

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

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

Section I: Efforts to Reach Regulatory Goals

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

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

- | | |
|--------------------------------|------------|
| a. Cluster GS-1 to GS-10 (PWD) | Answer No |
| b. Cluster GS-11 to SES (PWD) | Answer Yes |

Table B4 shows there are 342 total employees in the GS 11-SES/SL cluster. Of those, 342 total employees, 22 (6.4%) PWD, which is below the 12% benchmark, therefore there is a trigger.

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

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

- | | |
|---------------------------------|------------|
| a. Cluster GS-1 to GS-10 (PWTD) | Answer No |
| b. Cluster GS-11 to SES (PWTD) | Answer Yes |

Table B4 show there are 342 total employees in the GS 11-SES/SL cluster. Of the 342 total employees, three (0.9%) PWTD, which is below the 2% benchmark, therefore there is a trigger.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	31	10	32.26	3	9.68
Grades GS-11 to SES	339	26	7.67	3	0.88

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

DFC had turnover in the Disability Program Coordinator position in FY 2020, as it was transition/rebranding to a new agency. Although a new staff member was hired in April 2020 to take over this role, numerical goals were not communicated to the hiring managers and/or recruiters.

Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If “no”, describe the agency’s plan to improve the staffing for the upcoming year.

Answer Yes

2. Identify all staff responsible for implementing the agency's disability employment program by the office, staff employment status, and responsible official.

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Architectural Barriers Act Compliance	0	0	1	Marla Neustadt Supervisory Facilities Specialist
Processing applications from PWD and PWTB	0	1	5	Todd Morris Director, Talent Acquisition Unit
Answering questions from the public about hiring authorities that take disability into account	0	1	0	Lucy Cunningham Director of Human Resources
Special Emphasis Program for PWD and PWTB	1	0	0	Todd Morris Director, Talent Acquisition Unit
Processing reasonable accommodation requests from applicants and employees	0	1	0	Patrick Browne Director Workforce Relations
Section 508 Compliance	0	1	0	Amanda Burke Deputy Vice President, Office of External Affairs

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 No

Due to COVID-19 restrictions, and limited training options, the DFC has not provided any specific training in FY20. In FY21, training is still limited due to COVID-19 restrictions.

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

Due to COVID-19 restrictions, it has been difficult to implement the program as envisioned with recruitment and outreach events. In addition, the HR office had to quickly in-source all HR functions between May and September of 2020. Currently the program is under resourced with a 44% vacancy rate at this time. The leadership has committed resources to the team; however, it will take time to fill the positions.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	B.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]
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Brief Description of Program Deficiency	D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.
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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 DFC utilized a variety of recruitment strategies designed to increase the number of qualified applicants with disabilities and applicants with targeted disabilities within the major occupations. The DFC utilized the following resources to identify job applicants with disabilities, including targeted disabilities: • OPM’s Shared Register of Candidates with Disabilities (Bender List); and • Websites geared towards 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 DFC used Schedule A appointing authority (5 C.F.R. 213.310(2)) and 30% or More Disabled Veteran appointing authority (5 U.S.C. 3112; C.F.R. 316.302, 316.402, and 315.707) to proactively hire PWD/ expeditiously. DFC job announcements contain information explaining how to apply under Schedule A and other excepted service hiring authorities.

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.

To determine if an applicant is eligible under Schedule A, the HRM reviews the application package to determine if the required documentation was provided (as described in the vacancy announcement from OPM’s Disability Employment Page). The documentation is reviewed for eligibility under the hiring authority. This is applied when a candidate submits an application through USAJobs and/or directly to HRM. If the documentation submitted is unclear, HRM gives tentative consideration under this hiring authority. In this case, if the individual is selected, HRM asks the selectee to furnish the appropriate documentation. When an applicant applies through USAJobs, HRM reviews the package for qualifications and eligibility. Those eligible and qualified under non-competitive hiring authorities are placed on a certificate of eligibles that is separate from those competitively eligible.

Additionally, HRM searches OPM’s list of Persons with Disabilities (Bender) and/or any resumes on file. If qualified candidates are found, the resumes are forwarded to the hiring official via email for consideration.

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 No

The DFC plans to provide mandatory annual training for senior leadership, hiring managers, and HR specialists to: • Promote and support employment of PWD/PWTD for all employment opportunities in the agency; • Use Schedule A authority for people with disabilities; • Use other tools available to assist hiring managers to identify qualified applicants with disabilities; and • Remain versed on the DFC’s procedures for providing reasonable accommodation to job applicants and employees with disabilities.

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 Talent Acquisition Unit (TAU) HR Specialists conduct resume mining to identify PWD/PWTD for employment consideration. Beginning in FY21 most of TAU implemented enrollment of our HR Specialists as Workforce Recruitment Program (WRP) recruiters, a DOL Office of Disability Employment Policy program that connects federal and private-sector employers nationwide with highly motivated college students and recent graduates with disabilities who are eager to demonstrate their abilities in the workplace through summer or permanent jobs.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

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

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

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

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 No

b. New Hires for MCO (PWTD) Answer No

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 N/A
- b. Qualified Applicants for MCO (PWTD) Answer N/A

Relevant applicant pool data is not available. The data provided by USA Staffing does not identify which current DFC employees qualify for a job series they are not currently in. The HMR does not adjudicate applicant qualifications until an applicant applies for a specific position, and the applicant may qualify based on experience obtained prior to entry into their current job series, or into the DFC. The DFC has not attempted to develop an estimate for job series-relevant applicant pools or to tabulate relevant applicant pools for this reporting cycle.

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 N/A
- b. Promotions for MCO (PWTD) Answer N/A

Relevant applicant pool data is not available. The data provided by USA Staffing does not identify which current DFC employees qualify for a job series they are not currently in. The HMR does not adjudicate applicant qualifications until an applicant applies for a specific position, and the applicant may qualify based on experience obtained prior to entry into their current job series, or into the DFC. The DFC has not attempted to develop an estimate for job series-relevant applicant pools or to tabulate relevant applicant pools for this reporting cycle.

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.

DFC HR Specialists will continue to encourage and implement strategic prerecruitment discussions among hiring officials and HR professionals that includes detailed information about available hiring options and flexibilities, including programs that build education to career pipelines for applicants with disabilities. Additionally, while not a regulatory mandate, DFC promotes the use of individual development plans (IDPs) as a tool for monitoring.

B. CAREER DEVELOPMENT OPPORTUNITES

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

DFC provides both formal and informal training opportunities to employees via external organizations that host courses on finance, law and other practices deemed essential to meeting the DFC mission. Additional courses around project/time management and computer programs (i.e., Outlook) are provided by Graduate School USA or other external entities such as Skillsoft. DFC does not collect data relative to employees in these training opportunities.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Mentoring Programs	N/A	0	0	0	0	0
Other Career Development Programs	N/A	0	0	0	0	0
Fellowship Programs	N/A	0	0	0	0	0
Detail Programs	N/A	0	0	0	0	0
Training Programs	N/A	0	0	0	0	0
Internship Programs	201	0	0	0	3	0
Coaching Programs	N/A	0	0	0	0	0

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

The data for the applicants for the intern program are not available for FY20. Future screening of applicants including applicable data will be collected and analyzed for any barriers.

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

- a. Applicants (PWTD) Answer No
- b. Selections (PWTD) Answer No

C. AWARDS

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

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

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

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Awards Given	0	0.00	0.00	0.00	0.00

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

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTB 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 (PWTB) Answer No

N/A

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

3. If the agency has other types of employee recognition programs, are PWD and/or PWTB 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 (PWTB) Answer N/A

N/A

D. PROMOTIONS

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

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

i. Qualified Internal Applicants (PWD)	Answer	N/A
ii. Internal Selections (PWD)	Answer	N/A
c. Grade GS-14		
i. Qualified Internal Applicants (PWD)	Answer	N/A
ii. Internal Selections (PWD)	Answer	N/A
d. Grade GS-13		
i. Qualified Internal Applicants (PWD)	Answer	N/A
ii. Internal Selections (PWD)	Answer	N/A

Relevant applicant pool data is not available. Although all promotions are advertised to the public on USAJobs.gov, the DFC is unable to determine the percentage of qualified internal applicants by disability distribution due to limited applicant flow data available.

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

a. SES		
i. Qualified Internal Applicants (PWTD)	Answer	N/A
ii. Internal Selections (PWTD)	Answer	N/A
b. Grade GS-15		
i. Qualified Internal Applicants (PWTD)	Answer	N/A
ii. Internal Selections (PWTD)	Answer	N/A
c. Grade GS-14		
i. Qualified Internal Applicants (PWTD)	Answer	N/A
ii. Internal Selections (PWTD)	Answer	N/A
d. Grade GS-13		
i. Qualified Internal Applicants (PWTD)	Answer	N/A
ii. Internal Selections (PWTD)	Answer	N/A

Relevant applicant pool data is not available. Although all promotions are advertised to the public on USAJobs.gov, the DFC is unable to determine the percentage of qualified internal applicants by disability distribution due to limited applicant flow data available.

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

The DFC was unable to analyze new hires for PWD as compared to the required benchmark using applicant flow data. Applicant flow data does not identify which new hires were lateral transfers from other government agencies and which ones received promotions.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

The DFC was unable to analyze new hires for PWTB as compared to the required benchmark using applicant flow data. Applicant flow data does not identify which new hires were lateral transfers from other government agencies and which ones received promotions.

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

Due to the limited availability of applicant flow data, the DFC is unable to identify the participation rates of disability distribution of qualified internal applicants.

6.

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

a. Executives

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

b. Managers

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

c. Supervisors

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

Due to the limited availability of applicant flow data, the DFC is unable to identify the participation rates of disability distribution of qualified internal applicants.

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

The DFC was unable to analyze new hires for PWTB as compared to the required benchmark using applicant flow data. Applicant flow data does not identify which new hires were lateral transfers from other government agencies and which ones received promotions.

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 N/A
- b. New Hires for Managers (PWTB) Answer N/A
- c. New Hires for Supervisors (PWTB) Answer N/A

The DFC was unable to analyze new hires for PWTB as compared to the required benchmark using applicant flow data. Applicant flow data does not identify which new hires were lateral transfers from other government agencies and which ones received promotions.

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

- 1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If “no”, please explain why the agency did not convert all eligible Schedule A employees.

Answer Yes

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

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

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

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

a. Voluntary Separations (PWTD) Answer 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	0	0.00	0.00
Permanent Workforce: Resignation	0	0.00	0.00
Permanent Workforce: Retirement	0	0.00	0.00
Permanent Workforce: Other Separations	0	0.00	0.00
Permanent Workforce: Total Separations	0	0.00	0.00

- 4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

N/A

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.dfc.gov/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.dfc.gov/accessibility-statement>

- 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.

There are agency-wide renovations planned.

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.)

Average time frame for processing initial requests for reasonable accommodations was three (3) 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.

Policies are effective because employees were aware of the person responsible for acting on requests for reasonable accommodations, employees were aware of procedures to request an accommodation, requests are processed timely and requests are routinely approved.

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.

The DFC did not receive any PAS requests in FY 2021.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

- 1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the governmentwide average?

Answer No

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

Answer No

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

The DFC had no findings of discrimination.

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.

The DFC had no findings of discrimination.

Section VIII: Identification and Removal of Barriers

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

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

Answer Yes

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

Answer Yes

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

Source of the Trigger:	Workforce Data (if so identify the table)				
Specific Workforce Data Table:	Workforce Data Table - B4				
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?	GS 11-SES/SL: 342 total employees, 22 (6.4%) PWD and three (0.9%) PWTD, which is below the 12% and 2% benchmarks, therefore there is a trigger.				
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> People with Disabilities People with Targeted Disabilities				
Barrier Analysis Process Completed?:	Y				
Barrier(s) Identified?:	Y				
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	Barrier Name		Description of Policy, Procedure, or Practice		
	Low Participation in GS11-SES Ranks		PWD/PWTD employees has low participation rates in the GS11-SES ranks.		
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?	
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.

The COVID-19 pandemic and lack of resources and support severely impacted the DFC's progress on planned activities for FY2020.

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.

The DFC is hiring a Chief Diversity and Inclusion Officer to take the strategic lead on our diversity and inclusion program.