MD-715 – Part J

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

To capture agencies' affirmative action plan (AAP) 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)) requires 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 | |
|----|---|-------|
| | <u>PWD</u> by grade level cluster in the permanent workforce? If "yes", describe the trigge | er(s) |
| | in the text box. | |
| | | |

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

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving <u>PWTD</u> 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)b. Cluster GS-11 to SES (PWTD)YesNo X

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

The numerical goals are posted on NARA's internal collaboration tool, where they are available to all staff.

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 X No

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

| Disabilitas Busanana Tasla | # of Full Time Staff by Emp | | Responsible Official | |
|--|---|--------------|----------------------|--|
| Disability Program Task | Full Time | Part Time | Collateral Duty | (Name, Title, Office, Email) |
| Processing applications from PWD and PWTD | 10+ Administrative Resource Center (ARC) contractor staff | | | Tanya Pyatt, Selective Placement Program Coordinator (SPPC), Human Capital, Tanya.Pyatt@nara.gov |
| Answering questions from the public about hiring authorities that take disability into account | 10+ ARC Contractor Staff | | | Tanya Pyatt, Selective Placement Program Coordinator (SPPC), Human Capital, Tanya.Pyatt@nara.gov |
| Processing reasonable accommodation requests from applicants and employees | 2 | | | Kimberly Meyer, Disability Program Manager (DPM), NEEO, Kimberly.Meyer@nara.gov |

| D: 1:17 D T 1 | # of Full Time Employees (FTE) Staff by Employment Status | | | Responsible Official |
|---|---|--------------|--------------------|---|
| Disability Program Task | Full Time | Part Time | Collateral Duty | (Name, Title, Office, Email) |
| | | | | Rudregus Davis Reasonable Accommodation Coordinator (RAC), NEEO, Rudregus.davis@nara.gov |
| Section 508 Compliance | 1 | | | Jocelyn Blakely-Hill, Information Technology (IT) Specialist, Web Program Division Office of Innovation jocelyn.blakely-hill@nara.gov |
| Architectural Barriers Act Compliance | 1 | | | Mark Sprouse, Facilities & Materials Management Officer, Facility and Property Management Division, Mark.Sprouse@nara.gov |
| Special Emphasis Program for PWD and PWTD | | | | Vacant |

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 X No

In FY23, the DPM and RAC participated in the following training: Reasonable Accommodation Processing Training Reasonable Accommodations For Telework Accessibility Review Training/ Survey Section 508 Accessibility Work Group Schedule A Hiring

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 X | NO | |
|-------|----|--|
| | | |
| | | |
| | | |

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.

Throughout FY23, applicants with disabilities had the opportunity to apply to any NARA Merit Promotion vacancy through the appropriate non-competitive hiring authorities. NARA maintains a Selective Placement repository where candidates eligible for non-competitive hiring authorities, such as Schedule A, are able to upload a resume and required documentation for the consideration of NARA hiring managers. This repository is advertised heavily to NARA managers and supervisors. The Selective Placement repository is marketed to eligible candidates through strategic outreach efforts, including through LinkedIn postings.

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.

Schedule A language appears in Merit Promotion announcements, which include instructions for PWD and PWTD applying below Schedule A. In addition, we have implemented a resume repository, which enables hiring managers to direct hire persons with disabilities using Schedule A.

- 3. When individuals apply for a position below 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 below 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.
- (1) The determination of eligibility for appointment below one of the hiring authorities that take disability into account is made through the documentation provided by the applicant, i.e., their resume, transcripts (if required by the position), officially signed Schedule A disability letter, DD-214 (Certificate of Release or Discharge from Active Duty), and/or veterans disability rating letter. (2) The individual's name is added to a certificate created from the job announcement posting and forwarded to the Selecting Official. In addition, applicants to our Schedule A resume repository are reviewed by hiring managers and, if interested, are then reviewed by ARC to determine their eligibility for Schedule A hiring. If verified, the hiring manager is notified to interview the applicant and guidance provided regarding the manner in which the appointment will take place and the requirements by each appointment type.
 - 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 X No

Human Capital Specialists provide training to all new managers and supervisors during the 6-month Supervisor Development Program conducted two (2) times a year. NARA's shared services center for Staffing – ARC, conducts a Strategic Recruitment Conversation with the hiring manager, and this includes discussing alternate hiring authorities, including Schedule A disability appointments. In addition, training was provided to hiring managers in the use of the Schedule A and Disabled Veterans resume repository.

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 Office of Human Capital has continued to make efforts to establish meaningful relationships with organizations and groups that support the hiring of veterans, military spouses, and individuals with disabilities. These outreach efforts include but are not limited to registering for events with organizations like Hiring Our Heroes and marketing our Selective Placement repository for individuals with non-competitive hiring authorities. The Office of Human Capital has also conducted training to NARA hiring managers about the advantages of hiring veterans, military spouses, and individuals with disabilities.

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 Trigger(s): below.

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

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 Trigger(s): below.

a. New Hires for MCO (PWD)b. New Hires for MCO (PWTD)YesNo

The EEO Office receives raw applicant flow data with inconclusive information which does not allow accurate analysis of all applicant flow data. The office intends to recruit a Data Analyst to support this subject matter expert role for the EEO Office. At this current time, we are unable to analyze the data, but we intend to complete this in FY24.

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 Trigger(s): below.

a. Qualified Applicants for MCO (PWD)b. Qualified Applicants for MCO (PWTD)YesNo

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 Trigger(s): below.

a. Promotions for MCO (PWD)b. Promotions for MCO (PWTD)YesNo

The EEO Office receives raw applicant flow data with inconclusive information which does not allow accurate analysis of all applicant flow data. The office intends to recruit a Data Analyst to support this subject matter expert role for the EEO Office. At this current time, we are unable to analyze the data, but we intend to complete this in FY24.

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.

NARA continues to strive to increase the diversity of employees in mission-critical occupations for GS-12 and above positions to mirror the Civilian Labor Force. The Office of Human Capital continues to conduct strategic outreach to various organizations, colleges, and universities in an effort to increase the diversity of the workforce. NARA has now established meaningful relationships with several Historically Black Colleges and Universities and Hispanic-serving Institutions. The Office of Human Capital recently created a Voluntary Internship Program in an effort to build a diverse workforce. The Office of Human Capital has also worked to expand the use of the Pathways Program and is in the process of developing a Junior Fellows Program to further grow a diverse pipeline of candidates.

B. Career Development Opportunities

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

In addition to a managed cross-training program and competitive details and temporary promotions, leadership and development programs are offered by competition to all employees based on grade level:

Learning Development FY23 list Leadership and development programs are offered by competition to all employees based on grade level:

- Excellence in Government (GS 13-14)
- Preparing to Lead (GS 7-11)
- Training Program Supervisory Development Program
- 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 | Total Participants | | PWD | | PWTD | |
|---|--------------------|------------------|----------------|---------------|----------------|---------------|
| Opportunities | Applicants (#) | Selectees (#) | Applicants (%) | Selectees (%) | Applicants (%) | Selectees (%) |
| Internships Programs No internship Programs | N/A | N/A | N/A | N/A | N/A | N/A |
| Fellowship Programs Excellence in Government (GS 13/14) | 23 | 8 | 4.3% | 0% | 0% | 0% |
| Mentoring Programs No mentoring Programs | N/A | N/A | N/A | N/A | N/A | N/A |

| Detail Programs Cross Training (all grade levels) | 2 | 2 | 50% | 50% | 0% | 0% |
|--|-----|-----|--------|-------|-----|-----|
| Coaching Programs Supervisor Development Program | 51 | 51 | 5.88% | 5.88% | 0% | 0% |
| Coaching Programs Preparing to Lead (GS7-11) | 14 | 4 | 14.28% | 0% | 0% | 0% |
| Other Career Development Programs None | N/A | N/A | N/A | N/A | N/A | N/A |

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

a. Applicants (PWD)b. Selections (PWD)

Yes X Yes X No No

In FY23, triggers exist for PWD in three (3) of the Career Development Programs; Excellence in Government (GS 13/14), Supervisory Development Program and Preparing to Lead (GS 7-11).

For the Excellence in Government (GS 13/14), there was only one (1) PWD out of 23 that applied and they were not selected.

For the Supervisor Development Program, three (3) PWD attended the Supervisor Development Program.

4. Do triggers exist for <u>PWTD</u> 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 triggers in the text box.

a. Applicants (PWTD) b. Selections (PWTD)

Yes X Yes X No No

In FY23, triggers exist for PWTD in all four (4) of the development programs; Excellence in Government (GS 13/14), Preparing to Lead (GS 7-11) and Supervisor Development Program as there were no PWTD that applied for or attended any of the Career Development 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 triggers in the text box.

a. Awards, Bonuses, & Incentives (PWD)

Yes X

No

b. Awards, Bonuses, & Incentives (PWTD)

Yes X

No

| | PWD | PWOD | PWTD |
|--|---------|-----------|---------|
| | | Benchmark | |
| Total Time-Off 1-10 hours | 20.55% | 26.06% | 14.28% |
| Total Time-Off 11-20 hours | 3.79% | 4.56% | 2.85% |
| Total Time-Off 21-30 hours | 4.79% | 4.36% | 6.66% |
| Total Time-Off 31-40 hours | 3.59% | 4.20% | 3.80% |
| | PWD | PWOD | PWTD |
| Total Cash Awards \$500 and below | 111.57% | 124.18% | 114.28% |
| Total Cash Awards \$501 - \$999 | 23.95% | 17.44% | 32.38% |
| Total Cash Awards \$1000 - \$1999 | 35.92% | 34.43% | 44.76% |
| Total Cash Awards \$2000 - \$2999 | 0.79% | 1.31% | 1.90% |
| Total Cash Awards \$3000 - \$3999 | 27.5% | 46.55% | 12.19% |
| Total Cash Awards \$4000 - \$4999 | 0.00% | 0.20% | 0.00% |
| Total Cash Awards \$5000 or more | 0.79 % | 2.18% | 0.00% |

PWD Trigger(s):

There are trigger(s) in eight (8) award categories (Time-Off Awards 1-10, 11-20, 31-40, and Cash Awards \$500 and below, \$2000-\$2999, \$3000-\$3999, \$4000-\$4999 and \$5000-more), where the inclusion rate of PWD receiving awards is lower than the inclusion rate of PWOD receiving awards.

PWTD Trigger(s):

There are trigger(s) in seven (7) award categories (Time-Off Awards 1-10,11-20, 31-40, and Cash Awards \$500 and below, \$3000-\$3999, \$4000-\$4999 and \$5000-more), where the inclusion rate of PWTD receiving awards is lower than the inclusion rate of PWOD receiving awards.

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 X | No |
|----|----------------------|-------|----|
| b. | Pay Increases (PWTD) | Yes X | No |

| | PWD | PWOD | PWTD |
|------------------------------|-----|-----------|------|
| | | Benchmark | |
| Quality Step Increases (QSI) | 0% | 0.45% | 0% |

Trigger(s):

There are no PWD or PWTD who received Quality Step Increases compared to PWOD.

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 X | No |
|----|-----------------------------------|-------|----|
| b. | Other Types of Recognition (PWTD) | Yes X | No |

Archivist Achievement Awards.

In FY23, 373 NARA employees were awarded the Archivist Achievement Award. In FY23, there were 2679 employees in the workforce, including 501 PWD and 105 PWTD..

10.17% PWD received the award (51 PWD).

9.52% PWTD received the award (10 PWTD).

11.01% PWOD received the award (295 PWOD).

0.63% of awardees did not identify disability status (17 unidentified).

Trigger: There is a lower rate of PWD/PWTD receiving the award then PWOD.

D. PROMOTIONS

- 1. Does your agency have a trigger involving <u>PWD</u> among the qualified *internal* applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the <u>relevant applicant pool for qualified internal applicants</u> and the <u>qualified applicant pool for selectees</u>.) 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 |
|----|-------|-------------------------------------|-----|----|
| | ii. | Internal Selections (PWD) | Yes | No |
| b. | Grade | GS-15 | | |
| | i. | Qualified Internal Applicants (PWD) | Yes | No |
| | ii. | Internal Selections (PWD) | Yes | No |
| C. | Grade | GS-14 | | |
| | i. | Qualified Internal Applicants (PWD) | Yes | No |
| | ii. | Internal Selections (PWD) | Yes | No |
| d. | Grade | GS-13 | | |
| | i. | Qualified Internal Applicants (PWD) | Yes | No |
| | ii. | Internal Selections (PWD) | Yes | No |

2. Does your agency have a trigger involving <u>PWTD</u> among the qualified *internal* applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the <u>relevant applicant pool for qualified internal</u> applicants and the <u>qualified applicant pool for selectees</u>.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

SES

d. Grade GS-13

| a. | SES | | |
|----|---|-----|----|
| | i. Qualified Internal Applicants (PWTD) | Yes | No |
| | ii. Internal Selections (PWTD) | Yes | No |
| b. | Grade GS-15 | | |
| | i. Qualified Internal Applicants (PWTD) | Yes | No |
| | ii. Internal Selections (PWTD) | Yes | No |
| C. | Grade GS-14 | | |
| | i. Qualified Internal Applicants (PWTD) | Yes | No |
| | ii. Internal Selections (PWTD) | Yes | No |

Yes

Yes

No

No

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i. Qualified Internal Applicants (PWTD)

ii. Internal Selections (PWTD)

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWD</u> 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 |
|----|--------------------|-------|-----|----|
| b. | New Hires to GS-15 | (PWD) | Yes | No |
| c. | New Hires to GS-14 | (PWD) | Yes | No |
| d. | New Hires to GS-13 | (PWD) | Yes | No |

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWTD</u> 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 |
|----|---------------------------|-----|----|
| b. | New Hires to GS-15 (PWTD) | Yes | No |
| c. | New Hires to GS-14 (PWTD) | Yes | No |
| d. | New Hires to GS-13 (PWTD) | Yes | No |

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5. Does your agency have a trigger involving <u>PWD</u> 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.

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|---|------|-------|----|
| a | Exec | 1111V | es |

| | i. | Qualified Internal Applicants (PWD) | Yes | No |
|----|--------|-------------------------------------|-----|----|
| | ii. | Internal Selections (PWD) | Yes | No |
| b. | Manag | gers | | |
| | i. | Qualified Internal Applicants (PWD) | Yes | No |
| | ii. | Internal Selections (PWD) | Yes | No |
| C. | Superv | visors | | |
| | i. | Qualified Internal Applicants (PWD) | Yes | No |
| | ii. | Internal Selections (PWD) | Yes | No |

6. Does your agency have a trigger involving <u>PWTD</u> 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.

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|---|------|---------|---|
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b.

C.

| i. | Qualified Internal Applicants (PWTD) | Yes | No |
|--------|--------------------------------------|-----|----|
| ii. | Internal Selections (PWTD) | Yes | No |
| Manag | gers | | |
| i. | Qualified Internal Applicants (PWTD) | Yes | No |
| ii. | Internal Selections (PWTD) | Yes | No |
| Superv | visors | | |
| i. | Qualified Internal Applicants (PWTD) | Yes | No |
| ii. | Internal Selections (PWTD) | Yes | No |

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7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWD</u> 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 |
|----|---------------------------------|-----|----|
| b. | New Hires for Managers (PWD) | Yes | No |
| C. | New Hires for Supervisors (PWD) | Yes | No |

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8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWTD</u> 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 |
|----|----------------------------------|-----|----|
| b. | New Hires for Managers (PWTD) | Yes | No |
| C. | New Hires for Supervisors (PWTD) | Yes | No |

The EEO Office receives raw applicant flow data with inconclusive information which does not allow accurate analysis of all applicant flow data. The office intends to recruit a Data Analyst to support this subject matter expert role for the EEO Office. At this current time, we are unable to analyze the data, but we intend to complete this in FY24.

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 (2) 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 X No

There were 37 A disability hires during the period of 10/1/2021 to 9/30/2023; as of 9/30/2023, four (4) were eligible for conversion. Out of the four (4) eligible, two (2) were converted; two (2) separated prior to conversion date.

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

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

| | PWD | PWOD Benchmark |
|-------------------------------------|-------|-------------------|
| PWD Workforce Separations | 9.04% | 14.28% |
| PWD Removals (Involuntary) | 1.19% | 0.50% |
| PWD Resignations (Voluntary) | 2.39% | 1.25% |
| PWD Other Separations (Involuntary) | 3.99% | 3.34% |

Trigger(s): PWD inclusion rates are higher than PWOD in Removals (Involuntary), Resignations (Voluntary), and other Separations (involuntary).

PWD inclusion rates are higher than PWOD in Removals, Resignations and Other Separations.

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

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

| | PWTD | PWOD |
|--------------------------------------|--------|-----------|
| | TWID | Benchmark |
| PWTD Workforce Separations | 14.28% | 11.20% |
| PWTD Removals (Involuntary) | 0.95% | 0.50% |
| PWTD Resignations (Voluntary) | 5.71% | 1.25% |
| PWTD Other Separations (Involuntary) | 6.66% | 3.34% |

Trigger(s): PWTD inclusion rates are higher than PWOD in Total Workforce Separations, Removals (involuntary), Resignation (voluntary) and other separations (involuntary).

PWTD inclusion rates are higher than PWOD in Total Workforce Separations, Removals, Resignations and Other Separations.

| 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 state of the agency asing one invertion results and care and course. | |
| In FY23, exit surveys for PWD and PWTD were completed and we will review the data in | |
| FY24. | |
| | |
| | |
| | |

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 below Section 508 of the Rehabilitation Act of 1973 (29 United States Code (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 below Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

https://www.archives.gov/global-pages/accessibility. This webpage provides a telephone number, a mailing address, and an email address for feedback. In addition, the website provides individuals with contact information for Section 508 Coordinators at NARA to file a complaint and provides a link for contact information for the Section 508 Coordinators (https://www.archives.gov/global-pages/accessibility#coordinator)

2. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights below the Architectural Barriers Act (ABA), including a description of how to file a complaint.

https://www.archives.gov/eeo/policy/508-aba-rights. This page provides information about the ABA and the Access Board that is responsible for enforcing the ABA. Additionally, the website provides a link for individuals to access information on the Access Board's standards (www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards), link for information about filing a complaint (https://www.access-board.gov/enforcement) which provides individuals with the following options to file a complaint under the ABA:

- 1. Online ABA Complaint Form
- 2. Email to enforce@access-board.gov
- 3. Fax to 202-272-0081
- 4. Mail to:

Compliance and Enforcement Section Office of the General Counsel U.S. Access Board 1331 F Street, NW, Suite 1000 Washington, DC 20004-1111

3. Describe any programs, policies, or practices that the agency has below taken, or plans on below taking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

NARA's EEO Disability Program Office continues to monitor accessibility of agency facilities and/or assistive technology for NARA's workforce and the Public who visits NARA's buildings. The EEO Disability Program Office tracks reasonable accommodation requests from employee's and/or applicants and the public requiring accessibility of agency facilities and/or assistive technology as a form of an accommodation such as listening devices, digital timesheets, magnifying vision software, keyboards, mouse, voice recognition software and assistive equipment for hearing.

The EEO Disability Office will continue to work with the Disability Employee Affinity Group (EAG) and NARA's Diversity, Equity, Inclusion and Accessibility (DEIA) Program Manager to post various articles and blogs to NARA's Internal Collaboration Network (ICN) for education and awareness for all NARA staff.

In FY24, the EEO Disability Office will work with legal to have an outlined processes for public requests for accommodations, coordinate with research rooms and other public facing offices to install Video Relay Phones for persons who are deaf and hard of hearing. Additionally, the EEO Disability Office will work with Acquisitions to include FOH ergonomic assessments in NARA's Federal Occupational Health (FOH) contract. The EEO Disability Office will continue to work with NARA's 508 coordinator to ensure all internal and external websites, documents and forms are 508 compliant.

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.)

FY23 average processing time is 100.9 days. FY23 average processing time is 85.83 days.

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

NARA monitors the processing of reasonable accommodations requests and trends by tracking all requests on our Microsoft Excel database. In addition, we monitor accommodation trends annually, which tracks accommodations that are approved, denied and withdrawn from the RA process. Additionally, we created case summaries for reasonable accommodations requests where employees elect to participate in the reassignment process and assist managers and supervisors on conducting research for possible accommodations for employees that are in the reasonable accommodation process. NARA's Interim Guidance 303-1, Reasonable Accommodation Policy and Procedures, was updated in FY23 and is going through the final approval process. The updates made were to enhance the timeliness and efficiency of case processing for reasonable accommodations. The EEO Disability Office has hired an EEO Disability supervisor and is hiring two (2) more DPMs in 2024. Additionally, the EEO office has met with the research room to assist in providing accommodations for researchers and the public and is working to coordinate Video Relay phones in public spaces for persons who are deaf and/or hard of hearing.

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.

There were no requests for PAS during FY23. NARA's Interim Guidance 303-1, Reasonable Accommodation Policy and Procedures, remain published and posted on the internal website as a resource to all managers and supervisors which includes information on PAS Policy and Procedures.

During FY23, NARA greatly enhanced its policy guidance related to PAS to include a detailed procedure for requesting personal assistance services. The policy updates are included in the NARA Reasonable Accommodation Policy and Procedures document NARA-303-1 which is currently under review for final approval and publishing.

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 which is 23.12% for FY23?

Yes No X

In FY23, NARA had five (5) formal EEO complaints alleging harassment in FY23. With a total workforce of 2679, this is a rate of 0.18%, well below the government wide average of 23.12%.

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

In FY23, NARA had no findings.

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.

In FY23, NARA had no findings.

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 which is 13.79% for FY23?

Yes No X

In FY23, NARA had four (4) formal EEO complaints alleging failure to provide a Reasonable Accommodation in FY23. With a total workforce of 2679, this is a rate 0.14%, well below the government wide average of 13.79%.

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 X

N/A In FY23, NARA had no findings.

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 In FY23, NARA had no findings.

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 No X

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

Yes No X

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 | In FY23, triggers exist for PWTD in all four (4) of the development programs; Fellowship Programs Excellence in Government (GS 13/14), Detail Programs/Cross Training, Preparing to Lead (GS 7-11) and Supervisor Development Program as there were no PWTD that attended for any of the Career Development Programs In FY23, triggers exist for PWD in three (3) of the Career Development Programs; Excellence in Government (GS 13/14), Supervisory Development Program and Preparing to Lead (GS 7-11). For the Excellence in Government (GS 13/14), there was only one (1) PWD out of 23 that applied and they were not selected. For the Supervisor Development Program, there were three (3) PWD that applied and were selected for the Supervisor Development Program. | | |
|-----------------------------|---|---|--|
| Barrier(s) | None | | |
| Objective(s) | Increase Career Development Opportuni | ties to PWD and PWTD | |
| Responsible Official(s) | | Performance Standards Address the Plan? (Yes or No) | |
| Chief Human Capital Officer | | Yes | |
| Equal Employ | ment Opportunity Director | Yes | |
| Anti-Harassmo | ent/ Disability Program Supervisor | Yes | |
| Disability Program Managers | | Yes | |

| Barrier(s) Analysis Process Completed? (Yes or No) | | B | Barrier(s) Identii (Yes or No) | fied? | |
|---|---|--|---|----------------------------------|------------------------------------|
| | No | | No | | |
| Sources of Data | | Sources Reviewed? (Yes or No) | Identi | ify Information | Collected |
| Workforce Data | Tables | No | | | |
| Complaint Data | (Trends) | No | | | |
| Grievance Data | (Trends) | No | | | |
| Grievance, Mer | Decisions (e.g., EEO, it System Protections Anti-Harassment | No | | | |
| Climate Assessi Employee View | ment Survey (e.g., Federal point Survey) | No | | | |
| Exit Interview I | Data | No | | | |
| Focus Groups | | No | | | |
| Interviews | | No | | | |
| Government Ac | ongress, EEOC, MSPB, ecountability Office of Personnel Management | No | | | |
| Other (Please D | escribe) | Yes | Career Dev | elopment Data | |
| Target Date (mm/dd/yyyy) | Planned Activities | | Sufficient Staffing & Funding (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
| 9/30/2024 | During training, further disaccommodations may be no PWD or PWTD to apply for attend career development | needed for for and/or | Yes | | |

| | opportunities as an equal privilege and benefits of employment. | | | |
|--------------------------------------|--|------------------------------------|--|---------------|
| 9/30/2024 | Work with HR Training to ensure the process for requesting accommodation is listed in all directions and applications for Career Development Opportunities. | Yes | | |
| 9/30/2024 | Work with HR Training to ensure all applications and or trainings required for Career Development opportunities are 508 compliant and/or there is an alternative process for PWD and PWTD. | Yes | | |
| Fiscal Year | Accom | Accomplishments | | |
| | | | | |
| | ase explain the factor(s) that prevented the agency from timely completing any of the nned activities. | | | |
| | • | agency from | timely completing | g any of the |
| plan | • | | | |
| The EEO O | ned activities. | l activities in | FY24 and FY25 | |
| The EEO O | ffice will initiate the review of the planned the planned activities that were completed, | l activities in | FY24 and FY25 | |
| The EEO O 5. For tactive 6. If the | ffice will initiate the review of the planned the planned activities that were completed, | d activities in please description | FY24 and FY25. Tibe the actual implement in the second implement in the second in the | pact of those |

| | In FV23 Trigger(s) | exist in the fo | llow Award categories for PWD and PWTD: | |
|---|--|--|--|--|
| | Trigger(s) exist in 31-40, and Cash \$4000-\$4999 and \$ | Trigger(s) exist in eight (8) award categories (Time-Off Awards 1-10, 11-20, 31-40, and Cash Awards \$500 and below, \$2000-\$2999, \$3000-\$3999, \$4000-\$4999 and \$5000-more), where the inclusion rate of PWD receiving awards is lower than the inclusion rate of PWOD receiving awards. | | |
| Trigger 2 | In FY23, trigger(s) exist in seven (7) award categories (Time-Off Awards 1-10,11-20, 31-40, and Cash Awards \$500 and below, \$3000-\$3999, \$4000-\$4999 and \$5000-more), where the inclusion rate of PWTD receiving awards is lower than the inclusion rate of PWOD receiving awards. | | | |
| | There are no PWD or PWTD who received Quality Step Increases compared to PWOD. | | | |
| | There is a significant PWOD. | There is a significantly lower rate of PWD/PWTD receiving the award then PWOD. | | |
| Barrier(s) | None | None | | |
| Objective(s | Objective(s Increase award distribution to PWD and PWTD | | | |
| Res | sponsible Official(s) | | Performance Standards Address the Plan? (Yes or No) | |
| Chief Human Ca | pital Officer | | Yes | |
| Equal Employme | ent Opportunity Direc | ctor | Yes | |
| Anti- Harassmen | t / Disability Prograr | n Supervisor | Yes | |
| Disability Progra | m Managers | | Yes | |
| Barrier(s) Analysis Process Completed? (Yes or No) | | mpleted? | Barrier(s) Identified? (Yes or No) | |
| | No | | No | |
| Source | Sources of Data | | Identify Information Collected | |
| Workforce Data | Tables | Yes | Table B9 for awards | |
| Complaint Data | (Trends) | No | | |

| Fiscal Year | Accomplishments | | | | |
|---|--|----|--|----------------------------------|------------------------------------|
| 9/30/2024 | Promote awards and recognition opportunities to Senior Leaders for PWD and PWTD. | | Yes | | |
| Target Date (mm/dd/yyyy) | Planned Activities | | Sufficient Staffing & Funding (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
| Other (Please De | escribe) | No | | | |
| Reports (e.g., Co MSPB, GAO, O | | No | | | |
| Interviews | | No | | | |
| Focus Groups | | No | | | |
| Exit Interview D | ata | No | | | |
| Climate Assessm Federal Employe Survey) | nent Survey (e.g., ee Viewpoint | No | | | |
| Findings from D EEO, Grievance Anti-Harassmen | MSPB, | No | | | |
| Grievance Data (| (Trends) No | | | | |

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

The EEO Office will initiate the review of the planned activities in FY24 and FY25.

| 8. | For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s). |
|----|---|
| | |
| 9. | 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 |
| | how the agency intends to improve the plan for the next fiscal year. |
| | |