

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

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

### Section I: Efforts to Reach Regulatory Goals

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

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

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

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

\*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

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

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

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10					
Grades GS-11 to SES					

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

FNS manages an internal workforce demographics dashboard and a recruitment actions tracker, which is updated each Pay Period, and uploaded to an internal SharePoint site for all FNS management officials with responsibility for the hiring process. Senior leadership is briefed on recruitment efforts, status of vacancies, and other pertinent recruitment information on a quarterly basis. HRD holds regular interactions and sends regular communications to HR Liaisons who are responsible for updating and communicating hiring requirements to managers, hiring managers who are responsible for working with HR to develop appropriate recruitment strategies to reach targeted populations.

### 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

FNS has a full time Reasonable Accommodation Program Manager. This position works closely with the HR staffing team to administer the reasonable accommodation program, partnering on the hiring of PWD and overseeing the advancement program currently in place at FNS.

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	
Section 508 Compliance	1	0	0	
Processing reasonable accommodation requests from applicants and employees	1	0	0	
Processing applications from PWD and PWTD	3	0	0	
Architectural Barriers Act Compliance	1	0	0	
Answering questions from the public about hiring authorities that take disability into account	3	0	0	
Special Emphasis Program for PWD and PWTD	3	0	0	

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

Staff working in these programs attend classroom and webinar training, as well as attend conferences related to recruitment, hiring and reasonable accommodation. Staff utilize information and knowledge gain from these experiences to further educate the FNS workforce.

**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

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

<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>Objective</b>	The Agency EEO and HR offices will work together to implement the Affirmative Action Plan for Individuals with Disabilities.		
<b>Target Date</b>	Sep 30, 2020		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2020		Meet to discuss authorities for non-competitive hiring of qualified Persons with Disabilities and targeted disabilities.
	Sep 30, 2020		Coordinate Barrier Analysis training.
	Sep 30, 2020		Explore strategies to increase the rate by which applicants provide demographic data for hiring and advancement opportunities within FNS.
	Sep 30, 2020		Conduct Barrier Analysis utilizing Applicant Flow Data.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]		
<b>Objective</b>	The Agency will update the existing survey that allows for respondent feedback on the recruitment, hiring, inclusion and retention, and advancement of individuals with disabilities.		
<b>Target Date</b>	Sep 30, 2020		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2020		Revise the current exit survey to incorporate demographic information and allow respondents the ability to self-identify if they are an individual with a disability.
	Sep 30, 2020		Begin distributing the updated exit survey as a common practice to all employees leaving the Agency.
	Sep 30, 2020		Discuss the importance of the exit survey process with supervisors during new supervisor and supervisor refresher trainings.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

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

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

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

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

FNS has a multifaceted recruitment program. HR Liaisons, Civil Rights Liaisons, and Recruitment Liaisons functionally report to program owners at the National level and are responsible for managing the plan to recruit and hire individuals with disabilities in

accordance with 29 CFR 1614.203(d)(1)(i) and (ii). In FY 2019, FNS regained its delegated authority for multiple HR disciplines, to include hiring. FNS maintains Delegated Examining and Merit Promotion procedures and has developed resources for hiring managers to utilize targeted recruitment strategies. FNS developed a Hiring Authorities resource guide that details various competitive, non-competitive and other special hiring authorities. As part of the hiring process, HR and the hiring manager conduct a strategic recruitment conversation which provides an opportunity for HR to educate managers on special hiring authorities, including those for PWD. HR personnel are responsible for operating procedures and assisting management in focusing on program deficiencies to ensure the Agency maintains 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 PWTD for positions in the permanent workforce

FNS utilizes multiple pathways to recruit for PWD and PWTD, including Schedule A and 30 Percent or More Disabled Veterans. These allow the Agency to fill critical vacancies with quality candidates, in a timely manner. HR provides resources and education to hiring managers on the benefits of utilizing these flexibilities to hire diverse candidates to include PWD and PWTD.

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.

In order to be eligible for employment through noncompetitive appointment for PWD, 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 with 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). Once the applicant is found eligible, the HR staffing team will share the application with the hiring manager who submitted a vacancy for posting. Below is a snapshot of the steps taken when reviewing and placing the applicant: Hiring Manager/AO/HR Liaison will provide HR with the hiring package. A complete hiring package must include: 1) Recruit 52 Form 2) Schedule A candidate’s application and 3) PD and cover sheet for each grade. HR will determine the candidate’s qualifications, and if the candidate qualifies for the position, 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 has provided several sessions in FY 2019 for hiring managers about the recruitment and hiring process, to include competitive and non-competitive hiring authorities. This was also provided twice in FY 2019 to new FNS supervisors as part of their training requirements. Additionally, an FNS Hiring Authorities resource guide was developed.

**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 has established a partnership with various networks to assist in identifying and hiring PWD and PWTD over the past several years, however, the effectiveness of these relationships was limited within the shared service relationship FNS previously operated under. Now that FNS retained its delegated hiring authority and built an internal staffing and recruiting team, the Agency plans to do more focused and targeted outreach to organizations and networks for PWD and PWTD.

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

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

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

The permanent hiring rate for employees with disabilities (4.55%) in FY 2019 was below the federal goal of 12%. No individuals with targeted disabilities were hired in the FNS permanent workforce in FY 2019.

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 N/A
- b. New Hires for MCO (PWTD) Answer N/A

Due to USDA transitioning from eRecruit to the USA Staffing electronic hiring system in March 2019, FNCS was unable to obtain accurate applicant flow data for the FY 2019 reporting period. FNCS will ensure applicant data with all the necessary demographic information is available in FY 2020 in order to conduct the appropriate barrier analysis.

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 N/A
- b. Qualified Applicants for MCO (PWTD) Answer N/A

Due to USDA transitioning from eRecruit to the USA Staffing electronic hiring system in March 2019, FNCS was unable to obtain accurate applicant flow data for the FY 2019 reporting period. FNCS will ensure applicant data with all the necessary demographic information is available in FY 2020 in order to conduct the appropriate barrier analysis.

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 N/A
- b. Promotions for MCO (PWTD) Answer N/A

Due to USDA transitioning from eRecruit to the USA Staffing electronic hiring system in March 2019, FNCS was unable to obtain accurate applicant flow data for the FY 2019 reporting period. FNCS will ensure applicant data with all the necessary demographic information is available in FY 2020 in order to conduct the appropriate barrier analysis.

## Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

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

### A. ADVANCEMENT PROGRAM PLAN

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

All employees, regardless of disability status 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 the higher grades.

### B. CAREER DEVELOPMENT OPPORTUNITES

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

FNS provides employees in grades GS-5 through GS-15 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, which solicits applicants from the Agencies. This program is for high performing GS-14’s and GS-15’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 FNS 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 that 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 FNS. 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	NA	12	NA	0	NA	0
Training Programs	0	0	0	0	0	0
Mentoring Programs	0	0	0	0	0	0
Other Career Development Programs	57	25	14	28	3	4
Coaching Programs	12	12	58	58	8	8
Fellowship Programs	0	0	0	0	0	0
Detail Programs	NA	NA	NA	NA	NA	NA

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

Triggers do not exist.

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

Triggers do not exist.

**C. AWARDS**

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

- a. Awards, Bonuses, & Incentives (PWD) Answer Yes
- b. Awards, Bonuses, & Incentives (PWTD) Answer Yes

The inclusion rates of permanent employees that received a Cash Award between \$100 and \$500 for Persons with Disabilities (2.78%) and Persons with Targeted Disabilities (3.45%) were lower than the inclusion rate for persons with no disabilities (4.18%). The inclusion rates of permanent employees that received a Cash Award of more than \$500 for Persons with Disabilities (71.67%) and Targeted Disabilities (56.90%) were lower than the inclusion rate for persons with no disabilities (90.57%). The inclusion rate of individuals with targeted disabilities in the permanent workforce that received a Time Off Award of more than 9 hours (12.07%), was lower than the inclusion rate of persons no disability (15.83%). The inclusion rate of individuals with targeted disabilities in the permanent workforce that received a Time Off Award of 1 to 9 Hours (8.62%) was lower than the inclusion rate for persons with no disabilities (9.35%).

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards					

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

- a. Pay Increases (PWD) Answer Yes
- b. Pay Increases (PWTD) Answer Yes

The inclusion rates of permanent employees that received a QSI of individuals with disabilities (0.56%) and with targeted disabilities (0%) were lower than the inclusion rate of persons with no disabilities (1.15%).

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
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 N/A
- b. Other Types of Recognition (PWTD) Answer N/A

The agency does not have any other types of employee recognition programs.

**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 N/A
  - ii. Internal Selections (PWD) Answer N/A
- b. Grade GS-15
  - i. Qualified Internal Applicants (PWD) Answer N/A

ii. Internal Selections (PWD)	Answer	N/A
c. Grade GS-14		
i. Qualified Internal Applicants (PWD)	Answer	N/A
ii. Internal Selections (PWD)	Answer	N/A
d. Grade GS-13		
i. Qualified Internal Applicants (PWD)	Answer	N/A
ii. Internal Selections (PWD)	Answer	N/A

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2. Does your agency have a trigger involving PWTB 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 (PWTB)	Answer	N/A
ii. Internal Selections (PWTB)	Answer	N/A
b. Grade GS-15		
i. Qualified Internal Applicants (PWTB)	Answer	N/A
ii. Internal Selections (PWTB)	Answer	N/A
c. Grade GS-14		
i. Qualified Internal Applicants (PWTB)	Answer	N/A
ii. Internal Selections (PWTB)	Answer	N/A
d. Grade GS-13		
i. Qualified Internal Applicants (PWTB)	Answer	N/A
ii. Internal Selections (PWTB)	Answer	N/A

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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	N/A
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- b. New Hires to GS-15 (PWD) Answer N/A
- c. New Hires to GS-14 (PWD) Answer N/A
- d. New Hires to GS-13 (PWD) Answer N/A

Due to USDA transitioning from eRecruit to the USA Staffing electronic hiring system in March 2019, FNCS was unable to obtain accurate applicant flow data for the FY 2019 reporting period. FNCS will ensure applicant data with all the necessary demographic information be available in FY 2020 in order to conduct the appropriate barrier analysis.

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 N/A
- b. New Hires to GS-15 (PWTD) Answer N/A
- c. New Hires to GS-14 (PWTD) Answer N/A
- d. New Hires to GS-13 (PWTD) Answer N/A

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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 N/A
  - ii. Internal Selections (PWD) Answer N/A
- b. Managers
  - i. Qualified Internal Applicants (PWD) Answer N/A
  - ii. Internal Selections (PWD) Answer N/A
- c. Supervisors
  - i. Qualified Internal Applicants (PWD) Answer N/A
  - ii. Internal Selections (PWD) Answer N/A

Due to USDA transitioning from eRecruit to the USA Staffing electronic hiring system in March 2019, FNCS was unable to obtain accurate applicant flow data for the FY 2019 reporting period. FNCS will ensure applicant data with all the necessary demographic information be available in FY 2020 in order to conduct the appropriate barrier analysis.

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 N/A
  - ii. Internal Selections (PWTD) Answer N/A
- b. Managers
  - i. Qualified Internal Applicants (PWTD) Answer N/A
  - ii. Internal Selections (PWTD) Answer N/A
- c. Supervisors
  - i. Qualified Internal Applicants (PWTD) Answer N/A
  - ii. Internal Selections (PWTD) Answer N/A

Due to USDA transitioning from eRecruit to the USA Staffing electronic hiring system in March 2019, FNCS was unable to obtain accurate applicant flow data for the FY 2019 reporting period. FNCS will ensure applicant data with all the necessary demographic information be available in FY 2020 in order to conduct the appropriate barrier analysis

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 N/A
  - b. New Hires for Managers (PWD) Answer N/A
  - c. New Hires for Supervisors (PWD) Answer N/A

Due to USDA transitioning from eRecruit to the USA Staffing electronic hiring system in March 2019, FNCS was unable to obtain accurate applicant flow data for the FY 2019 reporting period. FNCS will ensure applicant data with all the necessary demographic information be available in FY 2020 in order to conduct the appropriate barrier analysis.

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

Due to USDA transitioning from eRecruit to the USA Staffing electronic hiring system in March 2019, FNCS was unable to obtain accurate applicant flow data for the FY 2019 reporting period. FNCS will ensure applicant data with all the necessary demographic information be available in FY 2020 in order to conduct the appropriate barrier analysis.

## 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

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

a. Voluntary Separations (PWD) Answer Yes

b. Involuntary Separations (PWD) Answer No

The inclusion rate of voluntary separations in the FNS workforce for FY 2019 of individuals with disabilities (11.98%) was higher than the inclusion rate of persons with no disabilities (8.69%).

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %

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

a. Voluntary Separations (PWTD) Answer Yes

b. Involuntary Separations (PWTD) Answer No

The inclusion rate of voluntary separations in the FNS workforce for FY 2019 of individuals with targeted disabilities (11.32%) was higher than the inclusion rate of persons with no disabilities (8.69%).

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %

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.

FNS will make updates to the exit survey in FY 2020 to include demographic information, to ensure that demographic information is available in FY 2020 to conduct the appropriate barrier analysis.

**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.usda.gov/accessibility-statement>

- 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.usda.gov/accessibility-statement>

- 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.

During FY 2020 FNS HQ will be moving to a different building in the same geographical area. The agency will assess any accessibility needs or improvements in its new facilities.

### 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.

- 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 FNS process to consider a reasonable accommodation request 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.

- 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.

FNS timely processes RA requests upon receipt, provides training for supervisors, managers, and employees. FNS also collaborates with the USDA Target Center to obtain assistance with technology and ergonomic needs and provides timely notifications to the staff of their approval status or denial of the request. All reasonable accommodations requests are tracked via the 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. Additionally, FNS worked with USDA OHRM to implement a new electronic tracking system for RA requests effective in FY 2020.

### 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.

FNS processes requests for Personal Assistance Services the same as a reasonable accommodations request within five days of receipt. The processing timeframes for Personal Assistance Services are also the same for reasonable accommodations requests and a determination to approve or deny the request should be completed within no more than 30 days.

## Section VII: EEO Complaint and Findings Data

### A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer Yes

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

Answer 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.

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?

Answer Yes

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

Answer Yes

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

N/A

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

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

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

Answer Yes

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

Answer Yes

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

<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>1.a. Permanent hiring rates of PWD and PWTD is below the Federal goals of 12% and 2% 1.b. Voluntary separations inclusion rates for PWD and PWTD are higher than Persons With no Disabilities.</p>							
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p>							
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>FNS previously lost its delegated hiring authority which caused challenges to recruitment and hiring</p>							
<p><b>Objective</b></p>	<p>Reduction in number of complaints citing disability and reasonable accommodations.</p> <table border="1" data-bbox="483 926 1503 1066"> <tr> <td><b>Date Objective Initiated</b></td> <td>Oct 30, 2019</td> </tr> <tr> <td><b>Target Date For Completion Of Objective</b></td> <td>Sep 30, 2020</td> </tr> </table>				<b>Date Objective Initiated</b>	Oct 30, 2019	<b>Target Date For Completion Of Objective</b>	Sep 30, 2020
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<b>Target Date For Completion Of Objective</b>	Sep 30, 2020							
<p><b>Responsible Officials</b></p>	<p>Allen Hatcher Human Resources Director</p>							
<p><b>Target Date (mm/dd/yyyy)</b></p>	<p><b>Planned Activities</b></p>	<p><b>Sufficient Staffing &amp; Funding (Yes or No)</b></p>	<p><b>Modified Date (mm/dd/yyyy)</b></p>	<p><b>Completion Date (mm/dd/yyyy)</b></p>				
<p>09/30/2020</p>	<p>Analyze complaint data</p>	<p>Yes</p>						
<p>05/30/2019</p>	<p>Appoint new FNS Reasonable Accommodation Program Manager.</p>	<p>Yes</p>		<p>11/24/2019</p>				
<p>09/30/2020</p>	<p>Conduct training for supervisor regarding reasonable accommodations</p>	<p>Yes</p>						
<p>09/30/0202</p>	<p>Conduct Anti-Harassment training</p>	<p>Yes</p>						
<p>09/30/2020</p>	<p>Offer training/orientation to FNS employees regarding disability awareness</p>	<p>Yes</p>						
<p>09/01/2020</p>	<p>Conduct 3 compliance reviews and compile report of findings.</p>	<p>Yes</p>						
<p>09/30/2020</p>	<p>Disseminate anti-harassment policy statement and procedures to Agency employees, once finalized by USDA</p>	<p>Yes</p>						
<p>09/30/2020</p>	<p>Collect and evaluate grievance data</p>	<p>Yes</p>						
<p>09/01/2020</p>	<p>Conduct EEO training for FNS national and regional offices.</p>	<p>Yes</p>						
<p><b>Fiscal Year</b></p>	<p><b>Accomplishments</b></p>							
<p>2019</p>	<p>New FNCS Reasonable Accommodations Program Manager was appointed.</p>							
<p>2019</p>	<p>FNCS is participating in the USDA Anti-Harassment policy work group. The work group will update the Anti-Harassment policy statement as well as issue a Departmental Regulation.</p>							
<p>2020</p>	<p>On 10/1/2019, FNCS implemented LERIS, an electronic system that will allow better collection and reporting of grievance activity data.</p>							

<b>BARRIER ANALYSIS:</b> Provide a description of the steps taken and data analyzed to determine cause of the condition.				
<b>STATEMENT OF IDENTIFIED BARRIER:</b> Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.		Changes in reasonable accommodation program staff.		
<b>Objective</b>		Reduction in number of complaints citing disability and reasonable accommodations.		
		<b>Date Objective Initiated</b>	Oct 30, 2019	
		<b>Target Date For Completion Of Objective</b>	Sep 30, 2020	
<b>Responsible Officials</b>		Allen Hatcher Human Resources Director		
<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
09/30/2020	Analyze complaint data	Yes		
05/30/2019	Appoint new FNS Reasonable Accommodation Program Manager.	Yes		11/24/2019
09/30/2020	Conduct training for supervisor regarding reasonable accommodations	Yes		
09/30/0202	Conduct Anti-Harassment training	Yes		
09/30/2020	Offer training/orientation to FNS employees regarding disability awareness	Yes		
09/01/2020	Conduct 3 compliance reviews and compile report of findings.	Yes		
09/30/2020	Disseminate anti-harassment policy statement and procedures to Agency employees, once finalized by USDA	Yes		
09/30/2020	Collect and evaluate grievance data	Yes		
09/01/2020	Conduct EEO training for FNS national and regional offices.	Yes		
<b>Fiscal Year</b>	<b>Accomplishments</b>			
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2019	FNCS is participating in the USDA Anti-Harassment policy work group. The work group will update the Anti-Harassment policy statement as well as issue a Departmental Regulation.			
2020	On 10/1/2019, FNCS implemented LERIS, an electronic system that will allow better collection and reporting of grievance activity data.			

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

No factors exist at present.

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