

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

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

### Section I: Efforts to Reach Regulatory Goals

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

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

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

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

\*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

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

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

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

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

The agency has communicated the EEOC goals to the hiring managers and/or recruiters through OCR and OMS reminding them to use disability hiring authorities, such as Schedule A. Also, EPA leadership, including the Deputy Administrator, Regional Administrators, Deputy Assistant Administrators, and Deputy Civil Rights Officials have also communicated this message. Furthermore, EPA promotes the benefits of the Workforce Recruitment Program (WRP). The Agency informed all senior leaders about the agency's Section 501 Affirmative Action Plan (AAP) and numerical goals, including the EEOC's 12% and 2% PWD and PWTD employment goals. The Agency encouraged senior leaders to socialize the EEOC goals to hiring managers within their region and program offices. EPA leadership communicated the EEOC goals to all employees through internal communications. The National Disability Program Manager conducted quarterly training for managers and supervisors, as well as other interested participants.

## 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	
Section 508 Compliance	3	0	61	Sarah Sorathia, Section 508 Program Manager, OMS Sorathia.Sarah@epa.gov
Architectural Barriers Act Compliance	1	0	1	Yvette Jackson, Director, Office of Real Property, Safety and Security, OMS Jackson.Yvette@epa.gov
Processing applications from PWD and PWTD	30	0	0	Tiffany Sykes, Director, Recruitment and Classification Division Office of Human Capital Operations Sykes.Tiffany@epa.gov
Processing reasonable accommodation requests from applicants and employees	2	1	25	Amanda Sweda, Senior National Reasonable Accommodation Coordinator, OCR Sweda.Amanda@epa.gov
Special Emphasis Program for PWD and PWTD	1	0	33	Russell Massey, National Disability Employment Program Manager, OCR/AEAA Massey.Russell@epa.gov
Answering questions from the public about hiring authorities that take disability into account	30	0	0	Tiffany Sykes, Director, Recruitment and Classification Division Office of Human Capital Operations Sykes.Tiffany@epa.gov

3.

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

Answer Yes

The Agency continued to provide disability training to its disability program staff using various educational methods, online training, on-the-job training, and participation in EEOC’s Disability Employment Program Manager trainings. OCR conducted four in-depth, three-day EEO Training and Accountability Visits (TAVs) for one program and three region offices and trainings for specific offices per request, all of which included reasonable accommodation (RA) trainings for employees and managers/supervisors. In addition, in FY 24, OCR’s National Reasonable Accommodation Program (NRAP) conducted 27 training sessions throughout the year, including agency-wide training for employees, supervisors and managers. Moreover, NRAP provided training to Local Reasonable Accommodation Coordinators (LORACs) on the Reasonable Accommodation Management Site (RAMS) for tracking reasonable accommodation requests.

## **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

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## **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.

The EPA’s Office of Mission Support Recruitment and Classification Division (RCD) maintained a Schedule A Repository. The Repository hosted resumes and writing samples from Schedule A Disability-eligible candidates, which RCD shared with the region and program offices to streamline and increase hiring managers’ use of the Schedule A hiring authority. EPA continued to leverage the hiring of PWD and PWTD through resources, such as the WRP and registries housed on [www.max.gov](http://www.max.gov). The Agency continued to take part in the Virtual Careers and the “disABLED” Magazine’s Career Expo. Furthermore, EPA has a Memorandum of Understanding (MOU) with Gallaudet University, with Rochester Institute of Technology, National Technical Institute of the Deaf, and with Landmark University.

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 EPA utilizes Schedule A hiring authority 5 C.F.R. 213.3102 (u) for persons with intellectual disabilities, severe physical disabilities or psychiatric disabilities; the Veterans' Recruitment Appointment authority 5 CFR part 307; and the 30% or More Disabled Veteran authorities in 5 CFR 316.302(b)(4) and 316.402(b)(4). All vacancy announcements state that the agency is an equal opportunity employer and encourages candidates with disabilities to apply for all merit promotion recruitments external to the EPA. All announcements also provide information for requesting a reasonable accommodation.

- 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.

For vacancies posted on USAJobs, applicants can elect to be considered under the Schedule A or Disabled Veterans authorities and must submit documentation designating their disability status pursuant to special hiring authority Schedule A (5 C.F.R. § 213.3102(u), the Veterans' Recruitment Appointment authority 5 CFR part 307, and the 30% or More Disabled Veteran authorities 5 CFR 316.302(b)(4) and 316.402(b)(4). The EPA's Recruitment and Classification Division (RCD) screens all applicants seeking employment through disability hiring authorities for minimum qualifications and selective factors to determine eligibility for noncompetitive, disability appointments. If the applicant is minimally qualified, the individual is referred to the hiring manager on a separate certificate of eligible candidates along with guidance explaining how to utilize the relevant hiring authority.

- 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

As part of the Agency's continued strategic efforts and activities to increase employment opportunities for PWD, in FY24, EPA hosted three enterprise-wide training sessions for hiring managers on effectively using the Schedule A hiring authority for PWDs and utilizing the Workforce Recruitment Program (WRP) database webinars. The webinars discussed ways to utilize hiring authorities for persons with disabilities, trained hiring managers on how to use the Workforce Recruitment Program database, OPM's Agency Talent Portal, and provided awareness to encourage managers to explore hiring qualified individuals with disabilities. The webinars were recorded and made available on the EPA intranet site. In addition to hiring managers, the webinars were open to all EPA employees for situational awareness should they advance to management positions. Moreover, 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.

The Agency continued to take part in the Virtual Careers & the "disABLED" Magazine's Career Expo, one of the nation's largest career fairs for persons with disabilities with employers looking to recruit new talent from a pool of applicants with disabilities. During FY 24, the Agency sponsored and funded a Virtual Room where the OMS National Disability Employment Program Manager (NDEPM), hiring managers, and recruiters spoke directly with candidates. OMS NDEPM also provided technical assistance to hiring managers and candidates on Schedule A hiring. EPA continued to focus on building partnerships with professional organizations. The Agency continued to increase the number of MOUs with organizations that foster strong ties with students with disabilities, including targeted disabilities, as part of its broad-based outreach efforts to raise awareness of EPA's mission and to potentially increase the applicant pool so as not to discriminate against this group. EPA also has an existing MOU with Landmark College (Neurodiversity). Some of the activities conducted by the disabilities program include the following: 1. Worked with Human Resources staff to develop a hiring webinar for Landmark college transition support staff highlighting the USA Jobs and schedule A hiring process. This train-the-trainer type of webinar seeks to increase applications of qualified candidates with disabilities. Region 1 began to update its college/university contact list and began planning another webinar for Boston-area colleges and universities in FY25. 2. Developed a poster to assist persons with disabilities apply for employment in Region 1. 3. Hosted a neurodiversity awareness presentation by students from Landmark college. The students shared their journeys including college and work study challenges and included tips on what helped them succeed, which over 40 EPA Region 1 staff and managers attended.

## 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

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

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or 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

For MCO 819, PWDs, Qualified External Applicants (QEA) was 6.68% and External Selections (ES) was 2.93%; for PWTDs QEA was 3.14% and ES was .8%. For MCO 1320, PWTDs, QEA was 3.05% and ES was 0%.

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

For promotions, for PWD, in MCO 1301, Qualified Internal Applicants (QIA) was 5.86% and Internal Selections (IS) was 3.63%. For promotions, for PWTD, in MCO 1320 QIA was 2.41% and IS was 0%.

## 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.

The Agency posts all internal advancement opportunities, i.e., details, temporary promotions, and reassignments on its internal website – Talent Hub and announcing opportunities via mass emails to all staff, which includes information for persons needing a reasonable accommodation due to disability. The Agency stresses the value of considering disability hiring authorities, such as Schedule A. Moreover, the Agency's National Disability Employment Program communicates with interested EPA employees with disabilities of its activities, such as the Disability Summit, which encourages professional development of employees with disabilities. In addition, EPA provides other advancement opportunities for all, including PWDs and PWTDs, which 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).

### B. CAREER DEVELOPMENT OPPORTUNITES

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

EPA did not provide any career development program opportunities in FY 2024.

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	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
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
Detail 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
Other Career Development 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 No

b. Selections (PWD)

Answer No

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

a. Applicants (PWTD) Answer No

b. Selections (PWTD) Answer No

## C. AWARDS

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

a. Awards, Bonuses, & Incentives (PWD) Answer Yes

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

There was a trigger for Cash Awards at the \$4,000-4,999 levels for PWD.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	52290	352.06	321.47	341.93	355.41
Time-Off Awards 1 - 10 Hours: Total Hours	5162	34.56	31.86	34.11	34.71
Time-Off Awards 1 - 10 Hours: Average Hours	0.1	0.00	0.00	0.02	0.00
Time-Off Awards 11 - 20 hours: Awards Given	39249	267.75	242.40	282.20	262.99
Time-Off Awards 11 - 20 Hours: Total Hours	2055	14.29	12.58	16.14	13.67
Time-Off Awards 11 - 20 Hours: Average Hours	0.05	0.00	0.00	0.01	0.00
Time-Off Awards 21 - 30 hours: Awards Given	21984	146.28	133.59	114.14	156.89
Time-Off Awards 21 - 30 Hours: Total Hours	785	5.28	4.76	3.99	5.71
Time-Off Awards 21 - 30 Hours: Average Hours	0.04	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 hours: Awards Given	40373	238.48	255.39	199.67	251.29
Time-Off Awards 31 - 40 Hours: Total Hours	984	5.74	6.20	4.99	5.99
Time-Off Awards 31 - 40 Hours: Average Hours	0.02	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	1198	7.43	7.47	8.99	6.92
Cash Awards: \$501 - \$999: Total Amount	3072311	15599.38	20046.17	18496.01	14643.38
Cash Awards: \$501 - \$999: Average Amount	2564.53	86.66	21.53	342.52	2.22
Cash Awards: \$1000 - \$1999: Awards Given	3467	25.85	20.73	25.29	26.03
Cash Awards: \$1000 - \$1999: Total Amount	7591958	52238.65	46461.19	49460.23	53155.63
Cash Awards: \$1000 - \$1999: Average Amount	2189.78	83.45	17.99	325.40	3.60
Cash Awards: \$2000 - \$2999: Awards Given	4491	29.89	27.85	28.45	30.37
Cash Awards: \$2000 - \$2999: Total Amount	11943289	78270.52	74466.34	74731.61	79438.50
Cash Awards: \$2000 - \$2999: Average Amount	2659.38	108.11	21.46	437.03	-0.45
Cash Awards: \$3000 - \$3999: Awards Given	3555	18.87	23.33	20.30	18.40
Cash Awards: \$3000 - \$3999: Total Amount	12751242	67760.03	83709.93	74206.32	65632.51
Cash Awards: \$3000 - \$3999: Average Amount	3586.85	148.27	28.80	608.25	-3.54
Cash Awards: \$4000 - \$4999: Awards Given	1898	7.72	13.12	6.82	8.02
Cash Awards: \$4000 - \$4999: Total Amount	8723084	35748.89	60271.81	31281.70	37223.23
Cash Awards: \$4000 - \$4999: Average Amount	4595.93	191.17	36.86	762.97	2.46
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 No

b. Pay Increases (PWTD)

Answer No

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Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	306	1.07	2.14	1.66	0.88

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

a. Other Types of Recognition (PWD)

Answer No



b. Other Types of Recognition (PWTD)

Answer No

**D. PROMOTIONS**

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

a. SES

i. Qualified Internal Applicants (PWD)

Answer No

ii. Internal Selections (PWD)

Answer No

b. Grade GS-15

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer Yes

c. Grade GS-14

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer No

d. Grade GS-13

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer No

For SES, it was unclear if there was a trigger. See Section VII, below. For GS-15, Qualified Internal Applicants (QIA) the relevant applicant pool (RAP) was 10.76% and the QIA is 6.95%; Internal Selections (IS) the QIA was 6.95% and IA was 2.78%. For GS-14, QIA, the RAP was 15% and QIA was 5.63%. For GS-13: QIA RAP was 19.58% and QIA was 8.09%.

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

a. SES

i. Qualified Internal Applicants (PWTD)

Answer No

ii. Internal Selections (PWTD)

Answer No

b. Grade GS-15

i. Qualified Internal Applicants (PWTD)

Answer No

ii. Internal Selections (PWTD)

Answer No

c. Grade GS-14

i. Qualified Internal Applicants (PWTD)

Answer Yes

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

For SES, it was unclear if there was a trigger. See Section VII, below. For GS-14, the relevant applicant pool (RAP) was 3.92% and the Qualified Internal Applicants (QIA) was 1.70%.

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 | Yes |
| b. New Hires to GS-15 (PWD) | Answer | Yes |
| c. New Hires to GS-14 (PWD) | Answer | Yes |
| d. New Hires to GS-13 (PWD) | Answer | No  |

For SES, Qualified External Applicants (QEA) was 6.75% and External Selections (ES) is 3.45%. For GS-15, QES is 7.94% and ES was 2.50%. GS-14 QEA was 7.94% and ES was 4.48% Selected.

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 | No  |
| b. New Hires to GS-15 (PWTB) | Answer | Yes |
| c. New Hires to GS-14 (PWTB) | Answer | No  |
| d. New Hires to GS-13 (PWTB) | Answer | No  |

For GS-15, Qualified External Applicants (QEA) was 4.85% and External Selections (ES) was .83%.

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

- |  |        |    |
|--|--------|----|
| a. Executives                          |        |    |
| i. Qualified Internal Applicants (PWD) | Answer | No |
| ii. Internal Selections (PWD)          | Answer | No |
| b. Managers                            |        |    |
| i. Qualified Internal Applicants (PWD) | Answer | No |

- |  |        |     |
|--|--------|-----|
| ii. Internal Selections (PWD)          | Answer | No  |
| c. Supervisors                         |        |     |
| i. Qualified Internal Applicants (PWD) | Answer | Yes |
| ii. Internal Selections (PWD)          | Answer | Yes |

For Executives, it is unclear if there is a trigger. See Section VII, below. For Managers, the data is too small to make a determination that a trigger exists for Internal Selections (IS), because there was only one Qualified Internal Applicant (QIA). For Supervisors QIA, the Relevant Applicant Pool was 15% and the QIA was 7.33%; for IS, the QIA was 7.33% and the IS was 3.64%.

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

- |   |        |     |
|---|--------|-----|
| a. Executives                           |        |     |
| i. Qualified Internal Applicants (PWTB) | Answer | No  |
| ii. Internal Selections (PWTB)          | Answer | No  |
| b. Managers                             |        |     |
| i. Qualified Internal Applicants (PWTB) | Answer | No  |
| ii. Internal Selections (PWTB)          | Answer | No  |
| c. Supervisors                          |        |     |
| i. Qualified Internal Applicants (PWTB) | Answer | Yes |
| ii. Internal Selections (PWTB)          | Answer | No  |

For Executives, it is unclear if there is a trigger. See Section VII, below. For Managers, the data is too small to make a determination that a trigger exists for Internal Selections (IS), because there was only one Qualified Internal Applicant (QIA). For Supervisors QIA, the Relevant Applicant Pool was 3.92% and QIA was 1.77%.

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 | Yes |
| b. New Hires for Managers (PWD)    | Answer | No  |
| c. New Hires for Supervisors (PWD) | Answer | Yes |

For Executives, the Qualified External Applicants (QEA) was 6.68% and External Selections (ES) was 2.08%. For Supervisors, QEA was 7.85% and ES was 2.84%.

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

- |                                    |        |    |
|------------------------------------|--------|----|
| a. New Hires for Executives (PWTB) | Answer | No |
|------------------------------------|--------|----|

b. New Hires for Managers (PWTD)

Answer Yes

c. New Hires for Supervisors (PWTD)

Answer No

For Managers, the Qualified External Applicants was 4.06% and External Selections was 0%.
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## 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

The EPA had 101 Schedule A disability appointees become eligible for conversion into the competitive service. Of those, the Agency converted 73 appointees into the competitive service. The remaining 28 appointees do remain with the agency on their Schedule A appointments. It is unclear whether the Agency did not convert these eligibles because of performance or whether the non-conversion was inadvertent. OCR will recommend the Agency require supervisors who do not convert eligible employees to provide an explanation. OCR also will work with HR to encourage it to develop/improve a tickler system to remind supervisors when Schedule A employees are eligible for conversion.
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2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.

a. Voluntary Separations (PWD)

Answer No

b. Involuntary Separations (PWD)

Answer No

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	34	0.44	0.16
Permanent Workforce: Resignation	249	1.83	1.41
Permanent Workforce: Retirement	520	3.10	3.07
Permanent Workforce: Other Separations	231	1.51	1.34
Permanent Workforce: Total Separations	1034	6.88	5.97

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

a. Voluntary Separations (PWTD)

Answer No

b. Involuntary Separations (PWTD)

Answer No

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	34	0.00	0.21
Permanent Workforce: Resignation	249	1.48	1.47
Permanent Workforce: Retirement	520	3.94	3.04
Permanent Workforce: Other Separations	231	1.31	1.37
Permanent Workforce: Total Separations	1034	6.73	6.08

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.

Not applicable.

## 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.

EPA developed guidance and resources for creating accessible on-line training and began the remediation for the existing mandatory training. EPA's Compliance Assessment and Remediation Plan (CARP), aligns with the U.S. Access Board Information and Communication Technology (ICT) Testing Baseline, which describes how to evaluate conformance to the Revised 508 Standards. 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 conducts monthly web accessibility meetings designed to provide employees with the tools needed for digital accessibility. EPA Accessibility workgroup 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 FY 24, the Agency processed and completed 537 out of the 538 requests within the timelines established by the EPA Reasonable Accommodation Procedures, achieving a 99.8% completion rate with an average processing time of 21.2 days.

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 FY 24, 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 21.2 days. In FY 23, the NRAP started tracking implementation dates from approval to having the reasonable accommodation(s) in place. The FY 24 average implementation time was 2.3 days. This data collection allowed EPA to identify areas for potential improvements in procurement and other implementation processes. In FY 24, EPA began to prepare a pilot of the Reasonable Accommodation Procurement Program (RAPP) to provide centralized funding and procurement of equipment and other similar items, which commenced in FY25. Additionally, in FY 24, the NRAP began tracking requests related to the Pregnant Workers Fairness Act (PWFA), which took effect in 2023 with final Equal Employment Opportunity Commission (EEOC) regulations issued on June 18, 2024.

## 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 three PAS requests in FY 24, all of which were approved within the time frames identified in the Reasonable Accommodation (RA) Procedures, with an average processing time of 2.6 days. In addition, all the 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](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>). The EPA continues to monitor trends for PAS requests. In FY 23 and 24, requests were 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.

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### B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?

Answer No

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

Answer No

3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.
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## Section VIII: Identification and Removal of Barriers

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

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

Answer 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

<b>Source of the Trigger:</b>	Workforce Data (if so identify the table)				
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B7				
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	EPA has not identified a barrier. Rather, it identified triggers, such as hiring in MCOs. See B7. EPA is completing this Section to provide the EEOC with notice that it is initiating an EEO Plan to address the triggers.				
<b>STATEMENT OF BARRIER GROUPS:</b>	<b>Barrier Group</b> People with Disabilities People with Targeted Disabilities				
<b>Barrier Analysis Process Completed?:</b>	N				
<b>Barrier(s) Identified?:</b>	N				
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b>  Expected representation in EPA's workforce.		<b>Description of Policy, Procedure, or Practice</b>  EPA has not identified an EPA policy, procedure, or practice that may be responsible for the trigger. EPA intends to conduct further analysis to determine if there is a barrier that is the result of an EPA policy, procedure, or practice.		
<b>Objective(s) and Dates for EEO Plan</b>					
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>
02/28/2025	09/30/2025	Yes			To determine whether EPA has a policy, practice, or procedure that may be responsible for any of the identified triggers.
<b>Responsible Official(s)</b>					
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>	
Acting Assistant Director, AEAA		Cynthia Darden		Yes	
National Disability Program Manager		Russell Massey		Yes	
<b>Planned Activities Toward Completion of Objective</b>					
<b>Target Date</b>	<b>Planned Activities</b>			<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>
04/30/2025	OCR National Disability SEPM to reevaluate and prioritize triggers that EPA will address first.			Yes	



Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
05/15/2025	OCR to notify OMS of need to develop a plan for EPA to post “SES” and “Executives” vacancies in a manner that allows for separating EPA applicants from external applicants.	Yes		
05/15/2025	OCR to notify OMS of need to define “Supervisors” for better tracking.	Yes		
05/31/2025	National Disability SEPM to develop a plan to address prioritized disability triggers.	Yes		
06/30/2025	OCR to dedicate resources to train National Disability SEPM on MD-715 disability triggers and analysis.	Yes		
07/31/2025	OCR Statistician to develop a process to validate data from competing sources, conduct data validation, and forward results to OMS to ensure errors, if any, are corrected.	Yes		
08/30/2025	National Disability SEPM to provide EEO Director, Deputy Director, and AEAA Assistant Director with Report on status of prioritized triggers.	Yes		
09/30/2025	OMS to ensure that any necessary data corrections that needed to be made were made and confirm this to OCR.	Yes		
09/30/2025	OCR Statistician to create a dashboard to automate process to transfer data into MD-715 Tables.	Yes		
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).

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