

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

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

Section I: Efforts to Reach Regulatory Goals

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

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

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

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

Table B4 indicates that PWDs in the GS-1 to GS-10 cluster participated at a rate of 24.52%, and 13.44% in the GS-11 to SES cluster of the permanent workforce, which exceeds the 12% EEOC 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

Table B4 indicates that PWTDs in GS-1 to GS-10 cluster was 6.61%, and 3.08% in the GS-11 to SES cluster of the permanent workforce, which exceeds the 2% EEOC goal.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-11 to SES	14097	1840	13.05	383	2.72
Grades GS-1 to GS-10	667	196	29.39	46	6.90

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

EPA leadership encouraged the region and program offices to consider PWDs when filling positions. EPA also promoted the benefits of the Schedule A (disability) hiring authority and the use of the Workforce Recruitment Program (WRP). EPA informed all senior leaders about the agency's Section 501 Affirmative Action Plan (AAP) and numerical goals, including the 12% and 2% numerical inclusion goals as part of ongoing EEO and DEIA strategic planning discussions. EPA encouraged senior leaders to socialize the goals to hiring managers within their region and program offices. EPA leadership communicated numerical goals to all employees through internal communication channels. Furthermore, EPA issued mass communication encouraging employees to

complete or update their disability status through its Employee Express portal and explained the benefit of reporting such data. The Agency uses this data to measure its efforts in recruiting, hiring, advancing, retaining, and eliminating barriers to EEO for individuals with disabilities.

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

- 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

- 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	

- 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

Yes, EPA has provided Disability Program Managers, collateral duty SEPMs, and staff with sufficient training to complete their responsibilities during the FY23 reporting period. In FY23, EPA continued to provide disability training to its disability program staff using various educational methods, online training, on-the-job training, and engagement during EEOC-facilitated Federal Exchange on Employment and Disability (FEED) calls. The Agency has also selected and trained additional Local Reasonable Accommodation Coordinators to effectuate the prompt processing of reasonable accommodation requests. OCR also conducted four in-depth three-day technical assistance visits of two program and two region offices, which included separate reasonable accommodation trainings for employees and for managers/supervisors. OCR’s NRAP also held two semi-annual nationwide trainings for employees and managers/supervisors.

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 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.

Over the last fiscal year, the agency utilized a variety of recruitment strategies designed to increase the number of qualified applicants with disabilities and applicants with targeted disabilities within the mission critical occupations. In FY23, the EPA modified the accessibility language used in job announcements posted by EPA on USAJOBS. The goal is to make the language in our job announcements be both inclusive and clear about what a Reasonable Accommodation (RA) is, and how to request a RA during the recruitment/hiring process. EPA finalized and implemented modified language in FY23. EPA continues to update the Agency's intranet website for PWD, including PWTD. The PWD section of the website contains information regarding the Schedule A hiring authority, training videos, resources, and guides, to help hiring managers and EPA employees. EPA continues to recruit PWD and PWTD using digital and social media outreach such as LinkedIn. EPA encourages individuals with disabilities to apply under the Schedule A Hiring Authority to open positions posted on USAJOBS. The Office of Mission Support (OMS) encourages hiring managers to utilize programs such as the Workplace Recruitment Program (WRP) to identify, interview, and hire PWD and PWTD non-competitively without vacancy announcements when possible. The agency's Handshake Premium Contract increased outreach and recruitment efforts to students from all educational institutions including PWD students from Minority Serving Institutions, and Veterans.

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 PWD and PWTD. EPA encourages individuals with disabilities (e.g., Schedule A, 30% or more disabled Veterans, etc.) to apply for vacancy announcements posted on USAJOBS. EPA refers individuals with disabilities who meet minimum qualifications and provide the appropriate documentation as prescribed by 5 CFR 213.3102(u) to the hiring manager for consideration. EPA continues to leverage the hiring of PWD and PWTD through resources such as, the WRP and existing registries housed on www.max.gov.

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. EPA's OMS, Shared Service Center (SSC) has developed a Schedule A Repository. This Repository hosts resumes and writing samples from Schedule A Disability-eligible candidates, which SSC shares with the region and program offices to streamline and increase hiring managers' use of the Schedule A hiring authority. EPA's SSC reviews applications from applicants who submit documentation designating their disability status pursuant to special hiring authority Schedule A (5 C.F.R. § 213.3102(u)). The SSC screens all applicants seeking employment through Schedule A for minimum qualifications/selective factors to determine eligibility for noncompetitive, Schedule A appointments. EPA may make permanent or time-limited appointments and determines whether the applicant is likely to succeed in the performance of the duties of the position for which the applicant applied. In determining whether the applicant is likely to succeed in performing the duties of the position, EPA 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. EPA notes that it also uses the 30% or More Disabled Veteran Authority.

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

For the first time, EPA also included a session on the use of OPM's Agency Talent Portal to search for Schedule A candidates. These Schedule A related webinars reached hundreds of hiring managers and special emphasis program managers. The webinars discussed ways to utilize hiring authorities for persons with disabilities, trained hiring managers on how to utilize the Workforce Recruitment Program database and provided awareness to encourage managers to hire more qualified individuals with disabilities. Training sessions were open to all EPA employees for situational awareness should they advance to management positions. The training sessions were recorded, and videos, including materials were made available on the EPA intranet site. The National Disability Employment Program Manager provided assistance and answered questions regarding the Schedule A Hiring Authority to both the hiring managers and candidates.

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.

EPA continues to focus on building partnerships with professional organizations. Through FY23, the Agency continued to increase the number of Memorandums of Understanding (MOUs) with organizations that foster strong ties with students with disabilities, including with targeted disabilities as part of its broad-based outreach efforts to raise awareness of EPA's mission and to potentially increase the diversity of the Agency's applicant pool. To name a few, the Agency has renewed its MOU agreement with Gallaudet University for an additional 5 years; EPA continued its partnerships with Rochester Institute of Technology (RIT)/National Technical Institute for the Deaf (NTID); and will continue to collaborate on the advancement of environmental education to improve awareness of national employment opportunities and other opportunities for individuals with disabilities and is working with program/regional offices to identify other PWD organizations to establish MOUs. For example, Region 1 signed a new agreement with Landmark College (Neurodiversity).

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

- 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

There were no triggers identified in the permanent workforce for PWD and PWTD. In FY23, EPA hired 1656 permanent employees. Of those new hires, 18.96% (314) were PWDs and 4.05% (67) were PWTDs.

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

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

a. New Hires for MCO (PWD) Answer No

b. New Hires for MCO (PWTD) Answer No

EPA has identified five mission critical occupations (MCOs): 0401 General National Resources Management, 0819 Environmental Engineering, 0830 Mechanical Engineering, 1301 General Physical Science, 1320 Chemist. In FY23, there were no triggers identified for new hires.

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

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

- a. Qualified Applicants for MCO (PWD) Answer No
- b. Qualified Applicants for MCO (PWTD) Answer No

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

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

In FY23, EPA experienced less than expected rates for selections in the General Natural Resource Management (0401) occupation for both PWDs and PWTDs. However, the data disparities were not significant enough to warrant further analysis. EPA will continue to monitor the data for statistical anomalies. Qualified PWDs 2.53%, PWDs Selected 1.76%, Qualified PWTDs 1.26%, PWTDs Selected 0.59%

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.

EPA will continue to post all internal advancement opportunities, i.e., details, temporary promotions, and reassignments on its internal website. The agency will continue to make PWD and PWTD aware of opportunities, such as promotions, details, and reassignments, and encourage PWD and PWTD to apply for these opportunities. Senior leadership also will partner with the Office of Mission Support (OMS) to promote internal advancement opportunities. Other advancement opportunities include promoting the use of training courses available through FedTalent in efforts to improve professional development; promoting the development of personal learning and development goals; and helping employees to develop and implement Individual Development Plans (IDPs). EPA empowers the Disability Employment Program Advisory Council (DEPAC) to coordinate plans with senior leadership for the Agency’s National Disability Employment Awareness Month (NDEAM) Observance Program Event. The purpose of this empowerment is to get all staff in the habit of encouraging professional development of employees with disabilities. As previously mentioned, OCR also provides several trainings for employees and supervisors/managers regarding PWD, including PWTD, to

ensure these employees have sufficient opportunities for advancement.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

EPA continues to offer career development tools and resources that assist all employees, including PWD and PWTd, with skill development. Additionally, EPA has added new offerings to include the following: *Competency of the Month*, *Mindful Communications*, *Workplace Environment Plan 2023: Leadership Training: Hybrid Workplace Program*, *Telling Your Story: Writing Executive Core Qualifications Workshop*, *National Executive Leadership Development Conference*, *Feedback to Fuel Executive Learning: 360-degree assessment for Senior Leaders*, *SES Candidate Development Program*, *Coaching Skills for Leaders*, *Executive Women in Motion*. EPA also notes that it is establishing a Career Development Framework, Career Planning tools, and other internal resources for professional growth and development for all employees, including PWD and PWTd, interested in promoting their career and development goals. The resources will include, Individual Development Planning and Career Development Workshops, self-directed career planning and development tools, resources, and activities, voluntary consultations on Individual Development Plans and Career Planning.

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 (%)
Fellowship Programs	16	16	N/A	N/A	N/A	N/A
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
Detail Programs	N/A	N/A	N/A	N/A	N/A	N/A
Internship Programs						
Other Career Development Programs	568	24	5%	8%	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 No

b. Selections (PWD)

Answer No

EPA does not capture data for all its career development programs; however, based on the data collected, there were no identified triggers.

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 capture any PWTB data for its career development programs.

C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTB 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 (PWTB) Answer Yes

There are no significant triggers for time off awards involving PWD and/or PWTB. However, EPA has identified the following triggers for Cash Awards that have more than a two-percentage point disparity: \$3000-3999 PWD 19.66% < PWOD 24.26% and PWTB 18.43% < PWOTD 23.78% \$4000-4999 PWD 8.66% < PWOD 14.19% and PWTB 8.04% < PWOTD 13.38%. In FY 2024, EPA will conduct further analysis of the data to determine if the agency should commence a barrier analysis of its award distributions.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	4286	30.55	28.85	29.84	30.74
Time-Off Awards 1 - 10 Hours: Total Hours	33473	236.89	225.80	224.48	240.20
Time-Off Awards 1 - 10 Hours: Average Hours	7	0.34	0.06	1.63	0.00
Time-Off Awards 11 - 20 hours: Awards Given	1873	14.88	12.29	15.38	14.75
Time-Off Awards 11 - 20 Hours: Total Hours	31113	246.27	203.95	248.02	245.80
Time-Off Awards 11 - 20 Hours: Average Hours	16	0.79	0.14	3.73	0.00
Time-Off Awards 21 - 30 hours: Awards Given	691	4.72	4.53	4.66	4.73
Time-Off Awards 21 - 30 Hours: Total Hours	18043	121.51	118.23	118.41	122.34
Time-Off Awards 21 - 30 Hours: Average Hours	26	1.23	0.22	5.83	0.00
Time-Off Awards 31 - 40 hours: Awards Given	897	5.16	6.13	4.20	5.41
Time-Off Awards 31 - 40 Hours: Total Hours	35435	204.81	242.16	163.64	215.81
Time-Off Awards 31 - 40 Hours: Average Hours	39	1.92	0.33	9.09	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	1256	8.25	8.41	9.09	8.03
Cash Awards: \$501 - \$999: Total Amount	914109	5953.34	6134.74	6479.72	5812.82

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Average Amount	727	35.41	6.16	165.97	0.56
Cash Awards: \$1000 - \$1999: Awards Given	3271	25.15	21.33	25.64	25.02
Cash Awards: \$1000 - \$1999: Total Amount	4451742	34153.78	29000.26	34145.69	34155.94
Cash Awards: \$1000 - \$1999: Average Amount	1360	66.70	11.49	310.26	1.68
Cash Awards: \$2000 - \$2999: Awards Given	4213	29.13	28.39	29.60	29.00
Cash Awards: \$2000 - \$2999: Total Amount	10173147	69821.81	68691.23	71796.97	69294.52
Cash Awards: \$2000 - \$2999: Average Amount	2414	117.73	20.45	565.27	-1.74
Cash Awards: \$3000 - \$3999: Awards Given	3918	22.50	27.47	20.05	23.15
Cash Awards: \$3000 - \$3999: Total Amount	13129917	74845.53	92148.66	66612.59	77043.37
Cash Awards: \$3000 - \$3999: Average Amount	3351	163.41	28.35	774.36	0.31
Cash Awards: \$4000 - \$4999: Awards Given	2342	10.12	17.35	9.32	10.33
Cash Awards: \$4000 - \$4999: Total Amount	10302710	44550.69	76354.74	41072.96	45479.09
Cash Awards: \$4000 - \$4999: Average Amount	4399	216.26	37.19	1026.81	-0.12
Cash Awards: \$5000 or more: Awards Given	881	3.63	6.52	2.56	3.92
Cash Awards: \$5000 or more: Total Amount	10282254	42144.74	76835.10	22341.49	47431.36
Cash Awards: \$5000 or more: Average Amount	11671	569.50	99.65	2031.00	179.34

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

a. Pay Increases (PWD)

Answer No

b. Pay Increases (PWTD)

Answer No

There were no triggers among PWD or PWTD for Quality Step Increases.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
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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 N/A

b. Other Types of Recognition (PWTD)

Answer N/A

EPA offers various award and recognition programs, both formal and informal. However, the agency was unable to determine whether triggers exist for PWD and/or PWTD in these programs because EPA does not capture the data in a way that would lead to

a meaningful analysis. OHR is working to collect this data. OCR will continue work with OHR to develop, implement, and track other employee recognition programs for PWD and/or PWTD.

D. PROMOTIONS

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

- a. SES

i. Qualified Internal Applicants (PWD)	Answer	No
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ii. Internal Selections (PWD)	Answer	No
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- b. Grade GS-15

i. Qualified Internal Applicants (PWD)	Answer	Yes
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ii. Internal Selections (PWD)	Answer	Yes
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- c. Grade GS-14

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

i. Qualified Internal Applicants (PWD)	Answer	No
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ii. Internal Selections (PWD)	Answer	No
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EPA captures some applicant flow data for its SES positions; however, there were some data inconsistencies that prevented the agency from conducting a meaningful analysis of PWD promotions in the SES. Nonetheless, in FY23, EPA notes that its qualified internal applicants with a disability for the GS-15 grade level was 1.16% and none were selected. Although, the data disparities were not significant enough to warrant a barrier analysis, EPA will continue to monitor the data for statistical anomalies.

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

- a. SES

i. Qualified Internal Applicants (PWTD)	Answer	No
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ii. Internal Selections (PWTD)	Answer	No
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- b. Grade GS-15

i. Qualified Internal Applicants (PWTD)	Answer	Yes
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ii. Internal Selections (PWTD)	Answer	Yes
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- c. Grade GS-14

- | | | |
|---|--------|----|
| i. Qualified Internal Applicants (PWTD) | Answer | No |
| ii. Internal Selections (PWTD) | Answer | No |
| d. Grade GS-13 | | |
| i. Qualified Internal Applicants (PWTD) | Answer | No |
| ii. Internal Selections (PWTD) | Answer | No |

EPA captures some applicant flow data for its SES positions; however, there were some data inconsistencies that prevented the agency from conducting a meaningful analysis of PWTD promotions in the SES. Nonetheless, in FY23, EPA notes that its qualified internal applicants for the GS-15 grade level was 0.29% and none were selected. Although, the data disparities were not significant enough to warrant a barrier analysis, EPA will continue to monitor the data for statistical anomalies.

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 applicant flow data personnel system, Monster Analytics, does not capture the required demographic workforce data for new hires including PWD in the grade levels GS13-SES. OCR continues to coordinate with OHR 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 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.

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|------------------------------|--------|-----|
| 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 applicant-flow data personnel system, Monster Analytics, does not capture the required demographic workforce data for new hires including PWTDs in the grade levels GS13-SES. OCR continues to coordinate with OHR 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 applicant-flow data personnel system, Monster Analytics, does not capture the required demographic workforce data for qualified internal applicants and/or selectees for promotions to supervisory positions, including data for PWDs. OCR continues to coordinate with OHR to develop a process that will collect applicant flow data.

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

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

EPA's applicant-flow data system, Monster Analytics, does not capture the required workforce data for qualified internal applicants and/or selectees for promotions to supervisory positions, including PWTDs. OCR continues to coordinate with OHR to develop a process that will collect applicant flow 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 applicant-flow data system, Monster Analytics, does not capture the required workforce data among selectees for new hires

to supervisory positions, including PWDs. OCR continues to coordinate with OHR to develop a process that will collect applicant flow 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 applicant-flow data systems, Monster Analytics, does not capture the required workforce data among selectees for new hires to supervisory positions, including PWTDs. OCR continues to coordinate with OHR to develop a process that will collect applicant flow 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 No

EPA had fifty-four Schedule A disability appointees become eligible for conversion into the competitive service. Of those, the Agency converted thirty-eight appointees into the competitive service. In addition, sixteen appointees remain with the agency on their Schedule A appointments. OCR will work with HR to encourage development/improvement of a tickler system to remind supervisors when Schedule A employees are eligible for conversion and require supervisors who do not convert eligible employees to provide an explanation. Such data will provide the Agency with information to understand if there are any issues or challenges and, if there are, it will place the Agency in a better position to address them.

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

- | | | |
|----------------------------------|--------|----|
| a. Voluntary Separations (PWD) | Answer | No |
| b. Involuntary Separations (PWD) | Answer | No |

Using the inclusion rate, voluntary separations among PWD were 6.22% compared to 6.28% among persons without disabilities (PWOD). There is no trigger among PWD for voluntary separations since PWOD separated at a slightly higher rate. For involuntary separations, PWD separated at a slightly higher rate of 0.46% compared to PWOD of 0.13%. We note that the difference did not exceed the two-percentage point threshold to warrant a barrier analysis. EPA will continue to monitor the data to ensure there are no significant trends involving involuntary separations of PWD.

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Removal	21	0.47	0.08
Permanent Workforce: Resignation	149	0.70	1.00
Permanent Workforce: Retirement	473	2.14	3.18
Permanent Workforce: Other Separations	265	2.10	1.64
Permanent Workforce: Total Separations	908	5.40	5.90

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

a. Voluntary Separations (PWTD) Answer No

b. Involuntary Separations (PWTD) Answer No

Using the inclusion rate, voluntary separations among PWTDs were 3.92% compared to 4.44% among persons without targeted disabilities (PWOTD). Involuntary separations among PWTD were 0.39% compared to 0.17% among PWOTD. Although the data shows that PWTD involuntarily departed the agency at a higher rate than PWOTD, the disparity does not meet the two-percentage point threshold to warrant a barrier analysis. EPA will continue to monitor the data to ensure there are no significant trends involving involuntary separations of PWTDs.

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	21	0.44	0.13
Permanent Workforce: Resignation	149	0.22	0.98
Permanent Workforce: Retirement	473	2.41	3.06
Permanent Workforce: Other Separations	265	2.41	1.68
Permanent Workforce: Total Separations	908	5.48	5.84

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.

Workforce data reveals that there were no significant data disparities involving the separation rate of PWDs and PWTDs when compared to PWODs and PWOTDs.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

<https://www.epa.gov/accessibility/epa-accessibility-statement>

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

<https://www.epa.gov/ocr/affirmative-employment-analysis-and-accountability#architectural>

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.

The agency developed guidance and resources for creating accessible on-line training and began the remediation for the existing mandatory training. EPA Compliance Assessment and Remediation Plan: EPA's Compliance Assessment and Remediation Plan (CARP), aligns with 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 biannually to the OMB on Section 508 Program Maturity. EPA Accessibility workgroup (WG) conducts monthly web accessibility meetings designed to provide employees with the tools needed for digital accessibility. EPA Accessibility WG is composed of EPA employees, including OCR employees, selected as accessibility subject matter experts.

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 FY23, EPA's National Reasonable Accommodation Program (NRAP) processed a total of 593 reasonable accommodation requests. Of the 593 requests, 36 were initiated in FY22 and 557 were initiated in FY23. The 36 requests initiated in FY22 were in pending status on September 30, 2022, and were carried over and all were completed in FY23. Of the 557 requests initiated in FY23, there were requests from seventeen (17) new employees and two (2) applicants, and 503 requests were processed and completed. At the conclusion of FY23, 54 requests remained in pending status and were carried over to FY24 to continue processing. In FY23, the EPA processed and completed 502 of the 503 requests (or 99.8%) within the time frames identified in EPA Reasonable Accommodation (RA) Procedures with an average processing time of 18.2 days. The EPA has attained a 90% or greater processing rate for thirteen consecutive years and attained better than 95% since FY17.

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.

In FY23, the EPA processed and timely completed 99.8% of RA requests within the time frames identified in its Reasonable Accommodation (RA) Procedures, with an average processing time of 18.2 days. In FY23, the NRAP started tracking implementation dates from approval to having the reasonable accommodation(s) in place. The average implementation time was 6.7 days. Collecting and analyzing the implementation dates assists EPA in identifying roadblocks or opportunities to improve or streamline processes for the procurement of equipment or services. In FY23, the Agency has developed and implemented mandatory training for all employees, managers, and supervisors regarding the Reasonable Accommodation process. The Reasonable Accommodation program has also conducted several individualized trainings to groups of supervisors and managers on various disability related topics. The Agency has also selected and trained additional Local Reasonable Accommodation Coordinators to effectuate the prompt processing of reasonable accommodation requests.

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 five PAS requests in FY23, all of which were approved within the time frames identified in the Reasonable Accommodation (RA) Procedures, with an average processing time of 3.4 days. In addition, all EPA reasonable accommodation

training includes information about PAS. The Reasonable Accommodation website has information about PAS including a reference guide that explains PAS in more depth along with frequent questions on the website (https://www.epa.gov/sites/default/files/2020-09/documents/pas_reference_guide_final_september_22_2020.pdf and <https://www.epa.gov/ocr/reasonable-accommodation#FAQPAS>). EPA continues to monitor the trends about PAS requests which this year was mostly related to official travel duty needs.

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.

In FY23, there were no findings alleging harassment from PWDs.

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 Yes

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 Yes

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.

The corrective action taken included requiring the responsible management officials to complete reasonable accommodation training and requiring the program offices to provide the complainants with an effective accommodation.

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 No

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

Answer N/A

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?	N/A				
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i>				
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 Infrequent Use of Schedule A Authority		Description of Policy, Procedure, or Practice 1. The Infrequent 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?	
Acting Assistant Director, AEAA		Cynthia Darden		Yes	
National Disability Program Manager		Russell Massey		Yes	
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.

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

N/A

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
