developing guidance and resources for creating accessible on-line training and begin the remediation for the existing mandatory training. EPA Compliance Assessment and Remediation Plan: EPA's Compliance Assessment and Remediation Plan (CARP), aligns to the U.S. Access Board ICT Testing Baseline which describes how to evaluate conformance to the Revised 508 Standards. EPA's CARP aims to assess and enhance the accessibility of EPA's ICT, develop a baseline to measure improvements, and report bi-annually to the OMB on Section 508 Program Maturity. Through FY21, EPA continued to inventory internal non-enterprise systems and applications, evaluated accessibility documentation from vendors, and conducted manual accessibility assessments of agency owned ICT. Additionally, the EPA Section 508 Program developed and enhanced the formal process for reviewing Accessible Conformance Reports (ACR), which is used to assess the level of conformance to Section 508 through the acquisition process. Using the lessons learned from FY21 results, in FY22, EPA plans to clarify the processes for assessing the level of conformance for existing systems and navigating the remediation process toward full compliance. The CARP will also align with the recently signed Section 508 procedures for testing and acquisition established processes and documentation for ensuring the accessibility of newly procured ICT. These two efforts will work together to create a full picture of the accessibility of EPA's Systems and applications. Additional Activities for FY22: • Establish workgroups to support the implementation of Executive Order (EO) 14035 Diversity, Equity, Inclusion, and Accessibility (DEIA) in the Federal Workforce. OCR-Led Accessibility Workgroup In FY21, OCR convened a workgroup to address accessibility-related concerns within the EPA community. This effort had an initial focus on issues impacting the deaf and hard of hearing community that resulted from the agency's transition to a virtual workforce due to the COVID-19 pandemic. This OCR-led Accessibility Workgroup collaborated with the Office of Public Affairs (OPA) to improve and standardize access to agency-wide virtual events. This collaboration included several actions to meet accessibility needs, including: • How events were presented • Clearly articulating the accessible features of virtual meetings • How to request a reasonable accommodation, if needed This workgroup laid the foundation for

work to continue through the agency's Diversity, Equity, Inclusion, and Accessibility (DEIA) efforts, per Executive Order 14035. EPA Compliance with Executive Order (EO) 14035 on Diversity, Equity, Inclusion, and Accessibility: DEIA efforts directly support and sustain the agency's mission and workforce, now and into the future. The OCR Director and Deputy Director were appointed to the agency's Diversity, Equity, Inclusion, and Accessibility Implementation Team (DEIA IT); the Director serves as a liaison to two of the eight new workgroups and the Deputy Director serves a liaison to one of the eight new workgroups. SES co-chairs will be appointed to lead the eight workgroups. Each workgroup will include two co-chairs, approximately ten members from the EPA community, and one or two members of the DEIA IT. The workgroups will play an important role in drafting EPA's DEIA Strategic Plan, due to the Office of Management and Budget (OMB) in FY22. DEIA Workgroups: • Data Collection, Analysis, and Measurement (OCR Director, DEIA IT liaison) • Outreach, Recruitment, and Hiring • Career Development and Training • Creating an Agency Culture of DEIA and Employee Engagement • Agency Organization for DEIA Sustainability • Accountability • LGBTQ+ (OCR Director, DEIA IT liaison) • Accessibility (OCR Deputy Director, DEIA IT liaison)

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 FY21, the Reasonable Accommodation (RA) program processed a total of 316 requests. Of the 316 requests, 288 were initiated in FY21 and 28 were initiated in FY20. The 28 requests initiated in FY20 were in pending status on September 30, 2020, and were carried over and completed in FY21. In FY21, the agency received 288 new requests and 243 were completed in FY21. EPA processed and completed all 243 requests (or 100%) within the time frames identified in EPA RA Procedures with an average processing time of 13.4 days. EPA has attained a 90% or greater processing rate for eleven consecutive years.

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.

The following is a summary and analysis of the RA requests that were initiated in FY 2021: Of the 288 requests initiated in FY 2021, 243 requests were processed and completed. There were 45 requests initiated in FY21 that were in pending status as of September 30, 2021; these requests will be carried over to FY22. Processing and completing a reasonable accommodation request refer to the steps taken starting when the employee or applicant first makes a request to the conclusion of the process usually with the decision-maker issuing a decision or in some cases when the request is withdrawn or closed. Breakdown of the 243 requests completed in FY 2021: • 210 requests were approved • 2 requests were denied • 4 requests were denied under reasonable accommodation (RA) but were offered some relief outside of the RA process • 17 requests were withdrawn by the employee • 10 requests were closed (employee resigned, retired, or separated from the agency or in some cases passed away; therefore, a decision for the request was no longer needed and was closed without a final decision). In FY21, the Reasonable Accommodation (RA) program processed a total of 316 requests. Of the 316 requests, 288 were initiated in FY21 and 28 were initiated in FY20. The 28 requests initiated in FY20 were in pending status on September 30, 2020, and were carried over and completed in FY21. In FY21, the agency received 288 new requests and 243 were completed in FY21. EPA processed and completed all 243 requests (or 100%) within the time frames identified in EPA RA Procedures with an average processing time of 13.4 days. EPA has attained a 90% or greater processing rate for eleven consecutive years. In FY 2021, the most requested items or types of accommodations were: 1. Assistive technology (AT) equipment as well as ergonomic equipment such as ergonomic keyboards and chairs (combined) with 71 requests 2. Telework (full-time, additional day, episodic, etc.) with 64 requests 3. Computer equipment such as larger monitor, mouse, etc. with 54 requests 4. Modified work schedule (start/end times) with 25 requests 5. Facilities related requests such as small refrigerators, space heaters, workspace modification, and changes to lighting with 10 requests 6. Sit/stand desks with 8 requests 7. Change in duty station with 7 requests. The National Reasonable Accommodation Coordinators (NRACs) delivered 27 training sessions to a total of 1,345 participants. The training sessions included four (4) agency-wide trainings delivered virtually, as well as trainings for the offices below: 1. Region 3 (Philadelphia) 2. Region 5 (Chicago) 3. Region 9 (San Francisco) 4. Region 10 (Seattle) 5. Office of the Administrator (AO) 6. Office of the Chief Financial Officer (OCFO) 7. Office of Enforcement and Compliance Assurance (OECA) 8. Office of Research and Development (ORD) In FY 2021, six (6) new Local Reasonable Accommodation Coordinators (LORACs) were trained on the EPA reasonable accommodation process. ***Table to be added as a Supplemental Document for Section V, C: Reasonable Accommodation Program, Question #2.***

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.

There were no Personal Assistance Services (PAS) requests initiated in FY 2021.

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?

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.

N/A

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.

N/A

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.

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

Answer Yes

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

Answer Yes

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments

Source of the Trigger:		Workforce Data (if so identify the table)				
Specific Workforce Data Table:		Workforce Data Table - B1				
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:		See Appendix I: PWD Barrier Analysis Report FY21				
Provide a brief narrative describing the condition at issue.						
How was the condition recognized as a potential barrier?						
STATEMENT OF BARRIER GROUPS:		<i>Barrier Group</i>				
Barrier Analysis Process Completed?:		Y				
Barrier(s) Identified?:		Y				
STATEMENT OF IDENTIFIED BARRIER:		Barrier Name		Description of Policy, Procedure, or Practice		
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.		Infrequent use of the Schedule A Hiring Authority		The inadequate use of Schedule A Authority by hiring officials is a barrier to EPA achieving the 12% hiring goal for people with disabilities required by law.		
Objective(s) and Dates for EEO Plan						
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description	
Responsible Official(s)						
Title		Name		Standards Address The Plan?		
Director, Office of Civil Rights (OCR)		JuanCarlos Hunt		Yes		
Director, Office of Human Resources (OHR)		Mara Kamen		No		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activities			Sufficient Staffing & Funding?	Modified Date	Completion Date
11/01/2021	OCR to identify an Executive Champion to work with senior management to identify a National Schedule A Champion who can promote and advocate for the program at the most senior level. Identify an SES co-lead for the Diversity, Equity, inclusion, Accessibility (DEIA) Workgroup.			Yes		11/01/2021
11/01/2021	The Research Triangle Park (RTP) Shared Service Center (SSC) to provide OCR with detailed automated reports related to the use of Schedule A.			Yes		10/01/2021

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
02/28/2022	The RTP SSC will develop a repository of qualified Schedule A candidates' resumes. Managers will have access to the resumes through USAJobs. Shared Service Centers will provide written instructions on how to access and use the resume repository to EEOOs, PMOs, HROs, and hiring managers who have requested access.	Yes		
02/22/2022	Begin conducting training sessions on findings and recommendations of barrier analysis report; Schedule A Hiring Authority for Persons with Disabilities; and Workforce Recruitment training sessions to managers.	Yes		
09/30/2022	Data collected on Schedule A to be analyzed. Engage Deputy Civil Rights Officials (DCROs) to set numerical goals and potential performance metrics.	Yes		
09/30/2022	EPA leadership to issue a separate policy statement specifically to emphasize its commitment to hiring individuals with disabilities.	Yes		
09/30/2022	OMS (including the SSCs and OHR), DCROs, and the Office of the Administrator (including OCR) to develop a unified disability recruitment strategy that incorporates the agency's Disability Program Managers (DPMs). These recruitment plans will be developed and implemented by EPA regions and program offices.	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments
2021	Barrier Analysis report was completed. Recommendations have been approved by EPA Senior Leadership.

Source of the Trigger:	Workforce Data (if so identify the table)
Specific Workforce Data Table:	Workforce Data Table - B1
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Infrequent use of the Schedule A Hiring Authority

STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> People with Disabilities People with Targeted Disabilities
-------------------------------------	---

Barrier Analysis Process Completed?:	N
---	---

Barrier(s) Identified?:	N
--------------------------------	---

STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	Barrier Name	Description of Policy, Procedure, or Practice
--	---------------------	--

Objective(s) and Dates for EEO Plan

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
06/01/2019	04/01/2021	Yes		04/01/2021	1. Conduct analysis of EPA policies, practices, and procedures related to disability recruitment to identify barriers.
03/01/2020	04/01/2021	Yes		04/01/2021	2. Assemble key findings as a result of analysis.
03/01/2020	04/01/2021	Yes		04/01/2021	3. Construct recommendations for the consideration of senior leaders that will have a meaningful impact on the hiring of Persons with Disabilities.

Responsible Official(s)		
Title	Name	Standards Address The Plan?

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date

Report of Accomplishments	
Fiscal Year	Accomplishments

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

N/A

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

Barrier Analysis identified the need to increase the use of the Schedule A – Hiring Authority to increase the hiring of persons with disabilities.

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.

N/A as barrier analysis completed in FY21 and recommendations to be implemented in FY22.

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 Yes

Table B-4 Participation Rates for General Schedule Grades - Permanent PWD in GS-11 to SES cluster of the permanent workforce participate at 9.18% or 1,206 PWD employees out of 13,123 Total Workforce, which is lower than the 12% benchmark goal.

*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 No

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	0	0	0.00	0	0.00
Grades GS-11 to SES	0	0	0.00	0	0.00

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

The Office of Civil Rights (OCR) has communicated the EEOC's 12% PWD and 2% PWTD hiring goals to hiring officials and agency managers, supervisors, and leadership at meetings and presentations. The agency also completed a national barrier analysis that identified the limited use of the Schedule A Hiring Authority as a barrier to hire PWD. Engagement on the hiring goals has happened at all management levels including EPA senior leadership. OCR also is implementing a measure for regions and AA-ships to increase the percentage of PWD and requiring regions and AA-ships to identify how each intends to do so in FY22, which resulted in OCR further communicating the numeric goals during the end of the FY21. Additionally, the increased use of the Schedule A Hiring Authority is a national priority for EPA. Hiring goals have been communicated to agency management through a combination of briefings and training sessions. OHR and OCR provided five training sessions to approximately 200 managers and

employees in FY21. The training sessions focused on two topics, the “Effective Use of the Schedule A Hiring Authority” and “How to Utilize the Workforce Recruitment Program (WRP) Database.”

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

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	
Section 508 Compliance	3	0	58	David Segovia, Libraries and Accessibility Division Director, OMS segovia.david@epa.gov Sarah Sorathia, Assistant Section 508 Program Manager, OMS sorathia.sarah@epa.gov This includes 58 collateral duty 508 Liaisons Agency-wide: program offices (39) and (19).
Architectural Barriers Act Compliance	1	0	1	Yvette Jackson, Director Office of Admission Support, OMS Jackson.yvette@epa.gov
Special Emphasis Program for PWD and PWTB	2	0	32	Tiffany Houser, National Disability Employment Program Manager, OCR houser.tiffany@epa.gov Anthony Napoli, Diversity and Inclusion Manager, DRESO, OHR napoli.anthony@epa.gov

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	13	0	12	Anthony Napoli, Diversity and Inclusion Manager, DRES, OHR napoli.anthony@epa.gov Tiffany Houser, EEO Manager, National Disability Employment Program Manager, OCR houser.tiffany@epa.gov There are also 12 Program Management Officers (PMOs), one for each program office at headquarters, who perform this function as a collateral duty.
Processing reasonable accommodation requests from applicants and employees	2	0	27	Amanda Sweda, Senior National Reasonable Accommodation Coordinator, OCR sweda.amanda@epa.gov Kristin Tropp, National Reasonable Accommodation Coordinator, OCR tropp.kristin@epa.gov
Processing applications from PWD and PWTD	30	0	0	Jerome Bonner, Director, Cincinnati Shared Service Center, Office of Mission Support OMS bonner.jerome@epa.gov The 30 full time employees include staff within the Shared Service Centers who are responsible for processing applications.

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

In FY21, 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 EEOC-facilitated Federal Exchange on Employment and Disability (FEED) calls. Training topics included: • EEO and Preventing Discrimination in the Workplace • SEPM training (three presentations): How to Use the Workforce Recruitment Program (WRP) database, State of Disability Hiring at the EPA, and the Computer/Electronic Accommodation Program (CAP) • Section 508 training on assistive technologies • Effective Use of Schedule A Hiring Authority and How to Utilize the Workforce Recruitment Program Database training (5 training sessions)

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.

In FY21, 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: • Office of Personnel Management's web page identifying the Bender Consulting firm's list of Schedule A applicants • OPM's Shared List of People with Disabilities page via MAX.gov • Veteran Employment Programs (e.g., Operations Warfighter, Wounded Warrior, Safe Harbor) • Workforce Recruitment Program • USAJOBS Agency Talent Portal • Special Emphasis Program Managers (SEPMs) and Disability Employment Advisory Council • National and Local Disability Employment Program Managers • Virtual Careers and Disability Job Fairs • Pathways-Presidential Management Fellows (PMF) Program • Pathways-Interns/Recent Graduates • Office of Environmental Information, Section 508 – Assistive Technology Program • Disability Employment Program Advisory Council Monthly Meetings • Memorandum of Understanding (MOU) Partnerships • Internal/External Outreach Programs/Activities

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 PWTDD for positions in the permanent workforce

The agency uses all available and appropriate hiring authorities to recruit and hire including: • 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) • 30 Percent or More Disabled Veterans • Pathways Programs

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 and the 30% or More Disabled Veteran Authority using the following processes: Schedule A Hiring EPA's Shared Service Center Human Resource Management Division announced the development and upcoming rollout of our own EPA Schedule A Repository. The Schedule A Repository will host resumes and writing samples from Schedule A Disability-eligible candidates and the agency will share it with Regions and Offices to streamline and increase our hiring managers' use of the Schedule A hiring authority. This new repository is on track to debut in calendar year in 2022 and the agency will be providing additional information on how to submit and access Schedule A Repository application materials. • 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 seeking to be hired through Schedule A for minimum qualifications / selective factors to determine eligibility for noncompetitive, Schedule A appointments. • An eligible 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, a state agency, or an agency of the District of Columbia or a U.S. territory issuing or provides disability benefits. • An agency may make permanent or time-limited appointments, where an applicant supplies proof of disability, and the agency determines that the individual is likely to succeed in the performance of the duties of the position for which he or she is applying. In determining whether the individual is likely to succeed in performing the duties of the position, the agency may

rely upon the applicant's employment, educational, or other relevant experience, including but not limited to service under another type of appointment in the competitive or excepted services. • Individuals who apply and are certified for a Merit Promotion (MP) External announcement (i.e., open government-wide) are referred to the hiring official through the EZHire/Monster platform. Certificates of qualified individuals are reviewed electronically. • Candidates are appointed following SSC onboarding procedures. After a tentative offer is extended, the selectee is processed through Personnel Security for background investigations (if applicable) and suitability determinations. Once Personnel Security has approved the candidate for employment, the SSC establishes a start date, issues a firm offer letter, and provides new hire documentation for the candidate to complete before onboarding. Veterans Hiring Eligibility is determined based on the guidelines provided in OPM's Vet Guide for HR Professionals. Candidates are referred on the appropriate certificate of eligibles after their veteran authority eligibility is determined, and their qualifications are verified. Individuals who apply and are certified for Delegated Examining (DE) announcement (i.e., open to the public) and are found to have veterans' preference are referred to the hiring official through the EZHire/Monster platform if they are in the highest quality category. Individuals who apply and are certified for a Merit Promotion (MP) External announcement (i.e., open government-wide) are referred to the hiring official through the EZHire/Monster platform. The certificate they are referred on is determined by their veteran authority eligibility (e.g., Compensable Disability Preference (CPS) eligible veterans are referred on the CPS-30% disabled certificate, while Veterans Recruitment Appointment (VRA) eligible individuals are referred on the VRA certificate). Certificates of qualified individuals are reviewed electronically. Hiring managers may receive applications for non-competitive appointments, meaning the applicant is eligible for a hiring authority that does not require public notice (i.e., an announcement on USAJobs) and provide those selections to the SSC for review. In this case, the hiring manager is providing the application to the SSC who then determines eligibility and qualifications. • Disabled veterans with disability ratings of 30% or more may be considered under 30% or More Disabled Veteran Authority (5 CFR § 315.707). Once eligibility for the 30% or More Disabled Veteran Authority is determined, the HR specialist notifies the hiring manager following applicable regulations for further consideration. SSC and HR specialists, along with Selective Placement Program Coordinators (SPPC), work closely with each hiring manager to ensure all pre- and post-appointment procedures are carried out and 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. 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. 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. Before the entry-on-duty, a manager discusses and verifies the need for any accommodation with the selected individual. • Veterans Recruitment Appointment (VRA) Authority (5 CFR Part 307) is a special hiring authority allowing for the appointment of eligible veterans into excepted service positions at any grade level through GS-11 or equivalent, without competition. Candidates must meet basic qualification requirements to be accepted into the excepted service. To be converted to competitive service, the candidate must complete two years of significant, continuous service in a position under VRA and receive a satisfactory job performance rating.

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

In FY21, the agency hosted several agency-wide training sessions for various EPA region and program offices. The increased use of the Schedule A Hiring Authority is a national priority for EPA. Hiring goals have been communicated to agency management through a combination of briefings and training sessions. OHR and OCR provided five training sessions to approximately 200 managers and employees in FY21. The training sessions focused on two topics, the "Effective Use of the Schedule A Hiring Authority" and "How to Utilize the Workforce Recruitment Program (WRP) Database." The training sessions were conducted virtually and recorded because of the Covid-19 pandemic. The videos are currently available on the agency intranet site and on Microsoft Teams video system for all EPA employees to view. In addition, EPA regions and program offices conducted their own Disability Employment Awareness, Reasonable Accommodation, and Schedule A Hiring Authority training sessions.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

• The agency continued to implement established Memoranda of Understanding (MOU) with Gallaudet University (GU), Rochester Institute of Technology/National Technical Institute for the Deaf (RIT/NTID), and Texas School for the Deaf (TSD). • EPA and Northwest Indian College (NWIC) signed an MOU in FY21. NWIC is a minority serving institution (MSI). The MOU focuses on collaboration to increase interest in careers related to protecting human health and the environment and awareness about publicly available recruitment and environmental education opportunities. • In FY21, EPA HQ and EPA Region 4 were in ongoing discussions to identify an organization to initiate another MOU. • Through the 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. Through the established MOUs with the institutions, students are given notice of publicly available career opportunities at EPA, through paid and unpaid internships. In FY21, the agency conducted virtual mock interviews with GU students. • OMS encourages the use of the Workforce Recruitment Program (WRP) and the Agency Talent Portal (ATP) and shares information on the WRP and the ATP with the region and program offices. • In FY21, Louis Orslene, Director of the Employer and Workplace Policy Team, Office of Disability Employment Policy, U.S. Department of Labor was the keynote speaker for EPA’s People with Disabilities Observance event to share the priorities of the Federal Government for people with disabilities.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

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

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	14331	13.93	0.00	7.23	0.00
% of Qualified Applicants	12065	12.22	0.00	6.20	0.00
% of New Hires	271	8.49	0.00	3.69	0.00

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

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

Table B-7 Monster: Application and Hires for Major Occupations by Disability. PWD triggers were identified in the following Major Occupation series: • General Biological Science (0401): Selection at 6.90% is less than expected compared to the qualified applicant pool rate of 9.68%. • Environmental Engineer (0819): Selection at 4.00% is less than expected compared to the qualified applicant pool rate of 10.13%. • Environmental Engineer (1301): Selection at 6.67% is less than expected compared to the qualified applicant pool rate of 9.89%. • Attorney Advisor (0905): Selection at 0.00 % is less than expected compared to the qualified applicant pool rate of 13.20%. PWTD triggers were identified in the following Major Occupation series: • General Biological Science (0401): Selection at 1.72% is less than expected compared to the qualified applicant pool rate of 5.03%. • Environmental Engineer (0819): Selection at 4.00% is less than expected compared to the qualified applicant pool rate of 5.19%. • Physical/ Environmental Scientist (1301): Selection at 2.67% is less than expected compared to the qualified applicant pool rate of 5.79%. • Attorney Advisor (0905): Selection at 0.00 % is less than expected compared to the qualified applicant pool rate of 6.16%.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
0028 ENVIRONMENTAL PROTECTION SPECIALIST	19	21.05	10.53
0301 GENERAL ADMINISTRATIVE	5	40.00	20.00
0343 MANAGEMENT ANALYSIS	12	25.00	16.67
0401 BIOLOGIST	116	6.90	1.72
0819 ENVIRONMENTAL ENGINEERING	25	4.00	4.00
0905 ATTORNEY	19	0.00	0.00
1301 GENERAL PHYSICAL SCIENCE	75	6.67	2.67

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

- a. Qualified Applicants for MCO (PWD) Answer Yes
- b. Qualified Applicants for MCO (PWTD) Answer Yes

Table B-9 Monster – Selections for Internal Competitive Promotions for Major Occupations by Disability. EPA utilized Table B9: Qualified Internal Applicants for MCO. The total applications received were used as the benchmark for the following. PWD triggers were identified in the following Major Occupation series: • Environmental Protection Specialist (0028): PWD Qualified Internal Applicants at 2.11% is less than expected compared to the PWD Applications Received at 3.90%. • Management/Program Analyst (0343): PWD Qualified Internal Applicants at 3.06% is less than expected compared to PWD Applications Received at 4.57%. • General Biological Science (0401): PWD Qualified Internal Applicants at 2.55% is less than expected compared to the PWTD Applications Received at 4.35%. • Environmental Engineer (0819): PWD Qualified Internal Applicants at 5.26% is less than expected compared to the PWD Applications Received at 6.98%. • Physical Scientist/Environmental Scientist (1301): PWD Qualified Internal Applicants at 2.33% is less than expected compared to the PWD Applications Received at 2.94%. PWTD triggers were identified in the following Major Occupation series: • Environmental Protection Specialist (0028): PWTD Qualified Internal Applicants at 1.41% is less than expected compared to the PWTD Applications Received at 2.84%. • Management/Program Analyst (0343): PWTD Qualified Internal Applicants at 0.51% is less than expected compared to PWTD Applications Received at 1.62%. • General Biological Science (0401): PWTD Qualified Internal Applicants at 0.51% is less than expected compared to the PWTD Applications Received at 1.52%. • Environmental Engineer (0819): PWTD Qualified Internal Applicants at 1.32% is less than expected compared to the PWD Applications Received at 2.33%.

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

- a. Promotions for MCO (PWD) Answer Yes
- b. Promotions for MCO (PWTD) Answer Yes

Table B-9 Monster– Selections for Internal Competitive Promotions for Major Occupations by Disability: EPA utilized Table B9: Selections 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: • Misc. Administration and Program Specialist (0301): PWD Promoted at 0.00% is less than expected compared to Qualified Benchmark of 3.90%. This is a trigger. • Biologist/ Life Scientist (0401): PWD Promoted at 2.55% is less than expected compared to Qualified Benchmark of 0.00%. This is a trigger. • Environmental Engineer (0819): PWD Promoted at 5.26% is less than expected compared to the PWD Applications Received at 2.33%. PWTD, triggers were identified in the following Major Occupation series: • Environmental Protection Specialist (0028): PWTD Promoted at 0.00% is less than expected compared to Qualified Benchmark of 1.41%. This is a trigger. • Management Analyst (0343): PWTD Promoted at 0.00% is less than expected compared to Qualified Benchmark of 0.51%. This is a trigger.

Environmental Engineer (0819): PWTD Promoted at 0.00% is less than expected compared to the PWD Applications Received at 1.32%.

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.

Increased communication. EPA informs all employees of advancement opportunities through 1) the Talent Hub website (a centralized experiential learning resource promoting a range of career development opportunities available across the agency); 2) broadcasting open vacancy announcements; 3) fee/non-fee based in-person/online training. Opportunities are marketed through email to all users, office announcements, intranet postings, and newsletters. Employees are encouraged to participate in skill-building trainings and courses related to federal employment, such as how to search USAJOBS, resume writing, and improving interviewing skills. Technical Assistance Visits: OCR conducted visits to two regions and two program offices in FY21. These visits served, in part, to educate managers on how to support opportunities for advancement and retention of employees with disabilities, provide information on the Schedule A hiring authority, and stress the importance of timely conversion for those participating in the program. Diversity and Inclusion Strategic Plan: EPA's 2017-2021 Diversity and Inclusion Strategic Plan (DISP) guides the agency's efforts in sustaining EPA as a leader in creating and maintaining a high-performing workforce embracing diversity and inclusion and empowers all employees to achieve their full potential to advance the agency's mission. The multi-year plan outlines goals, priorities, specific action items, and measures 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 conducted regular informational sessions open to all employees to share information on training and career development opportunities and resources; b) OMS ensured all hiring managers received training on the use of appropriate hiring authorities and flexibilities. • Goal 2: Include and engage all agency employees: senior leadership and managers used 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) utilized the MD-715 reports, applicant flow data, and focus groups to identify actions taken to address any potential barriers to career development and advancement identified by the agency; b) senior leaders used the results of the annual Employee Viewpoint Surveys and other workforce feedback to respond to employee concerns regarding opportunities for employee training, development, and advancement. The DISP expired at the end of FY21, and the agency is in the process of drafting a new DISP. OCR has proposed the new DISP specifically address the agency's lower than expected participation rate for persons with disabilities. This concern will be addressed in the new DISP per Executive Order (EO) 14035 Diversity, Equity, Inclusion, and Accessibility (DEIA) in the Federal Workforce. EPA's Successful Leaders Program: Mandatory year-long program for newly promoted or hired supervisors and managers. The program contains information regarding the various hiring authorities (such as Schedule A) to reach a wide range of candidates training on the Disability Hiring Tool such as the WRP, CAP, as well as training on how to manage Reasonable Accommodation requests. The agency restructured the course to be entirely virtual, effective FY2022. Miscellaneous: The agency launched FedTalent in FY18 and continues to use this learning management system interfacing with the agency's HR system of record (FPPS). The interface allows EPA to track selectees in its training and coaching programs and allows offices to provide information on the robust learning opportunities afforded on career development within the FedTalent course library.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

Employee career development is available through a variety of programs. Training is designed to promote professional and personal development. Entry Level: Mindful EPA; EPA Coaching; New Hire Onboarding; Talent Hub & Skills Marketplace Details; Leaders

& Learners Mentoring Program. Mid-Career: Individual Development Plan Support; LEGIS-Capital Hill Fellowship; President's Management Council Rotational Program; Stepping-up to Supervision; Treasury Executive Institute; Talent Development Programs. Supervisors/Managers & Senior Level: Skillssoft Leader Development Program; Successful Leaders Program; Strategic Start; Coaching (TEI); OPM & EPA's SES Orientation; Executive Rotations for SES. - FedTalent/Skillssoft: 15,084 courses - Skillssoft books/videos: 30,000 - Mandatory Training -Support for Individual/Executive Development Plans

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 (%)
Mentoring Programs	N/A	N/A	N/A	N/A	N/A	N/A
Training 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
Fellowship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Other Career Development Programs	N/A	N/A	N/A	N/A	N/A	N/A
Internship 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

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

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

EPA does not currently capture data for Career Development Opportunities (CDOs) that require competition and/or supervisory recommendation/approval to participate. OCR is coordinating with OHR to develop a process that will collect applicant flow data from training program applicants.

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

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

EPA does not currently capture data for Career Development Opportunities (CDOs) that require competition and/or supervisory recommendation/approval to participate. OCR continues to coordinate with OHR to develop a process that will collect applicant flow data from training program applicants.

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 Yes

b. Awards, Bonuses, & Incentives (PWTD)

Answer Yes

Comparing Time-off Awards of 1-9 hours for PWD/PWTD (Table B-13) to Total Workforce for PWD/PWTD (Table B1), there are triggers in the following Awards, Bonuses, and Incentives categories. PWD Time-off Awards 1-9 hours: PWD received awards at 25.5%, which is less than expected compared to people without disabilities at 26.8%. This is a trigger. PWTD Time-off Awards 1-9 hours: PWTD received awards at 11.9%, which is less than expected compared to people without disabilities at 27.0%. This is a trigger. PWTD Time-off Awards 9+ hours: PWTD received awards at 17.6%, which is less than expected compared to people without disabilities at 28.6%. This is a trigger. Comparing Cash Awards \$100-\$500 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 \$100 - \$500: • PWTD received awards at 15.3%, which is less than expected compared to people without disabilities at 23.2%. This is a trigger. Cash Awards \$501+: • PWD received awards at 87.6%, which is less than expected compared to people without disabilities at 95.1%. This is a trigger. Cash Awards \$501+: • PWTD received awards at 54.5%, which is less than expected compared to people without disabilities at 95.4%. This is a trigger. Senior Executive Service Performance Awards: • PWTD received awards at 0.0%, which is less than expected compared to people without disabilities at 100.0%. This is a trigger.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 1 - 10 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 1 - 10 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Awards Given	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$1000 - \$1999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Average Amount	0	0.00	0.00	0.00	0.00

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

a. Pay Increases (PWD) Answer Yes

b. Pay Increases (PWTD) Answer Yes

Comparing Employee Recognition and Awards for PWD/PWTD (Table B-13 Employee Recognition Awards) to Total Workforce for PWOD (Table B1 - Total Workforce - Permanent), there are triggers in the following Awards, Bonuses, and Incentives categories: PWD Qualify Step Increase (QSI): PWD received awards at 1.9%, which is less than expected compared to people without disabilities at 2.6%. This is a trigger. PWTD Qualify Step Increase (QSI): PWTD received awards at 1.1%, which is less than expected compared to people without disabilities at 2.5%. This is a trigger.

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

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

a. Other Types of Recognition (PWD) Answer Yes

b. Other Types of Recognition (PWTD) Answer Yes

The Other Awards category is broad-based and includes a variety of awards (see list below). PWD Other Awards: PWD received awards at 3.6%, which is less than expected compared to people without disabilities at 4.7%. This is a trigger. • Other Awards for PWD consist of (code-award): 815/ Recruitment Incentive 841/ Group Cash Award CH 45 847/ Group Time Off Award 889/ Group Award - Other PWTD Other Awards: PWTD received awards at 3.7%, which is less than expected compared to people without disabilities at 4.5%. This is a trigger. • Other Awards for PWTD consist of (code-award): 815/ Recruitment Incentive 841/ Group Cash Award CH 45 847/ Group Time Off Award 889/ Group Award – Other

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 N/A

ii. Internal Selections (PWD) Answer N/A

b. Grade GS-15

i. Qualified Internal Applicants (PWD) Answer Yes

ii. Internal Selections (PWD) Answer No

c. Grade GS-14

i. Qualified Internal Applicants (PWD) Answer Yes

ii. Internal Selections (PWD) Answer Yes

d. Grade GS-13

i. Qualified Internal Applicants (PWD) Answer Yes

ii. Internal Selections (PWD) Answer Yes

SES PWD promotion data is not available. OCR continues to coordinate with OMS to create a process to collect the required data. For FY21, EPA utilized Monster Table B11 – Internal Selections for Senior Level Positions. Using the 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. PWD GS-13: • Qualified Internal Applicants at 3.02% is less than expected compared to the PWD Applicants Received at 5.66%. This is a trigger. • PWD Selected Internal Applications at 1.69% is less than expected compared to the Qualified Applications at 3.02%. This is a trigger. GS-14: • Qualified Internal Applicants at 2.68% is less than expected compared to the PWD Applicants Received at 3.64%. This is a trigger. • PWD Selected Internal Applications at 2.01% is less than expected compared to the Qualified Applications at 2.68%. This is a trigger. GS-15: • Qualified Internal Applicants at 3.02% is less than expected compared to the PWD Applicants Received at 4.23%. This is 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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. SES

i. Qualified Internal Applicants (PWTD) Answer N/A

ii. Internal Selections (PWTD)	Answer	N/A
b. Grade GS-15		
i. Qualified Internal Applicants (PWTD)	Answer	Yes
ii. Internal Selections (PWTD)	Answer	No
c. Grade GS-14		
i. Qualified Internal Applicants (PWTD)	Answer	Yes
ii. Internal Selections (PWTD)	Answer	No
d. Grade GS-13		
i. Qualified Internal Applicants (PWTD)	Answer	Yes
ii. Internal Selections (PWTD)	Answer	Yes

SES PWTD promotion data is not available. OCR continues to coordinate with OMS to create a process to collect the required data. For FY21, EPA utilized Monster Table B11 – Internal Selections for Senior Level Positions. Using the PWTD 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. PWTD GS-13: • Qualified Internal Applicants at 0.34% is less than expected compared to the PWTD Applicants Received at 1.77%. This is a trigger. • PWTD Selected Internal Applications at 0.00% is less than expected compared to the Qualified Applications at 0.34%. This is a trigger. GS-14: • Qualified Internal Applicants at 0.70% is less than expected compared to the PWTD Applicants Received at 1.56%. This is a trigger. GS-15: • Qualified Internal Applicants at 1.37% is less than expected compared to the PWTD Applicants Received at 1.84%. This is 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. 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	N/A
b. New Hires to GS-15 (PWD)	Answer	N/A
c. New Hires to GS-14 (PWD)	Answer	N/A
d. New Hires to GS-13 (PWD)	Answer	N/A

EPA’s workforce tables do not provide information on New Hires of PWD in the senior grades of GS-13, 14, 15 and SES. OCR continues to coordinate with OMS to create a process to collect the required data.

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	N/A
b. New Hires to GS-15 (PWTD)	Answer	N/A
c. New Hires to GS-14 (PWTD)	Answer	N/A
d. New Hires to GS-13 (PWTD)	Answer	N/A

EPA’s workforce tables do not provide information on New Hires of PWD in the senior grades of GS-13, 14, 15 and SES. OCR continues to coordinate with OMS to create a process to collect the required data.

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

a. Executives

- i. Qualified Internal Applicants (PWD) Answer N/A
- ii. Internal Selections (PWD) Answer N/A

b. Managers

- i. Qualified Internal Applicants (PWD) Answer N/A
- ii. Internal Selections (PWD) Answer N/A

c. Supervisors

- i. Qualified Internal Applicants (PWD) Answer N/A
- ii. Internal Selections (PWD) Answer N/A

EPA’s workforce tables do not provide promotion data on PWD for executives, managers, and supervisors. OCR continues to coordinate with OMS to create a process to collect the required data.

6. Does your agency have a trigger involving PWTDD 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 (PWTDD) Answer N/A
- ii. Internal Selections (PWTDD) Answer N/A

b. Managers

- i. Qualified Internal Applicants (PWTDD) Answer N/A
- ii. Internal Selections (PWTDD) Answer N/A

c. Supervisors

- i. Qualified Internal Applicants (PWTDD) Answer N/A
- ii. Internal Selections (PWTDD) Answer N/A

EPA’s workforce tables do not provide promotion data on PWTDD for executives, managers, and supervisors. OCR continues to coordinate with OMS to create a process to collect the required data.

7.

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

- a. New Hires for Executives (PWD) Answer N/A
- b. New Hires for Managers (PWD) Answer N/A
- c. New Hires for Supervisors (PWD) Answer N/A

EPA’s workforce tables do not provide information on New Hires of PWD for executives, managers, and supervisors. OCR continues to coordinate with OMS to create a process to collect the required data.

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

- a. New Hires for Executives (PWTD) Answer N/A
- b. New Hires for Managers (PWTD) Answer N/A
- c. New Hires for Supervisors (PWTD) Answer N/A

EPA’s workforce tables do not provide information on New Hires of PWTD for executives, managers, and supervisors OCR continues to coordinate with OMS to create a process to collect the required data.

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

In FY21, EPA converted all twenty-five (25) of its eligible Schedule A-Disability employees into the competitive service.

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 Yes
- b. Involuntary Separations (PWD) Answer Yes

PWD Voluntary Separations (Table B1 and B14): • The PWD inclusion rate for Voluntary Separations is 6.6%. • The People Without Disabilities inclusion rate for Voluntary Separations is 6.4%. • The PWD inclusion rate for Voluntary Separations (6.6%) is greater than the People Without Disability inclusion rate for Voluntary Separations (6.4%). This indicates a trigger. PWD Involuntary Separations (Table B1 and B14): • The PWD inclusion rate for Involuntary Separations is 0.4%. • The People Without Disabilities inclusion rate for Involuntary Separations is 0.1%. • The PWD inclusion rate for Involuntary Separations (0.4%) is

greater than the People Without Disability inclusion rate for Involuntary Separations (0.1%). This indicates a trigger.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	0	0.00	0.00
Permanent Workforce: Resignation	0	0.00	0.00
Permanent Workforce: Retirement	0	0.00	0.00
Permanent Workforce: Other Separations	0	0.00	0.00
Permanent Workforce: Total Separations	0	0.00	0.00

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 Yes

b.Involuntary Separations (PWTD) Answer Yes

PWTD Voluntary Separations (Table B1 and B14): • The PWTD inclusion rate for Voluntary Separations is 6.5%. • The People Without Disabilities inclusion rate for Voluntary Separations is 6.4%. • The PWTD inclusion rate for Voluntary Separations (6.5%) is greater than the People Without Disability inclusion rate for Voluntary Separations (6.4%). This indicates a trigger. PWTD Involuntary Separations (Tables B1 and B14): • The PWTD inclusion rate for Involuntary Separations is 0.3%. • The People Without Disabilities inclusion rate for Involuntary Separations is 0.1%. The PWTD inclusion rate for Involuntary Separations (0.3%) is greater than the People Without Disability inclusion rate for Involuntary Separations (0.1%). This indicates a trigger.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	0	0.00	0.00
Permanent Workforce: Resignation	0	0.00	0.00
Permanent Workforce: Retirement	0	0.00	0.00
Permanent Workforce: Other Separations	0	0.00	0.00
Permanent Workforce: Total Separations	0	0.00	0.00

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.

Based on information available in OBIEE (Table B14): • Of the 98 PWD Separations in FY21, 92 were voluntary and 6 were involuntary. • Of the 24 PWTD Separations in FY21, 23 were voluntary and 1 was involuntary. OCR and OHR collaborated to modify the FY21 employee exit survey to include disability-specific questions. Based on information available from agency-wide employee exit survey: • In FY21, 158 exit surveys were received and of those surveys, four employees reported separation due to disability. Two employees left the agency and reported retiring due to disability; one employee responded, “Perceived barrier to career development due to my disability;” and one employee chose the “other” option, stating “Perceived failure to provide accommodations (religious or disability-related).

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.

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/employmentcomplaint-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/ocr/affirmative-employment-analysis-andaccountability#architectural> provides a link to the United States Access Board (<https://www.accessboard.gov/enforcement/>), 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 Section 508 Directives: In August 2021, the CIO signed an updated Section 508 Policy and 3 new procedures. These directives align with the Revised Section 508 Standards issued by the U.S. Access Board and establish the EPA's policy for ensuring access to the agency's Information and Communication Technology (ICT) and for complying with Section 508 of the Rehabilitation Act, as amended (29 U.S.C. § 794d). These directives take the first step to fully integrating Section 508 technical requirements into the entire IT lifecycle. The Section 508 Acquisition Procedure incorporates specific Section 508 technical requirements and acceptance criteria in the planning stage of the acquisition. The Section 508 Testing Procedure establishes a standard for how and when to test ICT for accessibility. The Section 508 Exceptions Procedure introduces the fundamental alteration exception and defines signature authority requirements for the different exceptions. These procedures include certification forms to help document how each organization integrates the 508 technical requirements as they acquire, develop, and maintain ICT. In FY22, EPA will strengthen efforts to increase awareness of these directives through the development of training, resources, and an agency-wide outreach campaign. Section 508 Training Campaign: In FY21, the 508 Program contracted with a vendor and initiated the development of role-based training courses designed to address specific requirements for the identified audiences based on their function at the agency. The training includes knowledge checks and a final quiz through FedTalent, which would allow us to measure critical takeaways to change behavior. In FY22, EPA will work to publish the role-based training to the agency's learning management systems and launch a communication and awareness campaign to promote the training. Section 508 Compliance Process for Mandatory training at EPA: EPA's Section 508 Program is providing guidance and support to the Office of Human Resources (OHR) to identify the requirements for ensuring that all mandatory training provided by the agency is 508 compliant. In FY22, EPA will focus on developing guidance and resources for creating accessible on-line training and begin the remediation for the existing mandatory training. EPA Compliance Assessment and Remediation Plan: EPA's Compliance Assessment and Remediation Plan (CARP), aligns to the U.S. Access Board ICT Testing Baseline which describes how to evaluate conformance to the Revised 508 Standards. EPA's CARP aims to assess and enhance the accessibility of EPA's ICT, develop a baseline to measure improvements, and report bi-annually to the OMB on Section 508 Program Maturity. Through FY21, EPA continued to inventory internal non-enterprise systems and applications, evaluated accessibility documentation from vendors, and conducted manual accessibility assessments of agency owned ICT. Additionally, the EPA Section 508 Program developed and enhanced the formal process for reviewing Accessible Conformance Reports (ACR), which is used to assess the level of conformance to Section 508 through the acquisition process. Using the lessons learned from FY21 results, in FY22, EPA plans to clarify the processes for assessing the level of conformance for existing systems and navigating the remediation process toward full compliance. The CARP will also align with the recently signed Section 508 procedures for testing and acquisition established processes and documentation for ensuring the accessibility of newly procured ICT. These two efforts will work together to create a full picture of the accessibility of EPA's Systems and applications. Additional Activities for FY22: • Establish workgroups to support the implementation of Executive Order (EO) 14035 Diversity, Equity, Inclusion, and Accessibility (DEIA) in the Federal Workforce. OCR-Led Accessibility Workgroup In FY21, OCR convened a workgroup to address accessibility-related concerns within the EPA community. This effort had an initial focus on issues impacting the deaf and hard of hearing community that resulted from the agency's transition to a virtual workforce due to the COVID-19 pandemic. This OCR-led Accessibility Workgroup collaborated with the Office of Public Affairs (OPA) to improve and standardize access to agency-wide virtual events. This collaboration included several actions to meet accessibility needs, including: • How events were presented • Clearly articulating the accessible features of virtual meetings • How to request a reasonable accommodation, if needed This workgroup laid the foundation for work to continue through the agency's Diversity, Equity, Inclusion, and Accessibility (DEIA) efforts, per Executive Order 14035. EPA Compliance with Executive Order (EO) 14035 on Diversity, Equity, Inclusion, and Accessibility: DEIA efforts directly support and sustain the agency's mission and

workforce, now and into the future. The OCR Director and Deputy Director were appointed to the agency's Diversity, Equity, Inclusion, and Accessibility Implementation Team (DEIA IT); the Director serves as a liaison to two of the eight new workgroups and the Deputy Director serves a liaison to one of the eight new workgroups. SES co-chairs will be appointed to lead the eight workgroups. Each workgroup will include two co-chairs, approximately ten members from the EPA community, and one or two members of the DEIA IT. The workgroups will play an important role in drafting EPA's DEIA Strategic Plan, due to the Office of Management and Budget (OMB) in FY22. DEIA Workgroups: • Data Collection, Analysis, and Measurement (OCR Director, DEIA IT liaison) • Outreach, Recruitment, and Hiring • Career Development and Training • Creating an Agency Culture of DEIA and Employee Engagement • Agency Organization for DEIA Sustainability • Accountability • LGBTQ+ (OCR Director, DEIA IT liaison) • Accessibility (OCR Deputy Director, DEIA IT liaison)

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 FY21, the Reasonable Accommodation (RA) program processed a total of 316 requests. Of the 316 requests, 288 were initiated in FY21 and 28 were initiated in FY20. The 28 requests initiated in FY20 were in pending status on September 30, 2020, and were carried over and completed in FY21. In FY21, the agency received 288 new requests and 243 were completed in FY21. EPA processed and completed all 243 requests (or 100%) within the time frames identified in EPA RA Procedures with an average processing time of 13.4 days. EPA has attained a 90% or greater processing rate for eleven consecutive years.

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.

The following is a summary and analysis of the RA requests that were initiated in FY 2021: Of the 288 requests initiated in FY 2021, 243 requests were processed and completed. There were 45 requests initiated in FY21 that were in pending status as of September 30, 2021; these requests will be carried over to FY22. Processing and completing a reasonable accommodation request refer to the steps taken starting when the employee or applicant first makes a request to the conclusion of the process usually with the decision-maker issuing a decision or in some cases when the request is withdrawn or closed. Breakdown of the 243 requests completed in FY 2021: • 210 requests were approved • 2 requests were denied • 4 requests were denied under reasonable accommodation (RA) but were offered some relief outside of the RA process • 17 requests were withdrawn by the employee • 10 requests were closed (employee resigned, retired, or separated from the agency or in some cases passed away; therefore, a decision for the request was no longer needed and was closed without a final decision). In FY21, the Reasonable Accommodation (RA) program processed a total of 316 requests. Of the 316 requests, 288 were initiated in FY21 and 28 were initiated in FY20. The 28 requests initiated in FY20 were in pending status on September 30, 2020, and were carried over and completed in FY21. In FY21, the agency received 288 new requests and 243 were completed in FY21. EPA processed and completed all 243 requests (or 100%) within the time frames identified in EPA RA Procedures with an average processing time of 13.4 days. EPA has attained a 90% or greater processing rate for eleven consecutive years. In FY 2021, the most requested items or types of accommodations were: 1. Assistive technology (AT) equipment as well as ergonomic equipment such as ergonomic keyboards and chairs (combined) with 71 requests 2. Telework (full-time, additional day, episodic, etc.) with 64 requests 3. Computer equipment such as larger monitor, mouse, etc. with 54 requests 4. Modified work schedule (start/end times) with 25 requests 5. Facilities related requests such as small refrigerators, space heaters, workspace modification, and changes to lighting with 10 requests 6. Sit/stand desks with 8 requests 7. Change in duty station with 7 requests. The National Reasonable Accommodation Coordinators (NRACs) delivered 27 training sessions to a total of 1,345 participants. The training sessions included four (4) agency-wide trainings delivered virtually, as well as trainings for the offices below: 1. Region 3 (Philadelphia) 2. Region 5 (Chicago) 3. Region 9 (San Francisco) 4. Region 10 (Seattle) 5. Office of the Administrator (AO) 6. Office of the Chief Financial Officer (OCFO) 7. Office of Enforcement and Compliance Assurance (OECA) 8. Office of Research and Development (ORD) In FY 2021, six (6) new Local Reasonable Accommodation Coordinators (LORACs) were trained on the EPA reasonable accommodation process. ***Table to be added as a Supplemental Document for Section V, C: Reasonable Accommodation Program, Question #2.***

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.

There were no Personal Assistance Services (PAS) requests initiated in FY 2021.

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.

N/A

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.

N/A

Section VIII: Identification and Removal of Barriers

Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.

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

Answer Yes

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

Answer Yes

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments

Source of the Trigger:	Workforce Data (if so identify the table)					
Specific Workforce Data Table:	Workforce Data Table - B1					
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	See Appendix I: PWD Barrier Analysis Report FY21					
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i>					
Barrier Analysis Process Completed?:	Y					
Barrier(s) Identified?:	Y					
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	Barrier Name		Description of Policy, Procedure, or Practice			
	Infrequent use of the Schedule A Hiring Authority		The inadequate use of Schedule A Authority by hiring officials is a barrier to EPA achieving the 12% hiring goal for people with disabilities required by law.			
Objective(s) and Dates for EEO Plan						
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description	
Responsible Official(s)						
Title		Name		Standards Address The Plan?		
Director, Office of Civil Rights (OCR)		JuanCarlos Hunt		Yes		
Director, Office of Human Resources (OHR)		Mara Kamen		No		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activities			Sufficient Staffing & Funding?	Modified Date	Completion Date
11/01/2021	OCR to identify an Executive Champion to work with senior management to identify a National Schedule A Champion who can promote and advocate for the program at the most senior level. Identify an SES co-lead for the Diversity, Equity, inclusion, Accessibility (DEIA) Workgroup.			Yes		11/01/2021

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
11/01/2021	The Research Triangle Park (RTP) Shared Service Center (SSC) to provide OCR with detailed automated reports related to the use of Schedule A.	Yes		10/01/2021
02/28/2022	The RTP SSC will develop a repository of qualified Schedule A candidates' resumes. Managers will have access to the resumes through USAJobs. Shared Service Centers will provide written instructions on how to access and use the resume repository to EEOOs, PMOs, HROs, and hiring managers who have requested access.	Yes		
02/22/2022	Begin conducting training sessions on findings and recommendations of barrier analysis report; Schedule A Hiring Authority for Persons with Disabilities; and Workforce Recruitment training sessions to managers.	Yes		
09/30/2022	Data collected on Schedule A to be analyzed. Engage Deputy Civil Rights Officials (DCROs) to set numerical goals and potential performance metrics.	Yes		
09/30/2022	EPA leadership to issue a separate policy statement specifically to emphasize its commitment to hiring individuals with disabilities.	Yes		
09/30/2022	OMS (including the SSCs and OHR), DCROs, and the Office of the Administrator (including OCR) to develop a unified disability recruitment strategy that incorporates the agency's Disability Program Managers (DPMs). These recruitment plans will be developed and implemented by EPA regions and program offices.	Yes		
Report of Accomplishments				
Fiscal Year	Accomplishment			
2021	Barrier Analysis report was completed. Recommendations have been approved by EPA Senior Leadership.			

Source of the Trigger:		Workforce Data (if so identify the table)							
Specific Workforce Data Table:		Workforce Data Table - B1							
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?		Infrequent use of the Schedule A Hiring Authority							
STATEMENT OF BARRIER GROUPS:		<i>Barrier Group</i> People with Disabilities People with Targeted Disabilities							
Barrier Analysis Process Completed?:		N							
Barrier(s) Identified?:		N							
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.		<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:50%; text-align: center;">Barrier Name</th> <th style="width:50%; text-align: center;">Description of Policy, Procedure, or Practice</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>				Barrier Name	Description of Policy, Procedure, or Practice		
Barrier Name	Description of Policy, Procedure, or Practice								
Objective(s) and Dates for EEO Plan									
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description				
06/01/2019	04/01/2021	Yes		04/01/2021	1. Conduct analysis of EPA policies, practices, and procedures related to disability recruitment to identify barriers.				
03/01/2020	04/01/2021	Yes		04/01/2021	2. Assemble key findings as a result of analysis.				
03/01/2020	04/01/2021	Yes		04/01/2021	3. Construct recommendations for the consideration of senior leaders that will have a meaningful impact on the hiring of Persons with Disabilities.				
Responsible Official(s)									
Title		Name		Standards Address The Plan?					
Planned Activities Toward Completion of Objective									
Target Date	Planned Activities			Sufficient Staffing & Funding?	Modified Date	Completion Date			
Report of Accomplishments									
Fiscal Year	Accomplishment								

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

N/A

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

Barrier Analysis identified the need to increase the use of the Schedule A – Hiring Authority to increase the hiring of persons with disabilities.

- 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.

N/A as barrier analysis completed in FY21 and recommendations to be implemented in FY22.