

USDA Food and Nutrition Service

For period covering October 1, 2018 to September 30, 2019

<b>PART A</b> Department or Agency Identifying Information	<b>1. Agency</b>	<b>1.</b> USDA Food and Nutrition Service
	<b>1.a</b> 2nd level reporting component	
	<b>2. Address</b>	<b>2.</b> 1320 Park Center Drive
	<b>3. City, State, Zip Code</b>	<b>3.</b> Alexandria, VA 22314
	<b>4. Agency Code</b>   <b>5. FIPS code(s)</b>	<b>4.</b> AG30   <b>5.</b> 4986

<b>PART B</b> Total Employment	<b>1.</b> Enter total number of permanent full-time and part-time employees	<b>1.</b> 1364
	<b>2.</b> Enter total number of temporary employees	<b>2.</b> 38
	<b>3. TOTAL EMPLOYMENT [add lines B 1 through 2]</b>	<b>4.</b> 1402

<b>PART C</b>	<b>Title Type</b>	<b>Name</b>	<b>Title</b>
Agency Official(s) Responsible For Oversight of EEO Program(s)	Head of Agency	Sonny Perdue	Secretary of Agriculture
	Head of Agency Designee	Pamilyn Miller	Administrator
	Principal EEO Director/Official	Roberto Contreras	Director, Civil Rights Division
	Affirmative Employment Program Manager	Paul Neubelt	Branch Chief, EEO/ADR Branch
	Complaint Processing Program Manager	Paul Neubelt	Branch Chief, EEO/ADR Branch
	Diversity & Inclusion Officer	Susan Siemietkowski	Director, Management Services
	Hispanic Program Manager (SEPM)	Jason Turner	E&T Program Analyst, SWRO
	Women's Program Manager (SEPM)	Jennifer Nagy	Program Specialist, MARO
	Disability Program Manager (SEPM)	Susan Siemietkowski	Director, Management Services
	Special Placement Program Coordinator (Individuals with Disabilities)	Joanie Dilone	Agency Recruiter
	Reasonable Accommodation Program Manager	Frederick Cheng	Reasonable Accommodations Manager
	Anti-Harassment Program Manager	Allen Hatcher	Human Resources Director
	ADR Program Manager	Paul Neubelt	Branch Chief, EEO/ADR Branch
	Compliance Manager	Paul Neubelt	Branch Chief, EEO/ADR Branch
	Principal MD-715 Preparer	Sheila McKie	Equal Opportunity Specialist
Other EEO Staff	Samantha Rivera	Counselor	

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<b>PART D</b> List of Subordinate Components Covered in This Report	<b>Subordinate Component and Location (City/State)</b>	<b>Country</b>	<b>Agency Code</b>
	USDA Food and Nutrition Service Alexandria, VA	United States	AG30
	USDA Food and Nutrition Service Chicago, IL	United States	AG30
	USDA Food and Nutrition Service Boston, MA	United States	AG30
	USDA Food and Nutrition Service Robbinsville, NJ	United States	AG30
	USDA Food and Nutrition Service Denver, CO	United States	AG30
	USDA Food and Nutrition Service Atlanta, GA	United States	AG30
	USDA Food and Nutrition Service San Francisco, CA	United States	AG30
	USDA Food and Nutrition Service Dallas, TX	United States	AG30

<b>EEOC FORMS and Documents</b>	<b>Required</b>	<b>Uploaded</b>	
Agency Strategic Plan	Y	Y	
Alternative Dispute Resolution Procedures	Y	Y	
Anti-Harassment Policy and Procedures	Y	Y	
EEO Policy Statement	Y	Y	
Organization Chart	Y	Y	
Personal Assistance Services Procedures	Y	Y	
Reasonable Accommodation Procedure	Y	Y	
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	N	Y	
Disabled Veterans Affirmative Action Program (DVAAP) Report	N	N	
Diversity Policy Statement	N	N	
EEO Strategic Plan	N	N	
Federal Equal Opportunity Recruitment Program (FEORP) Report	N	N	
Human Capital Strategic Plan	N	N	

EXECUTIVE SUMMARY: MISSION

Food, Nutrition, and Consumer Services

Period covering October 1, 2018 – September 30, 2019

The Food, Nutrition, and Consumer Services (FNCS) mission is to increase food security and reduce hunger in partnership with cooperating organizations by providing children and low-income people access to food, a healthy diet, and nutrition education in a manner that supports American agriculture and inspires public confidence. FNCS achieves its mission by ensuring all children and families have the food they need through its food assistance programs and comprehensive nutrition education efforts, enhancing the lives of Americans and setting them up for success and self-reliance.

The Civil Rights Division (CRD) of FNCS is the designated office responsible for implementing the Agency's overall continuing affirmative employment program, which promotes equal employment opportunity (EEO) and identifies and eliminates discriminatory practices and policies. It fosters workplace equality by ensuring FNCS follows EEO principles throughout the Agency and is committed to furthering the Agency's efforts to fulfill its obligations to operate a model EEO program.

EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

**Element A. Demonstrated Commitment from Agency Leadership.**

Agency leadership emphasizes there is zero-tolerance for any form of discrimination or harassment. Additionally, Agency leadership continues to communicate that every employee and applicant will be provided equal employment opportunity for all employees and applicants for employment, regardless of their race, religion, color, sex (including pregnancy, gender identity and sexual orientation), national origin, age, genetic information, disability, parental or familial status, political beliefs, receipt of public assistance, equal pay/compensation, harassment, or reprisal or retaliation for prior civil rights activity.

The EEO policy statement is posted on the FNCS public website and intranet, along with other EEO related materials so employees may find the information they need. Additionally, all policies are disseminated through email to ensure that employees are up-to-date on their rights and responsibilities. There is also an EEO brochure that identifies the EEO process and the counselors' contact information. Counselor information is available on the public website and intranet for easy access.

**Element B. Integration of EEO into the Agency's Strategic Mission.**

To ensure EEO is integrated into the Agency's strategic mission, the Civil Rights (CR) Director reports directly to the Administrator, and EEO goals are incorporated in the Agency's Priority Plan. The CR Director is responsible for all aspects of the EEO program, from personnel and budget to investigations, workforce changes, training, and EEO reporting. The CR Director also participates in senior meetings and provides status reports on the state of the EEO program to Agency leadership on a bi-weekly basis.

The Agency ensures managers and supervisors are trained in effective communication, interpersonal, and managerial skills, as it relates to EEO.

**Element C. Management and Program Accountability.**

Consistent with guidance from the Equal Employment Opportunity Commission (EEOC), FNCS conducts EEO compliance reviews to assess Regional staffs' compliance with EEO laws and to determine the effectiveness of the EEO program.

Managers and supervisors are held accountable for compliance with EEO laws and evaluated on them via their performance work plans. They are instructed in anti-harassment, reasonable accommodation, and personal assistance service policies. Managers and supervisors are also aware that EEO officials are available to assist them in EEO matters.

While there were no findings in FY 2019, FNCS is poised to take action, as necessary, in the event of a finding of discrimination. There are disciplinary policies in place and a table of penalties that cover discriminatory conduct.

EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

**Element D. Proactive Prevention of Unlawful Discrimination.**

FNCS assesses its divisions, as necessary, to prevent unlawful discrimination. FNCS' Human Resources Division (HRD) conducts exit interviews to assist with inclusion and hiring. The Agency also conducts Civil Rights Impact Analyses on all reorganizations to identify and alleviate any civil rights impacts on individuals within protected groups. In FY 2019, as a preventive measure, CRD hosted 12 EEO trainings on subjects such as harassment, age discrimination, reasonable accommodations, and retaliation.

**Element E. Efficiency.**

FNCS, in conjunction with the U.S. Department of Agriculture's (USDA) Office of the Assistant Secretary for Civil Rights, has a neutral EEO process and alternative dispute resolution process. Complaint data is captured in the iComplaints System and is analyzed to provide data for the No Fear Act report and the 462 report. It also provides data necessary to make adjustments to the different EEO programs.

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**EXECUTIVE SUMMARY: WORKFORCE ANALYSES**

	CLF 2010	FY 19 Total	FY 19 %	FY 18 Total	FY 18 %
Hispanic Male	5.17%	37	2.64%	40	2.74%
Hispanic Female	4.79%	56	3.99%	64	4.38%
White Male	38.33%	277	19.76%	284	19.44%
White Female	34.03%	516	36.80%	540	36.96%
Black Male	5.49%	107	7.63%	110	7.53%
Black Female	6.53%	283	20.19%	297	20.33%
Asian Male	1.97%	35	2.50%	37	2.53%
Asian Female	1.93%	56	3.99%	57	3.90%
Amer Ind/AN Male	0.55%	2	0.14%	2	0.14%
Amer Ind/AN Female	0.53%	6	0.43%	5	0.34%
Native Hawaiian Male	0.07%	0	0%	0	0%
Native Hawaiian Female	0.07%	1	0.07%	2	0.14%
Two or More Races Male	0.25%	6	0.43%	6	0.41%
Two or More Races Female	0.28%	20	1.43%	17	1.16%
Disability	12.00%	167	11.91%	180	12.32%
Targeted Disability	2.00%	53	3.78%	59	4.04%

White female, Black male and female, Asian male and female, Two or More Races male and female, and Targeted Disability participation rates exceeded their CLF. The following groups have consistently had less than expected participation rate: Hispanic males and females, White males; American Indian/Alaska Native males and females and Native Hawaiian males. It is recommended FNS conduct a barrier analysis to determine the root causes(s) of the low participation rates in the aforementioned groups.

The next table shows the net changes between the total, permanent, and temporary workforces. The total workforce and the permanent workforce for FNCS decreased in Fiscal Year (FY) 2019; however, the temporary workforce increased in comparison to FY 2018.

**Total Workforce**

	FNCS Total Workforce	FNCS Permanent Workforce	Temporary Workforce	Total Disabilities	Total Targeted Disabilities	Permanent Disabilities	Permanent Targeted Disabilities
FY 2018	1,454	1,445	9	183	59	180	58
FY 2019	1,402	1,364	38	167	53	165	52

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**EXECUTIVE SUMMARY: WORKFORCE ANALYSES**

Difference	-52	-81	29	-16	-6	-15	-6
Net Change	-3.58%	-5.61%	322.22%	-8.74%	-10.17%	-8.33%	-10.34%

The organization saw a net change of -3.58% in the total workforce and -5.61% in the permanent workforce. There was also a net change in the total workforce for Persons with Disabilities (-8.74%) and Persons with Targeted Disabilities (-10.17%) and the permanent workforce for Persons with Disabilities (-8.33%) and Persons with Targeted Disabilities (-10.34%). Further analysis of the organization and its retention strategies may help to identify the cause(s) for the negative net changes.

**Participation Rates - Total/Permanent Workforce with Civil Labor Force Percentages**

Group	Participation Rate in Total Workforce	CLF	Permanent Workforce
Males	33.10%	51.86%	33.21%
Females	66.90%	48.14%	66.79%
Hispanic Males	2.64%	5.17%	2.71%
Hispanic Females	3.99%	4.79%	3.96%
White Males	19.76%	38.33%	19.65%
White Females	36.80%	34.03%	36.22%
Black Males	7.63%	5.49%	7.77%
Black Females	20.19%	6.53%	20.67%
Asian Males	2.50%	1.97%	2.49%
Asian Females	3.99%	1.93%	4.03%
American Indian/AN Males	0.14%	0.55%	0.15%
American Indian/AN Females	0.43%	0.53%	0.44%
Native Hawaiian Males	0%	0.07%	0%
Native Hawaiian Females	0.07%	0.07%	0.07%

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**EXECUTIVE SUMMARY: WORKFORCE ANALYSES**

Disability	11.91%	12.00%	12.10%
Targeted Disability	3.78%	2.00%	3.81%

According to EEOC, the Civilian Labor Force (CLF) is the sum of the employed, at work during the enumeration week, the employed, not at work during the enumeration week, and the unemployed, including both experienced and new entrant jobless who were seeking work. The CLF is 51.86% for Males and 48.14% for Females. At FNCS Males represent 33.10% of the total workforce, well below the CLF. Females represent 66.90% of the total workforce, well above the CLF.

For FY 2019, Males, Hispanic (Males and Females), White Males, American Indian/Alaska Native (Males and Females), Native Hawaiian or Other Pacific Islander Males, and Persons with Disabilities were below their respective CLF. During FY 2019, Persons with Targeted Disabilities in FNCS' total workforce was higher (3.78%) than EEOC's target goal of 2 percent. Notwithstanding the need to develop better recruiting strategies to increase the participation rate of male employees, FNCS is still meeting its commitment towards maintaining a racially and ethnically diverse workforce.

**Total Workforce**

**Net Decreases**

Category	Males	Females
Total	-2.73%	-3.99%
Hispanic	-19.57%	-26.32%
White	-.72%	-3.37%
Black	-4.46%	-4.07%
Asian	-5.41%	-1.75%
Native Hawaiian/Pacific Islander	0%	-50%
American Indian/Alaska Native	0%	0%
Two or More Races	200.00%	185.71%
Disabilities	-8.74%	
Persons with Targeted Disabilities	-10.17%	

Overall, most categories in the total workforce experienced a net decrease in FY 2019. There was no change in Native Hawaiian/Pacific Islander Males, American Indian/Alaska Native Males, and American Indian/Alaska Native Females; each continued to represent less than 1% of the total workforce. There was a net increase in persons identifying as Two or more races for the FY (Males 200% and Females

**EXECUTIVE SUMMARY: WORKFORCE ANALYSES**

185.71%).

**Permanent Workforce**

Category	Males	Females
Total Permanent	-4.63%	-6.08%
Hispanic	-19.57%	-28.95%
White	-3.94%	-6.62%
Black	-5.36%	-3.75%
Asian	-2.86%	-3.51%
Native Hawaiian/Pacific Islander	0%	-50.00%
American Indian/Alaska Native	0%	0%
Two or more Races	200.00%	171.43%
Persons with Disabilities	-8.33%	
Persons with Targeted Disabilities	-10.34%	

FNCS Permanent Workforce mimicked the total workforce in decreases also for the FY.

Native Hawaiian/Pacific Islander Males, American Indian/Alaska Native Males, and Females saw no change. Two or more races also saw an increase (Males 200.00% and Females 171.43%).

Budget, hiring constraints, and a high volume of separations due to resignations and retirements, continue to contribute to the dramatic population shift in the Total Workforce.

**Temporary Workforce**

Category		Males	Females

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**EXECUTIVE SUMMARY: WORKFORCE ANALYSES**

Total Temporary	100% (38)	28.95% (11)	71.05% (27)
Hispanic		0%	5.26% (2)
White		23.68% (9)	57.89% (22)
Black or African American		2.63% (1)	2.63% (-1)
Asian		2.63% (-1)	2.63% (1)
Native Hawaiian/Pacific Islander		0%	0%
American Indian/Alaska Native		0%	0%
Two or More Races		0%	2.63% (1)
Persons with Disabilities		-33.33% (-1)	

The Temporary Workforce, on the other hand, saw an increase in the Total Males and Females categories and particularly in the White Males and Females categories. The Black Female, Asian Male, and Persons with Disabilities categories saw decreases in the Temporary workforce.

The categories that remained the same were Hispanic Males and Females, Black Males, Asian Females, Native Hawaiian/Pacific Islander Males and Females, American Indian/Alaska Native Males and Females, Native Hawaiian/Pacific Islander Males and Females, and Persons with Targeted Disabilities.

**Organizational Component Categories**

A review of the organization components revealed that there are inconsistencies in the demographics of the units. The organization components support that male representation is inconsistent in that only one component has an equal amount of representation of males and females. All other components show that males represent less than half of each unit. Another inconsistency is that in each unit there is at least 40% White representation, which suggests a trend that may need further inquiry.

**Occupational Categories**

Currently, USDA uses a 10% variance from the baseline (in this case Total Workforce) to determine disproportionate impact. As numbers improve over time, we may reduce the 10% variance. In the future we plan to analyze statistical variance.

The Occupational participation rate for Total Officials and Managers for the following groups was consistent with their respective participation rate in the Total workforce (Occupational participation Rate/Total workforce participation rate): Males (32.37%/ 33.10%); Females (67.63%/66.90%); Hispanic Males (2.79%/2.64%); White Males (18.02%/19.76%); White Females (35.81%/36.80%); Black Males (7.44%/7.63%); Asian Males (2.56%/2.50%); Asian Females (3.84%/3.99%); Disability (11.41%/11.91%); and Targeted Disability (3.46%/3.78%).

The Occupational participation rate for Total Officials and Managers for the following groups was disproportionately higher than their respective rate in the Total workforce (Occupational Category Rate/Total Workforce): Hispanic Females (5.70%/3.99%); Black Females (22.44%/20.19%); and Native Hawaiian Females (0.09%/0.07%).

The Occupational participation rate for Total Officials and Managers for the following groups was disproportionately lower than their respective rate in the Total workforce: American Indian/Alaska Native Males (0.19%/0.4%) and American Indian/Alaska Native Females

**EXECUTIVE SUMMARY: WORKFORCE ANALYSES**

(0.37%/0.43%).

**Permanent Hires**

The Permanent Hiring Rate for the following groups was disproportionately higher than their respective participation rate in the Total workforce (Permanent Hiring Rate/Total Workforce): Hispanic Females (4.55%/3.99%); White Males (22.73%/19.76%); White Females (40.91%/36.8%); Black Males (9.09%/7.63%); and American Indian/Alaska Native Females (2.27%/0.43%).

Permanent Hiring Rate for the following groups was consistent with their respective participation rate in the Total Workforce (Permanent Hiring Rate/Total Workforce): Males (31.82%/33.10%); Females (68.18%/66.90%); and Black Females (18.18%/20.19%).

Permanent Hiring Rate for the following groups was disproportionately lower than their respective participation rate in the Total Workforce (Permanent Hiring Rate/Total Workforce): Hispanic Males (0%/2.64%); Asian Males (0%/2.50%); Asian Females (2.27%/3.99%); American Indian/Alaska Native Males (0%/0.14%); Native Hawaiian Females (0%/0.07%); Disability (4.55%/11.91%); and Targeted Disabilities (0%/3.78%).

**Internal Selections for Senior-Level Positions (GS 13/14, GS 15, and SES)**

Due to USDA transitioning from eRecruit to the USA Staffing electronic hiring system in March 2019, FNS was unable to obtain accurate applicant flow data for the FY 2019 reporting period. In FY 2020, FNCS will develop a plan to ensure applicant flow data is collected to conduct analyses for the internal selection for senior-level positions.

**Voluntary Separations**

The Voluntary Separation Rate for the following groups was higher than their respective participation rate in the Total Workforce: Hispanic Males (3.08%/2.64%); Hispanic Females (7.69%/3.99%); White Females (41.54%/36.80%); Disability (15.38%/11.91%); and Targeted Disability (4.62%/3.78%).

The Voluntary Separation Rate for the following groups was consistent with their respective participation rate in the Total Workforce: Females (70.77%/66.90%); Black Males 6.92%/7.63%); Black Females (18.46%/20.19%); and Native Hawaiian Females (0.77%/0.07%).

The Voluntary Separation Rate for the following groups was inconsistent with their respective participation rate in the Total Workforce: Males (29.23%/33.10%); White Males (17.69%/19.76%); Asian Males (1.54%/2.50%); and Asian Females (2.31%/3.99%).

**EXECUTIVE SUMMARY: ACCOMPLISHMENTS**

1. In February 2019, FNCS received delegated authority to provide day-to-day human resources services, including position management, position classification, basic pay and leave administration, employment and staffing, benefits administration, awards, and related human resources operational support.
2. FNCS organized diversity and inclusion observances for each of the special emphasis groups.
3. FNCS's CRD exceeded the USDA Departmental requirement by providing 12 Agency-wide training opportunities to all FNCS employees and managers on topics such as the EEO process, reasonable accommodations, harassment, age discrimination, and ADR.
4. FNCS's CRD completed two additional EEO Case Law Study trainings for regional staff in the Mountain Plains Regional Office and the Southeast Regional Office.
5. FNCS's CRD completed three equal employment opportunity compliance reviews in FY 2019.

**EXECUTIVE SUMMARY: PLANNED ACTIVITIES**

- 1. FNCS's CRD and HRD plan to work together to implement the Affirmative Action Plan for Persons with Disabilities and conduct a Barrier Analysis of the Agency.**
- 2. FNCS's HRD plans to improve the representation of Hispanics in the total workforce.**
- 3. FNCS's EEO staff will coordinate a Barrier Analysis Training.**
- 4. FNCS's HRD will review and update the Reasonable Accommodations procedures in accordance with new Departmental regulations.**
- 5. FNCS's CRD will participate on the Departmental Anti-Harassment Workgroup to develop a Departmental Regulation on Anti-harassment and receive guidance on the appropriate training.**
- 6. FNCS's HRD will develop a plan to ensure applicant flow data is collected in FY 2020.**
- 7. FNCS's HRD will develop strategies to help improve the retention of Persons with Targeted Disabilities in the total workforce.**
- 8. FNCS's CRD will develop marketing strategies to encourage staff participation in the ADR process.**

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**CERTIFICATION of ESTABLISHMENT of CONTINUING  
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS**

[Redacted] am the  
(Insert Name Above) (Insert official title/series/grade above)

Principal EEO Director/Official for

[Redacted]  
(Insert Agency/Component Name above)

The agency has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and, as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program, are included with this Federal Agency Annual EEO Program Status Report.

The agency has also analyzed its work force profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure or practice is operating to disadvantage any group based on race, national origin, gender or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.

I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.

\_\_\_\_\_  
Signature of Principal EEO Director/Official  
Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Agency Head or Agency Head Designee

\_\_\_\_\_  
Date

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Agency Self-Assessment Checklist

Essential Element: A Demonstrated Commitment From agency Leadership

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Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	A.1. The agency issues an effective, up-to-date EEO policy statement.				
A.1.a. Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "Yes", please provide the annual issuance date in the comments column. [see MD-715, ll(A)]				X	Food, Nutrition, and Consumer Services (FNCS) did not issue a separate policy from USDA. USDA's Civil Rights policy statement was issued May 9, 2018, via the Secretary's OneUSDA Phase III – Civil Rights e-mail. However, the printed version was not signed and dated on agency letterhead. The same policy statement was used for the FY 2019 reporting period. 5/9/2018
A.1.b. Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)] If the EEO policy statement covers any additional bases (e.g., marital status, veteran status and political affiliation), please list them in the comments column.				X	Food, Nutrition, and Consumer Services (FNCS) did not issue a separate policy from USDA. USDA's Civil Rights policy statement was issued May 9, 2018, via the Secretary's OneUSDA Phase III – Civil Rights e-mail. However, the printed version was not signed and dated on agency letterhead. The same policy statement was used for the FY 2019 reporting period.

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Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	A.2. The agency has communicated EEO policies and procedures to all employees.				
	A.2.a. Does the agency disseminate the following policies and procedures to all employees:				
	A.2.a.1. Anti-harassment policy? [see MD 715, II(A)]	X			
	A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]	X			
	A.2.b. Does the agency prominently post the following information throughout the workplace and on its public website:				
	A.2.b.1. The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R. § 1614.102(b)(7)]	X			
	A.2.b.2. Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 CFR §1614.102(b)(5)]	X			
	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.	X			<a href="https://fns-prod.azureedge.net/sites/default/files/resource-files/Reasonable%20Accommodati%20Procedures.pdf">https://fns-prod.azureedge.net/sites/default/files/resource-files/Reasonable%20Accommodati%20Procedures.pdf</a>
	A.2.c. Does the agency inform its employees about the following topics:				
	A.2.c.1. EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If "yes", please provide how often and the means by which such training is delivered.	X			Annually, during training.
	A.2.c.2. ADR process? [see MD-110, Ch. 3(II)(C)] If "yes", please provide how often.	X			Annually, during training.
	A.2.c.3. Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If "yes", please provide how often.	X			Annually, during training.
	A.2.c.4. Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If "yes", please provide how often.	X			Annually, during training.
	A.2.c.5. Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR §2635.101(b)] If "yes", please provide how often.	X			Annually, during training.

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Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	A.3. The agency assesses and ensures EEO principles are part of its culture.				
	A.3.a. Does the agency provide recognition to employees, supervisors, managers and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a)(9)] If "yes", provide one or two examples in the comments section. .	X			Each employee's Performance Work Plan includes an EEO and Diversity and Inclusion Element. Employees receive awards in recognition of outstanding efforts throughout any given year as a part of their Performance Work Plan which include EEO and Diversity and Inclusion.
	A.3.b. Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	X			

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Agency Self-Assessment Checklist

Essential Element: B Integration of EEO into the agency's Strategic Mission

 Compliance Indicator	 Measures	Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
B.1. The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.					
B.1.a. Is the agency head the immediate supervisor of the person ("EEO Director") who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]		X			The Administrator, agency head, for the Food and Nutrition Service is the immediate supervisor of the EEO Director.
B.1.a.1. If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If "yes," please provide the title of the agency head designee in the comments.				X	The EEO Director reports to the Administrator.
B.1.a.2. Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]		X			
B.1.b. Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]		X			
B.1.c. During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comments column.		X			April 22, 2019
B.1.d. Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]		X			

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	B.2. The EEO Director controls all aspects of the EEO program.				
	B.2.a. Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)] If not, identify the office with this authority in the comments column.	X			
	B.2.b. Is the EEO Director responsible for overseeing the completion of EEO counseling? [see 29 CFR §1614.102(c)(4)]	X			
	B.2.c. Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]			X	The Office of the Assistant Secretary for Civil Rights (OASCR) is responsible for overseeing investigations. This is not an FNCS function.
	B.2.d. Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]			X	The Office of the Assistant Secretary for Civil Rights (OASCR) is responsible for overseeing the timely issuance of final agency decisions. This is not an FNCS function.
	B.2.e. Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	X			
	B.2.f. Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]	X			
	B.2.g. If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2); (c)(3)]	X			

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	B.3. The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.				
B.3.a. Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]		X			
B.3.b. Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.		X			Goal 3.2: Maintain excellence in Civil Rights training and closure of Civil Rights complaints. Objective 3.2c: Complete onsite EEOC-compliance reviews and trainings in three regions.

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	B.4. The agency has sufficient budget and staffing to support the success of its EEO program.				
	B.4.a. Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:				
	B.4.a.1. to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	X			
	B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]	X			
	B.4.a.11. to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	X			
	B.4.a.2. to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	X			
	B.4.a.3. to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR §§ 1614.102(c)(5); 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	X			
	B.4.a.4. to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.	X			
	B.4.a.5. to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]	X			
	B.4.a.6. to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	X			
	B.4.a.7. to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)] If not, please identify the systems with insufficient funding in the comments section.	X			
	B.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]	X			
	B.4.a.9. to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I; EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C. 1]	X			
	B.4.b. Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	X			
	B.4.c. Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	X			
	B.4.d. Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II) (A) of MD-110?	X			
	B.4.e. Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	X			

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	B.5. The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills				
	B.5.a. Pursuant to 29 CFR §1614.102(a)(5), have all managers and supervisors received orientation, training, and advice on their responsibilities under the following areas under the agency EEO program:				
	B.5.a.1. EEO complaint process? [see MD-715(II)(B)]	X			
	B.5.a.2. Reasonable Accommodation Procedures? [see 29 CFR § 1614.102(d)(3)]	X			
	B.5.a.3. Anti-harassment policy? [see MD-715(II)(B)]	X			
	B.5.a.4. Supervisory, managerial, communication and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	X			
	B.5.a.5. ADR, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	X			
 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	B.6. The agency involves managers in the implementation of its EEO program.				
	B.6.a. Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	X			
	B.6.b. Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	X			
	B.6.c. When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	X			
	B.6.d. Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR §1614.102(a)(5)]	X			

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Essential Element: C Management and Program Accountability

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	C.1. The agency conducts regular internal audits of its component and field offices.				
C.1.a. Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.		X			May 8, 2019 July 24, 2019 July 31, 2019
C.1.b. Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.		X			May 8, 2019 July 24, 2019 July 31, 2019
C.1.c. Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]		X			

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	C.2. The agency has established procedures to prevent all forms of EEO discrimination.				
	C.2.a. Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]			X	FNCS did not issue a separate policy from USDA. FNCS has accepted and adopted USDA's anti-harassment policy in accordance with the Secretary's OneUSDA guidance.
	C.2.a.1. Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]			X	FNCS did not issue a separate policy from USDA. FNCS has accepted and adopted USDA's anti-harassment policy in accordance with the Secretary's OneUSDA guidance.
	C.2.a.2. Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	X			
	C.2.a.3. Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	X			
	C.2.a.4. Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [See Enforcement Guidance, V.C.]	X			
	C.2.a.5. Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see Complainant v. Dep't of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Dep't of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.	X			
	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)]	X			
	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)]	X			
	C.2.b.1. Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR §1614.203(d)(3)(D)]	X			
	C.2.b.2. Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	X			
	C.2.b.3. Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR §1614.203(d)(1)(ii)(B)]	X			

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C.2.b.4. Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR §1614.203(d)(3)(i)(M)]	X			
C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.	X			
C.2.c. Has the agency established procedures for processing requests for personal assistance services that comply with EEOC’s regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR §1614.203(d)(6)]	X			
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.	X			<a href="https://www.fns.usda.gov/civil-rights/personal-assistance-services">https://www.fns.usda.gov/civil-rights/personal-assistance-services</a>

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	C.3. The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.				
	C.3.a. Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	X			
	C.3.b. Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:				
	C.3.b.1. Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]	X			
	C.3.b.2. Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	X			
	C.3.b.3. Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	X			
	C.3.b.4. Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	X			
	C.3.b.5. Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	X			
	C.3.b.6. Provide disability accommodations when such accommodations do not cause an undue hardship? [ see 29 CFR §1614.102(a)(8)]	X			
	C.3.b.7. Support the EEO program in identifying and removing barriers to equal opportunity?. [see MD-715, II(C)]	X			
	C.3.b.8. Support the anti-harassment program in investigating and correcting harassing conduct?. [see Enforcement Guidance, V.C.2]	X			
	C.3.b.9. Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	X			
	C.3.c. Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	X			
	C.3.d. When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	X			

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	C.4. The agency ensures effective coordination between its EEO program and Human Resources (HR) program.				
	C.4.a. Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	X			
	C.4.b. Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]	X			
	C.4.c. Does the EEO office have timely access to accurate and complete data (e.g., demographic data for the workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	X			
	C.4.d. Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	X			
	C.4.e. Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:				
	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]		X		Action plans to correct the program deficiency are included in Part H.
	C.4.e.2. Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	X			
	C.4.e.3. Develop and/or provide training for managers and employees? [see MD-715, II(C)]	X			
	C.4.e.4. Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	X			
	C.4.e.5. Assist in preparing the MD-715 report? [see MD-715, II(C)]	X			

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	C.5. Following a finding of discrimination, the agency explores whether it should take a disciplinary action.				
	C.5.a. Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR §1614.102(a)(6); see also Douglas v. Veterans Administration, 5 MSPR 280 (1981)]	X			
	C.5.b. When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If "yes", please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	X			There were no disciplined/sanctioned individuals during this reporting period.
	C.5.c. If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct (e.g., post mortem to discuss lessons learned)? [see MD-715, II(C)]	X			There were no findings of discrimination during this reporting period.
 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures	C.6. The EEO office advises managers/supervisors on EEO matters.				
	C.6.a. Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If "yes", please identify the frequency of the EEO updates in the comments column.	X			EEO updates are provided monthly.
	C.6.b. Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [see MD-715 Instructions, Sec. I]	X			

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Agency Self-Assessment Checklist

Essential Element: D Proactive Prevention

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	D.1. The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.	Yes	No	N/A	
	D.1.a. Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	X			
	D.1.b. Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; and/or external special interest groups? [see MD-715 Instructions, Sec. I]	X			
	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)]		X		Action plans to correct the program deficiency are included in Part H.
 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures	D.2. The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	Yes	No	N/A	
	D.2.a. Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	X			
	D.2.b. Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	X			
	D.2.c. Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	X			
	D.2.d. Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, and/or external special interest groups? [see MD-715 Instructions, Sec. I] If "yes", please identify the data sources in the comments column.	X			Complaint/grievance data

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	D.3. The agency establishes appropriate action plans to remove identified barriers.				
	D.3.a. Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]		X		Action plans to correct the program deficiency are included in Part H.
	D.3.b. If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]		X		Action plans to correct the program deficiency are included in Part H.
	D.3.c. Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]		X		Action plans to correct the program deficiency are included in Part H.
 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures	D.4. The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.	Yes	No	N/A	
	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.	X			<a href="https://www.ascr.usda.gov/sites/default/files/AffirmativeAction">https://www.ascr.usda.gov/sites/default/files/AffirmativeAction</a>
	D.4.b. Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR §1614.203(d)(1)(i)]	X			
	D.4.c. Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR §1614.203(d)(1)(ii)(A)]	X			
	D.4.d. Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR §1614.203(d)(7)(ii)]	X			

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Essential Element: E Efficiency

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	E.1. The agency maintains an efficient, fair, and impartial complaint resolution process.				
E.1.a. Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?		X			
E.1.b. Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?		X			
E.1.c. Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?				X	This is an Office of the Assistant Secretary for Civil Rights function. This is not an FNCS function.
E.1.d. Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments.				X	This is an Office of the Assistant Secretary for Civil Rights function. This is not an FNCS function.
E.1.e. Does the agency ensure that all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?		X			
E.1.f. Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?				X	This is an Office of the Assistant Secretary for Civil Rights function. This is not an FNCS function.
E.1.g. If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?				X	This is an Office of the Assistant Secretary for Civil Rights function. This is not an FNCS function.
E.1.h. When the complainant did not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?				X	This is an Office of the Assistant Secretary for Civil Rights function. This is not an FNCS function.

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E.1.i. Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?			X	This is an Office of the Assistant Secretary for Civil Rights function. This is not an FNCS function.
E.1.j. If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comments column.			X	This is an Office of the Assistant Secretary for Civil Rights function. This is not an FNCS function.
E.1.k. If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	X			
E.1.l. Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	X			

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Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	E.2. The agency has a neutral EEO process.				
E.2.a. Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)] If "yes", please explain.		X			The defense structure is a function of the USDA Office of the General Counsel.
E.2.b. When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If "yes", please identify the source/ location of the attorney who conducts the legal sufficiency review in the comments column.				X	The USDA Office of the General Counsel conducts legal sufficiency reviews. This is not an FNCS function.
E.2.c. If the EEO office relies on the agency's defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]				X	The USDA Office of the General Counsel conducts legal sufficiency reviews. This is not an FNCS function
E.2.d. Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]				X	The USDA Office of the General Counsel conducts legal sufficiency reviews. This is not an FNCS function
E.2.e. If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004)]				X	The USDA Office of the General Counsel conducts legal sufficiency reviews. This is not an FNCS function

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Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	E.3. The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.				
	E.3.a. Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	X			
	E.3.b. Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	X			
	E.3.c. Does the Agency encourage all employees to use ADR, where ADR is appropriate? [See MD-110, Ch. 3(IV)(C)]	X			
	E.3.d. Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	X			
	E.3.e. Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	X			
	E.3.f. Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	X			
 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	E.4. The agency has effective and accurate data collection systems in place to evaluate its EEO program.				
	E.4.a. Does the agency have systems in place to accurately collect, monitor, and analyze the following data:				
	E.4.a.1. Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	X			
	E.4.a.2. The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	X			
	E.4.a.3. Recruitment activities? [see MD-715, II(E)]	X			
	E.4.a.4. External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]	X			
	E.4.a.5. The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(4)]	X			
	E.4.a.6. The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	X			
	E.4.b. Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	X			

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	E.5. The agency identifies and disseminates significant trends and best practices in its EEO program.				
E.5.a. Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If "yes", provide an example in the comments.		X			On a monthly basis, the EEO offices develops a report capturing the status of all complaints. This includes a report tracking all bases which allows us to view trends. With this report, we determined Harassment was a main basis and offered harassment training in FY 2019.
E.5.b. Does the agency review other agencies' best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If "yes", provide an example in the comments.		X			We are currently reviewing Forest Service's and the Department of Transportations' Harassment program documents and best practices. We are also reviewing USDA NIFA's EEOC-approved reasonable accommodation and Personal Assistance Services standard operating procedures.
E.5.c. Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]		X			

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Agency Self-Assessment Checklist

Essential Element: F Responsiveness and Legal Compliance

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	F.1. The agency has processes in place to ensure timely and full compliance with EEOC orders and settlement agreements.				
	F.1.a. Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	X			
	F.1.b. Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	X			
	F.1.c. Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	X			
	F.1.d. Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	X			
	F.1.e. When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX) (H)]	X			
 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	F.2.a. Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	X			
	F.2.a.1. When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]	X			
	F.2.a.2. When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]	X			
	F.2.a.3. When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 CFR §1614.403(e)]	X			
	F.2.a.4. Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	X			

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Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			
 Measures		Yes	No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
F.3.a. Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	F.3. The agency reports to EEOC its program efforts and accomplishments.			X	This is a function of Office of the Assistant Secretary for Civil Rights.
F.3.b. Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]				X	<a href="https://www.usda.gov/nofear">https://www.usda.gov/nofear</a>

Essential Element:  Other

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Plan to Attain Essential Elements

PART H.1

STATEMENT of  
MODEL PROGRAM  
ESSENTIAL ELEMENT  
DEFICIENCY:

C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]

The Agency's EEO Office and HR office did not collaborate on implementing the Affirmative Action Plan for Individuals with Disabilities.

**OBJECTIVE:**

Date Objective Initiated: Oct 1, 2019      Target Date For Completion Of Initiative: Sep 30, 2020

The Agency EEO and HR offices will work together to implement the Affirmative Action Plan for Individuals with Disabilities.

**Responsible Official**

Allen Hatcher  
Roberto Contreras

**Planned Activities**

<i>Target Date</i>	<i>Planned Activity</i>
Sep 30, 2020 12:00 AM	Meet to discuss authorities for non-competitive hiring of qualified Persons with Disabilities and targeted disabilities.
Sep 30, 2020 12:00 AM	Coordinate Barrier Analysis training.
Sep 30, 2020 12:00 AM	Explore strategies to increase the rate by which applicants provide demographic data for hiring and advancement opportunities within FNS.
Sep 30, 2020 12:00 AM	Conduct Barrier Analysis utilizing Applicant Flow Data.

**Report of Accomplishments  
and Modifications to  
Objective**

USDA Food and Nutrition Service

For period covering October 1, 2018 to September 30, 2019

Plan to Attain Essential Elements

PART H.2

STATEMENT of  
MODEL PROGRAM  
ESSENTIAL ELEMENT  
DEFICIENCY:

D.3.a. Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]

The Agency does not currently analyze employment data, identify barriers or tailor action plans to particular policies, procedures, or practices.

**OBJECTIVE:**

*Date Objective Initiated:* Oct 1, 2019      *Target Date For Completion Of Initiative:* Sep 30, 2020

The Agency will analyze employment data, on an annual basis to identify barriers and tailor specific policies, procedures and practices.

**Responsible Official**

Allen Hatcher  
Roberto Contreras

**Planned Activities**

<i>Target Date</i>	<i>Planned Activity</i>
Sep 30, 2020 12:00 AM	Report analysis on an annual basis to the Agency Administrator.
Sep 30, 2020 12:00 AM	Establish a work group to include Human Resources (HR), Civil Rights and the Special Emphasis Program, to conduct a barrier analysis.
Sep 30, 2020 12:00 AM	Coordinate a barrier analysis training for the workgroup.

**Report of Accomplishments  
and Modifications to  
Objective**

USDA Food and Nutrition Service

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Plan to Attain Essential Elements

PART H.3

STATEMENT of  
MODEL PROGRAM  
ESSENTIAL ELEMENT  
DEFICIENCY:

D.3.c. Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]

The Agency did not identify barriers during the reporting period and therefore did not implement a plan in Part I. The Agency has not established a process of periodically reviewing the effectiveness of the plans.

**OBJECTIVE:**

Date Objective Initiated:

Oct 1, 2019

Target Date For Completion Of Initiative:

Sep 30, 2020

The Agency will analyze action plans on a bi-annual basis.

**Responsible Official**

Roberto Contreras

Allen Hatcher

**Planned Activities**

Target Date

Planned Activity

Sep 30, 2020 12:00 AM

Establish a work group to include Human Resources (HR), Civil Rights and the Special Emphasis Program, to conduct a barrier analysis.

Sep 30, 2020 12:00 AM

Report analysis on an annual basis to the Agency Administrator.

Sep 30, 2020 12:00 AM

Coordinate a barrier analysis training to the workgroup.

Sep 30, 2020 12:00 AM

Work group will review and revise action plan as necessary on a bi-annual basis

**Report of Accomplishments  
and Modifications to  
Objective**

USDA Food and Nutrition Service

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Plan to Attain Essential Elements

PART H.4

STATEMENT of  
MODEL PROGRAM  
ESSENTIAL ELEMENT  
DEFICIENCY:

D.3.b. If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]

The Agency did not identify barriers during the reporting period and therefore did not implement a plan in Part I.

**OBJECTIVE:**

Date Objective Initiated: Oct 1, 2019      Target Date For Completion Of Initiative: Sep 30, 2020

The Agency will analyze employment data, identify barriers and implement corrective action plans.

**Responsible Official**

Roberto Contreras  
Allen Hatcher

**Planned Activities**

<i>Target Date</i>	<i>Planned Activity</i>
Sep 30, 2020 12:00 AM	Work group will review and revise action plan as necessary on a bi-annual basis.
Sep 30, 2020 12:00 AM	Coordinate a barrier analysis training to the workgroup.
Sep 30, 2020 12:00 AM	Establish a work group to include Human Resources (HR), Civil Rights and the Special Emphasis Program, to conduct a barrier analysis.
Sep 30, 2020 12:00 AM	Report analysis on an annual basis to the Agency Administrator.

**Report of Accomplishments  
and Modifications to  
Objective**

USDA Food and Nutrition Service

For period covering October 1, 2018 to September 30, 2019

Plan to Attain Essential Elements

PART H.5

STATEMENT of  
MODEL PROGRAM  
ESSENTIAL ELEMENT  
DEFICIENCY:

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)]

The Agency does not collect demographic information from respondents and does not allow for responses to specify how the agency can improve the recruitment, hiring, inclusion and retention, and advancement for individuals with disabilities.

<b>OBJECTIVE:</b>	<b><u>Date Objective Initiated:</u></b> Oct 1, 2019	<b><u>Target Date For Completion Of Initiative:</u></b> Sep 30, 2020
	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>Responsible Official</b>	Allen Hatcher
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	<b><i>Target Date</i></b>	<b><i>Planned Activity</i></b>
<b>PlannedActivities</b>	Sep 30, 2020 12:00 AM	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 12:00 AM	Begin distributing the updated exit survey as a common practice to all employees leaving the Agency.
	Sep 30, 2020 12:00 AM	Discuss the importance of the exit survey process with supervisors during new supervisor and supervisor refresher trainings.

<b>Report of Accomplishments and Modifications to Objective</b>	
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USDA Food and Nutrition Service

For period covering October 1, 2018 to September 30, 2019

Plan to Eliminate Identified Barriers

PART I.1

**STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:**

Provide a brief narrative describing the condition at issue.

How was the condition recognized as a potential barrier?

Low participation rate (0%) of Hispanic Females in the Senior Executive Service. Low hiring rate of Hispanic Females in the permanent workforce. High voluntary separation rate of Hispanic Females.

**STATEMENT OF BARRIER GROUPS:**

*Barrier Group*

Hispanic or Latino Females

**MD-715 – Part J**  
**Special Program 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

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: 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.

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.

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 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.

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 SESCOs 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 SESCO 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%).

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%).

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

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.

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

d. New Hires to GS-13 (PWTB)

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.

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 PWTB 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 (PWTB)

Answer N/A

ii. Internal Selections (PWTB)

Answer N/A

b. Managers

i. Qualified Internal Applicants (PWTB)

Answer N/A

ii. Internal Selections (PWTB)

Answer N/A

c. Supervisors

i. Qualified Internal Applicants (PWTB)

Answer N/A

ii. Internal Selections (PWTB)

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 PWTB 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 (PWTB)

Answer N/A

b. New Hires for Managers (PWTB)

Answer N/A

c. New Hires for Supervisors (PWTB)

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 V: 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 CFR § 213.3102(u)(6)(i))? If “no”, please explain why the agency did not convert all eligible Schedule A employees.

Answer	Yes
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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%).

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%).

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>

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.usda.gov/accessibility-statement>

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.

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.

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 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.

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.

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 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?

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 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?

Answer Yes

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

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

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