

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

The overall agency PWD percentage of our current Title 5/Civilian workforce is 16.46% and well above the 12% mandate. The breakout between the two categories of employees is almost even per number of individuals with 7 PWD identifying in the GS10 or lower grades and 6 PWD identifying in the GS11 or higher grades. We do have an SES employees. Title 5/Civilian employees are not subject to military fitness and medical standards. However, the majority of our workforce is T32/Military Excepted Technicians and required to serve in the SD National Guard as a condition of their military technician employment and are subject to military fitness and medical standards. The T32 workforce is not considered in this section, however they are included in the workforce data tables uploaded thru the Excel Template process. We uploaded a separate "custom" spreadsheet that reflects just the T5 workforce in the B-Tables. See the substantiated files section for this data.

*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

We fall just short of the 2% goal of PWTD at 1.27% and this is an increase of .05% over FY18. We do not view this shortfall as a trigger because the majority of the personnel serving in these positions still continued to serve in the SD National Guard during FY19. We are starting to see some attrition going into FY20 and will continue to monitor this area for changes. The GS10 or lower grades has 1 PWD voluntarily identifying. The GS11 or higher grades currently do not have any one identifying as a PWD. The majority of our higher level GS positions, excluding a few GS11 and GS12 positions, are dual status military technician or active duty type positions and subject to military fitness and medical standards and not considered in this section.

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

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

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

During the annual MD-715 briefing to the Agency Head and Senior Leaders/Directors, at a minimum, is where the numerical goals are communicated. The Human Resource Officer is aware of the numeric goals and the exceptions to competition for hiring PWD/PWTD through Schedule A. We do not have full time recruiters on our staff outside of the standard staffing specialist. We also communicate the numeric goals to our supervisors/nominating and hiring officials through the annual and refresher supervisors courses and hiring workshops.

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

The Equal Employment Manager (EEM) is currently the trained Disability Program Manager for the agency. The EEM also serves as the Reasonable Accommodations Coordinator for all RA/PAS requests. The EEM attended the Disability Program Managers course at DEOMI. The agency will continue to analyze these programs for the need of additional personnel to support the processes.

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	2	Martin Yost Chief - Facility Management Office martin.r.yost.mil@mail.mil
Answering questions from the public about hiring authorities that take disability into account	0	0	3	kevin.r.pudwill.mil@mail.n
Processing applications from PWD and PWTD	0	0	3	carstin.k.jerzak.mil@mail.n
Special Emphasis Program for PWD and PWTD	0	0	1	carstin.k.jerzak.mil@mail.n
Processing reasonable accommodation requests from applicants and employees	0	0	3	kevin.r.pudwill.mil@mail.n

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Section 508 Compliance	0	0	3	theodore.l.bartunek.mil@m

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 DPM attended the Disability Program Managers course at DEOMI, receives updated information at the annual EEOC Excel or FDR Workshops. Training over the new RA/PAS policy and request procedures will continue in FY20 with the current policy/procedures and continue to be conducted in future FY's for managers and employees during the supervisors annual course and refresher training. Training for other personnel involved in processing RA/PAS is on going, as requests are processed, and as training needs are determined.

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

The agency supports the program with printing materials, website space and training time as needed. As RA/PAS requests are brought forward, the agency funds any requirements from the appropriate statutory funded account or re-programs funding to meet the requirement.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	C.2.b.2. Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]		
Objective	Re-assign the disability program and reasonable accommodation coordination process out of the EDI office and assign it where there isn't a conflict of interest or firewall concern in the management of the program and requests. HRO Deputy, HRO Benefits/Workers Comp, or Occupational Health Provider are optional positions without any general conflict of interest or firewall consideration.		
Target Date	Oct 1, 2020		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Oct 1, 2020		Work with the DJA to determine the best course of action for the re-assignment of the DPM and RA/PAS Request Coordinator duties/responsibilities.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	

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.

USAjobs affords us the option to utilize schedule A and applicable Veteran status as well as open vacancy eligible for PWD/PWTD applicants to apply. Applicants voluntarily identifying as a PWD/PWTD or as a disabled Veteran are visible to us as well as on board employee's voluntarily identifying through their records is another way for the agency to identify personnel within our organization with disabilities. Contact information is provided on the vacancy announcements and public websites for applicants needing accommodations in the applicant processes.

- 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

In FY18 our HRO officer worked with National Guard Bureau to obtain the official authority to utilize schedule A for Title 5/ civilian vacancies. The option is available on USAStaffing. We also consider Veteran status to include Veteran's with a disability in the hiring process. This option is also available in USAStaffing.

- 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.

All applicant packets are forward to agency selection officials through the USAStaffing portal for both internal and external vacancies. Applicants currently meeting Veterans preference or a disability status are identified on the selection certificate and must considered under their preference category first. Once the staffing section determines the applicant meets qualification standards, and preference eligibility, the applicant is added to the certificate for further consideration. Supervisors are required to consider preferred applicants first and also provide significant justification for non-selection.

- 4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If “yes”, describe the type(s) of training and frequency. If “no”, describe the agency’s plan to provide this training.

Answer Yes

We conduct an annual supervisors training course, refresher courses and hiring workshops where hiring authorities, such as Veterans preference and Schedule A, are discussed as well as the RA/PAS policy/operating procedures. We also conduct quarterly EEO training on various topics, to include RA/PAS and we have monthly staff meetings where the current status of RA/PAS requests are updated and discussed. RA/PAS and other areas of concern are always considered when setting up/conducting employee/supervisor training.

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 EEM continues to communicate with several state universities regarding the Workforce Recruitment Program and the utilization of students identifying with disabilities to apply for internships funding through NGB. However, there isn't a recruiter in SD that works the WRP program to assist the universities in building the applicant process with the students in order to create a pool for consideration of these internships. We will continue to pursue this option but until a local recruiter for WRP is established, the applicant pool for our agency isn't available at this time in this program. We will continue to pursue contacts to find alternate or appropriate resources for requests and applicant pools as this program developed more in the future.

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

The majority of our positions were not eligible for consideration or the hiring of PWD/ PWTD - these are the Title 32 dual status technicians and employees/applicants are required to be in the National Guard and meet military fitness/medical standards for serving. The majority of our vacancies were hired from internal and/or onboard workforce pools, also subject to military fitness/medical standards as a condition of employment. Considering our current percentages in the T5 workforce and the low number of new T5 hires, we do not see this as a trigger at this time.

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

See the response for C.1. above. We do not see this as a trigger at this time.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	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

See the response for C.1. above. We do not see this as a trigger at this time.

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

See the response for C.1. above. We do not see this as a trigger at this time.

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.

This is currently under consideration in our SDNG Merit Placement program. The fact that the majority of our upper level positions are currently Title 32 dual status military technicians or Active Guard/Reserve (AGR) (similar to active duty) positions only offers the potential for advancement of PWD/PWTD to the GS12 level in the 200/300 occupation series. These select positions may provide potential upward mobility if/when they come open through our current SDNG Merit Placement program/union agreements and under the current merit placement program, PWD, PWTD would be afforded an equal opportunity to compete for them along side any other qualifying employee.

B. CAREER DEVELOPMENT OPPORTUNITES

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

Career and Development Opportunities are per our SDNG Merit Placement program. The majority of our upper level positions are currently Title 32 dual status military technicians or Active Guard/Reserve (AGR) (similar to active duty) positions so advancement generally aligns with military rank progression and education. However, the basic rules of competition apply through our SDNG Merit Placement program/union agreements based on how the agency backfills the vacancy.

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 (%)
Detail Programs						
Fellowship Programs						
Internship Programs						
Other Career Development Programs						
Coaching Programs						
Mentoring Programs						
Training Programs						

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

describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Applicants (PWD) Answer N/A

b. Selections (PWD) Answer N/A

We currently do not have any of these programs.

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

a. Applicants (PWTD) Answer N/A

b. Selections (PWTD) Answer N/A

We currently do not have any of these programs.

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

Both the PWD/PWTD are included across all incentive categories except the Quality Step Increase.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %

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

Both the PWD/PWTD are included across all incentive categories except the Quality Step Increase.

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

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

a. Other Types of Recognition (PWD) Answer No

b. Other Types of Recognition (PWTD) Answer No

The incentive programs are open to all employees and include the time off, on-the-spot cash awards, performance based cash awards and employee of the year cash awards. Diversity awards are available at the national level for nominations/consideration.

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

All senior grade level positions require military membership in order to apply/compete/qualify for.

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

All senior grade level positions require military membership in order to apply/compete/qualify for.

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

All senior grade level positions require military membership in order to apply/compete/qualify for.

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

All senior grade level positions require military membership in order to apply/compete/qualify for.

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 No

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

The majority of the career development opportunities come from the military sector based on rank, branch, military occupation, education and leadership background. Merit placement is currently under consideration based on the potential for advancement of PWD/PWTD to the GS12 level in the 200/300 occupation series. These select positions may provide potential upward mobility if/when they come open through our current SDNG Merit Placement program/union agreements just based how the agency backfills the vacancy. Schedule A and Veterans preference/disability are incorporated in our current SDNG Merit Placement program. Our PWD percentages in our total labor force for Total Managers is at 4.10% and among the T5/Civilian positions it is 12.73% - which indicate we are exceeding the 12% requirement among the positions eligible for consideration. No trigger exist at this time.

- 6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
 - a. Executives
 - i. Qualified Internal Applicants (PWTD) Answer N/A
 - ii. Internal Selections (PWTD) Answer N/A
 - b. Managers
 - i. Qualified Internal Applicants (PWTD) Answer No
 - ii. Internal Selections (PWTD) Answer No
 - c. Supervisors
 - i. Qualified Internal Applicants (PWTD) Answer No
 - ii. Internal Selections (PWTD) Answer No

The majority of the career development opportunities come from the military sector based on rank, branch, military occupation, education and leadership background and PWD/PWTD were not a consideration for the internal vacancies.

- 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 majority of the career development opportunities come from the military sector based on rank, branch, military occupation, education and leadership background and PWD/PWTD were not a consideration for the majority of new hires. Where we did open a T5/Civilian vacancy, and PWD and PWTD were eligible to complete we did not have anyone voluntarily identify in any category. However, our current PWD and PWTD percentages within our workforce are steady or even higher then last FY, so we do not consider this a trigger.

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

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

The majority of the career development opportunities come from the military sector based on rank, branch, military occupation, education and leadership background and PWD/PWTD were not a consideration for the external vacancies or new hires.

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 N/A

We currently do not have any employees appointed under Schedule 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) Answer No
- b. Involuntary Separations (PWD) Answer No

We did not lose any employees in this category.

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
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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

We did not lose any employees in this category.

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
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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://sd.ng.mil/Pages/Home.aspx>

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://sd.ng.mil/Pages/Home.aspx>

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.

We updated our public/external website with the appropriate 508 compliance requirements. We posted our updated RA/PAS policy/request procedures on the public/external website and update all contact information for personnel to contact us for other options available to provide the agency information to them. We also include agency contact information and the option for applicants to request RA/PAS on all vacancy announcements. The majority of our facilities were designed for military use, however we are taking a systematic approach to installing automatic doors for accessibility in any facility where our Title 5 civilian personnel may be required to conduct facility or unit assistance visits for their respective programs.

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.)

24 Days on average to process.

2. Describe the effectiveness of the policies, procedures, or practices to implement the agency’s reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

The average days to process our RA/PAS requests fall well within the 30 day requirement per our RA/PAS policy and Standard Operating Procedures. No EEO complaints were filed in FY19 based on denial of reasonable accommodation or personal assistant services. Training is provided in the annual and refresher supervisors courses as well as any hiring workshops and in all new employee orientation presentations as well as a copy of the policy and SOP are on all internal and external websites. Also, cases are worked through an interactive process with the employee, supervisor and applicable subject matter experts in order to provide a recommendation/certification of the request to management for a final decision and pending approval/subsequent resourcing. The RA/PAS Coordinator facilitates this process upon receipt of a RA/PAS Request.

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.

Our PAS is combined with the RA policy and SOP. The average days to process our RA/PAS requests fall well within the 30 day requirement per our RA/PAS policy and Standard Operating Procedures. No EEO complaints were filed in FY19 based on denial of reasonable accommodation or personal assistant services. Training is provided in the annual and refresher supervisors courses as well as any hiring workshops and in all new employee orientation presentations as well as a copy of the policy and SOP are on all internal and external websites. Also, cases are worked through an interactive process with the employee, supervisor and applicable subject matter experts in order to provide a recommendation/certification of the request to management for a final decision and pending approval/subsequent resourcing. The RA/PAS Coordinator facilitates this process upon receipt of a RA/PAS Request.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer No

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

Answer No

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

N/A - no EEO complaints were filed in FY19

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer No

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

Answer No

- 3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

N/A - no EEO complaints were filed in FY19

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

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

We continue to work on accurate applicant flow data and workforce data for barrier analysis. Training for our HRO/Staffing Section on utilization of Schedule A preference and hiring opportunities would be beneficial. Lastly, an active recruiter for the WRP program in our state/local area to help in the recruitment of PWD/PWTD would be a major step in creating an applicant pool and awareness of the internship and employment opportunities.

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

The implementation of the RA/PAS policy and SOP has impacted employees needing accommodations in a positive manner as well as helped management and supervisors with alternate courses of action to support employees and continue to get work accomplished. We conducted a re-survey of our workforce for the voluntary identification of PWD/PWTD and our percentages have slightly improved or remained steady. In addition we recently installed automatic entry doors in our headquarters building to improve access for PWD/PWTD employees or other personnel needing access to work or for the services provided within. these improvements and initiatives all show a progressive approach to the inclusion of PWD/PWTD in our workforce.

- 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.

We will continue to pursue better applicant flow data and accountability in USA Staffing/Jobs for the tracking of applicant information. Continually evaluate our policies and procedures for improvements and compliance. Continue to train on RA/PAS in the applicable training courses. Initiate routine case reviews of RA/PAS requests to ensure timely processing and track trends for identification of triggers or courses of action where management can take proactive measures to improve the workplace for PWD/PWTD and all employees. Determine the feasibility of establishing a specific line item budget to support RA/PAS request resourcing needs.