

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

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

### Section I: Efforts to Reach Regulatory Goals

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

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

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

Because of fiscal constraints, the Bureau's overall staffing was significantly impacted in FY18. The percentage of PWD in the GS-01 to GS-10 (including WS-01 to WS-07) cluster was 7.03% and GS-11 to SES (including WS-08 to WS-15) cluster was 6.04%, which falls below the goal of 12%. However, should consideration be given to employment of persons with a disability not identified, the percentage increases to 10.25% for GS-01 to GS-10 (including WS-01 to WS-07) cluster and 8.36% for GS-11 to SES (including WS-08 to WS-15).

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

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

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

In FY18, the percentage of PWTD in the GS-01 to GS-10 (including WS-01 to WS-07) cluster was 1.66% and GS-11 to SES (including WS-08 to WS-15) cluster was 1.31%, which falls below the goal of 2%.

Grade Level Cluster(GS or Alternate Pay Plan)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	21797	1540	7.07	370	1.70
Grades GS-11 to SES	9507	569	5.99	123	1.29

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

The Bureau communicated the PWD and PWTD goals throughout the Agency via Performance Work Plans, quarterly Diversity Council Meetings, Recruitment Sub-committee meetings, Regional Affirmative Employment Program Administrators retreat and teleconferences and Executive Staff training.

## 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

- 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

CREED is evaluating hiring a Sr. Affirmative Employment Specialist. In addition, the National Reasonable Accommodation Coordinator's Office is evaluating employment of an additional staff member within this vital area.

- 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)
		Part Time	Collateral Duty	
Processing applications from PWD and PWTD	1	0	0	Matt Mangold, Chief, Human Resource Services Center, Mmangold@bop.gov
Processing reasonable accommodation requests from applicants and employees	1	0	0	Kurt Nance, National Reasonable Accommodation Coordinator, Personnel Directors Branch, knance@bop.gov
Section 508 Compliance	1	0	0	Scott Jenkins, Chief, Internet/Intranet Development Section, Information, Policy & Public Affairs Division, sjenkins@bop.gov
Architectural Barriers Act Compliance	1	0	0	Kurt Nance, National Reasonable Accommodation Coordinator, Personnel Directors Branch, knance@bop.gov
Special Emphasis Program for PWD and PWTD	0	0	128	AEP Committees maintain a Disability Employment Special Emphasis Program Manager

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
		Part Time	Collateral Duty	
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Georgette Brown, Ph.D., LCSW, Affirmative Employment Programs Officer/Selective Placement Program Coordinator, gbrown@bop.gov

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

All managers and supervisors complete mandatory training requirements including Schedule A: Roadmap to Success within 60 days of entry to position; Uniformed Services Employment and Reemployment Act (USERRA) and Veteran Employment for Hiring Managers within 60 days of entry to position and annually thereafter. Principles of Leadership training also incorporates Reasonable Accommodation 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

**Section III: Program Deficiencies in the Disability Program**

<b>Brief Description of Program Deficiency</b>	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.		
<b>Objective</b>	Evaluate an increase in designated officials for processing Reasonable Accommodations.		
<b>Target Date</b>	Dec 31, 2019		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019		Classify, announce and select for new RA position.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
<b>Objective</b>	Finalize updates to the Bureau's RA procedures, following publication of DOJ's RA procedures to include the 30 business day processing time.		
<b>Target Date</b>	Aug 19, 2019		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Aug 19, 2019		Once the final updated DOJ RA policy has been published, BOP will finalize updates to its policy, which will include the 30 business day processing timeframe to ensure alignment with the DOJ policy, and forward to EEOC for review.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.		
<b>Objective</b>	Post the Bureau's Affirmative Action Plan to the intranet and public website.		
<b>Target Date</b>	Sep 30, 2019		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jul 1, 2019		Route and gain approval for the posting of the Bureau's Affirmative Action Plan on the public website.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

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

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

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

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

In accordance with policy, each Affirmative Employment Programs (AEP) Committee must submit a Disabled Veterans Affirmative Action Program (DVAAP) Accomplishment Report annually. The DVAAP focuses on the reporting of methods used to recruit and employ disabled veterans, especially those who are 30 percent or more disabled, as well as improvement of internal advancement opportunities for disabled veterans. Each AEP Committee must submit an annual Federal Equal Opportunity Recruitment Program (FEORP) Plan. The FEORP establishes targeted recruitment efforts to reach underrepresented groups including PWD and PWTD. The Bureau's public website and vacancy announcements on the USAJOBS website provide information on Reasonable Accommodation and Personal Assistance Services.

2. Pursuant to 29 C.F.R. §1614.203(a)(3), describe the agency’s use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce

The Bureau uses all available and appropriate hiring authorities to recruit and hire PWD and PWTD: Schedule A, Veterans Recruitment Appointment (VRA), 30% or More Disabled Veteran, Veterans Employment Opportunities Act of 1998, as amended (VEOA) and Pathways Programs.

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority; and, (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

For Schedule A, the Bureau's Selective Placement Program Coordinator reviews the applicant's disability medical documentation. Upon verifying the applicant is a person with an intellectual disability, severe physical disability or a psychiatric disability, documentation of eligibility for employment under Schedule A is then forwarded to the appropriate Institution Human Resource Office and Human Resource Services Center, Consolidated Staffing Unit, for adjudication of position qualifications.

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

Managers and supervisors completed mandatory training requirements including Schedule A: Roadmap to Success within 60 days of entry to position; Uniformed Services Employment and Reemployment Act (USERRA) and Veteran Employment for Hiring Managers within 60 days of entry to position and annually thereafter. Principles of Leadership Training also incorporated Reasonable Accommodation Training.

**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.

Each Affirmative Employment Programs Committee maintained a Disability Employment Special Emphasis Program Manager who is responsible for engaging in community outreach efforts, such as developing working relationships with representatives of the Department of Veterans Affairs (VA) Vet Centers, Veterans Career Centers and military installations. In addition, annually, each Bureau facility prepared a FEORP to recruit and build a more inclusive workplace for under-represented groups including 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 Bureau is committed to meeting established goals set forth under Section 501 for employment of PWD and PWTD. To this end, in reviewing Table B1: Total Workforce Table, PWD represent 6.68% and PWTD represent 1.55% of the Bureau's total permanent workforce. From FY17 to FY18, the Bureau's employment of PWD and PWTD remained relatively constant, even with the severe limitations placed on hiring. Of the 910 permanent new hires in FY18, 9.89% of new hires were identified as PWD and 1.65% as PWTD. Another forty-four employees were hired with a disability that was not identified, increasing the total PWD new hires to 14.73%.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	34236	2.99	0.00	1.29	0.00
% of Qualified Applicants	27013	2.73	0.00	1.09	0.00
% of New Hires	1818	2.20	0.00	0.99	0.00

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 No
- b. New Hires for MCO (PWTD) Answer No

In reviewing Table B7: Applicants and Hires for Major Occupations, PWD, PWTD and persons with disabilities not identified applied and qualified for MCO's within the series of 0007, 0101 and 0006. Approximately 40% of qualified applicants were PWD, PWTD and persons with disabilities not identified.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	
0006CORRECTION INSTITUTION ADMINISTRATION	13172	2.15	0.05	0.61	0.01
0007CORRECTION OFFICER	14060	2.26	0.22	1.10	0.11
0101CORRECTION TREATMENT SPECIALIST	7004	1.96	0.03	0.84	0.01

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 No
- b. Qualified Applicants for MCO (PWTD) Answer No

According to Table B9: Selections for Internal Competitive Promotions for Major Occupations, data indicated the percentage of qualified PWD combined with the percentage of persons with disabilities not identified was above the relevant applicant pool percentage for the series of 0007; the PWTD qualified within this same series was within the disparity rate of 1%. For the 0101 series, data indicated the percentage of qualified PWD combined with persons with disabilities not identified was above the relevant applicant pool percentage; the PWTD qualified at a higher percentage than the relevant applicant pool. For the 0006 series, data indicated the percentage of PWD combined with persons with disabilities not identified qualified at a higher percentage than the relevant applicant pool; the PWTD qualified at just slightly below the relevant applicant pool by only a quarter of one percent.

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 No
- b. Promotions for MCO (PWTD) Answer Yes

Table B9: Selections for Internal Competitive Promotions for Major Occupations revealed PWTD applied for positions within the occupational series of 0006; however, none of the forty-five qualified applicants were selected. Additional research will be required to ascertain and appropriately address any identified barriers in the employment processes for internal competitive promotions for the occupational series 0006.

## 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.

Annually, Bureau employees are provided with the opportunity to complete an Individual Training Needs Assessment in which strategic planning initiatives, implementation of new technology, mission changes, mandatory training standards, audits/reviews, performance improvements identified during the performance appraisal process may be included for incorporation in the Annual Training Plan and completion during the FY. Employees may also apply to Training Opportunity Announcements for specialty programs provided throughout the year. In addition, there are a myriad number of professional development initiatives available via self-studies, computer-based training modules and distance learning courses (Cross Development Courses, Graduate School, OPM, ACA self-study courses, FEMA, NIC, BLU web-based courses).

### B. CAREER DEVELOPMENT OPPORTUNITES

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

The Bureau offers mandatory training, which is positional in nature. Mentoring Training is offered at Bureau facilities. Many locations provide leadership development via various forums. Annually, Bureau employees are provided with the opportunity to complete an Individual Training Needs Assessment in which strategic planning initiatives, implementation of new technology, mission changes, mandatory training standards, audits/reviews, performance improvements identified during the performance appraisal process may be included for incorporation in the Annual Training Plan and completion during the FY. Employees may also apply to Training Opportunity Announcements for select programs provided throughout the year. In addition, there are a myriad number of self-studies, computer-based training modules and distance learning courses available (Cross Development Courses, Graduate School, OPM, ACA self-study courses, FEMA, NIC, BLU web-based courses), which are available to employees.

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 (%)
Mentoring Programs						
Training Programs						
Detail Programs						
Other Career Development Programs						
Internship Programs	1288	76	55	0	28	0
Fellowship Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	0	0

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 N/A
- b. Selections (PWD) Answer N/A

The Bureau's technological systems currently allow for extraction of completion data for professional development programs. However, because of compartmentalization of specialty training provided on an ongoing basis at field locations, applicant flow data is not available.

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 N/A
- b. Selections (PWTD) Answer N/A

The Bureau's technological systems currently allow for extraction of completion data for Career Development Programs. However, because of compartmentalization of specialty training provided on an ongoing basis at field locations, applicant flow data is not available.

**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

In reviewing Workforce Table B13: Employee Recognition and Awards, triggers existed as follows: Time Off-Awards Hours 9+ hours were 1.39% less for PWD and 2.40% less for PWTD than the total average hours. Cash Awards \$100 - \$500 were 1.60% less for PWD and 1% less for PWTD than the total average amount.



Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards: 1-9 hours : Total Time-Off Awards Given	12234	7.63	89.47	1.78	5.85
Time-Off Awards: 9+ hours : Total Time-Off Awards Given	21637	5.77	91.53	1.37	4.40

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$100 - \$500: Total Cash Awards Given	15487	6.21	93.79	1.60	4.60
Cash Awards: \$501+: Total Cash Awards Given	12350	4.94	95.06	1.27	3.67

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

Workforce Table B13: Employee Recognition and Awards revealed Quality Step Increases (QSI) were 4.93% less for PWD and 3.65% less for PWTD than the total average benefit.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Quality Step Increases (QSI): Total QSIs Awarded	7103	6.49	93.51	1.37	5.12
Performance Based Pay Increase	0	0.00	0.00	0.00	0.00

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

- a. Other Types of Recognition (PWD) Answer N/A
- b. Other Types of Recognition (PWTD) Answer N/A

The Bureau 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 No
  - ii. Internal Selections (PWD) Answer No
- b. Grade GS-15
  - i. Qualified Internal Applicants (PWD) Answer No
  - ii. Internal Selections (PWD) Answer No

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

According to Table B11: Internal Selections for Senior Level Positions, data indicated the percentage of qualified and selected PWD combined with persons with disabilities not identified exceeded the percentage from the relevant applicant pools at the GS-13, GS-15 and SES levels. Data indicated the percentage of qualified and selected PWD combined with persons with disabilities not identified was below the percentage of the relevant applicant pools at the GS-14 level.

2. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. SES
  - i. Qualified Internal Applicants (PWTD) Answer Yes
  - ii. Internal Selections (PWTD) Answer Yes
- b. Grade GS-15
  - i. Qualified Internal Applicants (PWTD) Answer Yes
  - ii. Internal Selections (PWTD) Answer Yes
- c. Grade GS-14
  - i. Qualified Internal Applicants (PWTD) Answer Yes
  - ii. Internal Selections (PWTD) Answer Yes
- d. Grade GS-13
  - i. Qualified Internal Applicants (PWTD) Answer No
  - ii. Internal Selections (PWTD) Answer No

According to Table B11: Internal Selections for Senior Level Positions, at the GS-14 and GS-15 levels, there were no applicants with targeted disabilities. At the SES level there was one PWTD that qualified; however, the applicant was not selected.

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

- a. New Hires to SES (PWD) Answer No
- b. New Hires to GS-15 (PWD) Answer No

- c. New Hires to GS-14 (PWD) Answer No
- d. New Hires to GS-13 (PWD) Answer No

In FY18, there were no external Senior Level selections made at the GS-13, GS-14 or GS-15 grades. While PWD applied and qualified, external SES selections were limited.

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

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

In FY18, there were no external Senior Level selections made at the GS-13, GS-14 or GS-15 grades. While one PWTD applied and qualified, external SES selections were limited.

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 Yes
  - ii. Internal Selections (PWD) Answer Yes
- 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

According to Table B11: Internal Selections for Senior Level Positions, at the GS-14 and GS-15 levels there were no applicants with targeted disabilities. At the SES level there was one PWTD that qualified; however, the applicant was not selected.

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

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

According to Table B11: Internal Selections for Senior Level Positions, given consideration to both PWD and persons with a disability not identified, the qualified applicant pool and selections at the GS-13 level were comparable to those with no disability. As you progress in grade, the number of qualified applicants and selections lessens for PWD. At the GS-15 and SES levels, there were no PWD selected; one person with a disability not identified was selected.

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 (PWTB) Answer No
  - b. New Hires for Managers (PWTB) Answer No
  - c. New Hires for Supervisors (PWTB) Answer No

In FY18, there were no external Senior Level selections made at the GS-13, GS-14 or GS-15 grades. While PWD applied and qualified, external SES selections were limited.

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 No
  - b. New Hires for Managers (PWTB) Answer No
  - c. New Hires for Supervisors (PWTB) Answer No

In FY18, there were no external Senior Level selections made at the GS-13, GS-14 or GS-15 grades. While one PWTB applied and qualified, external SES selections were limited.

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

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

**A. VOLUNTARY AND INVOLUNTARY SEPARATIONS**

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

Answer N/A

There were no Schedule A employees eligible for conversion.

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 Yes

According to Table B14 Separation by Type of Separation: In 2018, there were 2,718 total Voluntary Separations: 210 PWD (7.73% of total voluntary separations and 8.81% of total PWD workforce) 46 PWTD (1.69% of total voluntary separations and 8.30% of total PWTD workforce) 2,423 persons without disabilities (7.51% of total voluntary separations and 7.51% of total workforce without disabilities). There were 126 Involuntary Separations: 20 PWD (15.87% of total involuntary separations and 84% of total PWD workforce) 4 PWTD (3.17% of total involuntary separations and .72% of total PWTD workforce) 96 persons without disabilities (76.19% of total involuntary separations .30% total workforce without disabilities).

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce	35691	6.68	93.32
Total Separations	2844	8.09	91.91
Voluntary Separations	2718	7.73	92.27
Involuntary Separations	126	15.87	84.13

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 Yes

According to Table B14 Separation by Type of Separation: In 2018, there were 2,718 total Voluntary Separations: 210 PWD (7.73% of total voluntary separations and 8.81% of total PWD workforce), 46 PWTD (1.69% of total voluntary separations and 8.30% of total PWTD workforce), and 2,423 persons without disabilities (7.51% of total voluntary separations and 7.51% of total workforce without disabilities). There were 126 Involuntary Separations: 20 PWD (15.87% of total involuntary separations and, 84% of total PWD workforce), 4 PWTD (3.17% of total involuntary separations and 72% of total PWTD workforce), and 96 persons without disabilities (76.19% of total involuntary separations and .30% total workforce without disabilities).

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce	35691	1.55	98.45
Total Separations	2844	1.76	98.24
Voluntary Separations	2718	1.69	98.31
Involuntary Separations	126	3.17	96.83

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.

In reviewing separations by Nature of Action Codes (NOA), numerically, the top four reasons for PWD separating were: Resignation, Retirement Voluntary, Termination Apt In and Retirement Disability. In comparing the number of resignations to the representation of PWD and persons without disabilities within the total workforce, PWD (76 resignations, 3.19% of total workforce) resigned at 1.23 percentage points higher than persons without disabilities (634 resignations, 1.96% of workforce). The top three reasons for PWTD leaving the Bureau were: Resignation, Retirement Voluntary and Termination Apt In. In FY18, 20 PWTD resigned, which equates to 3.61% of representation within the total PWTD workforce.

## 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.

The Bureau's public website and intranet contains information for applicants and employees of their rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint, the link is provided below:  
[https://www.bop.gov/resources/employee\\_support.jsp#eeo](https://www.bop.gov/resources/employee_support.jsp#eeo)

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.

The Bureau's public website and intranet contains information for applicants and employees of their rights under the Architectural Barriers Act, including a description of how to file a complaint; the link is provided below:  
[https://www.bop.gov/resources/employee\\_support.jsp#eeo](https://www.bop.gov/resources/employee_support.jsp#eeo)

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.

The Agency's National Reasonable Accommodation Coordinator (NRAC) has developed a Reasonable Accommodation (RA) Resource webpage, which contains information about accessibility of agency technology, Section 508 contact information and accessibility standards issued under the Architectural Barriers Act of 1968 (ABA). In addition, the webpage includes the Agency Reasonable Accommodation Policy, and links to the Job Accommodation Network (JAN) and the Computer Electronic Accommodation Program (CAP). The CAP link contains specific instructions on making a request for assistive technology and/or equipment and includes notification to the NRAC for tracking and reporting requirements.

## 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 Bureau documented 210 Reasonable Accommodation (RA) requests in FY18 as compared to 185 in FY17; 70 were reassignments. When reassignment is determined to be appropriate, employees receive a RA Letter explaining the process, and as a standard practice, the Bureau works with employees for (60) days in an effort to assist them in finding another position. For purposes of calculating the average processing timeframes, the reassignment cases are evaluated separately. The average timeframe for processing a reassignment case in FY18 was 69 days versus 60 days in FY17. Requests for reassignment in FY18 increased 126%. For the non-reassignment cases, the average timeframe for processing initial requests was 20 days in FY18 in comparison to 22 days in FY17.

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

The Bureau of Prisons (BOP) established a National Reasonable Accommodation Coordinator (NRAC) position within the Human Resources Management Division (HRMD) during FY16. The NRAC continues to assist the Agency with facilitating the processing of requests for reasonable accommodation, including updating the Agency’s Reasonable Accommodation Program Statement (PS), which will align with the most recent DOJ Departmental reasonable accommodation (RA) policy, & procedures, once they are published. During FY18, the NRAC pursued a rigorous reasonable accommodation training agenda. The training was designed to provide supervisors and managers with practical reasonable accommodation processing considerations and information. Results from these training sessions have led to increased program awareness and understanding. During FY18, the NRAC received 70 requests for reassignment compared to 41 in FY17. In addition to reassignments, requests for Temporary Job Modifications (TJM) also increased. The NRAC documented 51 TJM requests in FY18 as compared to 41 in FY17. It is noted the HRMD is in the process of identifying a second position within the Directorate to assist the NRAC managing the increase in requests for reasonable accommodation. It is anticipated this additional resource will assist in expediting the amount of time needed to appropriately evaluate and process the increased number of requests, including reassignments.

**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.

The Bureau of Prisons has established a process for employees to make a request for Personal Assistance Services (PAS), for those who request them due to a targeted disability through the Reasonable Accommodation Program. An employee may request PAS by informing their supervisor, or the Human Resource Office, that he/she needs assistance with daily living activities because of a medical condition. The Agency’s National Reasonable Accommodation Coordinator (NRAC) may be consulted to assist with PAS related information – and the NRAC must be consulted prior to any denial of such a request. Regarding the effectiveness of implementing the PAS requirement, the NRAC has not received any request (s) for PAS to date. The NRAC maintains a case tracking system for accommodation requests, and should any requests be made during the next year, those requests will be monitored for trends and to ensure they are processed expeditiously.

**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.

There were six findings of discrimination alleging harassment based on disability status during the last fiscal year, which is well below the government-wide average. The findings resulted in one reassignment; two removals rescinded with voluntary resignations; one supervisor's completion of mandatory training; and one performance evaluation modified and three leave restorations. As described above, the Bureau continues to provide relevant training.

## 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.

There were five findings of discrimination involving the failure to provide a reasonable accommodation during FY18, which is well below the government-wide average. The findings resulted in one change to Limited Light Duty (LLD) hours and a meeting with the CEO; one removal rescinded and voluntary resignation, leave restoration, and a personnel file purged of adverse materials; one leave restoration and reassignment; one complainant was paid a lump sum for leave, provided training in accessing the electronic official personnel file and WebTA Time and Attendance, and personnel file purged of adverse material; one complainant received a lump sum payment, leave restoration and removal rescinded and voluntary resignation. Reasonable Accommodation Training is provided to new employees during orientation training and to extant employees annually thereafter. In addition, managers and supervisors complete mandatory training requirements including Schedule A: Roadmap to Success within 60 days of entry to position; Uniformed Services Employment and Reemployment Act (USERRA) and Veteran Employment for Hiring Managers within 60 days of entry to position and annually thereafter; Principles of Leadership Training also incorporates Reasonable Accommodation Training.

## Section VIII: Identification and Removal of Barriers

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

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

Answer No

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

Answer No

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

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



- As a law enforcement agency whose mission-critical positions are located in an institutional setting, there are some physical requirements. These physical requirements include the ability to climb stairs, run to emergency situations, and walk and stand for prolonged periods of time.
- The agency's robust security investigation process includes drug testing and a credit report check along with other clearance requirements not normally indicative of non-law enforcement agencies.
- During the past fiscal year, the Bureau continued to face the challenges of imposed travel and budgetary constraints, which impacted the number of recruitment initiatives and physical visits to military installations and veterans organizations. Similar unforeseen directives imposed for the upcoming fiscal year may demonstrate the same pattern of reduced physical site visits for recruitment and outreach initiatives, which may or may not negatively impact recruitment, hiring and retention for the agency.

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

- The Bureau's Diversity Council met on a quarterly basis to provide advice and recommendations to the Director and senior leadership on diversity and inclusion issues affecting workforce strategies, measurement and evaluation, communication and outreach, and training and education.
- Managers and supervisors were evaluated on their commitment to agency EEO policies and principles. Performance plans incorporated language for commitment to EEO principles and practices in the workplace, including quantifiable benchmarks for recruitment and retention of PWD and PWTD.
- Initiated by DOJ, the Bureau participated in a resurvey of the workforce in August 2018, to encourage employees to review the Standard Form 256, Self-Identification of Disability and voluntarily self-identify or update their disability status.
- The Affirmative Employment Programs Office (AEPO) communicated at least quarterly with Regional Affirmative Employment Administrators (RAEAs), located throughout the agency, to share information about the Bureau's strategic approaches to support the employment needs of our nation's veterans, PWD and PWTD.
- The Bureau employed a full time National Recruitment Coordinator and National Reasonable Accommodation Coordinator who both facilitated ongoing efforts towards recruiting, promoting and retaining persons with disabilities. The National Recruitment Coordinator organized a strategic planning session with Bureau Recruiters and the AEPO in order to develop a targeted approach for recruitment of hard-to-fill positions and under-represented groups, especially PWD and PWTD.
- Human Resources Management employees, Disability Employment Program Managers (DEPMs), Recruitment and Outreach Program Coordinators (ROPCs), and other Bureau staff interacted with applicants via telephone, internet, job fairs, community events, and other face-to-face activities. Applicants were informed of the on-line application process via the Bureau's public website for a variety of disciplines.
- DEPMs and Diversity Instructors provided presentations at Staff Recalls throughout the year to promote and highlight the diversity and talent of our nation's disabled veterans and PWD.
- ROPCs and Special Emphasis Program Managers (SEPMs) actively communicated with representatives of veterans' service organizations, One Stop Career Centers, and other employment services agencies seeking referrals of disabled veterans.
- Managers and supervisors joined in supporting the employment of veterans and participated fully in our continued efforts to improve the recruitment and advancement of disabled veterans wherever it is possible to do so.
- Informational packets were sent to military bases throughout the country, focusing on disability employment and disabled veterans organizations.
- Human Resource staff monitored compliance under Section 508 of the Rehabilitation Act of 1973 to ensure employees with disabilities, including disabled veterans, had equal access to training and information.
- Human Resource Services Center staff provided training to SEPMs on veteran employment and special hiring authorities.
- Supervisors and management level employees were required to take the online Uniform Services Employment and Reemployment Rights Act training annually.
- The AEPO provided updates on the status of targeted initiatives for disabled veterans and people with disabilities on the agency intranet and via the electronic mail system.
- DEPMs provided presentations at Staff Recalls throughout the year to encourage, develop, and promote internal advancement opportunities for disabled veterans, and PWD.
- DEPMs and Human Resource staff provided briefings for managers and supervisors on the responsibility of employing and retaining disabled veterans.
- The AEPO monitored personnel policies and practices to limit barriers in employment opportunities for disabled veterans.
- Staff were notified of opportunities to participate in and/or attend programs hosted by the Office of Personnel Management (OPM) and Department of Justice (DOJ) covering areas such as Team Building and Leadership, Diversity and Inclusion, and Executive Management Development Seminars and Programs.

- The Bureau offered details for training in various occupations in an effort to provide staff opportunities to gain experience through temporary work assignments in other disciplines that would otherwise not be afforded to them through their current work assignments.
- The Staff Mentoring Program provided employees with opportunities to augment their personal growth by enhancing their knowledge, skills, abilities, and professional development.
- The Bureau implemented a new automated learning management systems, which provides all learners with access to online content, enhanced completion of mandatory and professional development initiatives.
- All employees, including disabled veterans, were notified of vacancies that will be filled through placement and provided with information about procedures to follow in order to be considered for positions.
- Site visits were conducted by Program Review Examiners to evaluate the effectiveness of programs and plans at Bureau facilities. Feedback was provided to the Chief Executive Officers, along with recommendations on corrective measures and/or program enhancements.
- Quarterly, the AEPO and RAEAs monitored statistical information on new hires, promotions, and separations of disabled veterans through information retrieved from the National Finance Reporting Center. The AEPO monitored reports submitted by the RAEAs. A national report was compiled on program accomplishments and concerns related to the employment of disabled veterans.
- RAEAs provided training to institution Affirmative Employment Committee members during staff assistance visits. Emphasis continued to be placed on effective recruitment strategies, policy updates, and the effective development of affirmative employment initiatives. • During FY18, Bureau staff participated in recruitment and outreach fairs, many of which were located on or near military bases, and targeted disabled veterans' organizations. After Action Reports detailing these recruitment activities were completed and forwarded to the Central Office for monitoring, review and evaluation.

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.

- The Bureau's Diversity Council will meet on a quarterly basis to provide advice and recommendations to the Director and senior leadership on diversity and inclusion issues affecting workforce strategies, measurement and evaluation, communication and outreach, and training and education.
- Managers and supervisors will continue to be evaluated on their commitment to agency EEO policies and principles. Performance plans will incorporate language for commitment to EEO principles and practices in the workplace, including quantifiable benchmarks to measure the success for recruitment and retention of PWD and PWTD in the workplace.
- The Bureau will continue to encourage employees to review the Standard Form 256, Self-Identification of Disability, and voluntarily self-identify or update their disability status in order to be more reflective of employment of PWD and PWTD within the workplace.
- Evaluate communication strategies (correspondence, training, national meetings, strategic planning) to further emphasize program goals throughout the organization.
- Investigate other agencies' initiatives and best practices to improve the recruitment and advancement of PWD and PWTD.