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

The percentage of PWD in the GS-11 to SES cluster was 9.75% in FY 2020, which fell below the goal of 12%.

*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

The percentage of PWTD in the GS-11 to SES cluster was 1.41% in FY 2020, which fell below the goal of 2%.

Grade Level Cluster (GS or Alternate	Total	Reportable Disability		Targeted Disability	
Pay Plan)	#	#	%	#	%
Numerical Goal		12%		2%	
Grades GS-1 to GS-10	185260	30831	16.64	6570	3.55
Grades GS-11 to SES	187341	18271	9.75	2644	1.41

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

The numerical goals and additional information about the Disability Program and resources are available on the Office of Diversity and Inclusion (ODI) Web page.

Section II: Model Disability Program

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

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

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

Answer No

VA currently has one staff member to oversee all aspects of the National Disability Program with the exception of oversight of the National Reasonable Accommodation Program and Section 508 compliance. VA is in the process of adding staff members in addition to the requested detailees to assist in supporting the needs associated with the Disability Program to meet workforce and policy demands. Currently the VA has one program manager to oversee all aspects of the Department wide Reasonable Accommodation and Personal Assistance program.

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

D: 130 D T 1	# of FTE	Staff By Employn	nent Status	Responsible Official
Disability Program Task	Full Time	Part Time	Collateral Duty	(Name, Title, Office Email)
Processing applications from PWD and PWTD	1	0	400	Roberto Rojo, National Disability Program Manager
Answering questions from the public about hiring authorities that take disability into account	1	0	400	Roberto Rojo, National Disability Program Manager
Processing reasonable accommodation requests from applicants and employees	1	0	400	Dr. Andreé M. Sutton, Chief of Reasonable Accommodation, Office of Resolution Management, Andree.Sutton@va.gov
Section 508 Compliance	25	0	0	Pat Sheehan, Director, VA Section 508 Office, Office of Information and Technology, Pat.Sheehan@va.gov
Architectural Barriers Act Compliance	1	0	10	Roberto Rojo, National Disability Program Manager
Special Emphasis Program for PWD and PWTD	1	0	300	Roberto Rojo, National Disability Program Manager

3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If "yes", describe the training that disability program staff have received. If "no", describe the training planned for the upcoming year.

Answer Yes

In FY 2020, the National Disability Program Manager received training (1.) Multi-agency Task Force on Increasing Employment Opportunities for People with Disabilities; (2.) VA's Mission Accomplishment and Prioritization of Activities; and (3.) VA's Workplace Strategies and Position Management. Additionally, all mandatory compliance training courses were each completed within the time scope assignments.

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 No

Currently, there are no plans to ensure sufficient funding for the disability program.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency Objective	B.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709] Increase staffing for Departmental Special Emphasis Programs.				
Target Date Completion Date	Dec 31, 2020				
Planned Activities	Target Date Jun 30, 2020 Dec 31, 2020 Dec 31, 2020	<u>Completion Date</u> 09/30/2020	Planned Activity Obtain approval for additional full-time equivalents (FTE). Fill 2 Special Emphasis Program (SEP) vacancies that VA currently has. Fill all remaining vacancies to ensure effective, efficient, and well-managed SEPs.		
Accomplishments	Fiscal Year 2019	1			

Brief Description of Program Deficiency	B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]					
Objective	Hire additional	staff to support the rea	sonable accommodation program.			
Target Date	Dec 31, 2020					
Completion Date						
Planned Activities	Target Date	Completion Date Planned Activity				
	Dec 31, 2020	Hire additional staff to support all aspects of the reasonable accommodation				
		program.				
Accomplishments	Fiscal Year	Accomplishment				
	2019	The Reasonable Accommodation Staff Office (RASO) hired a management analyst to aid in the				
		development of the s	ystem and monitor and track RA data once the system is developed.			

Brief Description of Program	C.2.b.2. Has the	C.2.b.2. Has the agency established a firewall between the Reasonable Accommodation Program Manager and the				
Deficiency	EEO Director? [see MD-110, Ch. 1(Γ	V)(A)]			
Objective	Establish firewa	ll between RA Progra	m Manager and the EEO Director.			
Target Date	Mar 31, 2021					
Completion Date						
Planned Activities	Target Date Completion Date Planned Activity					
	Feb 28, 2021 Identify the firewall needed between the RA Program Manager and the EEO					
	Feb 28, 2021		Identify the firewall needed between the RA Program Manager and the EEO			
	Feb 28, 2021		Identify the firewall needed between the RA Program Manager and the EEO Director.			
	Feb 28, 2021 Mar 31, 2021		, ,			
Accomplishments		Accomplishment	Director.			

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	Deploy a standard	dized system to track	reasonable accommodation requests across the VA.		
Target Date	Oct 29, 2021				
Completion Date					
Planned Activities	Target Date	Completion Date	Planned Activity		
	Sep 1, 2021		Develop an enterprise-wide system to track reasonable accommodation		
			requests.		
	Sep 15, 2021		Test the system.		

	Oct 29, 2021	Deploy the system.
Accomplishments	Fiscal Year	<u>Accomplishment</u>
	2018	VA has gathered system requirements and established rules regarding mandatory usage of system.
	2019	The RASO hired a management analyst to aid in the development of the system and monitor and
		track RA data once the system is developed.
	2020	VA has contracted with Microsoft to develop an administration wide system. Processing maps
		have been created and provided to the contractor and development of the system has begun.

Brief Description of Program	C.2.c.1. Does the agency post its procedures for processing requests for Personal Assistance Services on its public					
Deficiency	website? [see 29	CFR § 1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column.			
Objective	Post PAS proce	dures on VA's public	website.			
Target Date	Nov 16, 2020					
Completion Date						
Planned Activities	Target Date	Completion Date	Planned Activity			
	Nov 16,2020		Post procedures on VA's public website.			
Accomplishments	<u>Fiscal Year</u>	Fiscal Year Accomplishment				
	2019	operational procedures, blogs, presentations, and additional resource available for in-service trainings, and individual access for supervisors and managers to garner knowledge regarding the				
		RA process.				

Brief Description of Program Deficiency Objective Target Date	C.3.b.6 Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)] Require all rating officials to evaluate all managers and supervisors on the EEO element. Sep 30, 2021					
Completion Date						
Planned Activities	Target Date	Completion Date	<u>Planned Activity</u>			
	Sep 30, 2021		Update HR guidance for rating officials to evaluate managers and supervisors on tier performance under the EEO critical element.			
Accomplishments	Fiscal Year	Accomplishment				
	2018	The SES cadre has an element in their performance plans that evaluates their commitment to				
		agency EEO policies and principles and their participation in the EEO program. VA is working to				
			Il managers and supervisors.			

Brief Description of Program	E.4.a.5. The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]						
Deficiency							
Objective	Deploy a standa	rdized system to track	reasonable accommodation requests across the VA.				
Target Date	Nov 30, 2021						
Completion Date							
Planned Activities	Target Date	Completion Date	Planned Activity				
	Sep 1, 2021	Develop an enterprise-wide system to track reasonable accommodation					
	1	requests.					
	Sep 15, 2021	Test the system.					
	Nov 30,	Deploy the system.					
	2021						
Accomplishments	Fiscal Year	Accomplishment					
	2018	VA has gathered system requirements and established rules regarding mandatory usage of system.					
	2019	The RASO hired a management analyst to aid in the development of the system and monitor and					
		track RA data once the system is developed.					
	2020	VA has contracted w	with Microsoft to develop an administration wide system. Processing maps				
		have been created ar	nd provided to the contractor and development of the system has begun.				

Brief Description of Program	E.4.b. Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions,				
Deficiency	Sec. I]				
Objective	Implement a me	echanism to resurvey t	he workforce on a regular basis.		
Target Date	Mar 31, 2021				
Completion Date					
Planned Activities	Target Date	Completion Date	Planned Activity		
	Oct 1, 2020		Develop an electronic self-reporting tool for employees to verify and change their race, ethnicity, gender, and disability status that functions within HR		
			Smart.		
	Mar 31, 2021		Implement the self-reporting tool enterprise-wide.		
Accomplishments	Fiscal Year	<u>Accomplishment</u>			

Section IV: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

VA works regularly with Veterans, to include disabled Veterans, through the Vocational Rehabilitation and Employment (VR&E) Program and through the Veterans Employment Program (VEP), to assist Veterans with seeking employment. VR&E also assists Disabled Veterans with job-related training that may assist them with building skills to assist with employment. VEP provides direct support nationally to Veterans seeking employment in VA in addition to services such as assistance with resume writing and resume review. Additionally, there is a National Selective Placement Program (SPP) Manager, Administration-level SPP Managers, and SPP Coordinators (SPPC) at every VA facility who assist PWD and PWTD with employment opportunities using the Schedule A hiring authority.

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.

VA SPPCs and Managers have increased awareness of Schedule A hiring authority through marketing. Standard training for VA SPPCs is being further developed-with recruitment and placement policy. VA hiring managers in coordination with VA HR offices use a number of hiring authorities which include Schedule A, 30% or more Disabled Veterans and Veterans Recruitment Appointment authorities to attract and employ PWD based on the following criteria.

VA hiring managers use the Schedule A hiring authority to select eligible persons with severe physical, psychological or intellectual disability for appointment to positions at any grade level for which they qualify non-competitively, which means they do not have to go through the normal hiring process. In addition, VA hiring managers use the 30% or More Disabled Veteran authority to select eligible Veterans with a service-connected disability rating of 30% or more for appointment to positions at any grade level for which they qualify.

VA hiring managers may also use the Veteran Recruitment Appointment authority to select eligible disabled Veterans without competition to positions at any grade level up to the GS-11 or equivalent for which they qualify. After VA HR offices verify eligibility, VA hiring manager may use any of the above-mentioned authorities to hire eligible and qualified PWD candidates non-competitively which means by law, VA HR offices may use streamlined hiring procedures to appoint them at a much faster rate than usual. Alternatively, VA Human Resources (HR) Offices also use traditional recruitment methods to attract and recruit individuals with disabilities it its workforce. To be considered under this process, PWD candidates must apply to a Job Opportunity Announcement (JOA) posted on USAJOBS under Merit Promotion (MP) procedures when VA opens vacancies to candidates outside its workforce. PWD candidates who apply under these procedures receive consideration in the same manner as current/former federal employees.

To attract PWD candidates, all VA JOA templates in the USAStaffing System includes a statement encouraging individuals with disabilities to apply. To increase awareness and educate VA HR professionals and hiring managers on effective use of these available tools, VA's Office of the Chief Human Capital Officer has developed a comprehensive recruitment job aide on Schedule A and other non-competitive hiring authorities.

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

The SPPC receives the individual's resume and schedule A letter and reviews it to ensure eligibility. Once confirmed, the SPPC forwards the resume to the hiring manager of an open, vacant position for consideration and advises the hiring manager of the benefits of using this non-competitive hiring authority. Regardless of the referral method, whether via SPPC for Schedule A, Veterans Employment Services Office (VESO) or self-referral to hiring managers for disabled PWD using other non-competitive hiring authorities, VA HR offices must verify eligibility and qualifications prior to appointment as described below.

- (1) VA HR Specialists must review the resume of the PWD to determine if he/she meets the specialized experience and qualification requirements for the position.
- (2) VA HR Specialist must review the documentation of the PWD to determine if he/she meets the eligibility requirements.
- (3) If the PWD meets both of the above requirements, the VA HR Specialist refers the PWD on a Certificate of Eligibles for consideration by the hiring manager.
- (4) If interested, the hiring manager may conduct an interview and select the candidate.
- (5) The hiring manager must return the Certificate of Eligibles with the selection of the PWD.
- (6) HR Specialist must contact the PWD and notify him/her of the selection and extend a tentative job offer.
- (7) When the PWD accepts the tentative job offer, the HR office may then make the appointment.
 - 4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If "yes", describe the type(s) of training and frequency. If "no", describe the agency's plan to provide this training.

Answer No

In FY 2020, the National Disability Program Manager affirmatively collaborated with the VA Office of the Chief Human Capital Officer (OCHCO), Recruitment Placement and Policy Service (RPPS) for development of Non-Competitive Hiring Authorities & and Appointment Flexibilities training guidance materials – which are targeted to be transmitted to all the VA Selective Placement Program Coordinators within FY 2021.

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.

VA places the onus on each facility to ensure they are partnering with and marketing employment opportunities to external organizations such as state and local Disability Committees, Commissions, Department of Labor, and organizations as well as the disability offices at local colleges and universities.

In FY 2020, the VA's Section 504 Policy was published to ensure the accessibility of programs and activities conducted by the VA are in compliance alignment with Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S. Code § 794).

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 Yes

b. New Hires for Permanent Workforce (PWTD)

Answer No

Among the new hires in the permanent workforce in FY 2020, triggers exist for PWD (10.07%).

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

2.

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

a. New Hires for MCO (PWD)

Answer No

b. New Hires for MCO (PWTD)

Answer Yes

As compared to the benchmark, triggers exist for PWTD, triggers exist in the Psychology, Medical Officer, Physician's Assistant, Nurse, Practical Nurse, Physical Therapist, Medical Technologist, Pharmacist, and Cemetery Caretaking occupations.

New Hires to Mission-		Reportable	e Disability	Targetable Disa	ability
Critical Occupations	Total (#)	Qualified Applicants (%)	New Hires	Qualified Applicants	New Hires (%)
Numerical Goal		` '	2%	2%	(70)
0180PSYCHOLOGY	377	1.51	4.68	3.52	0.47
0201HUMAN RESOURCES MANAGEMENT	337	3.28	20.31	3.10	3.82
0602MEDICAL OFFICER	2931	1.44	5.26	0.58	0.00
0603PHYSICIAN'S ASSISTANT	292	0.60	10.79	0.69	0.00
0610NURSE	7352	1.11	6.53	0.71	0.56
0620PRACTICAL NURSE	2258	0.91	8.06	1.62	1.24
0631OCCUPATIONAL THERAPIST	153	0.12	7.34	0.37	0.60
0633PHYICAL THERAPIST	178	0.32	4.89	1.26	1.09
0644MEDICAL TECHNOLOGIST	462	2.22	5.61	1.74	0.49
0660PHARMACIST	622	0.87	5.41	0.60	0.00
0996VETERANS CLAIMS EXAMINING	1485	3.13	30.53	3.44	6.30
1102CONTRACTING	212	3.61	26.33	4.24	8.90

New Hires to Mission-		Reportable Disability Targetable		Targetable D	isability
Critical Occupations	Total	Qualified Applicants	New Hires	Qualified Applicants	New Hires
	(#)	(%)	(%)	(%)	(%)
Numerical Goal		12%		2%	
2210INFORMATION TECHNOLOGY MANAGEMENT	532	3.22	22.40	3.15	4.51
4754CEMETERY CARETAKING	171	2.48	13.18	3.72	3.10

- 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 Yes

As compared to the benchmark, triggers exist for PWD in the Psychology, Human Resources Management, Medical Officer, Physician's Assistant, Nurse, Practical Nurse, Occupational Therapist, Physical Therapist, Medical Technologist, Pharmacist, Veterans Claims Examining, Contracting, Information Technology Management, and Cemetery Caretaking occupations.

For PWTD, triggers exist in the Medical Officer, Physician's Assistant, Occupational Therapist, Physical Therapist, and Medical Technologist occupations.

- 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

As compared to the benchmark, triggers exist for PWD in the Psychology, Nurse, Practical Nurse, Medical Technologist, and Cemetery Caretaking occupations.

For PWTD, triggers exist in the Psychology, Medical Officer, Physician's Assistant, Nurse, Occupational Therapist, Medical Technologist, Pharmacist, and Cemetery Caretaking occupations.

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.

Per the aforementioned absence of sufficient funding to designate necessary National Disability Program support personnel, the VA Disability Committee has been paused. Upon the needed funding being provided, re-establishment will continue to proceed.

In addition, an internal policy document is being created to ensure managers and supervisors understand how they can better utilize available tools to encourage participation in opportunities for career development and promotion. VA designated learning officers at most VA facilities to assist VA staff in identifying career development and training resources and opportunities. Program announcements for advancement opportunities or development will contain language, to include PWD and PWTD.

B. CAREER DEVELOPMENT OPPORTUNITES

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

VA has numerous formal career and leadership development programs available for all employees. In addition, the VA Acquisition Academy offers training opportunities that lead to certifications in Federal Acquisition processes that employees can use to seek further career advancement.

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

C D - 1	Total Par	ticipants	PWD PWTD		TD	
Career Development Opportunities	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Fellowship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Mentoring Programs	N/A	N/A	N/A	N/A	N/A	N/A
Coaching Programs	N/A	N/A	N/A	N/A	N/A	N/A
Training Programs	N/A	N/A	N/A	N/A	N/A	N/A
Detail Programs	N/A	N/A	N/A	N/A	N/A	N/A
Other Career Development Programs	N/A	N/A	N/A	N/A	N/A	N/A

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

VA is working to collect this data enterprise-wide.

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

VA is working to collect this data enterprise-wide.

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

In FY 2020, VA identified triggers involving the percentage of PWD who received time-off awards of 41 or more hours and cash awards (\$1,000 - \$1,999, \$2,000 - \$2,999, \$3,000 - \$3,999, \$4,000 - \$4,999, and \$5,000 or more).

Also, VA identified triggers involving the percentage of PWTD who received time-off awards (21 - 30 hours, 31 - 40 hours, 41 or more hours) and cash awards (\$501 - \$999, \$1,000 - \$1,999, \$2,000 - \$2,999, \$3,000 - \$3,999, \$4,000 - \$4,999, and \$5,000 or more).

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time -Off Awards: 1-10 hours Total Time-Off Awards Given	31283	11.49	7.34	10.83	7.88
Time-off Awards: 11-20 hours Total Time-Off Awards Given	2772	0.81	0.69	0.83	0.70
Time-off Awards: 21-30 hours Total Time-Off Awards Given	1247	0.33	0.31	0.23	0.32
Time-off Awards: 31-40 hours Total Time-Off Awards Given	599	0.19	0.14	0.15	0.15
Time-off Awards: 41 or more hours Total Time-Off Awards Given	10	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$500 and Under:	105449	29.84	26.63	30.56	26.71
Cash Awards: \$501 - \$999:	107673	28.31	27.87	26.98	27.38
Cash Awards: \$1000 - \$1999:	79966	18.38	21.11	15.52	20.45
Cash Awards: \$2000 - \$ 2999:	14201	2.80	3.82	2.19	3.65
Cash Awards: \$3000 - \$ 3999:	6083	1.11	1.66	0.79	1.57
Cash Awards: \$4000 - \$ 4999:	1854	0.27	0.51	0.23	0.48
Cash Awards: \$5000 or More:	7084	1.14	1.95	1.06	1.82

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 Yes

b. Pay Increases (PWTD)

Answer Yes

In FY 2020, VA identified a trigger involving the percentage of PWD and PWTD who received quality step increases and performance-based increases.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Quality Step Increases (QSI): Total QSIs Awarded	1074	0.25	0.28	0.26	0.27
Performance Based Pay Increase	577	0.12	0.15	0.14	0.15

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 Yes

ii. Internal Selections (PWD)

Answer Yes

b. Grade GS-15

i. Qualified Internal Applicants (PWD)

Answer No

ii. Internal Selections (PWD)

Answer No

c. Grade GS-14

i. Qualified Internal Applicants (PWD)

Answer No

ii. Internal Selections (PWD)

Answer No

d. Grade GS-13

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer No

In FY 2020, the percentage of PWD among the qualified internal applicants for SES and grade GS-13 fell below the benchmark of the relevant applicant pool. Also, the percentage of PWD among the selectees for promotion at the SES level fell below the benchmark of qualified internal applicants.

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 No

FY 2020

Yes

ii. Internal Selections (PWTD)

Answer

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

In FY 2020, the percentage of PWTD among the selectees for promotion at SES and grades GS-15, 14, and 13 fell below the benchmark.

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 Yes

b. New Hires to GS-15 (PWD)

Answer Yes

c. New Hires to GS-14 (PWD)

Answer Yes

d. New Hires to GS-13 (PWD)

Answer Yes

In FY 2020, the percentage of PWD among the new hires at SES and grade GS-15, 14, and 13 fell below the benchmark.

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 Yes

b. New Hires to GS-15 (PWTD)

Answer Yes

c. New Hires to GS-14 (PWTD)

Answer Yes

d. New Hires to GS-13 (PWTD)

Answer Yes

In FY 2020, the percentage of PWTD among the new hires at SES and grade GS-15, 14, and 13 fell below the benchmark.

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.

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

FY 2020

b. New Hires for Managers (PWTD)

Answer N/A

c. New Hires for Supervisors (PWTD)

Answer N/A

OPM's USA-Staffing applicant flow system currently does not provide the necessary information.

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer No

VA was unable to verify if all eligible Schedule A employees with a disability were converted into the competitive service after two years of satisfactory service.

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

In FY 2020, triggers exist for PWD (10.20%) who voluntarily separated from VA, as compared to the rate of persons without disabilities (7.40%) and for PWD (1.78%) who involuntarily separated from VA, as compared to the rate of persons without disabilities (0.78%).

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0	0
Permanent Workforce: Removal	3815	1.78	0.78
Permanent Workforce: Resignation	15395	4.89	3.57
Permanent Workforce: Retirement	12021	3.87	3.02
Permanent Workforce: Other Separations	3646	1.44	0.81
Permanent Workforce: Total Separations	34877	11.97	8.17

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

In FY 2020, triggers exist for PWTD (10.67%) who voluntarily separated from VA, as compared to the rate of persons without targeted disabilities (7.83%) and for PWTD (2.47%) who involuntarily separated from VA, as compared to the rate of persons without targeted disabilities (0.93%).

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0	0
Permanent Workforce: Removal	3815	2.47	0.93
Permanent Workforce: Resignation	15395	5.84	3.87
Permanent Workforce: Retirement	12021	3.33	3.05
Permanent Workforce: Other Separations	3646	1.50	0.91
Permanent Workforce: Total Separations	34877	13.14	8.76

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.

In FY 2020, the top three most important reasons PWD voluntarily left VA was due to personal health issues, unethical behavior on the part of leadership or the organization, and opportunity for advancement.

The top three most important reasons PWTD voluntarily left VA was due to personal health issues, personal/family matters such as caring for a parent or a child, poor working relationship with supervisor or co-worker(s) (tied for second), and unethical behavior on the part of leadership or the organization.

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.

The VA Secretary's EEO, Diversity and Inclusion, No FEAR, and Whistleblower Rights and Protection Policy Statement, most recently signed on August 27, 2018, contains employee and applicant rights under all Sections of the Rehabilitation Act, to include section 508 and can be found at https://www.va.gov/ORMDI/docs/EEO_Policy.pdf. Additional information can be found at the VA Section 508 Office Website at https://www.section508.va.gov/index.asp.

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

https://www.va.gov/ORMDI/DiversityInclusion/IWD.asp

Please note the following above hyperlink established within our new ORMDI Internet Website, includes the hyperlink: https://www.access-board.gov/enforcement/, which notifies how employees/applicants can file an Architectural Barriers Act Complaint.

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 2020, the VA's Section 504 Policy was published to ensure the accessibility of programs and activities conducted by the VA are in compliance alignment with Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S. Code § 794).

In FY 2020, the National Disability Program Manager affirmatively collaborated with the VA's Office of the Chief Human Capital Officer (OCHCO), Recruitment Placement and Policy Service (RPPS) for development of Non-Competitive Hiring Authorities & and Appointment Flexibilities training guidance materials – which are targeted to be transmitted to all the VA Selective Placement Program Coordinators within FY 2021.

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.)

VA is unable to determine the average time frame for processing initial requests for reasonable accommodations. VA is developing a RA tracking system to monitor timeliness of requests. This system is expected to be operational in FY 2021. However, in an effort to ensure timeliness and standardization the VA will be implementing the following new timelines in the new handbook covering both RA and PAS.

The timeframe will shift to 30 business days for employee's RA and PAS requests and 10 business days for applicant's RA requests. PAS is not afforded during the applicant phase.

Currently, RA must be processed within 30 calendar days for employees and 10 calendar days for processing applications according to the current VA Handbook 5975.1, dated Nov 2013.

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.

During this reporting period the VA has implemented a RA and PAS Critical Consults to include COVID-19 consults to provided expedited just intime virtual services to field RA Coordinators and National RA Consultants regarding complex cases. During the FY20 reporting period over 131 Critical Consults have been conducted. Additionally, over 40 training sessions were conducted with 2,988 supervisors and managers participating. Employees were also provided opportunities to attend training sessions with 17 sessions conducted with over 850 employees participating.

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.

1. 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.

As indicated previously, during this reporting period the VA has implemented a RA and PAS Critical Consults to include COVID-19 consults to provided expedited just intime virtual services to field RA Coordinators and National RA Consultants regarding complex cases. During the FY20 reporting period over 131 Critical Consults have been conducted providing timely guidance on how to ensure employees with PAS needs were provided the proper level of support during the pandemic and beyond.

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.

In FY 2020 there were 4 cases where there was a finding of discrimination involving a PWD filing a harassment claim based on disability. In each case, the remedial and corrective actions ordered included:

Training for all individuals involved;

Consideration of disciplinary action for involved management officials;

Make-whole relief for the complainant;

Posting a notice of the violation;

Payment of attorney fees (if represented)

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer No

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

Answer Yes

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.

In FY 2020 there were 13 cases where there was a finding of discrimination involving a PWD filing a claim alleging denial of a reasonable accommodation. In each case, the remedial and corrective actions ordered included:

Providing a reasonable accommodation to the complainant

Training for all individuals involved;

Consideration of disciplinary action for involved management officials;

Make-whole relief for the complainant;

Posting a notice of the violation;

Payment of attorney fees (if represented)

Section VIII: Identification and Removal of Barriers

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

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

Answer Yes

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

Answer Yes

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

STATEMENT OF CONDITION THA' TRIGGER FOR A POTENTIAL BARI Provide a brief narrat describing the condit	T WAS A RIER:	The less than expected participation rate of people with disabilities in the GS-11 to SES (9.75%) grade level cluster, as compared to the goal of 12%. The less than expected participation rate of people with targeted disabilities in the GS-11 to SES (1.41%) grade level cluster, as compared to the goal of 2%.						
How was the condition recognized as a poter								
STATEMENT OF I	BARRIER	Barrier Group	arrier Group					
GROUPS:		People with Disabilities						
		People with Targeted Disabil	lities					
Provide a description taken and data analy determine cause of the	n of the steps zed to							
STATEMENT OF IDENTIFIED BAR		The specific policy, procedu disabilities is currently not k	re, or practice causing the nown. Further analysis is a	less than expected pneeded.	participation rates for	people with		
Provide a succinct st the agency policy, pr or practice that has be determined to be the undesired condition.	rocedure een							
Objective		Resurvey the workforce reg Date Objective Initiated	arding their disability state Oct 1, 2018	us.				
		Target Date For Completion of Objective						
		Complete a barrier analysis Date Objective Initiated	to identify the specific po Oct 1, 2018	licy, procedure, or p	practice that could be	causing the trigger.		
	Target Date For Completion of Objective							
Respon	sible Officials	Karen M. Basnight Director Joseph Thele Executive Dire Ryan Pugh Management and	ector, Human Resources In					
Target Date (mm/dd/yyyy)		Planned Activities	s	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)		
09/30/2020	Conduct additions	tional outreach and recruitme	nt efforts for PWD in the	(2000200)		09/30/2020		
09/30/2020		g and internship programs for PWD to reach the senior				09/30/2020		
09/30/2020	Provide disab	ility-related training to managers and employees.				09/30/2020		
10/01/2020	and change th	an electronic self-reporting tool for employees to verify nge their race, ethnicity, gender, and disability status that s within HR Smart.		Yes				
03/31/2021	Implement the	e self-reporting tool.		Yes				
11/02/2020	1	arrier analysis working group.		Yes	01/29/2022			
06/30/2021		brough investigation of releva to determine the cause of the rates.		No	09/30/2022			
09/30/2021	†	to eliminate the identified ba	rrier.	Yes	12/30/2022			

Fiscal Year	Accomplishments
	In FY20, VA's Human Capital Services Center (HCSC) designed a program to increasing outreach and recruitment efforts, consolidating Internship programs and services for all VA organizations. This program now includes robust communication support, and across the Department, the HCSC has added training opportunities, online, on-demand and micro-learning for all employees. In FY21, HCSC will add a mentorship program that may be used to fully meet the regulatory goals.
	During FY 20, VA provided over 40 Reasonable Accommodation and Personal Assistance Services training sessions to over 2,900 supervisors and managers. Additionally, over 850 employees were trained during 17 sessions. In response to the COVID -19 pandemic, VA initiated a service titled Critical Consults. During FY20, over 130 Reasonable Accommodation Consultations were provided to RA Coordinators, EEO Counselors, OGC attorneys, and other critical stake holders to provide evidence-based solutions, guidance and assistance regarding complex RA cases thus minimizing agency risk related to Rehabilitation Act of 1973 violations.

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

N/A

N/A

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

N/A