

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

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

### Section I: Efforts to Reach Regulatory Goals

*EEOC regulations (29 CFR §1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with targeted disabilities in the federal government*

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

- |                                |            |
|--------------------------------|------------|
| a. Cluster GS-1 to GS-10 (PWD) | Answer Yes |
| b. Cluster GS-11 to SES (PWD)  | Answer Yes |

Yes, the FNCS trigger is any decreases in the current number of permanent employees with PWD. We closely monitor the benchmark and increase the use of Special hiring authorities. The FNS trigger for PWD is the Agency participation rate at 12% requirement. Fulltime permanent employee with a a disability in the workforce increased from 12.10% (FY 2017) tp 12.20% in (FY 2018).

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

Yes, the FNCS trigger is any decreases in the current number of permanent employees with PWD. We closely moni8to9r the 12? benchmark and increase the use of Special hiring authorities.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	63	25	39.68	11	17.46
Grades GS-11 to SES	1385	151	10.90	46	3.32

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

Senior leadership is briefed on recruitment efforts, status of vacancies, and other recruitment information, problematic deviations to benchmarks relative to PWD on quarterly basis. With senior leadership support, we are able to reach hiring managers and recruiters throughout the nation. HRD holds monthly meeting with HR liaisons responsible for updating and communicating hiring requisites to hiring managers who are responsible for selection and recruiters who are reaching out to communities where we can reach the

targeted applicants.

## Section II: Model Disability Program

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

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

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

Answer Yes

FNCS is currently in the process of recruiting a fulltime Reasonable Accommodation Coordinator. The new hire will be responsible for partnering with recruiters, administering the reasonable accommodation and special emphasis program, and to oversee any other disability hiring and advancement program currently in place at FNCS.

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 PWTB	1	0	0	Joanie.Dilone@fns.usda.go
Architectural Barriers Act Compliance	1	0	0	Rick Bumpers Chief, Real Property
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Joanie.Dilone@fns.usda.go
Special Emphasis Program for PWD and PWTB	3	1	0	Joanie.Dilone@fns.usda.go
Processing reasonable accommodation requests from applicants and employees	1	0	0	James.Wesley@fns.usda.gc
Section 508 Compliance	1	0	0	James.Wesley@fns.usda.gc

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

Answer Yes

FNCS is currently in the process of recruiting a fulltime Reasonable Accommodation Coordinator. The new hire will be responsible for partnering with recruiters, administering the reasonable accommodation and special emphasis program, and to oversee any other disability hiring and advancement program currently in place at FNCS.

**B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM**

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

Answer Yes

Yes, FNS has provided sufficient funding for American Sign Language (ASL) and CART service. Also, FNS provided equipment such as elevated desks, chairs, and software programs.

**Section III: Program Deficiencies In The Disability Program**

<b>Brief Description of Program Deficiency</b>	A.2.b.3. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.
<b>Brief Description of Program Deficiency</b>	C.2.a.6. Do the agency’s training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR §1614.203(d)(2)]
<b>Brief Description of Program Deficiency</b>	C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC’s regulations and guidance? [see 29 CFR §1614.203(d)(3)]
<b>Brief Description of Program Deficiency</b>	C.2.c.1. Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR §1614.203(d)(5)(v)] If “yes”, please provide the internet address in the comments column.
<b>Brief Description of Program Deficiency</b>	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]
<b>Brief Description of Program Deficiency</b>	D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.

**Section IV: Plan to Recruit and Hire Individuals with Disabilities**

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

**A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES**

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

The Agency administers one of the best recruitment programs within USDA. There are HR Liaisons, Civil Rights Liaisons, Recruiter Liaisons, that report to both Program Owners at Headquarters and an Executive Officer at every Regional Office responsible for managing the plan to recruit and hire individual with disabilities in accordance with 29 CFR 1614.203(d)(1)(i) and (ii). HR personnel are responsible to craft and monitor an annual priority plan that includes the identification of resources to focus on program deficiencies to bring the Agency back to compliance and so that we maintain required benchmarks.

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 PWTDD for positions in the permanent workforce

The Agency uses Schedule A authority to hire and recruit PWD and PTWD for permanent positions at FNCS. Hiring managers are fully aware of the benefits of hiring diverse candidates to include PWD and PTWD.

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.

1) In order to be eligible for employment through the Schedule A non-competitive process, job seekers must provide documentation of their disability. Such documentation is used to verify that the individual being hired is indeed a person with a disability. This documentation must be attached to the applicant's resume. Documentation of eligibility for employment under Schedule A can be obtained from a licensed medical professional (e.g., a physician or other medical professional certified to practice medicine by a state, the District of Columbia, or a U.S. territory; a licensed vocational rehabilitation specialist; or any Federal, State or agency of the District of Columbia or a U.S. territory that issues or provides disability benefits). 2) Once the applicant is found eligible, the Headquarters National Office Recruiter will share the application with the Hiring Official who submitted a vacancy for posting. The Headquarters reviewer also coordinates with appropriate recruiter and the FSIS, Agency's HR Service Provider. Below is a snapshot of the steps taken when reviewing and placing the applicant: Hiring Manager/AO/HR Liaison will provide Recruiter with the hiring package. a. Complete hiring package must include: i. Recruit 52 Form ii. Schedule A candidate's application iii. PD and cover sheet for each grade iv. Appendix A b. The Recruiter will work with FSIS to determine candidate's qualifications. If candidate qualifies for the position provided, the FSIS HR Specialist will proceed with the hiring action.

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

Answer Yes

The Agency provides annual training and also targeted training on an as-needed basis to all hiring managers and personnel that assists them in the process such as HR Liaisons and Deputy Officers. New Supervisory training is conducted annually and Special hiring authorities training is conducted quarterly.

**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 PWTDD, in securing and maintaining employment.

The Agency has established a close partnership with various networks to assist in identifying and hiring PWD and PWTDD. The USDA Disability Employment Network is a team of external contacts used to help recruit and refer pre-screened, qualified applicants with disabilities for specific job vacancies; the Diversity Notification List (DNL) is an email contact listing of more than 200 organizations, institutions of higher learning and affinity groups which may be excellent resources for acquiring applications from a broad spectrum of diverse, talented individuals. The listing includes organizations participating in the Disability Employment Network and the Agency is on its distribution; the Outreach Job Notice (OJN) is a network source the Agency uses to disseminate notices outlining the vacancy information including the position title, series, grade, location, duties and qualifications required at FNCS. Outreach Job Notices are shared with the Network and the DNL organizations with the objective of soliciting and receiving applications from interested candidates. We share job openings and requirements with these sources before official posting. The objective is to provide advance notice so that pre-screened candidates can be identified, considered and even hired before posting.

**C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)**

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

- a. New Hires for Permanent Workforce (PWD) Answer Yes
- b. New Hires for Permanent Workforce (PWTD) Answer Yes

Due to a hiring freeze, FNCS has no new hires for FY2018. Moving forward into FY2019, FNCS will focus on partnering with the Wounded Warrior Project, National Center on Disability and Journalism and American Association of People with Disabilities.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	0				
% of Qualified Applicants	0				
% of New Hires	0				

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

- a. New Hires for MCO (PWD) Answer Yes
- b. New Hires for MCO (PWTD) Answer Yes

Yes, FNCS triggers are any decreases to the current number of current permanent employees with PWD. We closely monitors the 12% and 2% benchmarks, However, we need to determine why PWD and PWTD are not being considered for positions in these series (301 and 343).

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	

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

- a. Qualified Applicants for MCO (PWD) Answer Yes
- b. Qualified Applicants for MCO (PWTD) Answer Yes

Yes, FNCS triggers are any decreases to the current number of current permanent employees with PWD. We closely monitors the 12% and 2% benchmarks, However, we need to determine why PWD and PWTD are not being considered for positions in these series (301 and 343).

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

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

Yes, FNCS triggers are identified as any decrease to the current number of permanent employees with PWD within the benchmarks of 12% and 2%. However, we must review career developmental opportunities and details that are offered that assist PWD to obtain a different skillset and obtain marketable skills.

## 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 PWT, have sufficient opportunities for advancement.

All employees, regardless of disability may participate in the Employee Development Program/National Training Program, which is designed to satisfy the occupationally specific, task oriented training required of an employee to be successful in their job and be competitive for advancement to higher grades. There is no special training tailored to employees with disabilities which is not offered to all employees.

### B. CAREER DEVELOPMENT OPPORTUNITIES

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

FNS provides employees in grades GS5 through GS15 with leadership development training, professional skills development, and rotational/detail opportunities on an ongoing basis. SES personnel development is managed by the USDA Office of Executive Services. We utilize a Leadership Continuum methodology to incorporate targeted competencies into each of the development programs, with increasing competency levels as employee's progress through the various programs. FNS does not ask applicants to any of the following programs to disclose if they have a disability. The following describes the leadership continuum programs available to employees. Senior Executive Service Candidate Development Program (SESCDP) is hosted by USDA, who solicits applicants from the Agency's. This program is for high performing GS14's and GS15's and is designed to further develop SES candidates' competencies in each of the Executive Core Qualifications (ECQs). Graduates of SESCDPs who are certified by OPM's Qualifications Review Board (QRB) may receive an initial career SES appointment without further competition. QRB-certified graduates typically start their SESCDP with experiences normally obtained at the GS-15 level, or equivalent. Federal Executive Institute (FEI) programs are designed to help executives perform effectively as the top leaders of the American civil service. As leaders with responsibility for running the agencies that defend, protect, regulate, and support our nation and its citizens, and for working effectively with each Presidential Administration and its political appointees, Federal executives are unique among managers. Performance is not measured by "bottom line" numbers or market indicators. Stewardship of the public trust requires a clear understanding of the basic values that support the democratic process and literacy in the fundamental documents that express those belief systems. Managerial Excellence Program (MEP), is a unique learning experience for professional and personal growth, serves to develop FNCS leadership by providing high-quality training to current managers who want to lead the organization in meeting its future challenges. Leadership Institute (LI) is comprised of three components: training, developmental assignments, and leading teams. The first component is classroom based training. The second component is developmental assignments which are self-directed. Each participant will identify activities, including, but not limited to a 30 day rotation, individual change initiative, and a capstone project. The final component is leading teams, where the participants will work on an individual change initiative and a capstone project. Aspiring Leaders Program (ALP) is a 4 month program and will prepare employees at the GS 5-11 levels with Leadership Development skills for future challenges. The program is designed for classroom learning, developmental work assignments, and self-study assignments to be completed inside and outside the classroom. These avenues will allow participant(s) to meet specific individual & team development skills while acquiring leadership developmental skills for the 21st Century. Participants will learn to strengthen their leadership abilities and interpersonal skills through teambuilding and team performance, conflict management, cultural awareness, and other transformations which will stimulate commitment to personal and professional development. Career Development Program (CDP) is the occupationally specific, task oriented training program to develop the skills and competencies required of each mission critical occupational series within FNCS. The program consists of directed study, individual knowledge review, and both formal and informal training sessions. Mentoring Program Career Coaching Program (CCP)

is aligned with the FNS Career Pathing Guides (CPG’s) which provide competency/skill requirements by occupational series and grade within the Agency. The career coaching program is designed to foster an appreciation of the requirements for each grade level, and for the employees to self-evaluate their strengths and weaknesses against these established metrics. Presidential Management Council Inter-agency Rotation (PM CIR) enables emerging Federal leaders to expand their leadership competencies, broaden their organizational experiences, and foster networks they can leverage in the future

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	1	0	0%	0%	0%	0%
Fellowship Programs	3	1	0%	0%	0%	0%
Mentoring Programs	15	15	1(6.6%)	1(6.6%)	0%	0%
Coaching Programs	30	20	2(6.6%)	1(5.0%)	1(3.33)	1(5.0%)
Training Programs	0	0	0%	0%	0%	0%
Detail Programs	1	1	0%	0%	0%	0%
Other Career Development Programs	197	48	2(1.86)	2(4.16)	1(0.93)	1(2.08)

3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWD) Answer No
- b. Selections (PWD) Answer No

Employees with PWD are treated no differently than employees without identified disabilities, and compete for acceptance into each program in the leadership continuum utilizing the same criteria as employees without disabilities. Individuals with reasonable accommodations requirements who are accepted into any of the programs will have those requirements incorporated into the program plan for their individual cohort.

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWTD) Answer No
- b. Selections (PWTD) Answer No

Employees with PWTD are treated no differently than employees without identified disabilities, and compete for acceptance into each program in the leadership continuum utilizing the same criteria. Individuals with reasonable accommodations requirements who are accepted into any of the programs will have those requirements incorporated into the program plan for their individual cohort.

**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 No
- b. Awards, Bonuses, & Incentives (PWTD) Answer No

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards: 1-9 hours : Total Time-Off Awards Given	258	12.40	85.66	5.04	7.36
Time-Off Awards: 9+ hours : Total Time-Off Awards Given	495	10.30	85.45	2.63	7.68

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$100 - \$500: Total Cash Awards Given	97	17.53	82.47	9.28	8.25
Cash Awards: \$501+: Total Cash Awards Given	1632	10.91	89.09	2.51	8.39

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance- based pay increases? If “yes”, please describe the trigger(s) in the text box.
- a. Pay Increases (PWD) Answer No
  - b. Pay Increases (PWTD) Answer No

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Quality Step Increases (QSI): Total QSIs Awarded	16	6.25	93.75	0.00	6.25
Performance Based Pay Increase	0	0.00	0.00	0.00	0.00

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.
- a. Other Types of Recognition (PWD) Answer No
  - b. Other Types of Recognition (PWTD) Answer No

**D. PROMOTIONS**

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- a. SES
    - i. Qualified Internal Applicants (PWD) Answer No
    - ii. Internal Selections (PWD) Answer No
  - b. Grade GS-15

i. Qualified Internal Applicants (PWD)	Answer	No
ii. Internal Selections (PWD)	Answer	No
c. Grade GS-14		
i. Qualified Internal Applicants (PWD)	Answer	No
ii. Internal Selections (PWD)	Answer	No
d. Grade GS-13		
i. Qualified Internal Applicants (PWD)	Answer	No
ii. Internal Selections (PWD)	Answer	No

2. Does your agency have a trigger involving PWT/D 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 (PWT/D)	Answer	No
ii. Internal Selections (PWT/D)	Answer	No
b. Grade GS-15		
i. Qualified Internal Applicants (PWT/D)	Answer	No
ii. Internal Selections (PWT/D)	Answer	No
c. Grade GS-14		
i. Qualified Internal Applicants (PWT/D)	Answer	No
ii. Internal Selections (PWT/D)	Answer	No
d. Grade GS-13		
i. Qualified Internal Applicants (PWT/D)	Answer	No
ii. Internal Selections (PWT/D)	Answer	No

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires to SES (PWD)	Answer	No
b. New Hires to GS-15 (PWD)	Answer	No
c. New Hires to GS-14 (PWD)	Answer	No
d. New Hires to GS-13 (PWD)	Answer	No

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires to SES (PWTD) Answer No
- b. New Hires to GS-15 (PWTD) Answer No
- c. New Hires to GS-14 (PWTD) Answer No
- d. New Hires to GS-13 (PWTD) Answer No

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

- a. Executives
  - i. Qualified Internal Applicants (PWD) Answer No
  - ii. Internal Selections (PWD) Answer No
- b. Managers
  - i. Qualified Internal Applicants (PWD) Answer No
  - ii. Internal Selections (PWD) Answer No
- c. Supervisors
  - i. Qualified Internal Applicants (PWD) Answer No
  - ii. Internal Selections (PWD) Answer No

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

- a. Executives
  - i. Qualified Internal Applicants (PWTD) Answer No
  - ii. Internal Selections (PWTD) Answer No
- b. Managers
  - i. Qualified Internal Applicants (PWTD) Answer No
  - ii. Internal Selections (PWTD) Answer No
- c. Supervisors

- i. Qualified Internal Applicants (PWTD) Answer No
- ii. Internal Selections (PWTD) Answer No

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

- a. New Hires for Executives (PWD) Answer No
- b. New Hires for Managers (PWD) Answer No
- c. New Hires for Supervisors (PWD) Answer No

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

- a. New Hires for Executives (PWTD) Answer No
- b. New Hires for Managers (PWTD) Answer No
- c. New Hires for Supervisors (PWTD) Answer No

## Section VI: Plan to Improve Retention of Persons with Disabilities

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

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer Yes

The Agency identified a need to automate exit surveys for voluntary and involuntary separations. We have been analyzing separation data to identify barriers in retaining employees with disabilities to ensure access to technology and facilities for PWD and PWTD. We also included a plan to provide information om the reasonable accommodation program and workplace personal assistance services. To date, we have succeed in automating the on-boarding process of PWD and PWTD and we are now expanding the program to include, off-boarding PWD and PWTD which includes an automated exit survey. An automatic tracking system will be so much more efficient to analyze and report the findings to key stakeholders to improve retention of PWD and PWTD.

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 No
- b. Involuntary Separations (PWD) Answer No

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permenant Workforce	1451	12.20	87.80
Total Separations	100	14.00	86.00
Voluntary Separations	99	14.14	85.86
Involuntary Separations	1	0.00	100.00

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 No
- b. Involuntary Separations (PWTD) Answer No

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permenant Workforce	1451	4.00	96.00
Total Separations	100	4.00	96.00
Voluntary Separations	99	4.04	95.96
Involuntary Separations	1	0.00	100.00

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.

FNCS analyzes the results of the exit interviews, but have not identified a separation trigger rate. Due to FNCS being a small agency, all separations by PWD are analyzed.

**B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES**

Pursuant to 29 CFR §1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the agency’s public website for its notice explaining employees’ and applicants’ rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

<https://www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer>

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

<https://www.ascr.usda.gov/filing-program-discrimination-complaint-usda-customer>

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.

Currently, FNCS follows the USDA 508 requirements to address the technology and building accessibility to meet the needs of

persons with disabilities. In FY2018, FNCS and facilities staff plans to develop and implement new standards for building inspections, facility upgrades, improved accessibility and expanding the scope of technology services to meet the needs of persons with disabilities

**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.)

The current FNCS process to consider a reasonable accommodation begins within five days of receipt of the request (either orally or written). The timeframe to approve and provide an accommodation should be completed in no more than 30 days.

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

FNCS timely processes RA requests upon receipt, provides training for supervisors, managers, and employees. FNCS also collaborates with the USDA Target Center to obtain assistance with technology and ergonomic needs and provides timely notifications to staff of their approval status or denial of the request. All reasonable accommodations are tracked via internal tracker. Each week the reasonable accommodations program manager (RAPM) briefs the Branch Chief on the status of new requests, ongoing cases and cases that are closed. The interactive process is used at all phases of the RA process. RAPM conducts annual training for new supervisors.

**D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE**

*Pursuant to 29 CFR §1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.*

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

FNCS processes requests for Personal Assistance Services as a reasonable accommodations request within 5 days of receipt. The processing timeframes are the same for PAS requests and a determination to approve or deny the request should be completed within no more than 30 days. These PAS services will also be included in the new Reasonable accommodation policy and procedures.

**Section VII: EEO Complaint and Findings Data**

**A. EEO COMPLAINT DATA INVOLVING HARASSMENT**

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

Answer 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 No

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.

There were no findings of discrimination in FY 2018

**B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION**

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

Answer No

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

Answer No

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

There were two EEO cases initiated in FY 2017 and settled in FY 2018. One EEO case was initiated in FY 2018 and settled in FY 2018.

**Section VIII: Identification and Removal of Barriers**

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

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

Answer No

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

Answer No

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

<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>PWD and PTWD decreased for FY 2018 in the permanent workforce.</p>
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p>

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

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

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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.

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