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

There is a trigger for PWD in the cluster for GS-11 to SES (includes GS equivalents); their participation is 7.27% which is below the 12% goal.

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

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

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

    b. Cluster GS-11 to SES (PWTD)   Answer   Yes

There is a trigger for PWTD in the cluster for GS-11 to SES (includes GS equivalents); their participation rate is 1.99% which is below the 2% goal.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical Goal	--	12%		2%	
Grades GS-1 to GS-10	9163	1265	13.81	311	3.39
Grades GS-11 to SES	32121	2335	7.27	639	1.99

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

Provided State of the Agency and quarterly briefings to senior leadership to communicate goals and progress in reaching targets. Communicated goals during supervisor/managers' training. Numerical goals communicated to Human Resources, especially recruiting staff to inform hiring managers of agency goals. Hiring managers are made aware of numerical goals with each recruitment action.

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.

<div align="right">Answer   Yes</div>

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	9	0	36	Roseal Fowlkes, Veterans Employment rfowlkes@doc.gov
Answering questions from the public about hiring authorities that take disability into account	17	0	36	Roseal Fowlkes, Veterans Employment & Selective Placement Program Manager
Architectural Barriers Act Compliance	6	0	0	Michael Rusten Associate Director mrusten@doc.gov
Special Emphasis Program for PWD and PWTD	6	0	0	Monique Dismuke Senior Disability Program Manager mdismuke@doc.gov
Processing reasonable accommodation requests from applicants and employees	13	0	11	Monique Dismuke, DPM & RA Program Manager
Section 508 Compliance	6	0	11	Jennifer Jessup Office of the Chief Information Office jjessup@doc.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.

<div align="right">Answer   Yes</div>

Disability program staff received training offered by various entities, including: USDA Graduate School, ASKEARN Training Center, Disability Management Employer Coalition, Job Accommodation Network (JAN), and EEOC. Staff attended conferences hosted by EEOC, Federal Dispute Resolution (FDR), and the Federal Employment Law Training Group. Some DPMs will attend the EEOC DPM Course in 2019. Additionally, Bureau disability program staff attended internal training coordinated provided by the Office of Civil Rights' DPM.

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 program does have sufficient funding. However, DOC is researching the plausibility of establishing centralized funding for: 1) targeted recruitment efforts; 2) commonly requested reasonable accommodation items; 3) sign language interpreters, and 4) a DOC-wide automated RA Tracking System.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	C.2.a.6. Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR §1614.203(d)(2)]

Brief Description of Program Deficiency	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.
Objective	To improve the timely processing of requests for reasonable accommodations.
Target Date	Mar 31, 2020
Completion Date	

Planned Activities	*Target Date*	*Completion Date*	*Planned Activity*
	May 28, 2019		Discuss issue with Bureau RACs at quarterly RAC meeting and ensure RA quarterly reports monitor and track timeliness.
	Sep 30, 2019		Secure a new automated reasonable accommodations tracking system to improve the processing of reasonable accommodations within the time frame set forth in the reasonable accommodations procedures
	Sep 30, 2019		Incorporate training on updated RA procedures in mandatory New Supervisors training.
	Mar 31, 2020		Provide training on updated RA procedures for all DOC managers and supervisors.

Accomplishments	*Fiscal Year*	*Accomplishment*
	2018	This is a new Plan H, accomplishments will be included in the FY19 report.

Brief Description of Program Deficiency	D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]		
Objective	To develop and conduct a Departmental retention survey that includes questions on recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities.		
Target Date	Apr 30, 2019		
Completion Date			
Planned Activities	*Target Date*	*Completion Date*	*Planned Activity*
	Sep 30, 2018	August 20, 2018	Partner with the Census Bureau's Center for Behavioral Science Methods (CBSM) to implement survey via Qualtrics, a web-based survey tool to conduct survey research, evaluations and other data collection activities.
	Sep 30, 2018	August 20, 2018	Develop questions for retention survey
	Mar 20, 2019		Disseminate survey to OGC, Unions, Privacy Offices, Departmental Management Council, and the PHRM Council for testing, review and comments.
	Apr 30, 2019		Launch Retention Survey
Accomplishments	*Fiscal Year*	*Accomplishment*	
	2018	In FY18, the Office of Civil Rights (OCR) began the development of a Retention Survey to invite and encourage the Departments workforce to provide insight into why employees may want to leave the Department, as well as their reasons for staying. Once implemented, results from the survey will lead to the improvement of policies, practices, and procedures that can positively affect retention of individuals with disabilities and other minority groups. OCR partnered with the Center for Behavioral Science Methods (CBSM) at the Census Bureau and entered into a Memorandum of Understanding (MOU) to develop the survey. More accomplishments on this effort will be provided in the FY19 MD-715 Report.	

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.

DOC uses a variety of programs and resources to recruit and hire PWD/TD, to include: maintaining an internal database of resumes from applicants eligible for non-competitive hiring authorities; use of alternative recruitment sources, i.e. VetSuccess.gov; use of USAJOBS to search for resumes for applicants eligible for Schedule A hire; use of OPM's Bender list of applicants with disabilities; participation in local colleges and university job recruitment fairs; coordination with the Workforce Recruitment Program for access to postsecondary students and recent graduates with disabilities; participation in the VA's Non-Paid Work Experience Program; coordination with the Veterans Vocational and Rehabilitation Program and Disabled Veterans Service Organizations to recruit eligible disabled veterans; and development of DOC's Bureau webpages to disseminate information to interested job applicants w/disabilities. DOC continuously provides job applicants information about DOC's disability employment programs, various employment opportunities, the government hiring process, points of contacts for reasonable accommodations. This information is provided on DOC Bureau webpages, LinkedIn, Facebook and other social media sites.

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 Department encourages managers to use Schedule A to fill vacant positions, whenever possible, and to utilize Bureau Selective Placement Program Coordinators (SPPC) to receive guidance in this area. Through outreach to vocational rehabilitation centers and disabled veterans' organizations, the SPPC encourages eligible applicants to make their resumes searchable in USAJOBS by selecting eligibility for special hiring authorities. The SPPC develops recruitment solutions tailored to specific hiring needs, market agency vacancies to persons with disabilities who are eligible for non-competitive placement via Schedule A, and represent DOC at events focused on hiring people with disabilities. The SPPC encourages individuals utilizing Schedule A to send their resumes directly to them to be placed in the Bureau-specific database. The SPPC then sends resumes of qualified applicants to hiring officials within the agency to review and fill vacant positions. Applicants who have questions or would like to receive technical assistance on how to apply under Schedule A are provided DOC's centralized Schedule A email address: ScheduleA@doc.gov.

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority; and, (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

The DOC's Human Resources (HR) Specialists and SPPC are dedicated to working with job applicants that apply under special hiring authorities, i.e. Schedule A, to determine eligibility and ensure their application is provided to relevant hiring officials. 1) Applications received via USAJOBS are assessed by an assigned HR Specialist, then qualified candidates are referred to hiring officials for relevant vacancies. 2) Through the Selective Placement Program, Schedule A applicants can submit their application package directly to the SPPC via email. The SPPC reviews the application to determine if the person qualifies for the position and that the Schedule A letter submitted meets OPM's requirements. If all criteria are met, the candidate's resume is placed in an electronic database and forwarded to hiring managers for review when positions that match the applicant's qualifications are being filled. 3) The SPPC can also proactively search the internal database for resumes of qualified applicants. These applications are then forwarded to the hiring official with an explanation of the Selective Placement Program and the process for 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

DOC requires all hiring managers to complete a specialized training program called "Roadmap to Success: Hiring, Retaining, and Including People with Disabilities". This training is available to all managers online via the Commerce Learning Center. All new supervisors/managers are required to take supervisor's training within their first year of becoming a supervisor. This training provides information on recruitment and hiring of PWD/TD. Some Bureaus conduct additional training, i.e. Census' Strategic Recruitment and Outreach Branch (SROB) provides a 3-hour management level training to supervisors and hiring managers on selective placement hiring initiatives and procedures for disability hiring; USPTO provides computer based training at least bi-annually; NOAA offers the ABC's of Schedule A Hiring, bi-monthly in-person or via webinar to hiring managers.

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.

DOC Bureaus have established and/or maintain contacts with "Hiring Our Heroes", Vocational Rehabilitation Services, and RecruitMilitary, all which target PWD/TD; attended campus events for students with disabilities; developed relationships and partnered with disability offices at local colleges and universities; partnered with affinity groups to help recruit individuals with disabilities; partnered with local Vocational Rehabilitation centers, Maryland's Department of Rehabilitation Services, and the Virginia Department of Aging and Rehabilitative Services to provide guidance on applying for federal positions.

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

No triggers. New hires for PWD and PWTD were 13.4% and 2.67%, respectively.

| New Hires | Total | Reportable Disability | | Targeted Disability | |
| | | Permanent Workforce | Temporary Workforce | Permanent Workforce | Temporary Workforce |
	(#)	(%)	(%)	(%)	(%)
% of Total Applicants	139738	4.48	2.72	2.09	1.19
% of Qualified Applicants	96792	3.90	2.73	1.79	1.14
% of New Hires	2276	1.76	2.20	0.70	0.83

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

a. New Hires for MCO (PWD) Answer Yes

b. New Hires for MCO (PWTD) Answer Yes

Among the new hires with disabilities, who voluntarily identified their disability, triggers existed for PWTD in the following most populous MCOs: 301 – 4.0% applicants, 4.1% qualified, 0% selected 343 – 3.4% applicants, 3.0% qualified, 0% selected 0482 – 1.2% applicants, 1.1% qualified, 0% selected 0905 – 2.1% applicants, 2.1% qualified, 0% selected 1101 – 3.5% applicants, 3.6% qualified, 0% selected 1340 – 2.8% applicants, 2.4% qualified, 0.8% selected 1530 – 3.2% applicants, 2.6% qualified, 0% selected Among the new hires with disabilities who voluntarily identified their disability, triggers existed for PWD in the following most populous MCOs: 301 – 8.8% applicants, 8.4% qualified, 1.8% selected 343 – 8.0% applicants, 7.4% qualified, 1.3% selected 0482 – 5.1% applicants, 5.1% qualified, 0% selected 0905 – 4.6% applicants, 4.4% qualified, 0% selected 1530 – 7.4% applicants, 5.9% qualified, 1.2% selected While the number of PWD/TD applicants is low, the data is provided to show a trend in non-selection, and in some cases, a disparity in those who applied versus those who qualified among PWD.

| New Hires to Mission-Critical Occupations | Total | Reportable Disability | | Targetable Disability | |
| | | Qualified Applicants | New Hires | Qualified Applicants | New Hires |
	(#)	(%)	(%)	(%)	(%)
Numerical Goal	--	12%		2%	
0301MISC. ADMIN. GENERAL BUSINESS AND INDUSTRY	10910	4.77	0.01	2.30	0.00
0343MANAGEMEN ANALYSIS	24101	4.83	0.00	1.95	0.00
0482FISHERY BIOLOGY	1348	3.78	0.00	0.82	0.00
0905ATTORNEY	1172	3.58	0.00	1.71	0.00
1101MISC. ADMIN	2853	4.00	0.07	2.10	0.00
1224PATENT EXAMINER	5522	2.14	0.24	0.94	0.14

New Hires to Mission-Critical Occupations	Total	Reportable Disability		Targetable Disability	
	(#)	Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	
1301GEN. PHYS. SCIENCE	2743	2.22	0.07	1.09	0.04
1340METEOROLOG	15122	3.65	0.05	1.96	0.01
1530SURVEY STATISTICIAN	3097	3.91	0.03	1.71	0.00
2210COMPUTER SCIENCE INFOR TECH SPECIALIST	24318	4.25	0.05	2.03	0.02

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   Yes
>
> b. Qualified Applicants for MCO (PWTD)   Answer   No

Among the qualified internal applicants with disabilities, who voluntarily identified their disability, triggers existed for PWD in the 0301 MCO - 4.2% of applicants; 2.3% found qualified. No triggers were found for PWTD.

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

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

Among the qualified employees with disabilities who voluntarily identified their disability, triggers existed for PWTD and PWD promoted in the following most populous MCOs: PWD: 0301 – 2.3% qualified, 0% selected 0343 – 2.6% qualified, 0% selected 0905 – 1.4% qualified, 0% selected 1224 – 1.2% qualified, 0% selected 1340 – 3.5% qualified, 0% selected PWTD: 0301 – 2.3% qualified, 0% selected 0343 – 1.3% qualified, 0% selected 0905 – 1.4% qualified, 0% selected 1224 – 0.5% qualified, 0% selected 1340 – 2.0% qualified, 0% selected While some of the percentages may not represent significant differences, the information is provided to show a trend for non-selection in 5 out of the 10 most populous MCOs.

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.

DOC Bureaus provided career/professional development programs for their employees, including PWD/TD. The competitive

opportunities were announced via USAJOBS and many other internal programs were opened to all employees. In FY 2018, opportunities were provided for employees to gain management and leadership skills to accomplish their career objectives. For example, workshops on developing Individual Development Plans and Leadership Competencies were offered. All employees were encouraged to participate in DOC-wide developmental opportunities, as well as Federal Government-wide career development programs. Additionally, Bureaus initiated and engaged Employee Resource Groups, including Disability Working Groups, to implement career development programs. This will continue in 2019.

B. CAREER DEVELOPMENT OPPORTUNITES

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

DOC Bureaus have instituted various career development opportunities. NIST: Foundations of Leadership Program (FLP); New Leader Program (NLP); project Management and Leadership Program (PMLP). Mentoring and coaching sessions are available to participants of these programs. NOAA: Leadership Competencies Development Program (LCDP); NOAA Leadership Seminar (NLS); and NOAA Rotational Assignment Program (NRAP). Census: Offers job rotational opportunities. Details are posted on a SharePoint site that is available Census-wide. Internship positions are posted on USAJOBS and are open to all qualified candidates.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Fellowship Programs						
Internship Programs						
Coaching Programs						
Training Programs						
Mentoring Programs						
Other Career Development Programs	n/a	17	n/a	4	n/a	0
Detail 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

Applicant data is not available at this time. Data is only available for those selected to participate. DOC plans to collect applicant data in FY 2020.

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

Applicant data is not available at this time. Data is only available for those selected to participate. DOC plans to collect applicant data in FY 2020.

C. AWARDS

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

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

    b. Awards, Bonuses, & Incentives (PWTD)   Answer   Yes

Using the inclusion rate, triggers were identified for the following awards: Cash awards $500 and under: The average award amount for PWDs and PWTDs is lower than the average award amount for all recipients. Cash awards between $501 and $1500: The average award amount for PWDs is lower than the average award amount for all recipients. Cash awards greater than $1500: The average award amount for PWDs and PWTDs is also lower than the average award amount for all recipients.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards: 1-9 hours : Total Time-Off Awards Given	1939	10.21	86.80	2.84	7.37
Time-Off Awards: 9+ hours : Total Time-Off Awards Given	1208	9.27	87.83	2.73	6.54

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: $100 - $500: Total Cash Awards Given	14632	10.56	89.44	2.39	8.17
Cash Awards: $501+: Total Cash Awards Given	34565	6.59	93.41	1.85	4.74

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

No triggers

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Quality Step Increases (QSI): Total QSIs Awarded	407	7.86	92.14	2.21	5.65
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   N/A

    b. Other Types of Recognition (PWTD)   Answer   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   No

        ii. Internal Selections (PWD)   Answer   No

   b. Grade GS-15

        i. Qualified Internal Applicants (PWD)   Answer   Yes

        ii. Internal Selections (PWD)   Answer   Yes

   c. Grade GS-14

        i. Qualified Internal Applicants (PWD)   Answer   No

        ii. Internal Selections (PWD)   Answer   Yes

   d. Grade GS-13

        i. Qualified Internal Applicants (PWD)   Answer   Yes

        ii. Internal Selections (PWD)   Answer   Yes

No triggers were identified at the SES level because there were no PWD among the applicants for SES positions. The following triggers were identified: GS 15: 1.4% qualified; 0% selected GS 14: 0.9% qualified, 0% selected GS 13: 3.4% qualified, 2.6% selected While the percentages may not represent significant differences, the information is provided to show a trend for non-selection, at the higher grade level, and the disparity in those qualified versus selected.

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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   No

        ii. Internal Selections (PWTD)   Answer   Yes

   c. Grade GS-14

        i. Qualified Internal Applicants (PWTD)   Answer   No

        ii. Internal Selections (PWTD)   Answer   Yes

    d. Grade GS-13

       i. Qualified Internal Applicants (PWTD)   Answer   No

       ii. Internal Selections (PWTD)   Answer   Yes

No triggers were identified at the SES level because there were no PWD among the applicants for SES positions. The following triggers were identified: GS 15: 0.6% qualified; 0% selected GS 14: 0.9% qualified, 0% selected GS 13: 1.3% qualified, 0% selected While the percentages may not represent significant differences, the information is provided to show a trend for non-selection, at the higher grade level, and the disparity in those qualified versus selected.

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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

Due to a loss of key personnel, the EEO Office has not been able to sufficiently explore all available data sources, beyond the MD 715 data tables, in order to fully respond to the MD 715 reporting requirements. Plans are in place (see Part H-6) to address this deficiency.

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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. 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 (PWTD)   Answer   N/A

    b. New Hires to GS-15 (PWTD)   Answer   N/A

    c. New Hires to GS-14 (PWTD)   Answer   N/A

    d. New Hires to GS-13 (PWTD)   Answer   N/A

Due to a loss of key personnel, the EEO Office has not been able to sufficiently explore all available data sources, beyond the MD 715 data tables, in order to fully respond to the MD 715 reporting requirements. Plans are in place (see Part H-6) to address this deficiency.

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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 a loss of key personnel, the EEO Office has not been able to sufficiently explore all available data sources, beyond the MD 715 data tables, in order to fully respond to the MD 715 reporting requirements. Plans are in place (see Part H-6) to address this deficiency.

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

     a. Executives

          i. Qualified Internal Applicants (PWTD)   Answer   N/A

          ii. Internal Selections (PWTD)   Answer   N/A

     b. Managers

          i. Qualified Internal Applicants (PWTD)   Answer   N/A

          ii. Internal Selections (PWTD)   Answer   N/A

     c. Supervisors

          i. Qualified Internal Applicants (PWTD)   Answer   N/A

          ii. Internal Selections (PWTD)   Answer   N/A

Due to a loss of key personnel, the EEO Office has not been able to sufficiently explore all available data sources, beyond the MD 715 data tables, in order to fully respond to the MD 715 reporting requirements. Plans are in place (see Part H-6) to address this deficiency.

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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

Due to a loss of key personnel, the EEO Office has not been able to sufficiently explore all available data sources, beyond the MD 715 data tables, in order to fully respond to the MD 715 reporting requirements. Plans are in place (see Part H-6) to address this deficiency.

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

Due to a loss of key personnel, the EEO Office has not been able to sufficiently explore all available data sources, beyond the MD 715 data tables, in order to fully respond to the MD 715 reporting requirements. Plans are in place (see Part H-6) to address this deficiency.

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.

<div align="right">Answer   Yes</div>

All eligible Schedule A employees with disabilities were converted after two years. In FY 2018, the agency established a system to monitor the status of Schedule A employees with disabilities. DOC's SPCC within OHRM track this data. Also, there was a recent change in HR to implement "Shared Services" which should provide the means to better monitor and track the status of Schedule A employees to ensure conversion opportunities in the future.

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	Yes
b.Involuntary Separations (PWD)	Answer	Yes

The % of voluntary and involuntary separations for PWD exceeded those without disabilities. Inclusion (Separation) Rate: 6.4% PWD Sep Rate: 9.5% No Dis Sep Rate: 6.0% Involuntary Sep Rate: PWD: 1.5% No Dis: 0.6% Voluntary Sep Rate: PWD: 8.2% No Dis: 5.5%

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permenant Workforce	41567	8.79	91.21
Total Separations	2856	13.45	86.55
Voluntary Separations	2568	12.77	87.23
Involuntary Separations	288	19.44	80.56

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	Yes

      b.Involuntary Separations (PWTD)   Answer   Yes

The % of voluntary and involuntary separations for PWTD exceeded those without disabilities. Inclusion (Separation) Rate: 6.4% PWTD Sep Rate: 8.6% No Dis Sep Rate: 6.0% Involuntary Sep Rate: PWTD: 1.1% No Dis: 0.6% Voluntary Sep Rate: PWTD: 7.6% No Dis: 5.5%

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permenant Workforce	41567	2.34	97.66
Total Separations	2856	3.19	96.81
Voluntary Separations	2568	3.12	96.88
Involuntary Separations	288	3.82	96.18

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.

The agency does not have a system to collect DOC-wide exit interview results. However, some Bureaus have implemented automated exit interview surveys. The Office of Civil Rights is currently developing a DOC-wide retention survey designed to capture data on why people leave DOC and what makes them stay. The survey is to be launched in FY 2019.

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.commerce.gov/about/policies/accessibility

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 proposed notice is under review and will be available in FY 2020.

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 2018, a DOC-wide Web Accessibility Working Group was established to monitor, update, provide guidance and advice on web content, and to ensure accessibility. This group ensures that DOC websites and electronic technology are fully compliant and accessible to users with disabilities. Each Bureau also has a Web Advisory Committee (WAC) that provides guidance and training on proper development and presentation of accessible electronic information. The WAC includes a Section 508 working group that meets regularly to address specific regulatory requirements and implementation concerns. Some Bureaus' internal websites also provide training materials, tools, and other resources for developers and managers. In FY 2019, all DOC Bureaus are expected to establish Web Accessibility Working Groups to locally address any accessibility concerns and elevate issues that have DOC-wide impact. The Bureaus' Facility Management Offices collaborate with DPMs and/or Reasonable Accommodation staff to ensure that newly constructed or renovated areas are accessible to persons with disabilities and to address Americans with Disabilities Act (ADA) or Architectural Barriers Act (ABA) accessibility issues.

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.)

For FY 2018, the average processing time for initial requests was 14.2 days. DOC's Reasonable Accommodation Coordinators (RAC) reported receiving and processing 1,531 requests for reasonable accommodations.

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 2018, DOC Bureaus increased the number of training opportunities provided to employees and managers/supervisors in the area of reasonable accommodations. This has been instrumental in working towards providing more timely approvals of accommodation requests and improving managers/supervisors' understanding of their roles and responsibilities.

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.

In FY 2018, there was one request for PAS that was timely provided. Bureaus continue to include procedures for requesting PAS in their RA training. Some Bureaus have created standard operating procedures with detailed internal procedures for handling PAS requests that are consistent with EEOC and DOC-wide procedures.

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   Yes

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   Yes

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 Agency did not have any findings of discrimination alleging harassment based on disability status during the last fiscal year. However, cases involving disability-based harassment were settled.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1.

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

Answer   Yes

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

Answer   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 Agency did not have any findings of discrimination alleging failure to provide a reasonable accommodation during the last FY. However, cases involving disability-based harassment were settled.

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

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?	Separation rates for PWD and PWTD are disproportionately higher than people without disabilities. Barrier Analysis is in-progress. Barrier Analysis in progress. Potential barriers include: 1) limited opportunities for advancement or career development; 2) employees and supervisors lack knowledge of reasonable accommodation procedures or do not adhere to them; and/or 3) lack of supervisor training for addressing workplace harassment.
STATEMENT OF BARRIER GROUPS:	*Barrier Group*
	People with Disabilities
	People with Targeted Disabilities

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?	There were no PWD or PWTD applicants or selectees for promotion/appointments to SES positions. There were no PWD selected for Promotion to GS-14 and GS-15 grade levels. There were no PWTD selected for Promotion to GS-13, GS-14, or GS-15 grade levels. Potential barriers include: 1) lack of mentoring programs that target individuals with disabilities and 2) lack of career development programs that target individuals with disabilities.
STATEMENT OF BARRIER GROUPS:	*Barrier Group*
	People with Disabilities
	People with Targeted Disabilities

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?	Participation rates for PWD at GS 11 to SES is 7.27%, which is below the 12% goal. Participation rate for PWTD is 1.99%, which is below the 2% goal. Potential barriers include 1) lack of resources for recruitment and outreach activities for PWD/TD and 2) lack of policy enforcement that encourages the hiring of (PWD/PWTD) candidates using special hiring authorities (Schedule A, Veterans, etc.) when filing vacant positions.
STATEMENT OF BARRIER GROUPS:	*Barrier Group*
	People with Disabilities
	People with Targeted Disabilities

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

FY 2017 Planned Activity: Establish retention and possibly exit interview surveys to determine root cause for increased separation rates. This action is still in progress and has been moved to the action plan for Trigger #2.

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

In FY 2018, OHRM hired a DOC SPPC to improve outreach and recruitment of PWD/TD through external sources. The SPPC established a collaborative working group of Bureau SPPCs and DPMs to revise and implement DOC's Strategic Operations Plan for the Recruitment, Hiring and Advancement of PWD and PWTD.

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.

DOC will continue implementing the strategies identified in this year's Affirmative Action Plan and DOC's updated Strategic Operational Plan for the Recruitment, Hiring and Retention of Individuals with Disabilities.