

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

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

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

Section I: Efforts to Reach Regulatory Goals

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

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.
 - a. Cluster GS-1 to GS-10 (PWD) Answer: No
 - b. Cluster GS-11 to SES (PWD) Answer: Yes

The percentage of PWD in the GS-11 to SES cluster was 10.45% in FY 2017, which falls below the goal of 12%.

* 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

The percentage of PWTD in the GS-1- to GS-10 and GS-11 to SES Clusters was 4.95% and 3.21% in FY 2017, which is above the 2% goal by 2.95% and 1.21% respectively.

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

The percentage of PWTD in the GS-1- to GS-10 and GS-11 to SES Clusters was 4.95% and 3.21% in FY 2017, which is above the 2% goal by 2.95% and 1.21% respectively.

Section II: Model Disability Program

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

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

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

Answer: Yes

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	25	0	0	Multiple HR personnel across all DOL HR Offices
Answering questions from the public about hiring authorities that take disability into account	4	0	0	Vance Wilkerson, Disability Program Manager
Processing reasonable accommodation requests from applicants and employees	5	0	11	WECO, CRC
Section 508 Compliance	0	0	3	CRC, OCIO
Architectural Barriers Act Compliance	0	0	3	CRC, Building Operations Center
Special Emphasis Program for PWD and PWTD	2	0	0	Vance Wilkerson, Disability Program Manager

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

Answer: Yes

Reasonable accommodation staff have attended the EEOC EXCEL conference, received training in ergonomics, participated in FEED meetings, attended EEO trainings, and have received on-the-job training.

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

HR Personnel in the National Office and across the regions participated in OPM’s Hiring Excellence Training. Additionally, the Civil Rights Office provided training on reasonable accommodations. Training was also provided in FY 2017 on Special Hiring Authorities, Disability Etiquette, and Schedule A.

Section III: Program Deficiencies in the Disability Program

The agency has not reported any program deficiencies involving the disability program.

Section IV: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

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

Though the FY 2017 government-wide and DOL hiring freeze limited job postings, the Department utilized several recruitment strategies designed to increase the number of qualified applicants with disabilities and applicants with targeted disabilities. Currently, DOL exceeds the 12% goal for PWD and 2% sub-goal of PWTD at the GS-10 level and below as well as the 2% sub-goal at the GS-11 level and above. However, DOL falls slightly below the goals set forth in the final rule for senior grade level positions. As such, DOL continued the following multi-year recruitment strategies:

- Outreach: The disability program manager continued providing training on the federal hiring process and conducting mock interviews with our external disability partner: the Virginia Department of Aging and Rehabilitative Services (DARS). The Bureau of Labor Statistics (BLS) utilized e-recruitment processes to disseminate information concerning BLS career opportunities. Through on-campus e-postings, outreach to the academic community increased, including to students with disabilities. Between October 2016 and January 2017, BLS posted 36 merit staffing job opportunity announcements. These announcements allowed individuals with disabilities to apply to positions under the Schedule A hiring authority. The Office of Disability Employment Policy (ODEP) worked closely with OPM to help inform other federal agencies how to increase the federal employment population of individuals with disabilities using the Schedule A hiring process. The Veterans Employment Program Manager (VEPM) continued to facilitate the referral of qualified disabled veterans for vacancies. During FY 2017, the DOL VEPM received and responded to 85 inquiries and provided more than 500 employment services to veterans with disabilities seeking consideration for non-competitive employment, career advice, the Federal application process, skills translating, and Federal resume assistance.

- Recruitment: The Employment and Training Administration (ETA) has worked to

improve federal hiring of individuals with disabilities. All resumes received are reviewed for qualification determinations and kept on file for HR Specialists to review before approval to post a vacancy announcement. The Mine Safety and Health Administration (MSHA)'s Human Resources Division continues to identify and target positions for outreach and recruitment. The Office of the Assistant Secretary for Administration and Management (OASAM) Veterans Employment Program Manager (VEPM) continued to facilitate the referral of qualified veterans with disabilities for vacancies.

During FY 2017, the Diversity and Inclusion Branch, along with input from internal stakeholders, drafted a Recruitment, Hiring, and Retention Best Practices Guide for Persons with Disabilities, which is currently in clearance and is scheduled for release in FY 2018.

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.

DOL uses all available and appropriate hiring authorities to recruit and hire PWD and PWTD.

The DOL Disability Program Manager works closely with agency hiring managers and provides resumes of eligible Schedule A candidates for non-competitive consideration. During FY 2017, DOL hired 31 PWD utilizing the Schedule A hiring authority. Additionally, there were 81 veterans with disabilities hired under the 30% or more hiring authority

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.

Agency HR representatives review referred resumes and Schedule A letters provided by the Disability Program Manager using OPM's qualification standards. Resumes are usually received through email, at outreach events, or through our disability partners. Hiring Managers and HR Professionals are provided training on Schedule A and the non-competitive hiring process throughout the fiscal year

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

Answer: No

The Diversity and Inclusion Branch provides disability-related training such as Schedule A, Disability Etiquette, and Veterans Employment at least once per fiscal year for hiring managers and HR professionals. Currently this training is not mandatory for all managers and supervisors. It is DOL's goal to provide this training in FY 2018 to all hiring managers. Additionally, Reasonable Accommodations training is provided by the Civil Rights Center (CRC). Also, during FY 2017, the Disability Action Group (DAG) presented two training sessions to DOL employees on Federal Disability Employment Laws. Additionally, during the American's with Disabilities Act (ADA) anniversary month, the DAG facilitated a Diversity and Inclusion panel discussion. The panel consisted of people with disabilities who represented a

diversity of cultures and ethnicities, moderated by Joe Shapiro of NPR News

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.

In FY 2017, DOL continued to maintain and develop strategic partnerships with affinity organizations, professional associations, and educational institutions focused on groups with low participation rates to perform recruitment outreach. DOL maintained its contact with the Virginia Department of Aging and Rehabilitative Services (DARS) and the Maryland Division of Rehabilitation Services (DORS) with which we have a formal Memorandum of Understanding (MOU). This formal partnership has provided DOL with an excellent pipeline of qualified Schedule A applicants, many of which have been hired. In FY 2018 DOL plans to extend its outreach to individuals with hearing impairments by engaging individuals and counselors at Gallaudet University. Additionally, DOL has a formal MOU with the Department of Veterans Affairs (VA) Veteran’s Vocational Rehabilitation and Employment Program

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If “yes”, please describe the triggers below.
 - a. New Hires for Permanent Workforce (PWD) Answer: No
 - b. New Hires for Permanent Workforce (PWTD) Answer: No

(Table B8)
 Among the new hires in the permanent workforce, triggers do not exist for PWD (14.94%) and PWTD (3.28%), both of which exceed the respective benchmarks of 12% for PWD and 2% for PWTD.

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.
 - a. New Hires for MCO (PWD) Answer: No
 - b. New Hires for MCO (PWTD) Answer: No

(Table B7)
 Of the 6.13% of applications received for PWD, 4.63% were hired; and, of the 2.81% of applications for PWTD, 1.54% were hired

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

Table B9 indicates triggers exist for PWD and PWTD among the qualified internal

applicants for promotions for the following positions in FY 2017:

- Safety and Occupational Health Management – PWD (4.00%)
- Economist – PWD (0.80%)
- Workforce Development - PWD (0.00%)
- Apprenticeship and Training – PWD (9.09%)
- Miscellaneous Administration and Program – PWD (14.58%)
- Auditing – PWD (0.00%) and PWTD (0.00%)
- Worker’s Compensation Claims Examining – PWD (10.00%)
- General Inspection, Investigation and Compliance – PWD (6.90%)

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

(Table B9)
 In comparison to the benchmarks, triggers exist for PWD and PWTD among the selected internal applicants for promotions for the following positions in FY 2017:

- Safety and Occupational Health Management – PWD (0.00%) and PWTD (0.00%)
- Economist – PWD (0.00%)
- Workforce Development - PWD (0.00%)
- Auditing – PWD (0.00%) and PWTD (0.00%)
- Worker’s Compensation Claims Examining – PWD (0.00%) and PWTD (0.00%)
- General Inspection, Investigation and Compliance – PWD (0.00%) and PWTD (0.00%)
- Mine Safety and Health Inspection - PWD (0.00%)

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

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

A. ADVANCEMENT PROGRAM PLAN

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

In FY 2018, DOL plans to engage in initiatives designed to ensure employees with disabilities and employees with targeted disabilities have sufficient advancement opportunity. (Please refer to Section B for a detailed description)
 The Department of Labor utilizes all available methods to provide and improve internal advancement opportunities for persons with disabilities within fiscal and staffing resources. These methods include as many of the activities listed below, as possible,

including others that may be available.

1. Increase the awareness of managers to encourage their full commitment to affirmative action goals and the need to provide advancement and training opportunities for persons with disabilities.
2. Increase the awareness of managers and human resources specialists or professionals of the Department of Labor's obligation and responsibility to enhance the advancement opportunities for persons with disabilities (e.g., training seminars, personnel management letters, and memoranda, etc.). Although persons with disabilities are not excluded from participating in any training offered by the Department, it is highly recommended that when feasible specific training be provided to this population.
3. Encourage utilization of internal procedures and programs such as internal developmental training programs, individual training classes, and special appointing authorities (Schedule A) for persons with disabilities for career advancement.
4. Encourage managers to work with human resources to restructure jobs, design bridge positions, and develop and implement individual development plans as tools to help advance persons with disabilities.
5. Identify career enhancing opportunities such as details, developmental assignments, mentoring programs, etc. Developmental details should be structured to expose a broad range of employees to a variety of positions within the DOL.
6. Encourage referrals of persons with disabilities when filling vacancies.
7. Modify training methods to incorporate reasonable accommodations for persons with disabilities, e.g., Braille, captioned films, large print, etc. Ensure facilities are accessible to and useable by persons with disabilities.
8. Evaluate program effectiveness and achievement in a systematic manner and at regular intervals.
9. Encourage persons with disabilities to participate in available training that includes in-house training, college courses, and correspondence courses for work or self-development.
10. Conduct workforce analyses of persons with disabilities to identify business policies and practices that create barriers that are not substantiated by a legitimate business case. Investigate whether less exclusionary policies or practices can be used that serves the same business purpose.
11. Encourage the use of a skills-building survey, including but not limited to, current and potential gaps in skills and the distribution of competencies that will be utilized to fill vacancies as appropriate.
12. Encourage persons with disabilities to participate in training opportunities provided by the Department's Disability Action Group.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

During FY 2017, DOL employees and managers continued to take one-day and four-day Leading@Labor sessions. A total of 237 managers completed the one-day training of which 10.54% were persons with disabilities, and 183 managers were trained in the four-day sessions, of which 6.56% were persons with disabilities. The Leading@Labor program aims to improve supervisory effectiveness through a shared vision of management success, a standard set of tools, skills, language, and knowledge. The sessions cover: Communicating Effectively, Developing Employees, Building Trust with Employees, and Recognizing Employees. DOL also offered an Emerging Leaders training course in FY 2017. A total of 326 employees in grade levels GS-12 through GS-14 participated, of which 11.66% were persons with disabilities.

The Department also launched the FY 2017 Career Enhancement Program (CEP) in Washington, DC. The CEP presents a unique opportunity to enhance the skills and experiences needed for high-level technical, administrative, and professional positions. It is open to DOL employees up to and including the GS-9 level in the Washington, DC, metropolitan area. Over the course of one year, participants receive on-the-job training, rotational assignments, technical training, career counseling, and mentoring. After completing the program, participants are eligible for expanded promotional opportunities. A total of 19 employees participated, of which 5.26% were persons with disabilities.

DOL concluded a successful one-year mentoring pilot program called Mentoring@Labor, which offered employees at the GS-9 and below grade levels, opportunities for career advice, learning, and development, one-on-one guidance, networking, and expanded professional relationships. DOL will expand the mentoring program to higher graded employees in FY 2018.

DOL's Repository of Opportunities, Assignments & Details (ROAD) program continued to provide assignments to employees that exposed them to other types of work and other organizations for up to 120 days. In FY 2017, 277 employees were provided ROAD assignments. DOL Leadership encourages use of the ROAD program for regional, short-term, part-time, and telework-based opportunities and appreciates that the program promotes cross-training between offices and agencies, improves employee engagement by supporting employee career development, and helps widen DOL's internal candidate pool for vacancies. Disability data was not collected for this program in FY 2017 but will be collected in FY 2018.

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

a. Applicants (PWD)

Answer: No

b. Selections (PWD)

Answer: No

Per EEOC instructions and guidelines, this section is not required for the current FY 2017 submission but must be completed beginning with the FY 2018 submission. Information currently available has been provided in the above table based on the data we have for these programs

3. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are

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

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

Per EEOC instructions and guidelines, this section is not required for the current FY 2017 submission but must be completed beginning with the FY 2018 submission. Information currently available has been provided in the above table based on the data we have for these programs.

C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If "yes", please describe the trigger(s) in the text box.
 - a. Awards, Bonuses, & Incentives (PWD) Answer: No
 - b. Awards, Bonuses, & Incentives (PWTD) Answer: No

Table B13 was reviewed utilizing the average cash and time-off award as the benchmark comparing the average cash and time-off award given to PWD and PWTD against those without a disability. The data shows that PWD and PWTD received slightly more than those without a disability and in instances where PWD and PWTD received less, the difference was too minor, therefore our findings indicate that there are no triggers.

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

Table B13 was reviewed utilizing the average quality step increases or performance-based pay increases as the benchmark comparing the average quality step increases or performance-based pay increases given to PWD and PWTD against those without a disability. The data shows that PWD and PWTD received slightly more than those without a disability and in instances where PWD and PWTD received less, the difference was too minor, therefore our findings indicate that there are no triggers.

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

DOL presents Secretary's Honor Awards; however demographic data has not been collected. We will start collecting this information in FY 2018.

D. PROMOTIONS

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

a. SES

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

b. Grade GS-15

- i. Qualified Internal Applicants (PWD) Answer: Yes
- ii. Internal Selections (PWD) Answer: No

c. Grade GS-14

- i. Qualified Internal Applicants (PWD) Answer: Yes
- ii. Internal Selections (PWD) Answer: No

d. Grade GS-13

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

Table B-11)
 DOL has no information on internal applicants and/or selectees for promotion in the SES.
 In FY 2017, the percentage of PWD among the qualified internal applicants for grade GS-15 (4.81%) fell below the benchmark.
 In FY 2017, the percentage of PWD among the qualified internal applicants for grade GS-14 (4.64%) fell below the benchmark.
 In FY 2017, the percentage of PWD among the qualified internal applicants for grade GS-13 (4.58%) fell below the benchmark.
 In FY 2017, the percentage of PWD among the selectees for promotion at grade GS-13 (5.56%) fell below the benchmark

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

a. SES

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

b. Grade GS-15

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

c. Grade GS-14

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

d. Grade GS-13

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

(Table B-11)
 DOL has no information on internal applicants and/or selectees for promotion in the SES.
 In FY 2017, the percentage of PWTD among the qualified internal applicants for grade GS-15 (1.92%) fell below the benchmark.
 In FY 2017, the percentage of PWTD among the qualified internal applicants for grade GS-14 (2.06%) fell below the benchmark.
 In FY 2017, the percentage of PWTD among the selectees for promotion at grade GS-13 (2.78%) fell below the benchmark.

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

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

DOL's workforce data tables do not include new hires data by senior grade levels.

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

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

DOL's workforce data tables do not include new hires data by senior grade levels.

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

a. Executives

- | | |
|--|------------|
| i. Qualified Internal Applicants (PWD) | Answer: No |
| ii. Internal Selections (PWD) | Answer: No |

b. Managers

- | | |
|--|------------|
| i. Qualified Internal Applicants (PWD) | Answer: No |
| ii. Internal Selections (PWD) | Answer: No |

c. Supervisors

- | | |
|--|------------|
| i. Qualified Internal Applicants (PWD) | Answer: No |
| ii. Internal Selections (PWD) | Answer: No |

DOL's workforce data tables do not include new hires data by senior grade levels.

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

a. Executives

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

b. Managers

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

c. Supervisors

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

DOL's workforce data tables do not include new hires data by senior grade levels.

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

a. New Hires for Executives (PWD) Answer: No

b. New Hires for Managers (PWD) Answer: No

c. New Hires for Supervisors (PWD) Answer: No

DOL's workforce data tables do not include new hires data by senior grade levels.

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

a. New Hires for Executives (PWTD) Answer: No

b. New Hires for Managers (PWTD) Answer: No

c. New Hires for Supervisors (PWTD) Answer: No

DOL's workforce data tables do not include new hires data by senior grade levels.

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer: Yes

DOL is currently working with our HR systems personnel to identify individuals hired under Schedule A who have no record of conversions after two years of satisfactory service. In FY 2018, we plan to have a process in place that automatically alerts the HR Professional and Hiring Manager in advance that their Schedule A employee is eligible for conversion. Our systems currently do not have that capability and we currently rely on managers or the individuals themselves tracking conversion eligibility. It has been and continues to be DOL's practice to convert Schedule A applicants into the competitive service after satisfactory completion of two years.

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

a. Voluntary Separations (PWD) Answer: No

b. Involuntary Separations (PWD) Answer: No

The inclusion rate of PWD who voluntarily and/or involuntarily separated from the permanent workforce is lower than that of persons without disabilities.

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

a. Voluntary Separations (PWTD) Answer: No

b. Involuntary Separations (PWTD) Answer: No

The inclusion rate of PWD who voluntarily and/or involuntarily separated from the permanent workforce is lower than that of persons without disabilities.

4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

No trigger exists. Note that DOL does have a system in place to collect exit interview results.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

<https://www.dol.gov/oasam/regs/statutes/sec508.htm>
<https://www.dol.gov/oasam/ocio/ocio-508.htm>
<https://www.dol.gov/oasam/programs/crc/complaint.htm>

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.

N/A

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.

DOL will improve the accessibility of the reasonable accommodation request process by implementing a Section 508 compliant Sharepoint database in FY 2018 for employees/applicants to request reasonable accommodations. This database will also assist reasonable accommodation staff in tracking requests.

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.)

DOL will improve the accessibility of the reasonable accommodation request process by implementing a Section 508 compliant Sharepoint database in FY 2018 for employees/applicants to request reasonable accommodations. This database will also assist reasonable accommodation staff in tracking requests.

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.

DOL has an effective reasonable accommodation program. The DOL PDF forms for requesting reasonable accommodations are Section 508 compliant. In FY 2017 DOL trained managers and supervisors throughout the U.S. on DOL's reasonable

accommodation process and will continue this training in FY 2018. DOL revised its reasonable accommodation policy, which went into effect in December 2016. These revisions incorporated changes under the ADAAA, timeframes for processing, and procedures for issuing decisions.

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

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

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

DOL currently provides PAS to approximately 10 employees with severe disabilities. DOL had a PAS program prior to the requirement. DOL is planning to expand the PAS program in FY 2018. The program is currently run using a contract vehicle to provide a pool and one-on-one services. DOL will expand the program to include FTEs hired under Schedule A.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer: No

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

Answer: Yes

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

Compensatory damages, policy changes within agency.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer: No

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

Answer: 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.

Compensatory damages

Section VIII: Identification and Removal of Barriers

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

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

Answer: No

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

Answer: N/A

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

Trigger				
Barrier(s)				
Objective(s)				
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)		
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)		
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected		
Workforce Data Tables				
Complaint Data (Trends)				
Grievance Data (Trends)				
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)				
Climate Assessment Survey (e.g., FEVS)				
Exit Interview Data				
Focus Groups				
Interviews				
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)				
Other (Please Describe)				
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
Fiscal Year	Accomplishments			

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

N/A

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

N/A

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

N/A