

Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

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

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

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

b. Cluster GS-11 to SES (PWD) Answer: No

* 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 1.33 percent in FY 2017, which falls below the goal of 2 percent.

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

The VA's 2% onboard goal and 3% hiring goal for PWTD is communicated widely through the VA Secretary's EEO Policy Statement, which is disseminated agency-wide to all employees. Additionally, The EEO Policy statement and a webpage dedicated to disability employment, to include reasonable accommodation and Schedule A Hiring Authority, is posted on the VA Office of Diversity and Inclusion's (ODI) website both internally and externally facing. Furthermore, it is also covered in reasonable accommodation training provided to employees and supervisors by both ODI and the Office of General Counsel (OGC). Finally, during the six annual EEO/Diversity and Inclusion Technical Assistance reviews (TARs), specific focus is placed on measuring, achieving, and exceeding these goals by TAR team members

from ODI, and recommendations are made to the facility on what areas require improvement in the area of disability employment and workforce retention.

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 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

The agency currently has one designated staff member to oversee the entire Disability Program (to include the RA Program portfolio), within ODI. Because of the previous and current budget constraints and coupled with the continued growth rate of PWDs in the workforce, VA is considering realigning/repurposing EEO Specialists with existing expertise in disability employment in the field per ORM’s District model.

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	1	0	400	Nanese A. Loza National Selective Placement Program Coordinator, Office of Diversity and Inclusion, Nanese.Loza@va.gov
Answering questions from the public about hiring authorities that take disability into account	1	0	400	Nanese A. Loza National Selective Placement Program Coordinator, Office of Diversity and Inclusion, Nanese.Loza@va.gov
Processing reasonable accommodation requests from applicants and employees	1	0	500	Nanese A. Loza National Selective Placement Program Coordinator, Office of Diversity and Inclusion, Nanese.Loza@va.gov
Section 508 Compliance	12	0	0	Pat Sheehan Director, VA Section 508 Office Software Testing and 508 Division VA Section 508 Coordinator. Office of Information and Technology, Pat.Sheehan@va.gov

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Architectural Barriers Act Compliance	5	0	200	Denene Burnette, 504 Officer, Office of Resolution Management.
Special Emphasis Program for PWD and PWTD	1	0	300	Nanese A. Loza National Reasonable Accommodation Coordinator, Office of Diversity and Inclusion, Nanese.Loza@va.gov

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

Answer: No

Due to budget constraints, every opportunity for free training will be explored to keep current with activities and new developments in the disability employment arena. VA does participate in the Federal Exchange on Employment And Disability (FEED) meetings where participants learn about policies/guidelines, standard operating procedures, tools, and partnerships. Some of the activities included with the FEED meetings can suffice as in-service training for practitioners.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If “no”, describe the agency’s plan to ensure all aspects of the disability program have sufficient funding and other resources.

Answer: No

There is currently no funding dedicated to the disability program. The costs for reasonable accommodations are covered by the VA facility or organization to which the requesting employee is assigned. The Department’s RA Handbook is being refreshed, and we continue to require that all VA components ensure they have a budget line item for funding RA requests.

Section III: Program Deficiencies in the Disability Program

In Part G of its FY 2017 MD-715 report, the agency identified the following program deficiencies involving its disability program:

Program Deficiencies	Agency Comments

Program Deficiencies	Agency Comments
<p>Are statutory/regulatory EEO related Special Emphasis Programs sufficiently staffed: People With Disabilities Program Manager; Selective Placement Program for Individuals With Disabilities - Section 501 of the Rehabilitation Act; Title 5 U.S.C. Subpart B, Chapter 31, Subchapter I-3102; 5 CFR 213.3102(t) and (u); 5 CFR 315.709</p>	
<p>Are 90% of accommodation requests processed within the frame set forth in the agency procedures for reasonable accommodation?</p>	<p>VA is unable to track requests accurately and is unsure as to whether it's meeting the 90 percent threshold.</p>
<p>Does the agency review disability accommodation decisions/actions to ensure compliance with its written procedures and analyze the information tracked for trends, problems, etc.?</p>	<p>Reference action plan for Question #75 in Part H</p>

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 APPLICANTS WITH DISABILITIES

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

Since VA regularly works with Veterans (including disabled Veterans), this population serves as a regular resource for talent acquisition. Many organizations work closely with the Vocational Rehabilitation and Employment Program, which exists at every VBA Regional Office, to receive quality applications for employment. These Veterans are often hired using a 30% Service Connected disability under Veteran’s hiring authority rather than Schedule A due to the two year probationary period for Schedule A. Additionally, many facilities work with Student Disability Offices within local colleges and universities located near the facility, and recruit quality applicants from those resources. VA is also a huge proponent of the WRP for students and recent graduates with disabilities. VA ranks in the top three Federal agencies hiring WRP participants, and converts nearly half of them to full-time or part-time employment 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.

The current HR system, HR Smart, has some challenges. It is not accurately capturing and reporting individuals hired using the Schedule A Hiring Authority. VA organizations regularly use this and the Veteran’s hiring authorities to hire individuals

with disabilities, to include those with targeted disabilities. There is a Selective Placement Program Coordinator (SPPC) at every VA facility who is assigned to the role of recruitment using Schedule A and 30% Service Connected disability Veterans 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.

Each VA facility has a designated SPPC (collateral duty) and a Local Veterans Employment Coordinator (LVEC) which handles all Schedule A and 30% SCD applications. The SPPC and LVEC ensures all documentation necessary (Schedule A letter, 30% SCD letter, etc.) is received from the applicant and then reaches out to and/or searches current facility vacancies and provides the selecting official with the applications for non-competitive selection using Schedule A/30% SCD. The individual may or may not be selected for the vacant position and it is the responsibility of either the selecting official or the SPPC/LVEC to inform the applicant of their status.

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

VA is developing a course that will focus on Schedule A for People with Disabilities and other flexible hiring authorities. In the interim, there is a HR University course hiring managers are encouraged to take.

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.

It is at the discretion of each VA 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. Each VA facility is responsible for conducting analysis of barriers to employment of individuals with disabilities as well as those with targeted disabilities, and creating plans to address identified barriers. Additionally, each facility must also achieve or make efforts to achieve the percentage goals set forth by EEOC for hiring and representation of individuals with disabilities and targeted disabilities within the various grades within each facility.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

a. New Hires for Permanent Workforce (PWD) Answer: No

b. New Hires for Permanent Workforce (PWTD) Answer: No

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

a. New Hires for MCO (PWD) Answer: Yes

b. New Hires for MCO (PWTD) Answer: Yes

VA was unable to verify if triggers exist for PWD and/or PWTD among the new hires for any of the MCOs using the qualified applicant pool as the benchmark. OPM’s USA-Staffing applicant flow system currently does not provide the necessary information.

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

a. Qualified Applicants for MCO (PWD) Answer: Yes

b. Qualified Applicants for MCO (PWTD) Answer: Yes

VA was unable to verify if triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the MCOs using the relevant applicant pool as the benchmark. OPM’s USA-Staffing applicant flow system currently does not provide the necessary information.

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

a. Promotions for MCO (PWD) Answer: Yes

b. Promotions for MCO (PWTD) Answer: Yes

VA was unable to verify if triggers exist for PWD and/or PWTD among employees promoted to any of the MCOs using the qualified applicant pool as the benchmark. OPM’s USA-Staffing applicant flow system currently does not provide the necessary information.

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.

The advancement of PWD, to include PWTD is embedded within VA’s hiring, onboard, and retention goals and strategies, in accordance with Executive Order 13548 and other relevant regulations. Any VA vacancy can be filled with a PWD or PWTD using either a competitive or non-competitive hiring authority. VA has attempted to ensure there are developmental opportunities and mentorship or coaching available for PWD and PWTD to improve their skills and increase their opportunities for upward mobility. VA has many opportunities for advancement and there are onsite Designated Learning Officers at most VA facilities to assist VA staff in receiving needed training and achieving their career goals. In addition, all VA advancement program announcements will contain inclusive language, to include PWD and PWTD.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

VA has numerous career development opportunities ranging from leadership develop programs to programs in specific career fields, such as human resources.

2. 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 applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

a. Applicants (PWD) Answer: No

b. Selections (PWD) Answer: No

VA performed trigger analysis of the Leadership VA 2017 and the Corporate Employee Development Board (FY 2018 – FY 2017) career development programs and determined there were no triggers for applicants with disabilities.

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

a. Applicants (PWTD) Answer: No

b. Selections (PWTD) Answer: No

VA performed trigger analysis of the Leadership VA 2017 and the Corporate Employee Development Board (FY 2018 – FY 2017) career development programs and determined there were no triggers for applicants with targeted disabilities.

C. AWARDS

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

In FY 2017, VA identified a trigger involving the percentage of PWD who received cash awards (\$501+). Also, VA identified triggers involving the percentage of PWTD who received time-off awards (9+ hours) and cash awards (\$501+).

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 2017, VA identified triggers involving the percentage of PWD and PWTD who received quality step increases.

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: Yes
 - b. Other Types of Recognition (PWTD) Answer: Yes

VA does have other employee recognition programs. However, such data on these programs is not currently collected.

D. PROMOTIONS

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.
 - a. SES
 - i. Qualified Internal Applicants (PWD) Answer: Yes
 - ii. Internal Selections (PWD) Answer: Yes
 - b. Grade GS-15
 - i. Qualified Internal Applicants (PWD) Answer: Yes
 - ii. Internal Selections (PWD) Answer: Yes
 - c. Grade GS-14
 - i. Qualified Internal Applicants (PWD) Answer: Yes
 - ii. Internal Selections (PWD) Answer: Yes
 - d. Grade GS-13
 - i. Qualified Internal Applicants (PWD) Answer: Yes
 - ii. Internal Selections (PWD) Answer: Yes

VA was unable to verify if triggers exist involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels using the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees as the benchmark. OPM's USA-Staffing applicant flow system currently does not provide the necessary information.

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

a. SES

- i. Qualified Internal Applicants (PWTD) Answer: Yes
- ii. Internal Selections (PWTD) Answer: Yes

b. Grade GS-15

- i. Qualified Internal Applicants (PWTD) Answer: Yes
- ii. Internal Selections (PWTD) Answer: Yes

c. Grade GS-14

- i. Qualified Internal Applicants (PWTD) Answer: Yes
- ii. Internal Selections (PWTD) Answer: Yes

d. Grade GS-13

- i. Qualified Internal Applicants (PWTD) Answer: Yes
- ii. Internal Selections (PWTD) Answer: Yes

VA was unable to verify if triggers exist involving PWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels using the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees as the benchmark. OPM's USA-Staffing applicant flow system currently does not provide the necessary information.

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

- a. New Hires to SES (PWD) 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

VA was unable to verify if triggers exist involving PWD among the new hires to the senior grade levels using the qualified applicant pool as the benchmark. OPM's USA-Staffing applicant flow system currently does not provide the necessary information.

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

- | | |
|------------------------------|-------------|
| a. New Hires to SES (PWTD) | 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 |

VA was unable to verify if triggers exist involving PWTD among the new hires to the senior grade levels using the qualified applicant pool as 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.

a. Executives

- | | |
|--|-------------|
| i. Qualified Internal Applicants (PWD) | Answer: Yes |
| ii. Internal Selections (PWD) | Answer: Yes |

b. Managers

- | | |
|--|-------------|
| i. Qualified Internal Applicants (PWD) | Answer: Yes |
| ii. Internal Selections (PWD) | Answer: Yes |

c. Supervisors

- | | |
|--|-------------|
| i. Qualified Internal Applicants (PWD) | Answer: Yes |
| ii. Internal Selections (PWD) | Answer: Yes |

VA was unable to verify if triggers exist involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions using the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees as the benchmark. OPM's USA-Staffing applicant flow system currently does not provide the necessary information.

6. Does your agency have a trigger involving PWTD among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

a. Executives

i. Qualified Internal Applicants (PWTD) Answer: Yes

ii. Internal Selections (PWTD) Answer: Yes

b. Managers

i. Qualified Internal Applicants (PWTD) Answer: Yes

ii. Internal Selections (PWTD) Answer: Yes

c. Supervisors

i. Qualified Internal Applicants (PWTD) Answer: Yes

ii. Internal Selections (PWTD) Answer: Yes

VA was unable to verify if triggers exist involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions using the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees as the benchmark. OPM's USA-Staffing applicant flow system currently does not provide the necessary information.

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

a. New Hires for Executives (PWD) Answer: Yes

b. New Hires for Managers (PWD) Answer: Yes

c. New Hires for Supervisors (PWD) Answer: Yes

VA was unable to verify if triggers exist involving PWD among the selectees for new hires to supervisory positions using the qualified applicant pool as the benchmark. OPM's USA-Staffing applicant flow system currently does not provide the necessary information.

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

a. New Hires for Executives (PWTD) Answer: Yes

b. New Hires for Managers (PWTD) Answer: Yes

c. New Hires for Supervisors (PWTD) Answer: Yes

VA was unable to verify if triggers exist involving PWTD among the selectees for new hires to supervisory positions using the qualified applicant pool as the

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

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

Using the inclusion rate, triggers exist for PWD who voluntarily separated (9.75%) and involuntarily separated (1.64%) from VA, as compared to the rate of persons without disabilities (7.52% and 0.69% respectively).

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

Using the inclusion rate, triggers exist for PWTD who voluntarily separated (10.00%) and involuntarily separated (2.45%) from VA, as compared to the rate of persons without disabilities (7.52% and 0.69% respectively).

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.

VA's current exit survey tool does not collect data on disability status.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 C.F.R. § 1614.203(d)(4), federal agencies are required to inform job 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 posted on July 5, 2017, contains employee and applicant rights under all Sections of the Rehabilitation Act, to include 508 and can be found at <https://www.diversity.va.gov/policy/statement.aspx>. 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.

The VA Secretary's EEO, Diversity and Inclusion, No FEAR, and Whistleblower Rights and Protection Policy Statement, most recently posted on July 5, 2017, contains employee and applicant rights under all Sections of the Rehabilitation Act, to include 508 and can be found at <https://www.diversity.va.gov/policy/statement.aspx>. Additionally, each VA facility is responsibly to for assessing accessibility of facilities, making any needed modifications, and reporting any modifications made each year.

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.

VA is currently exploring options to be able to offer live captioning for all online courses and seminars to ensure accessibility for both internal and external participants. Additionally, VA is working to expand oversight of Section 504 to more VA organizations and increase staffing dedicated to this function.

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.)

At the current time, there is not an accurate method for tracking the time frames for processing RA requests. Each facility is tracking RA requests using a password protected, encrypted Excel spreadsheet and the Local Reasonable Accommodation Coordinator is responsible for ensuring that all processing is completed in accordance with federal regulation and VA RA processing timelines. VA is in the process of

establishing both a short-term SharePoint tracking system (eta 2018) and a long-term enterprise-wide system (eta 2019) to ensure accurate and timely RA tracking.

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.

VA is in the process of updating its RA policies and procedures to ensure compliance with revisions to section 501 of the Rehabilitation Act, reduce liabilities, fill gaps, reduce redundancies, address conflicts, and increase affirmative employment to individuals with disabilities. Once finalized, VA will launch an aggressive training schedule to ensure awareness and compliance with the new policy and procedures.

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, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

VA is in the process of updating its RA policy and procedures to ensure the process and timelines for PAS are covered within that document. In the meantime, all requests for PAS are being processed in consultation with the National Disability Program Manager to ensure oversight.

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 government-wide average?

Answer: No

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

Answer: Yes

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

The VA provided all managers with training on harassment prevention procedures. In addition, to deter future discriminatory behavior, one of the two RMOs found to engage in discrimination against an employee was given a verbal counseling, and the other retired from service.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer: Yes

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

Answer: 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.

The Agency provided all management with training on the EEO process. As a method of future deterrence, some RMOs were given written counseling. Additionally, there were RMOs reassigned from the departments complaints originated. The Agency has also removed an RMO.

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.

Trigger 1	Less than expected participation rate of PWTDs in VA's GS-11 to SES grade cluster (1.33 percent), as compared to the goal of 2 percent	
Barrier(s)	An inconsistent way of classifying employees by disability status has resulted in less than expected participation rates.	
Objective(s)	Create a way for employees to voluntarily identify their disability status	
	Responsible Official(s)	Performance Standards Address the Plan? (Yes or No)
	Peter J. Shelby, Assistant Secretary for Human Resources and Administration	No

Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)		
No		Yes		
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected		
Workforce Data Tables	Yes			
Complaint Data (Trends)	No			
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	No			
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	Yes			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2018	Resurvey the workforce using the newly updated SF-256 form reflecting the new disability categories	Yes		
Fiscal Year	Accomplishments			

Trigger 2	Less than expected awards rate of PWDs and PWTDs
Barrier(s)	The cause of the less than expected awards rate of PWDs and PWTDs is unknown. Further examination is needed.
Objective(s)	Review the policy, procedures and practices impacting awards.
Responsible Official(s)	Performance Standards Address the Plan? (Yes or No)
Peter J. Shelby, Assistant Secretary for Human Resources and Administration	No
Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
No	No

Sources of Data		Sources Reviewed? (Yes or No)	Identify Information Collected		
Workforce Data Tables		Yes			
Complaint Data (Trends)		No			
Grievance Data (Trends)		No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)		No			
Climate Assessment Survey (e.g., FEVS)		No			
Exit Interview Data		No			
Focus Groups		No			
Interviews		No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)		No			
Other (Please Describe)		No			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)	
09/30/2018	Resurvey the workforce using the newly updated SF-256 form reflecting the new disability categories	Yes			
06/30/2019	Based on survey results, conduct cause analysis on the less than expected awards rate of PWDs and PWTDS	No			
04/30/2018	Prepare memo for ASHRA's signature to require OHRM and CSEMO to include ODI in all awards policy reviews to ensure absence of systemic barriers to EEO.	Yes			
Fiscal Year	Accomplishments				

Trigger 3	High separations rate of PWDs and PWTDS
Barrier(s)	The cause of the high separation rates of PWDs and PWTDS is unknown. Further examination is needed.
Objective(s)	Lower the separations rate of PWDs and PWTDS
Responsible Official(s)	Performance Standards Address the Plan? (Yes or No)
Peter J. Shelby, Assistant Secretary for Human Resources and Administration	No
Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)

Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)		
No		No		
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected		
Workforce Data Tables	Yes			
Complaint Data (Trends)	No			
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	No			
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	No			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2019	Add disability status related questions to the exit survey tool	Yes		
06/30/2018	Generate resource awareness and strategies (i.e., Employee Assistance Program and Employee/Labor Relations) for managers dealing with an employee in crisis	Yes		
06/30/2019	Based on survey results, conduct cause analysis on the less than expected separations rate of PWDs and PWTDs	No		
09/30/2018	Resurvey the workforce using the newly updated SF-256 form reflecting the new disability categories	Yes		
Fiscal Year	Accomplishments			

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

N/A

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

N/A

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