

Part J - Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

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

Section I: Efforts to Reach Regulatory Goals

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

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

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

Table B4 shows:
 GS 11-SES/SL: 399 total employees, 33 (8.2%) PWD. In FY 22, DFC had 342 total employees, 22 (6.4%) PWD. Although this is still below the 12% benchmark, we saw improvement from the prior FY. This is still a trigger.

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

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

Table B4 shows:
 GS 11-SES/SL: 399 total employees, six (1.5%) PWTD. This is an increase from FY 2021 when DFC had 342 total employees, three (0.9%) PWTD. We are still below the 2% benchmark, therefore there is a trigger.

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

The EEO Director began making strides to communicate the numerical goals to hiring managers and recruiters. We will heighten communication in FY 23, incorporating strategic recruitment efforts to target applicants with targeted 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

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

Yes No X

During the FY, we found that current EEO staffing, i.e., one EEO Director, was insufficient to proactively build a model EEO program. The EEO Office added collateral duty staff; however, they were only utilized for the EEO complaints process. During FY 2023, the agency will focus on building resources (permanent and collateral duty) to ensure adequate staffing is available for barrier analysis and to fulfill a Disability Program Manager role.

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	1	0	0	Samantha Miller, Selective Placement Coordinator/ Human Resources Specialist Samantha.miller@dfc.gov
Answering questions from the public about hiring authorities that take disability into account	5	0	0	Todd Morris, Director, Talen Acquisition, Office of Human Resources Management todd.morris@dfc.gov
Processing reasonable accommodation requests from applicants and employees	0	3	0	Patrick Browne, Director, Workforce Relations Patrick.Browne@dfc.gov
Section 508 Compliance	0	1	0	Office of Information Technology
Architectural Barriers Act Compliance	0	1	0	Charles von Goins, Supervisory Facilities Specialist charles.vongoins@dfc.gov
Special Emphasis Program for PWD and PWTD	1	0	0	Samantha Miller, Selective Placement Coordinator/ Human Resources Specialist Samantha.miller@dfc.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.

Yes No X

During FY 2022, there was insufficient resourcing for the EEO program to ensure training occurred. A training plan will be developed for FY 2023.

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*.

Yes No

In FY 2023, the agency will hire a Chief Diversity and Inclusion Officer to increase awareness, outreach, and assist the EEO Director with barrier analysis.

Section III: Plan to Recruit and Hire Individuals with Disabilities

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

A. Plan to Identify Job Applicants with Disabilities

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

Over the last fiscal year, 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. 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
- Virtual Career Fairs at Universities
- Updating Selective Placement Program Coordinator information on OPM’s Directory.
- Workforce Recruitment Program

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.

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. During FY 22, four Schedule A hires were made. All Schedule A hires were appointed to GS-11 to SES positions, and three of the four were in mission critical occupations.

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, OHRM 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 applies through USAJOBS and/or directly to OHRM. If the documentation submitted is unclear, OHRM 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, OHRM reviews the package for qualifications and eligibility. Those eligible and qualified under non-competitive hiring authorities are placed on a certificate of eligible applicants that is separate from those competitively eligible. Additionally, OHRM 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.

Yes No **X** N/A

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 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 Selective Placement Coordinator (SPC) utilizes the Workforce Recruitment Program to identify job applicants with disabilities, including individuals with targeted disabilities. Although the SPC made referrals under the WRP and served as a recruiter during FY 22, no WRP hires were made. During FY 23, the EEO Office plans to significantly increase marketing and promotion of the WRP program. Additionally, the EEO Director will provide recommendations to the recruiting team that would increase the applicant pool for PWTD.

C. Progression Towards Goals (Recruitment and Hiring)

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

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

During FY22, 11 new hires (12.79%) were PWD and 2 (2.33%) were PWTD.

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

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

Of the 107 new hires in FY 2022, 14 (13.1% of 107 new hires) were PWDs and two (14.3% of the 14 PWDs) were in mission critical occupations (1 in 1101 series, and 1 in 301 series).
Of the 107 new hires in FY 2022, two (1.9% of 107 hires) had targeted disabilities, but none were in MCOs. This is a trigger.

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

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

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 HR Office 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 DFC. 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.

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

Due to agency size, DFC is not required to analyze Table A – B 6. We plan to review and analyze this data in FY 2023.

Section IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

A. Advancement Program Plan

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

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.

The EEO Director will seek to appoint a Disability Program Manager (DPM) to ensure DFC is a model employer for people with disabilities. The DPM will partner with DFC SPC to build a pipeline of Schedule A applicants, encourage the use of the Workforce Recruitment Program, ensure an effective and efficient Reasonable Accommodation program, and develop a community outreach plan. Additionally, the DPM will analyze data from the agency’s Federal Employees Viewpoint Survey (FEVS) to identify areas of concern for employees and develop action plans for improvement.

B. Career Development Opportunities

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, soft skills, and professional development 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 (%)
Internship Programs	294	7	6.8%	14.3%	3.1%	14.3%
Fellowship Programs	NA	NA	NA	NA	NA	NA
Mentoring Programs	NA	NA	NA	NA	NA	NA
Coaching Programs	NA	NA	NA	NA	NA	NA
Training Programs	NA	NA	NA	NA	NA	NA
Detail Programs	NA	NA	NA	NA	NA	NA
Other Career Development Programs	NA	NA	NA	NA	NA	NA

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

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

Not applicable

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

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

Not applicable

C. Awards

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

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

Due to agency size, DFC is not required to analyze Tables 9.1 and 9.2. We plan to review and analyze this data in FY 2023.

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

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

Due to agency size, DFC is not required to analyze Tables 9.1 and 9.2. We plan to review and analyze this data in FY 2023.

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

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

Due to agency size, DFC is not required to analyze Tables 9.1 and 9.2. We plan to review and analyze this data in FY 2023.

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.

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

Due to agency size, DFC is not required to analyze Tables 6. We plan to review and analyze this data in FY 2023.

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.

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

Due to agency size, DFC is not required to analyze Tables 6. We plan to review and analyze this data in FY 2023.

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.

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

Due to agency size (<500 employees), DFC is not required to analyze Tables 6. We plan to review and analyze this data in FY 2023.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

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

Due to agency size (<500 employees), DFC is not required to analyze Tables 6. We plan to review and analyze this data in FY 2023.

5. Does your agency have a trigger involving PWD among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.
- a. Executives
 - i. Qualified Internal Applicants (PWD) Yes No X
 - ii. Internal Selections (PWD) Yes No X
 - b. Managers
 - i. Qualified Internal Applicants (PWD) Yes No X
 - ii. Internal Selections (PWD) Yes No X
 - c. Supervisors
 - i. Qualified Internal Applicants (PWD) Yes No X
 - ii. Internal Selections (PWD) Yes No X

Due to agency size (< 500 employees), DFC is not required to analyze Tables 6. We plan to review and analyze this data in FY 2023.

6. Does your agency have a trigger involving PWTD among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.
- a. Executives
 - i. Qualified Internal Applicants (PWTD) Yes No X
 - ii. Internal Selections (PWTD) Yes No X
 - b. Managers
 - i. Qualified Internal Applicants (PWTD) Yes No X
 - ii. Internal Selections (PWTD) Yes No X
 - c. Supervisors
 - i. Qualified Internal Applicants (PWTD) Yes No X
 - ii. Internal Selections (PWTD) Yes No X

Due to agency size (< 500 employees), DFC is not required to analyze Tables 6. We plan to review and analyze this data in FY 2023.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box.

- | | | |
|------------------------------------|-----|------|
| a. New Hires for Executives (PWD) | Yes | No X |
| b. New Hires for Managers (PWD) | Yes | No X |
| c. New Hires for Supervisors (PWD) | Yes | No X |

Due to agency size (< 500 employees), DFC is not required to analyze Tables 6. We plan to review and analyze this data in FY 2023.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.

- | | | |
|-------------------------------------|-----|------|
| a. New Hires for Executives (PWTD) | Yes | No X |
| b. New Hires for Managers (PWTD) | Yes | No X |
| c. New Hires for Supervisors (PWTD) | Yes | No X |

Due to agency size, DFC is not required to analyze Tables 6. We plan to review and analyze this data in FY 2023.

Section V: Plan to Improve Retention of Persons with Disabilities

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

A. Voluntary and Involuntary Separations

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

Yes No N/A x

N/A

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

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

N/A

3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and

involuntary separations exceed that of persons without targeted disabilities? If “yes”, describe the trigger below.

- | | | |
|-----------------------------------|-----|------|
| a. Voluntary Separations (PWTD) | Yes | No X |
| b. Involuntary Separations (PWTD) | Yes | No X |

N/A

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

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

The internet address is <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.

The internet address is <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.

In FY 2022, DFC continued to enable and allow all employees the flexibility to telework. In March 2022, DFC workforce returned to onsite work and launched its remote work policy. The agency analyzed the workforce to determine positions that were available for total remote work. As of FY 22, approximately 25% of DFC employees are remote and more than 95% have telework

agreements and are able to telework.

DFC will continue to ensure their internal and external websites comply with all facility and technological guidance. During FY 2023, the agency will conduct an architectural barriers survey to ensure all facilities are accessible for PWD and PWT. The agency will also survey public-facing webpages to ensure compliance with ADA regulations.

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.)

During FY 2022, DFC received 25 requests for Reasonable Accommodation. The average time to respond to requests was 1 day. The average time to provide a request was 52 days. In addition to processing RA requests, the agency proactively provides high volume accommodation solutions outside of the RA process (e.g., sit-stand stations, ergonomic chairs, etc.).

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 2022, new staff were assigned the responsibility of processing RA requests. Training was provided to staff in late FY 2022. In FY 2023, the RA program effectiveness will be reviewed to determine ways to streamline the process and improve efficiencies. Employee education and training will be provided in FY 2023. The EEO office will recommend changes to the RA policy.

D. Personal Assistance Services Allowing Employees to Participate in the Workplace

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

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.

DFC did not receive any PAS requests in FY 2022.

Section VI: EEO Complaint and Findings Data

A. EEO Complaint data involving Harassment

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

- Yes No N/A X
2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

- Yes No X N/A
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.

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?

Yes No N/A X

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

Yes No N/A X

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.

DFC did not have any findings in FY 2022.

Section VII: Identification and Removal of Barriers

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

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

Yes X No

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

Yes X No

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.

Trigger 1	Results from the FY 2022 FEVS	
Barrier(s)	Perceptions, Attitudinal barriers	
Objective(s)	Improve FEVS results for DFC PWD and PWTD employees	
Responsible Official(s)	Performance Standards Address the Plan?	

		(Yes or No)		
EEO Director Vice President, Office of Human Resources Management		Yes (both)		
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)		
No		No. During FY 2022, the agency identified FEVS results as a trigger.		
Sources of Data		Sources Reviewe d? (Yes or No)	Identify Information Collected	
2022 FEVS		Yes		
Target Date (MM/DD/YYYY)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (MM/DD/YYYY)	Completion Date (MM/DD/YYYY)
09/30/2023	Establish Focus Groups	No	12/31/2023	
09/30/2023	Appoint a Disability Program Manager	No	12/31/2023	
09/30/2023	Establish a cross-functional Barrier Analysis Team (BAT)	No	12/31/2023	
09/30/2023	Conduct Barrier Analysis training for the EEO staff and BAT members	No	03/31/2024	
Fiscal Year	Accomplishments			

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

In FY 22, the agency's EEO Office had insufficient staffing to conduct barrier analysis.

5. For the planned activities that were completed, please describe the actual impact of those

activities toward eliminating the barrier(s).

Not applicable.

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.

Not applicable.