

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

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

### Section I: Efforts to Reach Regulatory Goals

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

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

- a. Cluster GS-1 to GS-10 (PWD) Answer No
- b. Cluster GS-11 to SES (PWD) Answer Yes

In FY23, the agency was below the 12% inclusion benchmark for PWD. Though the agency fell short, there was improvement from FY22. While this shows a positive trend, the agency lacked the HR analytics personnel and resources to adequately analyze this information to determine if triggers existed.

\*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

N/A

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical Goal	--	12%		2%	
Grades GS-11 to SES	497	49	9.86	15	3.02
Grades GS-1 to GS-10	51	13	25.49	4	7.84

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

During FY22, OHRM modified their checklist used by Hiring Managers and HR Staffing Specialists which effectively is the "plan" for each DFC hiring action. Along with details on the requirements of the position, the checklist provides guidance on how the vacancy will be filled, how the Hiring Manager will be targeting the recruitment action to obtain the desired applicant pool. The vacancy announcement information includes goals listed for PWDs and PWTDs government-wide hiring goals, i.e., 10-12% for PWDs and 2% for PWTDs, as well as education requirements permissible only when required by the applicable OPM qualification

standard to ensure Hiring Managers’ awareness. The hiring planning conversation between an HR Specialist and a Hiring Manager is the forum where a hiring action is planned, and the checklist is populated. To guide this conversation, HR Specialists use a “Pre-Recruitment Strategic Conversation” guide, especially with inexperienced Hiring Managers. The guide includes a note to HR Specialists to discuss recruitment options: Delegated Examining (DE), Merit Promotion (MP), Direct Hire, non-competitive hiring authorities (e.g., Veterans’ Recruitment Authority (VRA), 30% disabled veterans, Schedule A, Military Spouse), resume mining, Pathways Programs, Peace Corps Board, WRP, and clearing Career Transition Assistance Plan (CTAP)/Interagency Career Transition Assistance Plan (ICTAP).

## Section II: Model Disability Program

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

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

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

Answer No

During FY23, DFC’s disability program was managed by various departments, including OEDI, OIT, and OHRM. OEDI increased its staff to 5 FTEs and OIT dedicated resources to Section 508 Accessibility compliance. The agency will benefit from increased staffing, collaboration, and more centralization of the disability program. DFC has approved OEDI 3 additional FTEs.

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	

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

Training included Department of Homeland Security (DHS), Trusted Tester (Version 5), General Services Administration (GSA), ART/Procurement Accessibility Training, Introduction to Accessibility (FedTalent), Video Accessibility 101 by 3Play Media.

### 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 No

Presently DFC lacks sufficient sources to fully mature the accessibility program. Additional resources are needed to: Create and deliver on enterprise-wide education. Conduct a lly reviews and remediation in an on-going pipeline fashion for all content published to the Web. Conduct a lly reviews and remediation in an on-going pipeline fashion for all digital communications to employees. Create standards around accessible events---both e-events/townhalls and in-person events. Support capabilities for

escalated Section 508 complaints, including those from employees and those from outside the Agency. Funding is needed to procure a mass-scanning tool for Web accessibility to scan out site monthly and roll up findings into “bugs” and a dashboard so a qualitative trend line around DFC Web accessibility can be started. Planned course of action is (a) adopt and socialize the Accessibility Policy which mandates changes to existing business and technical practices, which will have the consequence of needing increase Section 508 SME count, and (b) establish annual accessibility conformance goals and ways to measure success and impact.

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

<b>Brief Description of Program Deficiency</b>	B.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]		
<b>Objective</b>	DFC will ensure OEDI has sufficient budget and staffing to effectively administer its SEPs.		
<b>Target Date</b>	Sep 30, 2024		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2023	OEDI hired a Deputy Director, DEIA, Deputy Director, EEO, and retained a senior EEO Specialist with technical expertise. In addition, three additional full-time equivalents (FTEs) have been approved in the coming fiscal year to augment the EEO and DEIA programs, including Employee Resource Groups (ERGs) and Special Emphasis Programs (SEPs).	

<b>Brief Description of Program Deficiency</b>	C.2.b.3. Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR §1614.203(d)(1)(ii)(B)]		
<b>Objective</b>	DFC will ensure job applicants are adequately informed of how to request and receive RA during the application and placement processes.		
<b>Target Date</b>	Sep 30, 2024		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2023	The CEDIO utilized regular interactions with agency senior leaders to further the EEO Program. DFC incorporated OEDI recommendations in various organizational changes and leadership development. OEDI staff had access to HR data to inform the EEO program and identify areas of strengths and opportunities. Further analysis will be pursued in FY24.	

<b>Brief Description of Program Deficiency</b>	C.3.b.6. Provide disability accommodations when such accommodations do not cause an undue hardship? [ see 29 CFR §1614.102(a)(8)]		
<b>Objective</b>	DFC will require rating officials to evaluate performance of managers and supervisors in providing disability accommodations that do not cause undue hardship.		
<b>Target Date</b>	Sep 30, 2024		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]		
<b>Objective</b>	DFC will ensure the agency has an effective communication between its EEO programs and Human Resources (HR Programs) to implement the Affirmative Action Plan for Individuals with Disabilities.		
<b>Target Date</b>	Sep 30, 2024		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2023	The CEDIO utilized regular interactions with agency senior leaders to further the EEO Program. DFC incorporated OEDI recommendations in various organizational changes and leadership development.	

<b>Brief Description of Program Deficiency</b>	D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]		
<b>Objective</b>	DFC will conduct exit interviews that include questions on how the agency could improve the recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities.		
<b>Target Date</b>	Sep 30, 2024		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
<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.

Over the last fiscal year, DFC utilized a variety of recruitment strategies designed to increase the number of qualified applicants with disabilities and applicants with targeted disabilities within the major occupations. DFC utilized the following resources to identify job applicants with disabilities, including targeted disabilities: OPM’s Shared Register of Candidates with Disabilities (Bender List) Websites geared towards veterans Virtual Career Fairs at Universities Updating Selective Placement Program Coordinator information on OPM’s Directory. Workforce Recruitment Program Recruiters utilize the Agency Talent Portal on USAJOBS to source candidates who meet non-competitive eligibility, including PWD under Schedule A and 30% or More Disabled Veterans hiring authorities. FedshireVets has the Agency’s contact information listed. Recruiters engage with and share open opportunities with over 90 diverse groups on LinkedIn, including some that are specifically targeted to PWD.

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

DFC uses Schedule A appointing authority (5 C.F.R. 213.310(2)) and 30% or More Disabled Veteran appointing authority (5 U.S.C. 3112; C.F.R. 316.302, 316.402, and 315.707) to proactively hire PWD and PWTD expeditiously.

- 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.

To determine if an applicant is eligible under Schedule A, OHRM reviews the application package to determine if the required documentation was provided (as described in the vacancy announcement from OPM's Disability Employment Page). The documentation is reviewed for eligibility under the hiring authority. This is applied when a candidate applies through USAJOBS and/or directly to OHRM. If the documentation submitted is unclear, OHRM gives tentative consideration under this hiring authority. In this case, if the individual is selected, OHRM asks the selectee to furnish the appropriate documentation. When an applicant applies through USAJOBS, OHRM reviews the package for qualifications and eligibility. Those eligible and qualified under non-competitive hiring authorities are placed on a certificate of eligible applicants that is separate from those competitively eligible. Additionally, OHRM searches OPM's List of Persons with Disabilities. If qualified candidates are found, the resumes are forwarded to the hiring official via email for consideration.

- 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

DFC will review plans for training encompassing topics that cover: Promoting and supporting employment of PWDs/PWTDs for all employment opportunities in the agency. Use of Schedule A authority for people with disabilities. Use of other tools available to assist hiring managers to identify qualified applicants with disabilities. Education on DFC's procedures for providing RA to job applicants and employees with disabilities. Education for onboarding employees and hiring managers.

**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.

DFC recruiters attended several diverse recruitment events in FY23, three (3) of which were targeted towards individuals with disabilities. Regardless of whether the target audience at these events included PWD or PWTD, DFC Recruiters educated attendees on the use of non-competitive hiring authorities (i.e., Schedule A, Veterans 30% or More Disabled). Events included: Stevenson University Fall Career & Internship Fair (Q1) Towson University CBE Fall Career Fair (Q1) Hiring Our Heroes Virtual Hiring Fair for Federal Jobs (Q1) Career Connections Virtual Career Fair (Q2) – Targeted to RPCVs, AmeriCorps Alumni, and U.S. Exchange Alumni John Hopkins SAIS Career Fair (Q3) Navy Wounded Warrior Professional Social (Q3) Career Connections Career Fair (Q3) - Targeted to RPCVs, AmeriCorps Alumni, and U.S. Exchange Alumni Peace Corps Career Fair (Q3) Hiring Our Heroes Virtual Hiring Fair for Federal Jobs (Q4) Peace Corps Career Fair - Seattle (Q4) Congressional Black Caucus Foundation, 2023 Annual Legislative Conference Exhibit Showcase (Q4) DFC hosted two (2) virtual information sessions in FY23 for potential candidates and ensured both sessions was accessible by providing closed captioning and ASL Interpreters. DFC recruiters referred roughly 10 candidates via the Selective Placement Program and Workforce Recruitment Program (WRP) in FY23 for a variety of administrative positions. DFC staffing specialists are also registered recruiters in the Workforce Recruitment Program (WRP) and have access to the WRP Database for possible placement of candidates. DFC recruiters contacted and shared DFC information with veteran support groups, information was specifically targeted toward members with 30% or more disability or those who qualify for VRA. DFC recruiters and staffers continuously met with hiring managers about using non-competitive hiring authorities (i.e., Schedule A, Veterans 30% or More Disabled) to hire candidates. DFC recruiters used social media platforms and the USAJOBS Agency Talent Portal to source candidates with non-competitive hiring authority eligibility (i.e., Schedule A, Veterans 30% or More Disabled) to meet vacancy requirements. DFC recruiters shared vacancies with 93 plus diverse, several targeted towards PWD & PWTD, groups on LinkedIn. DFC recruiters posted DFC vacancies in each group and answered questions about the position. This resulted in thousands of impressions to increase awareness of DFC and available positions. In FY23, DFC recruiters attended multiple Workforce Recruitment Program (WRP) webinars and trainings. Through WRP, we have access to candidates with disabilities and veterans across the nation. A DFC Recruiter and the DFC Student Programs Coordinator participated in the WRP informational interviews with students in Q1. DFC Recruiters updated contacted information on OPM's Selective Placement Program Coordinator Directory and FedshireVets.

**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

N/A

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	8950	4.30	0.08	1.73	0.02
% of Qualified Applicants	5269	4.12	0.09	1.71	0.00
% of New Hires	64	1.56	0.00	0.00	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 Yes

No PWTD were newly hired in MCO’s in FY 23. The qualified applicant pool for two of the MCO’s (Economist, job series 0110 and General Attorney, job series 0905) were low in comparison to the other MCO’s for the agency. The agency lacked the HR analytics personnel and resources to adequately analyze this information to determine if triggers existed.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
0110 ECONOMIST	2	50.00	0.00
0301 PROGRAM ANALYST	17	0.00	0.00
0510 ACCOUNTING	0	0.00	0.00
0905 GENERAL ATTORNEY	1	0.00	0.00
1101 GENERAL BUSINESS/INDUSTRY	43	0.00	0.00

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

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

PWD were a small part of the applicant pool for MCO’s in comparison to their inclusion rate. PWTD were just under their inclusion rate in applications, but none were selected. Applications for job series 0905 and 0110 lagged behind other MCO’s for all applicants without disabilities and both PWD and PWTD. The agency lacked the HR analytics personnel and resources to adequately analyze this information to determine if triggers existed.

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

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

PWD exceeded their benchmarks in two of the agency’s MCO’s (Accounting, job series 0510 and Administration, job series 0301) for promotions. Despite this, there were no promotions of PWD in any other MCO’s even when there was a qualified applicant pool. The agency lacked the HR analytics personnel and resources to adequately analyze this information to determine if triggers existed.

## 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.

DFC plans to review and advise on the development of the agency’s plan for opportunities for advancement.

### B. CAREER DEVELOPMENT OPPORTUNITES

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

DFC provides technical and professional development training to supervisory and non-supervisory employees through agency training, individual training, Skillsoft training, executive coaching, and a pilot mentoring program.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Fellowship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Mentoring Programs	25	25	N/A	N/A	N/A	N/A
Coaching Programs	N/A	6	N/A	N/A	N/A	N/A
Training Programs	N/A	N/A	N/A	N/A	N/A	N/A

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Other Career Development Programs	N/A	N/A	N/A	N/A	N/A	N/A
Detail Programs	N/A	N/A	N/A	N/A	N/A	N/A

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

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

N/A

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

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

N/A

**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 FY23, average cash award amounts for PWD and PWTD were lower than individuals with no disabilities. In FY23, TOAs (1-9 hours) was lower for PWDs and significantly lower for PWTDs than that of individuals with no disabilities. There were no notable distinctions for TOAs (9 hours or greater) among PWD, PWTD, and individuals with no disabilities. The agency lacked the HR analytics personnel and resources to adequately analyze this information to determine if triggers existed.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 1 - 10 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 1 - 10 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 Hours: Total Hours	0	0.00	0.00	0.00	0.00



Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 11 - 20 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Awards Given	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$5000 or more: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Average Amount	0	0.00	0.00	0.00	0.00

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 No

In FY23, the average benefit for QSIs and Total Benefit for PWD was significantly lower than that of individuals with no disabilities. The average benefit for PWTD was higher than both PWDs and individuals with no disabilities. The agency lacked the HR analytics personnel and resources to adequately analyze this information to determine if triggers existed.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	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

N/A

**D. PROMOTIONS**

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

- a. SES
  - i. Qualified Internal Applicants (PWD) Answer N/A
  - ii. Internal Selections (PWD) Answer N/A
- b. Grade GS-15
  - i. Qualified Internal Applicants (PWD) Answer N/A
  - ii. Internal Selections (PWD) Answer N/A
- c. Grade GS-14
  - i. Qualified Internal Applicants (PWD) Answer N/A
  - ii. Internal Selections (PWD) Answer N/A

d. Grade GS-13

- i. Qualified Internal Applicants (PWD) Answer N/A
- ii. Internal Selections (PWD) Answer N/A

N/A

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 N/A
- ii. Internal Selections (PWTD) Answer N/A

b. Grade GS-15

- i. Qualified Internal Applicants (PWTD) Answer N/A
- ii. Internal Selections (PWTD) Answer N/A

c. Grade GS-14

- i. Qualified Internal Applicants (PWTD) Answer N/A
- ii. Internal Selections (PWTD) Answer N/A

d. Grade GS-13

- i. Qualified Internal Applicants (PWTD) Answer N/A
- ii. Internal Selections (PWTD) Answer N/A

N/A

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

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

N/A

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

the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

N/A

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

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

N/A

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

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

ii. Internal Selections (PWTB)

Answer N/A

N/A

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

a. New Hires for Executives (PWD)

Answer N/A

b. New Hires for Managers (PWD)

Answer N/A

c. New Hires for Supervisors (PWD)

Answer N/A

N/A

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

a. New Hires for Executives (PWTB)

Answer N/A

b. New Hires for Managers (PWTB)

Answer N/A

c. New Hires for Supervisors (PWTB)

Answer N/A

N/A

## 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

HR data was not available at the time of this reporting.

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

a. Voluntary Separations (PWD)

Answer Yes

b. Involuntary Separations (PWD)

Answer No

PWD separated from the agency at a higher rate in comparison to those with no disabilities. Most of these separations were categorized as resignation or other. More information and analysis will be needed to determine the root cause of these separations.

The agency did not have HR analytics personnel or resources to determine if this was a trigger.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	0	0.00	0.00
Permanent Workforce: Resignation	0	0.00	0.00
Permanent Workforce: Retirement	0	0.00	0.00
Permanent Workforce: Other Separations	0	0.00	0.00
Permanent Workforce: Total Separations	0	0.00	0.00

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

- a. Voluntary Separations (PWTD) Answer No
- b. Involuntary Separations (PWTD) Answer No

N/A

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	0	0.00	0.00
Permanent Workforce: Resignation	0	0.00	0.00
Permanent Workforce: Retirement	0	0.00	0.00
Permanent Workforce: Other Separations	0	0.00	0.00
Permanent Workforce: Total Separations	0	0.00	0.00

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

N/A

**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 internet address is <https://www.dfc.gov/accessibility-statement>.

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

DFC is coordinating to update its public-facing website to include information about the Architectural Barriers Act, to include

details on how to file a complaint.

- 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.

Planned and completed activities for FY23 and FY24 include: Drafted an agency Section 508 Policy, which is pending finalization. Completed the FY23 Government-Wide Section 508 Assessment. Conducted web site testing inclusive of manual and automated testing. Created an Accessibility Resource Hub on SharePoint. Implemented a file remediation process inclusive of DOCs, PDFs, PPTs, etc.

**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.)

In FY23, we received 37 requests for accommodation: 31 were approved as requested, 4 were approved with modification, and 2 were not finalized by the employee. The average time for completion was 13 calendar days.

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

In FY23, RA requests were processed in an efficient and timely manner. The average completion time was well within the limits outlined in Agency policy.

**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.

DFC has a PAS policy, but it was not evaluated as there were no requests for PAS in FY23.

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

**A. EEO COMPLAINT DATA INVOLVING HARASSMENT**

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

Answer N/A

- 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 N/A

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

N/A

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

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

Answer N/A

- 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 N/A

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

N/A

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

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

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

Answer 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

- 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