

Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities U.S. Environmental Protection Agency Fiscal Year 2020

To capture federal agencies' affirmative action plans for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 C.F.R. § 1614.203(d)(7)) 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) | Yes | No X |
| b. Cluster GS-11 to SES (PWD) | Yes X | No |

Table B-4 Participation Rates for General Schedule Grades - Permanent

PWD in GS-11 to SES cluster of the permanent workforce participate at 8.37% or 1085 PWD employees out of 12961 Total Workforce. 8.37% is lower than the expected 12% benchmark, indicating a trigger.

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) | Yes | No X |
| b. Cluster GS-11 to SES (PWTD) | Yes | No X |

No triggers identified.

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

The Agency utilizes EEOC's 12% PWD and 2% PWTD benchmarks as the hiring goals. The Office of Civil Rights (OCR) made the increased use of the Schedule A Hiring Authority a national priority and through this effort has communicated the hiring goals to Agency management. Engagement on the hiring goals has happened at all management levels including EPA senior leadership. Additionally, the Office of Human Resources (OHR) and OCR provided a series of trainings and presentations on the "Effective use of the Schedule A Hiring Authority and How to Utilize the Workforce Recruitment Program (WRP) Database" to managers and employees Agency-wide. The total estimate of attendees ranged between 650 and 700.

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 and Competent Staffing for the Disability Program

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

Yes X No

N/A

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	30			Jerome Bonner, Director, Cincinnati Shared Service Center, OMS bonner.jerome@epa.gov Jeremy Taylor, Director, Research Triangle Park Shared Service Center, OMS taylor.jeremy@epa.gov The 30 full-time employees include staff within the Shared Service Centers who are responsible for processing applications.
Answering questions from the public about hiring authorities that take	13		12	Anthony Napoli, Diversity and Inclusion Manager, DRESD, OHR napoli.anthony@epa.gov

disability into account				<p>Christopher Emanuel, EEO Manager, National Disability Employment Program Manager, OCR emanuel.christopher@epa.gov</p> <p>The 13 full-time employees include 10 EEO Officers (EEOOs), one in each EPA regional office throughout the nation.</p> <p>There are also 12 collateral duty Program Management Officers (PMOs), one for each program office at headquarters, who perform this function among other duties.</p>
Processing reasonable accommodation requests from applicants and employees	2		24	<p>Amanda Sweda, Senior National Reasonable Accommodation Coordinator, OCR sweda.amanda@epa.gov</p> <p>Kristin Tropp, National Reasonable Accommodation Coordinator, OCR tropp.kristin@epa.gov</p> <p>This includes 24 collateral duty Local Reasonable Accommodations Coordinators (LORACs) in EPA's regional offices.</p>
Section 508 Compliance	4		58	<p>Giselle Jasmin, Section 508, Program Manager, OMS jasmin.giselle@epa.gov</p> <p>Sarah Sorathia, 508 Coordinator, Assistant Program Manager, OMS sorathia.sarah@epa.gov</p> <p>Psyche Lewis, 508 Coordinator, Training Lead, OMS lewis.psyche@epa.gov</p> <p>Bruce Franklin, Section 508, OMS franklin.bruce@epa.gov</p> <p>This includes 58 collateral duty 508 Liaisons Agency-wide: program offices (39) and regions (19).</p>
Architectural Barriers Act Compliance	1			<p>Cynthia Simbanin, Deputy Director Facilities Management, OMS simbanin.cynthia@epa.gov</p>

Special Emphasis Program for PWD and PWTD	2		25	<p>Christopher Emanuel, National Disability Program Manager, OCR emanuel.christopher@epa.gov</p> <p>Anthony Napoli, Diversity and Inclusion Manager, DRESO, OHR napoli.anthony@epa.gov</p> <p>This includes 25 collateral duty Special Emphasis Program Managers (SEPMs).</p>
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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.

Yes X No

In FY20, EPA provided ongoing disability training to its disability program staff using various educational methods, such as online training, on-the-job training, and engagement on EEOC-facilitated Federal Exchange on Employment and Disability (FEED) calls.

Training topics included:

- EEO and Preventing Discrimination in the Workplace
- SEPM training (three presentations): How to Use the Workforce Recruitment Program (WRP) database, State of Disability Hiring at the EPA, and the Computer/Electronic Accommodation Program (CAP)
- Section 508 training on assistive technologies
- Effective Use of Schedule A and Workforce Recruitment Program trainings (11 training sessions)

B. Plan to Ensure Sufficient Funding for the Disability Program

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

Yes X No

N/A

Section III: Plan to Recruit and Hire Individuals with Disabilities

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

A. Plan to Identify Job Applicants with Disabilities

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

In FY20, the Agency utilized a variety of programs and resources to identify qualified job applicants with disabilities, including those with targeted disabilities. These included, but were not limited to:

- Office of Personnel Management's Blanket Purchase Agreement with Bender Consulting firm that maintains a list of Schedule A applicants
- Veteran Employment Programs (e.g., Operations Warfighter, Wounded Warrior, Safe Harbor)
- Workforce Recruitment Program for college students with disabilities
- Special Emphasis Program Managers (SEPMs) and Disability Employment Advisory Council
- Disability Employment Program Managers
- Careers and Disability Job Fairs
- Pathways-Presidential Management Fellows (PMF) Program
- Green Interns Program
- Pathways-Interns/Recent Graduates
- Office of Environmental Information, Section 508 – Assistive Technology Program
- Disability Employment Program Advisory Council Monthly Meetings
- Memorandum of Understanding (MOU) Partnerships
- Internal/External Outreach Programs/Activities and Career Fairs

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 Agency uses all available and appropriate hiring authorities to recruit and hire including:

- Excepted Service, Schedule A: 5 Code of Federal Regulations (C.F.R.) section 213.3102(u)
- Disabled Veterans Affirmative Action Program (DVAAP)
- Veterans Recruitment Appointments (VRA)
- Pathways Programs

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.

EPA determines eligibility for individuals who apply using special hiring authorities, such as Schedule A and the 30% or More Disabled Veteran Authority using the following processes:

Schedule A Hiring

- Shared Service Centers (SSCs) review all incoming applicants who submit documentation designating their disability status pursuant to special hiring authority Schedule A (5 C.F.R. § 213.3102(u)).
- SSCs screen all applicants seeking to be hired through Schedule A for minimum qualifications/selective factors to determine eligibility for noncompetitive, Schedule A appointments.
- A qualified person must have an intellectual disability, a severe physical disability, or a psychiatric disability. The Agency accepts, as proof of disability, appropriate documentation (e.g., records, statements, or other appropriate information) issued by a licensed medical professional (e.g., a physician or other medical professional duly certified by a state, the District of Columbia, or a U.S. territory, to practice medicine); a licensed vocational rehabilitation specialist (state or private); or, any federal agency, state agency, or an agency of the District of Columbia or a U.S. territory that issues or provides disability benefits.
- For permanent or time-limited appointments, EPA also determines whether the individual is likely to succeed in the performance of the duties of the position for which he or she is applying.
- Individuals who apply and are certified for a Merit Promotion (MP) External announcement (i.e., open government-wide) are referred to the hiring official through the EZHire/Monster platform. Certificates of qualified individuals are reviewed electronically.
- Candidates are appointed in accordance with SSC onboarding procedures. After a tentative offer is extended, the selectee is processed through Personnel Security for background investigations (if applicable) and suitability determinations. Once Personnel Security has approved the candidate for employment, the SSC establishes a start date, issues a firm offer letter, and provides new hire documentation for the candidate to complete prior to onboarding.

Veterans Hiring

Eligibility is determined based on the guidelines provided in OPM's Vet Guide for HR Professionals. Candidates are referred on the appropriate certificate of eligibles, after their eligibility is determined, and their qualifications are verified.

Individuals who apply and are certified for Delegated Examining (DE) announcement (i.e., open to the public) and are found to have veterans' preference are referred to the hiring official through the EZHire/Monster platform.

Individuals who apply and are certified for a Merit Promotion (MP) External announcement (i.e., open government-wide) are referred to the hiring official through the EZHire/Monster platform. The certificate that they are referred on is determined by their veteran authority eligibility (e.g., Compensable Disability Preference (CPS) eligible veterans are referred on the CPS-30% disabled certificate, while Veterans Readjustment Appointment (VRA) eligible individuals are referred on the VRA certificate). Certificates of qualified individuals are reviewed electronically.

Hiring managers may receive non-competitive appointments, meaning the applicant is eligible for a hiring authority that does not require public notice (i.e., an announcement on USAJobs) and provide those selections to the SSC for review. In this case, the hiring manager is providing the application to the SSC who then determines eligibility and qualifications.

- **Disabled veterans with disability ratings of 30% or more** may be considered under 30% or More Disabled Veteran Authority (5 CFR § 315.707).
 - Once eligibility for the 30% or More Disabled Veteran Authority is determined, the HR specialist notifies the hiring manager in accordance with applicable regulations for further consideration. SSC and HR specialists, along with Selective Placement Program Coordinators (SPPC), work closely with each hiring manager to ensure that all pre- and post-appointment procedures are carried out and that applicants meet all legal and regulatory requirements for EPA position(s).
 - Candidates may be selected and appointed with or without the typical formal interview process.
 - A hiring manager may fill the position based on the applicant’s ability to perform the duties of the position as described in the position description. Applicants can be hired on 1) a temporary position with a Not to Exceed (NTE) date; 2) a non-temporary position with an NTE date; or 3) a non-temporary excepted service position. After two years of successful performance on the job, they may be non-competitively converted to a permanent appointment.
 - The hiring manager notifies SSC of their selection. SSC extends an official offer based on the vacancy’s selection factors and determines a start date based on dialogue with the manager and selectee. Prior to the entry-on-duty, a manager discusses and verifies the need for any accommodation with the selected individual.

- **Veterans Readjustment Act (VRA) Authority** (5 CFR Part 307) (5 CFR Part 307, 752.401 (c) (3)) is a special hiring authority that allows for the appointment of eligible veterans without competition to positions at any grade level through GS-11 or equivalent (reference 5 CFR Part 307.752.401 (c)(3)).

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

Yes X No N/A

In FY20, the Agency hosted seven Agency-wide training sessions and four trainings to management in the various EPA region and program offices. OHR and OCR provided trainings and presentations on the “Effective use of the Schedule A Hiring Authority and How to Utilize the Workforce Recruitment Program (WRP) Database” to managers and employees.

Initially, the training sessions were conducted in-person, then virtually and recorded because of the Covid-19 pandemic. The videos are currently available on the Agency intranet site and on Microsoft Teams video system for all EPA employees to view. In addition, EPA regions and program offices conduct their own Disability Employment Awareness, Reasonable Accommodation and Schedule A hiring trainings and recognition activities.

B. Plan to Establish Contacts with Disability Employment Organizations

Describe the agency’s efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

- The Agency continued to implement established Memoranda of Understanding (MOU) with Gallaudet University (GU) and the Rochester Institute of Technology/National Technical Institute for the Deaf (RIT/NTID).
- In FY20, the Agency signed a new MOU with Texas School for the Deaf (TSD).
- Through the MOUs, EPA continues to collaborate on the advancement of environmental education to improve awareness of national employment opportunities and other opportunities for individuals with disabilities. Through the established MOUs with the institutions, students are given notice of publicly available career opportunities at EPA, through paid and unpaid internships. In FY20, the Agency conducted mock in-person and virtual interviews with GU, RIT/NTID and TSD students.
- OMS encourages the use of the Workforce Recruitment Program (WRP) and shares information on the WRP with the region and program offices.
- In FY20, EPA hosted a panel discussion facilitated by the Agency’s National Disability Employment Program Manager for the observance of the 2020 National Disability Employment Awareness Month. The event provided an opportunity to share with EPA employees an in-depth learning experience on how the Agency taps into the talent of Persons with Disabilities. Participants were able to hear from officials from federal agencies, including the U.S. Department of Defense’s Computer/Electronic Accommodations Program; U.S. Office of Personnel Management, Outreach, Diversity and Inclusion Center of Employee Services; and, EPA’s National Reasonable Accommodation Coordinator. The panel also included the Chief Executive Officer of Access Interpreting, Inc., who spoke on promising practices of accommodation needs to allow employees to perform work duties.

C. Progress Towards Goals (Recruitment and Hiring)

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

- | | | |
|---|-----|------|
| a. New Hires for Permanent Workforce (PWD) | Yes | No X |
| b. New Hires for Permanent Workforce (PWTB) | Yes | No X |

Table B-8: NEW HIRES - Permanent Workforce No triggers identified.
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2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTB 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) | Yes X | No | N/A |
| b. New Hires for MCO (PWTB) | Yes X | No | N/A |

For FY20, EPA utilized **Table B-7 Monster**: Application and Hires for Major Occupations by Disability. The Agency continues its efforts to collect complete applicant flow data for the Attorney Adviser (GS 0905) positions.

In FY20, the Agency issued an SOP that required headquarters and regional Attorney Adviser positions in legal offices to be posted on USAJobs. However, the Agency has yet to issue an SOP requiring Attorney Adviser positions in non-legal offices to be posted on USAJobs. OCR continues to work with OGC and OMS to issue an SOP requiring Attorney Adviser positions in non-legal offices to be posted in USAJobs. Once that SOP is issued, EPA will be able to collect complete applicant flow data for the 0905 series.

PWD triggers were identified in the following Major Occupation series:

- **Environmental Protection Specialist (0028)**: Selection at 7.02% is less than expected compared to the qualified applicant pool rate of 12.93%.
- **Misc. Administration and Program Specialist (0301)**: Selection at 3.13% is less than expected compared to the qualified applicant pool rate of 13.87%.
- **Management/Program Analyst (0343)**: Selection at 10.14% is less than expected compared to the qualified applicant pool rate of 13.40%.
- **General Biological Science (0401)**: Selection at 4.89% is less than expected compared to the qualified applicant pool rate of 7.31%.
- **Environmental Engineer (1301)**: Selection at 3.37% is less than expected compared to the qualified applicant pool rate of 5.78%.

PWTD triggers were identified in the following Major Occupation series:

- **Environmental Protection Specialist (0028)**: Selection at 3.51% is less than expected compared to the qualified applicant pool rate of 6.61%.
- **Misc. Administration and Program Specialist (0301)**: Selection at 0.00% is less than expected compared to the qualified applicant pool rate of 6.67%.
- **Management/Program Analyst (0343)**: Selection at 1.45% is less than expected compared to the qualified applicant pool rate of 6.19%.
- **General Biological Science (0401)**: Selection at 1.33% is less than expected compared to the qualified applicant pool rate of 3.38%.
- **Environmental Engineer (0819)**: Selection at 3.51% is less than expected compared to the qualified applicant pool rate of 3.76%.
- **Physical/Environmental Scientist (1301)**: Selection at 1.12% is less than expected compared to the qualified applicant pool rate of 2.97%.

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) | Yes X | No | N/A |
| b. Qualified Applicants for MCO (PWTD) | Yes X | No | N/A |

Table B-9 Monster – Selections for Internal Competitive Promotions for Major Occupations by Disability

PWD triggers were identified in the following Major Occupation series:

- **Environmental Protection Specialist (0028):** PWD Qualified Internal Applicants at 3.25% is less than expected compared to the PWD Applications Received at 3.80%.
- **Misc. Administration and Program Specialist (0301):** PWD Qualified Internal Applicants at 3.09% is less than expected compared to the PWD Applications Received at 3.39%.
- **Management/Program Analyst (0343):** PWD Qualified Internal Applicants at 3.30% is less than expected compared to PWD Applications Received at 7.14%.
- **Environmental Engineer (0819):** PWD Qualified Internal Applicants at 2.80% is less than expected compared to the PWD Applications Received at 3.87%.
- **Physical Scientist/Environmental Scientist (1301):** PWD Qualified Internal Applicants at 1.53% is less than expected compared to the PWD Applications Received at 2.02%.

PWTD triggers were identified in the following Major Occupation series:

- **Environmental Protection Specialist (0028):** PWTD Qualified Internal Applicants at 0.36% is less than expected compared to the PWTD Applications Received at 0.95%.
- **Misc. Administration and Program Specialist (0301):** PWTD Qualified Internal Applicants at 1.03% is less than expected compared to the PWTD Applications Received at 1.13%.
- **Management/Program Analyst (0343):** PWTD Qualified Internal Applicants at 0.00% is less than expected compared to PWTD Applications Received at 2.72%.
- **General Biological Science (0401):** PWTD Qualified Internal Applicants at 0.40% is less than expected compared to the PWTD Applications Received at 0.67%.

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)	Yes X	No	N/A
b. Promotions for MCO (PWTD)	Yes X	No	N/A

Table B-9 Monster– Selections for Internal Competitive Promotions for Major Occupations by Disability: QUALIFIED APPLICANT POOL for Major Occupations by Disability

EPA utilized Table B9: Promoted for Internal Competitive Promotions for MCO. The qualified applicant pool was used as the benchmark for the following.

PWD, triggers were identified in the following Major Occupation series:

- **Misc. Administration and Program Specialist (0301)**: PWD Promoted at 0.00% is less than expected compared to Qualified Benchmark of 3.09%. This is a trigger.
- **Management Analyst (0343)**: PWD Promoted at 2.63% is less than expected compared to Qualified Benchmark of 3.30%. This is a trigger.
- **Biologist (0401)**: PWD Promoted at 2.21% is less than expected compared to Qualified Benchmark of 3.39%. This is a trigger.

PWTD, triggers were identified in the following Major Occupation series:

- **Misc. Administration and Program Specialist (0301)**: PWTD Promoted at 0.00% is less than expected compared to Qualified Benchmark of 1.03%. This is a trigger.
- **Physical Scientist/Environmental Scientist (1301)**: PWTD Promoted at 0.00% is less than expected compared to Qualified Benchmark of 0.76%. This is a trigger.

Section IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

A. Advancement Program Plan

Describe the agency's plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

Increased communication. EPA informs all employees of advancement opportunities through 1) the Talent Hub website (a centralized experiential learning resource that promotes a range of career development opportunities available across the Agency); 2) broadcasting open vacancy announcements; and, 3) fee/non-fee based in-person/ online training. Opportunities are marketed through email to all users, office announcements, intranet postings, and newsletters. Employees are encouraged to participate in skill-building trainings and courses related to federal employment such as how to search through USAJOBS, resume writing, and improving interviewing skills.

Technical Assistance Visits: OCR plans to schedule visits to several region and program offices in FY21. These visits will serve, in part, to educate managers on how to support opportunities for advancement and retention of employees with disabilities, provide information on the Schedule A hiring authority, and stress the importance of timely conversion for those participating in the program.

Diversity and Inclusion Strategic Plan: EPA's 2017-2021 Diversity and Inclusion Strategic Plan (DISP) guides the Agency's efforts in sustaining EPA as a leader in creating and maintaining a high-performing workforce that embraces diversity and inclusion and empowers all employees to achieve their full potential. The multi-year plan outlines goals, priorities, specific action items and measures that were developed by senior leadership and the EPA Human Resources community. The DISP received concurrence from EPA's Diversity and Inclusion Advisory Committee (DIAC), a subcommittee of the Human Resources Council. DISP goals are outlined below.

- **Goal 1:** Diversify the federal workforce through active engagement of leadership: a) senior leaders conducted regular informational sessions open to all employees to share information on training and career development opportunities and resources; b) OMS ensured that all hiring managers received training on the use of appropriate hiring authorities and flexibilities.
- **Goal 2:** Include and engage all Agency employees: senior leadership and managers used Talent Hub to promote and encourage all employees to apply for temporary, full-time detail assignments, part-time projects/special assignments, temporary promotions, SES rotations, and other developmental assignments.
- **Goal 3:** Optimize inclusive diversity efforts using data-driven approaches: a) utilized the MD-715 reports, applicant flow data, and focus groups to identify actions that could be taken to address any potential barriers to career development and advancement identified by the Agency; b) senior leaders used the results of the annual Employee Viewpoint Surveys and other workforce feedback to respond to employee concerns regarding opportunities for employee training, development, and advancement.

The DISP expires at the end of this fiscal year, and the Agency is in the process of drafting a new DISP. OCR has proposed that the new DISP specifically address the Agency's underrepresentation of persons with disabilities.

Stepping Up to Supervision: This training is designed for all employees interested in learning about the roles and responsibilities of formal leadership. Each participant receives formal feedback through a multi-rater 360 assessment and is encouraged to build a development plan to help map their learning plans towards their career goals and objectives. Due to COVID-19, the Agency is redesigning the course so that it may be offered in a virtual format beginning FY21.

EPA's Successful Leader's Program: Mandatory classroom-based program for newly promoted or hired supervisors and managers. The program contains information regarding the various hiring authorities (such as Schedule A) to reach a wide range of candidates training on the Disability Hiring Tool such as the WRP, CAP, as well as training on how to manage Reasonable Accommodation requests. The Agency is restructuring the course so that it may be offered in a virtual format beginning FY21.

Miscellaneous: The Agency launched Fed Talent in FY18 and continues to use this learning management system that interfaces with the Agency's HR system of record (FPPS). The interface allows EPA to track selectees in its training and coaching programs and allow offices to provide information on the robust learning opportunities afforded on career development within the Fed Talent course library.

B. Career Development Opportunities

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

Employee career development is available through a variety of programs. Training is designed to promote professional and personal development. EPA provides the following programs and resources designated for career development:

- Fellowship Programs
- Mentoring Programs
- Coaching Programs
- Training Programs
- Detail Programs

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

EPA does not currently capture data for Career Development Opportunities (CDOs) that require competition and/or supervisory recommendation/approval to participate.

Career Development Opportunities	Total Participants		PWD		PWTD	
	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) | Yes | No | N/A X |
| b. Selections (PWD) | Yes | No | N/A X |

Data is not available for FY20. OCR is coordinating with OMS to create a process that will collect the required data.

4. 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. 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)	Yes	No	N/A X
b. Selections (PWTD)	Yes	No	N/A X

Data is not available for FY20. OCR is coordinating with OMS to create a process that will collect the required data.

C. Awards (Includes Time Off Awards and Cash 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)	Yes X	No
b. Awards, Bonuses, & Incentives (PWTD)	Yes X	No

Comparing Time-off Awards of 1-9 hours for PWD/PWTD (**Table B-13**) to Total Workforce for PWD/PWTD (**Table B1**), there are triggers in the following Awards, Bonuses, and Incentives categories.

PWD

Time-off Awards 1-9 hours: PWD received awards at 26.40%, which is less than expected compared to people without disabilities at 26.59%. This is a trigger.

PWTD

Time-off Awards 1-9 hours: PWTD received awards at 23.05%, which is less than expected compared to people without disabilities at 26.65%. This is a trigger.

PWTD

Time-off Awards 9+ hours: PWTD received awards at 26.35%, which is less than expected compared to people without disabilities at 27.51%. This is a trigger.

Comparing Cash Awards \$100 -\$500 for PWD/PWTD (Table 13) to Total Workforce for PWOD (Table B1), there are triggers in the following Awards, Bonuses and Incentives categories.

Cash Awards \$100 - \$500:

- PWD received awards at 19.81%, which is less than expected compared to people without disabilities at 22.44%. This is a trigger.

Cash Awards \$100 - \$500:

- PWTD received awards at 20.96%, which is less than expected compared to people without disabilities at 22.24%. This is a trigger.

Cash Awards \$501+:

- PWD received awards at 88.25%, which is less than expected compared to people without disabilities at 95.55%. This is a trigger.

Cash Awards \$501+:

- PWTD received awards at 88.02%, which is less than expected compared to people without disabilities at 95.06%. This is a trigger.

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases (QSI)? If “yes”, please describe the trigger(s) in the text box.

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

Comparing Employee Recognition and Awards for PWD/PWTD (**Table B-13 Employee Recognition Awards**) to Total Workforce for PWOD (**Table B1 - Total Workforce - Permanent**), there are triggers in the following Awards, Bonuses and Incentives categories:

PWD Qualify Step Increase (QSI): PWD received awards at 1.64%, which is less than expected compared to people without disabilities at 2.46%. This is a trigger.

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

a. Other Types of Recognition (PWD)	Yes X	No	N/A
b. Other Types of Recognition (PWTD)	Yes X	No	N/A

The **Other Awards** category is broad-based and includes a variety of awards (see list below).

PWD Other Awards: PWD received awards at 0.08%, which is less than expected compared to people without disabilities at 0.15%. This is a trigger.

- Other Awards for PWD consist of (code-award):
 - 815/ Recruitment
 - 816/ Relocation Incentive
 - 825/ Separation Incentive
 - 827/ Retention Incentive
 - 889/ Group Award

PWTD Other Awards: PWTD received awards at 0.00%, which is less than expected compared to people without disabilities at 0.15%. This is a trigger.

- Other Awards for PWTD consist of (code-award):
 - 815/ Recruitment
 - 816/ Relocation Incentive
 - 825/ Separation Incentive
 - 827/ Retention Incentive
 - 889/ Group Award

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)	Yes	No	N/A X
ii. Internal Selections (PWD)	Yes	No	N/A X
b. Grade GS-15			
i. Qualified Internal Applicants (PWD)	Yes X	No	N/A
ii. Internal Selections (PWD)	Yes X	No	N/A
c. Grade GS-14			
i. Qualified Internal Applicants (PWD)	Yes X	No	N/A
ii. Internal Selections (PWD)	Yes X	No	N/A
d. Grade GS-13			
i. Qualified Internal Applicants (PWD)	Yes X	No	N/A
ii. Internal Selections (PWD)	Yes	No X	N/A

SES PWD promotion data is not available for FY20. OCR is coordinating with OMS to create a process to collect the required data.

For FY20, EPA utilized **Monster Table B11 – Internal Selections for Senior Level Positions**. Using the PWD Applications Received when analyzing the applicant flow of internal applicants and/or selections for promotions by grade (Table B11), the following triggers are identified for GS-13 thru GS 15.

PWD

GS-13:

- Qualified Internal Applicants at 4.97% is less than expected compared to the PWD Applicants Received at 6.16%. This is a trigger.

GS-14:

- PWD Qualified Internal Applications at 3.24% is less than expected compared to the PWD Applications Received at 3.85%. This is a trigger.
- PWD Selected Internal Applicants at 3.14% is less than expected compared to the Qualified Applicants at 3.24%. This is a trigger.

GS-15:

- PWD Qualified Internal Applicants at 1.34% is less than expected compared to the PWD Applicants Received at 3.38%. This is a trigger.
- PWD Selected Internal Applicants at 1.20% is less than expected compared to the Qualified Applicants at 1.34%. This is a trigger.

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)	Yes	No	N/A X
ii. Internal Selections (PWTD)	Yes	No	N/A X
b. Grade GS-15			
i. Qualified Internal Applicants (PWTD)	Yes X	No	N/A
ii. Internal Selections (PWTD)	Yes X	No	N/A
c. Grade GS-14			
i. Qualified Internal Applicants (PWTD)	Yes X	No	N/A
ii. Internal Selections (PWTD)	Yes	No X	N/A
d. Grade GS-13			
i. Qualified Internal Applicants (PWTD)	Yes X	No	N/A
ii. Internal Selections (PWTD)	Yes	No X	N/A

SES PWTD promotion data is not available for FY20. OCR is coordinating with OMS to create a process to collect the required data.

In FY20, EPA used **Monster Table B11 – Internal Selections for Senior Level Positions**: Internal Selections for Senior Level Positions, to analyze the applicant flow of internal applicants and/or selections for promotions by grade for PWTD. The senior level analysis includes grades 13-15. The SES is excluded from this analysis because relevant data was not collected for this series in FY20. OCR has submitted a request to OHR to capture SES applicant flow data for Qualified Internal Applicants and Internal Selections.

GS-13: PWTD

- Qualified Internal Applicants at 1.47% is less than expected compared to the PWD Applicants Received at 1.90%. This is a trigger.

GS-14: PWTD

- Qualified Internal Applicants at 0.71% is less than expected compared to the PWTD Applicants Received at 1.15%. This is a trigger.

GS-15: PWTD

- Qualified Internal Applicants at 0.34% is less than expected compared to the PWTD Applicants Received at 1.07%. This is a trigger.
- PWTD Selected Internal Applicants at 0.00% is less than expected compared to the Qualified Applicants at 1.07%. This is a trigger.

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. (Table B11 and B8)

a. New Hires to SES (PWD)	Yes	No	N/A X
b. New Hires to GS-15 (PWD)	Yes	No	N/A X
c. New Hires to GS-14 (PWD)	Yes	No	N/A X
d. New Hires to GS-13 (PWD)	Yes	No	N/A X

EPA's FY20 workforce tables do not provide information on New Hires of PWD in the senior grades of GS-13, 14, 15 and SES. OCR is coordinating with OMS to create a process to collect the required data.

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.

a. New Hires to SES (PWTD)	Yes	No	N/A X
b. New Hires to GS-15 (PWTD)	Yes	No	N/A X
c. New Hires to GS-14 (PWTD)	Yes	No	N/A X
d. New Hires to GS-13 (PWTD)	Yes	No	N/A X

EPA's FY20 workforce tables do not provide information on New Hires of PWTD in the senior grades of GS-13, 14, 15 and SES. OCR is coordinating with OMS to create a process to collect the required data.

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

a. Executives			
i. Qualified Internal Applicants (PWD)	Yes	No	N/A X
ii. Internal Selections (PWD)	Yes	No	N/A X
b. Managers			
i. Qualified Internal Applicants (PWD)	Yes	No	N/A X
ii. Internal Selections (PWD)	Yes	No	N/A X
c. Supervisors			
i. Qualified Internal Applicants (PWD)	Yes	No	N/A X
ii. Internal Selections (PWD)	Yes	No	N/A X

EPA's FY20 workforce tables do not provide promotion data on PWD for executives, managers, and supervisors. OCR is coordinating with OMS to create a process to collect the required data.

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

a. Executives				
i. Qualified Internal Applicants (PWTD)	Yes	No	N/A	X
ii. Internal Selections (PWTD)	Yes	No	N/A	X
b. Managers				
i. Qualified Internal Applicants (PWTD)	Yes	No	N/A	X
ii. Internal Selections (PWTD)	Yes	No	N/A	X
c. Supervisors				
i. Qualified Internal Applicants (PWTD)	Yes	No	N/A	X
ii. Internal Selections (PWTD)	Yes	No	N/A	X

EPA's FY20 workforce tables do not provide promotion data on PWTD for executives, managers, and supervisors. OCR is coordinating with OMS to create a process to collect the required data.

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

a. New Hires for Executives	(PWD)	Yes	No	N/A	X
b. New Hires for Managers	(PWD)	Yes	No	N/A	X
c. New Hires for Supervisors	(PWD)	Yes	No	N/A	X

EPA's FY20 workforce tables do not provide information on New Hires of PWD for executives, managers, and supervisors. OCR is coordinating with OMS to create a process that will collect the required data.

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)	Yes	No	N/A	X
b. New Hires for Managers	(PWTD)	Yes	No	N/A	X
c. New Hires for Supervisors	(PWTD)	Yes	No	N/A	X

EPA's FY20 workforce tables do not provide information on New Hires of PWTD for executives, managers, and supervisors. OCR is coordinating with OMS to create a process that will collect the required data.

Section V: Plan to Improve Retention of Persons with Disabilities

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

A. Voluntary and Involuntary Separations

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

Yes X No N/A

In FY20, EPA converted all eight (8) of its eligible Schedule A employees into the competitive 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)	Yes X	No
b. Involuntary Separations (PWD)	Yes X	No

PWD Voluntary Separations (Table B1 and B14):

- The PWD inclusion rate for Voluntary Separations is 6.50%.
- The People Without Disabilities inclusion rate for Voluntary Separations is 5.98%.
- The PWD inclusion rate is greater than the People Without Disability inclusion rate. This indicates a trigger.

PWD Involuntary Separations (Tables B1 and B14):

- The PWD inclusion rate for Involuntary Separations is 0.86%.
- The People Without Disabilities inclusion rate for Involuntary Separations is 0.17%.
- The PWD inclusion rate is greater than the People Without Disability inclusion rate. This indicates a trigger.

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)	Yes X	No
b. Involuntary Separations (PWTD)	Yes X	No

PWTD Voluntary Separations (Table B1 and B14):

- The PWTD inclusion rate for Voluntary Separations is 8.14%.
- The People Without Disabilities inclusion rate for Voluntary Separations is 5.97%.
- The PWTD inclusion rate is greater than the People Without Disability inclusion rate. This indicates a trigger.

PWTD Involuntary Separations (Tables B1 and B14):

- The PWTD inclusion rate for Involuntary Separations is 0.60%.
- The People Without Disabilities inclusion rate for Involuntary Separations is 0.23%.
- The PWD inclusion rate is greater than the People Without Disability inclusion rate. This indicates a trigger.

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*.

Based on information available in FPPS:

- Of the 94 PWD Separations in FY20, 83 were voluntary and 11 were involuntary.
- Of the 30 PWTD Separations in FY20, 28 were voluntary and 2 were involuntary.

OCR and OHR are collaborating to update the exit survey to include a question regarding separations due to the perception of disabilities affecting career development. OHR is developing a process to review exit survey results.

B. Accessibility of Technology and Facilities

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 Accessibility Statement explains employees' and applicants' rights under Section 508 of the Rehabilitation Act. EPA's Accessibility Statement can be found on EPA's website:

<https://www.epa.gov/accessibility/epa-accessibility-statement>

EPA follows the same process for Section 508 complaints as for other complaints related to disability discrimination. Details can be found on EPA's website: <https://www.epa.gov/ocr/employment-complaint-resolutions>

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.

EPA's website: <https://www.epa.gov/ocr/affirmative-employment-analysis-and-accountability#architectural> provides a link to the United States Access Board (<https://www.access-board.gov/enforcement/>), which provides information on employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a 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.

EPA Section 508 Governance: Revision of Section 508 Policy and Procedures for compliance to address the Section 508 Refresh. In FY20, the policy received Agency-wide review by the Section 508 staff, but has not yet been finalized. Section 508 expects to finalize the policy in FY21.

Section 508 Training Campaign: In FY20, the 508 Program conducted market research to expand the training curriculum to include specific web-based role-based training. In FY21, the Section 508 Team will target this training to employees who play roles in acquiring, developing, using, or maintaining Information Communications Technology (ICT). The Agency expects to award a suitable vendor and award a contract that will assist with strategic planning, Section 508 program support, and training in FY21.

EPA Compliance Assessment and Remediation Plan: EPA's Compliance Assessment and Remediation Plan (CARP) aims to:

- Assess and enhance the accessibility of EPA's ICT,
- Develop a baseline to measure improvements, and
- Report bi-annually to the OMB on Section 508 Program Maturity.

Activities include:

- Conduct an inventory of EPA's ICT and prioritize ICT for assessments.
- Assess the inventoried ICT's compliance.
- Develop and implement remediation plans to address concerns identified during the assessments.
- Report compliance within EPA to OMB.

Initially, the CARP focused on a phased approach towards inventorying systems based on the type of internal and external system or application. Due to the global pandemic, changes in the operating environment presented challenges in maintaining the inventory phased approach. The Agency has increased communications with system owners and shifted from a phased approach to compliance reporting that includes new and decommissioned ICT regardless of audience. Through FY21, EPA will continue the inventory of internal non-enterprise systems and applications and evaluate system documentation.

As part of the CARP effort, the EPA Section 508 Program has developed and enhanced the formal process for reviewing Accessible Conformance Reports (ACR). System owners use this process to assess the conformance level to Section 508 claimed by the vendors before purchasing.

The following are FY21 high-level Section 508 tasks at the Agency:

- In FY21, the Agency plans to assess the maturity of the Section 508 Program with offices to integrate 508:
 - Acquisition
 - System Lifecycle and processes
 - Testing
 - Complaints Process
 - Training

- Publish EPA Information Directives: Section 508 Policy and Procedures
- Provide hands-on consultation, clear instructions, and information resources to advise on Section 508 requirements for all users, raise awareness, and increase the level of conformance
- Promote proven industry and Federal best practices to improve the accessibility or functionality of Enterprise ICT and components
- Listen to users and develop resources per business and user needs
- Train EPA 508 Team, EPA Section 508 Liaisons, System Owners, Acquisition professionals, management, and staff on their responsibilities
- Provide E-Learning training modules in EPA Enterprise Learning Management System and monitor and improve their effectiveness

C. Reasonable Accommodation Program

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.)

In FY19, 108 requests were not concluded at the end of FY19 and were concluded in FY20. Of the 498 FY20 new requests, 470 were initiated, processed, and concluded in FY20. There were 28 requests pending at the end of FY20 that were carried over to FY21 for continued processing. In FY20, the Agency processed and concluded 469 of the 470 completed requests (or 99.7%) within the time frames identified in EPA Reasonable Accommodation (RA) Procedures with an average processing time of 16.4 days. The Agency has attained a 90% or greater processing rate for ten consecutive years.

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

The following is a summary and analysis of the RA requests that were initiated in FY20.

Of the 470 requests that were initiated, processed, and concluded in FY20:

- 392 requests were approved
- 6 requests were denied
- 7 requests were denied under reasonable accommodation (RA) but were offered some relief outside of the RA process
- 35 requests were withdrawn by the employee
- 30 requests were closed (employee resigned, retired, or separated from the Agency or in some cases passed away; therefore, a decision for the request was no longer needed and was closed without a final decision)

There was no noticeable change to the type of reasonable accommodation requests that were made from the previous two fiscal years. In FY20, the most requested items or types of accommodations were:

1. Telework (full-time, additional day, episodic, etc.): 205 requests
2. Assistive technology (AT) equipment, including equipment such as ergonomic keyboards: 78 requests
3. Sit/stand desks: 74 requests
4. Computer equipment, such as larger monitor, mouse, etc.: 61 requests
5. Modified work schedule (start/end times): 31 requests
6. Facilities related requests such as small refrigerators, space heaters, workspace modification, and changes to lighting: 35 requests

The National Reasonable Accommodation Coordinators (NRACs) delivered 12 training sessions to a total of 280 participants. The 12 training sessions included Agency-wide trainings delivered in person and virtually and trainings for the below offices:

- Region 3 (Philadelphia)
- Region 6 (Dallas)
- Office of Inspector General (OIG)
- Office of Mission Services – Office of Acquisition Solutions (OAS)
- Office of the Chief Financial Officer (OCFO)

Trainings were also conducted for 5 new Local Reasonable Accommodation Coordinators (LORACs) and recertification training for all 24 LORACs.

In understanding the following chart, please note that in FY20, the National Reasonable Accommodation Coordinator (NRAC) started using the title Senior NRAC as indicated on the position description and the Assistant NRAC position was updated to NRAC.

Trainer	Date	Audience	Locations Included	Method	Number Attended
NRAC	10/2/2019	Employees	Region 6 - Dallas	In Person in Dallas	20
NRAC	10/2/2019	Managers/Supervisors	Region 6 - Dallas	In Person in Dallas	10
NRAC / Assistant NRAC	10/28/2019	Managers/Supervisors	Office of Inspector General (OIG)	In Person at HQ	15
NRAC	10/30/2019	Headquarters	Headquarters (HQ)	In Person at HQ	30
NRAC	12/17-12/18/2019	New LORACs	Region 3 - Philadelphia, Region 8 - Denver	In Person at HQ	2
Senior NRAC / NRAC	3/5/2020	Managers/Supervisors	Office of Mission Services (OMS) – Office of Acquisition Solutions (OAS)	In Person at HQ	20
Senior NRAC / NRAC	5/5-5/7/2020	New LORACs	Region 1 - Boston, Region 9 - San Francisco, OIG, Cincinnati, Research Triangle Park (RTP)	Virtual	6
NRACs	6/18/2020	Managers/Supervisors	Region 3 - Philadelphia	Virtual	103
NRACs	7/30/2020	Disability Employment Program Advisory Council (DEPAC)	All	Virtual	18
SNRAC/NRAC	9/15-9/17/2020	LORACs	All	Virtual	20
SNRAC/NRAC	9/22/2020	Managers/Supervisors	Office of the Chief Financial Officer (OCFO)	Virtual	20
SNRAC/NRAC	9/24/2020	Managers/Supervisors	OCFO	Virtual	16
FY20 Total Trainings Sessions: 12					
Total Number of Persons Trained: 280					

D. Personal Assistance Services Allowing Employees to Participate in the Workplace

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

There were no PAS requests made in FY2020. However, the Agency included Frequently Asked Questions (FAQS) about PAS on the Reasonable Accommodation website:
<https://www.epa.gov/ocr/reasonable-accommodation#FAQPAS>.

During FY20, the Office of Civil Rights and the PAS Workgroup developed the Personal Assistance Services (PAS) Reference Guide and posted the document to the Agency website in September 2020

https://www.epa.gov/sites/production/files/2020-09/documents/pas_reference_guide_final_september_22_2020.pdf).

The Reference Guide provides clear guidelines to assist decision makers and others involved in the PAS processing to ensure greater efficient and efficacy in delivering PAS.

All Reasonable Accommodation trainings also mention PAS and include references to where to find PAS information.

Section VI: EEO Complaint and Findings Data

A. EEO Complaint Data Involving Harassment

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

Yes No X N/A

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

Yes No X N/A

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

N/A

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?

Yes No X N/A

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

Yes No X N/A

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

N/A

Section VII: Identification and Removal of Barriers

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

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

Yes No X

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

Yes No N/A X

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

N/A

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