

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

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

Section I: Efforts to Reach Regulatory Goals

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

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

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

FEMA is meeting this benchmark. The percentage of PWD in cluster GS-1 to GS-10 is 25%. The percentage of PWD in cluster GS-11 to SES is 24.91%. Table B4-1Per

*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 |

FEMA is meeting this benchmark. The percentage of PWTD in cluster GS-1 to GS-10 is 2.75%. The percentage of PWTD in cluster GS-11 to SES is 2.38%. Table B4-1Per

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

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

The agency's Selective Placement Program Coordinator (SPPC) provides regular trainings and information sessions to hiring managers and recruiters. In addition, the SPPC works closely with the Talent Acquisition Division (TAD), Disaster Field Operations Division (DFO) and the Recruiting team to share information and coordinate with managers and applicants. Conversations are also held with HR liaisons to ensure that all participants in the process are aware of the agency goals and all the various hiring opportunities to include special appointing authorities.

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 No

In FY19, the Office of Equal Rights (OER) Reasonable Accommodation Program was staffed with three employees and two detailees. OER hired a Disability Program Manager in FY19 and is in the process of obtaining additional staffing and resources to support the RA Program and to replace the specialists that left at the end of the FY. FEMA OCCHCO has a dedicated Selective Placement Program Coordinator (SPPC). The SPPC is responsible for developing, managing and evaluating FEMA’s Employment program for Individuals with Disabilities. The SPPC strives to help FEMA meet hiring objectives and enculturates the use of special hiring authorities for PWD and PWTD across the enterprise.

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing reasonable accommodation requests from applicants and employees	4	0	0	michael.looney@fema.dhs.
Special Emphasis Program for PWD and PWTD	1	0	0	michael.looney@fema.dhs.
Processing applications from PWD and PWTD	1	0	0	Chris Pugh Selective Placement Program Coordinator chris.pug@fema.dhs.gov
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Chris Pugh Selective Placement Coordinator chris.pugh@fema.dhs.gov
Section 508 Compliance	1	0	0	janice.fenlason@fema.dhs.gov
Architectural Barriers Act Compliance	0	0	0	Data is currently unknown N/A N/A

- 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 OER staff members attended training at DHS Headquarters (EEO Training) or Mission Rehearsal Training where they received training on best practices in Reasonable Accommodations and updates in the law. Additionally, OER hosted Lunch and Learn sessions, and OER plans to provide training to disability program staff through JAN, CAP and EEOC to carry out their responsibilities during the reporting period.

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

Funding for reasonable accommodation program is provided through the Office of Equal Rights (OER). OER provides funding for implementing the reasonable accommodation process and procuring accommodations for FEMA employees. OER utilizes the DHS/Accessibility Case Management (ACMS) 2.0 tracking system for reasonable accommodation requests.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	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.		
Objective	Increase staffing to ensure timely processing of RA requests. See also, Part H Plan 3.		
Target Date	Sep 30, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019		OER will utilize the ACMS 2.0 RA tracking system to track the number of RA requests, trends in the type of RAs requested, number of days to complete the request, etc.... Trends will be reported to OER senior leadership quarterly.
	Sep 30, 2019	March 21, 2020	Hire a Disability Program Manager Hire two (2) additional Reasonable Accommodation (RA) Specialists.
	Feb 29, 2020		Subject to updates to the FEMA RA policy, post the RA policy internally and on FEMA’s public facing website.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	<ul style="list-style-type: none"> • FEMA hired a Disability Program Manager in August of 2019. • FEMA hired two Reasonable Accommodation Specialist in March 2020. Modification: FEMA has extended its target dates for its planned activities above to allow sufficient time to hire additional reasonable accommodation resources and to update its internal and public facing websites. 	
Objective	Publish updated RA policy/procedures internally and on FEMA’s public facing website.		
Target Date	Sep 30, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019	March 31, 2020	Hire a Disability Program Manager Hire two (2) additional Reasonable Accommodation (RA) Specialists.
	Sep 30, 2019		OER will utilize the ACMS 2.0 RA tracking system to track the number of RA requests, trends in the type of RAs requested, number of days to complete the request, etc.... Trends will be reported to OER senior leadership quarterly.
	Feb 29, 2020		Subject to updates to the FEMA RA policy, post the RA policy internally and on FEMA’s public facing website.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	<ul style="list-style-type: none"> • FEMA hired a Disability Program Manager in August of 2019. • FEMA hired two Reasonable Accommodation Specialist in March 2020. Modification: FEMA has extended its target dates for its planned activities above to allow sufficient time to hire additional reasonable accommodation resources and to update its internal and public facing websites. 	

Objective	Update FEMA RA policies and procedures to include measures/timeframes and policies/procedures related personal assistant services.		
Target Date	Sep 30, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019	March 31, 2020	Hire a Disability Program Manager Hire two (2) additional Reasonable Accommodation (RA) Specialists.
	Feb 29, 2020		Subject to updates to the FEMA RA policy, post the RA policy internally and on FEMA's public facing website.
	Sep 30, 2020		OER will utilize the ACMS 2.0 RA tracking system to track the number of RA requests, trends in the type of RAs requested, number of days to complete the request, etc.... Trends will be reported to OER senior leadership quarterly.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	<ul style="list-style-type: none"> • FEMA hired a Disability Program Manager in August of 2019. • FEMA hired two Reasonable Accommodation Specialist in March 2020. Modification: FEMA has extended its target dates for its planned activities above to allow sufficient time to hire additional reasonable accommodation resources and to update its internal and public facing websites. 	

Brief Description of Program Deficiency	C.2.c. Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR §1614.203(d)(6)]		
Objective	Increase staffing to ensure timely processing of RA requests. See also, Part H Plan 3.		
Target Date	Sep 30, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019		OER will utilize the ACMS 2.0 RA tracking system to track the number of RA requests, trends in the type of RAs requested, number of days to complete the request, etc.... Trends will be reported to OER senior leadership quarterly.
	Sep 30, 2019	March 31, 2020	Hire a Disability Program Manager Hire two (2) additional Reasonable Accommodation (RA) Specialists.
	Feb 29, 2020		Subject to updates to the FEMA RA policy, post the RA policy internally and on FEMA's public facing website.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	• FEMA hired a Disability Program Manager in August of 2019. • FEMA hired two Reasonable Accommodation Specialist in March 2020. Modification: FEMA has extended its target dates for its planned activities above to allow sufficient time to hire additional reasonable accommodation resources and to update its internal and public facing websites.	
Objective	Publish updated RA policy/procedures internally and on FEMA's public facing website.		
Target Date	Sep 30, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019	March 31, 2020	Hire a Disability Program Manager Hire two (2) additional Reasonable Accommodation (RA) Specialists. .
	Sep 30, 2019		OER will utilize the ACMS 2.0 RA tracking system to track the number of RA requests, trends in the type of RAs requested, number of days to complete the request, etc.... Trends will be reported to OER senior leadership quarterly.
	Feb 29, 2020		Subject to updates to the FEMA RA policy, post the RA policy internally and on FEMA's public facing website.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	• FEMA hired a Disability Program Manager in August of 2019. • FEMA hired two Reasonable Accommodation Specialist in March 2020. Modification: FEMA has extended its target dates for its planned activities above to allow sufficient time to hire additional reasonable accommodation resources and to update its internal and public facing websites.	

Objective	Update FEMA RA policies and procedures to include measures/timeframes and policies/procedures related personal assistant services.		
Target Date	Sep 30, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019		OER will utilize the ACMS 2.0 RA tracking system to track the number of RA requests, trends in the type of RAs requested, number of days to complete the request, etc.... Trends will be reported to OER senior leadership quarterly.
	Sep 30, 2019	March 31, 2020	Hire a Disability Program Manager Hire two (2) additional Reasonable Accommodation (RA) Specialists.
	Feb 29, 2020		Subject to updates to the FEMA RA policy, post the RA policy internally and on FEMA's public facing website.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	<ul style="list-style-type: none"> • FEMA hired a Disability Program Manager in August of 2019. • FEMA hired two Reasonable Accommodation Specialist in March 2020. Modification: FEMA has extended its target dates for its planned activities above to allow sufficient time to hire additional reasonable accommodation resources and to update its internal and public facing websites. 	

Brief Description of Program Deficiency	C.2.c.1. Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR §1614.203(d)(5)(v)] If “yes”, please provide the internet address in the comments column.		
Objective	Increase staffing to ensure timely processing of RA requests. See also, Part H Plan 3.		
Target Date	Sep 30, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019		OER will utilize the ACMS 2.0 RA tracking system to track the number of RA requests, trends in the type of RAs requested, number of days to complete the request, etc.... Trends will be reported to OER senior leadership quarterly.
	Sep 30, 2019	March 31, 2020	Hire a Disability Program Manager Hire two (2) additional Reasonable Accommodation (RA) Specialists.
	Feb 29, 2020		Subject to updates to the FEMA RA policy, post the RA policy internally and on FEMA’s public facing website.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	• FEMA hired a Disability Program Manager in August of 2019. • FEMA hired two Reasonable Accommodation Specialist in March 2020. Modification: FEMA has extended its target dates for its planned activities above to allow sufficient time to hire additional reasonable accommodation resources and to update its internal and public facing websites.	
Objective	Update FEMA RA policies and procedures to include measures/timeframes and policies/procedures related personal assistant services.		
Target Date	Sep 30, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019	March 31, 2020	Hire a Disability Program Manager Hire two (2) additional Reasonable Accommodation (RA) Specialists.
	Sep 30, 2019		OER will utilize the ACMS 2.0 RA tracking system to track the number of RA requests, trends in the type of RAs requested, number of days to complete the request, etc.... Trends will be reported to OER senior leadership quarterly.
	Feb 29, 2020		Subject to updates to the FEMA RA policy, post the RA policy internally and on FEMA’s public facing website.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	• FEMA hired a Disability Program Manager in August of 2019. • FEMA hired two Reasonable Accommodation Specialist in March 2020. Modification: FEMA has extended its target dates for its planned activities above to allow sufficient time to hire additional reasonable accommodation resources and to update its internal and public facing websites.	

Objective	Publish updated RA policy/procedures internally and on FEMA's public facing website.		
Target Date	Sep 30, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019	March 31, 2020	Hire a Disability Program Manager Hire two (2) additional Reasonable Accommodation (RA) Specialists.
	Sep 30, 2019		OER will utilize the ACMS 2.0 RA tracking system to track the number of RA requests, trends in the type of RAs requested, number of days to complete the request, etc.... Trends will be reported to OER senior leadership quarterly.
	Feb 29, 2020		Subject to updates to the FEMA RA policy, post the RA policy internally and on FEMA's public facing website.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	<ul style="list-style-type: none"> • FEMA hired a Disability Program Manager in August of 2019. • FEMA hired two Reasonable Accommodation Specialist in March 2020. Modification: FEMA has extended its target dates for its planned activities above to allow sufficient time to hire additional reasonable accommodation resources and to update its internal and public facing websites. 	

Brief Description of Program Deficiency	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]		
Objective	Establish timetables to review at regular intervals agency policies, practices and procedures for systemic barriers and collaborate with OCCHCO on Affirmative Employment Action Plans.		
Target Date	May 31, 2021		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jul 31, 2019		OER will collaborate with OCCHCO to provide training on the requirements of the MD-715 and clarify OCCHCO's joint role in demonstrating meaningful progression towards eliminate barriers to equal employment opportunity.
	Sep 30, 2019		OER will coordinate with OCCHCO to obtain a listing of personnel policies.
	Sep 30, 2019		OER will coordinate with OCCHCO in obtaining a copy of the agency's recruitment schedule and collaborate on outreach and recruiting initiatives.
	Dec 31, 2019		OER will collaborate with OCCHCO to establish a timetable for the review of agency policies, procedures, practices and programs for systemic barriers.
Dec 31, 2019	OER will collaborate with OCCHCO on the implementation of the Affirmative Action Plan for Individuals with Disabilities.		
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	FEMA did not address any performance deficiencies under this plan during the rating period. Modification: The target dates by which to complete the planned activities have been extended. Further, this plan is modified to remove the item below as a trigger. (C.4.e.2) Develop and/or conduct outreach and recruiting initiatives?	

Brief Description of Program Deficiency	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.		
Objective	Post the FEMA Affirmative Action Plan to the FEMA public facing website.		
Target Date	Jul 31, 2019		
Completion Date			
Planned Activities	<i>Target Date</i>	<i>Completion Date</i>	<i>Planned Activity</i>
	Sep 30, 2019		OER will post the affirmative action plan to the FEMA public facing website upon completion of its FY19 MD-715.
Accomplishments	<i>Fiscal Year</i>	<i>Accomplishment</i>	
	2019	FEMA hired a Disability Program Manager in August of 2019, who will assist with the agency's affirmative action plan and in its posting on both its internal and public facing website. Modification: The target dates by which to complete the planned activities have been extended.	

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.

FEMA used a variety of programs and resources to recruit and hire Individuals with Disabilities (IWD) to include: maintaining an internal database of resumes from applicants eligible for non-competitive hiring authorities; use of alternative recruitment sources, i.e.; use of USAJOBS Agency Talent Portal to search for resumes for applicants eligible for Schedule A hire; use of OPM's Bender list of applicants with disabilities; participation in local colleges and university job recruitment fairs; coordination with the Workforce Recruitment Program for access to postsecondary students and recent graduates with disabilities; participation in the VA's Non-Paid Work Experience Program; coordination with the Veterans Vocational and Rehabilitation Program and Disabled Veterans Service Organizations to recruit eligible disabled veterans and to disseminate information to interested job applicants w/ disabilities. FEMA continuously provides job applicants information about FEMA's disability employment programs, various employment opportunities, the government hiring process, points of contacts for reasonable accommodations.

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

FEMA encouraged managers to use Schedule A to fill vacant positions, whenever possible, and to utilize the Selective Placement Program Coordinators (SPPC) to receive guidance in this area. Through outreach to vocational rehabilitation centers and disabled veterans' organizations, the SPPC encourages eligible applicants to make their resumes searchable in USAJOBS by selecting eligibility for special hiring authorities. The SPPC developed recruitment solutions tailored to specific hiring needs, marketed agency vacancies to IWD who are eligible for non-competitive placement via Schedule A and represented FEMA at events, such as EOP Career Expo for People with Disabilities, focused on hiring people with disabilities. The SPPC encouraged individuals utilizing Schedule A to send their resumes directly to the SPPC to be placed in the FEMA Schedule A database. The SPPC sent resumes of qualified applicants to the hiring officials within the agency to review and fill vacant positions. Applicants who have questions or would like to receive technical assistance on how to apply under Schedule A are provided FEMA's centralized Schedule A email address: FEMA-Schedule-A@fema.dhs.gov.

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.

FEMA Human Resources (HR) Specialists and SPPC are dedicated to working with job applicants that apply under special hiring authorities, i.e. Schedule A, to determine eligibility and ensure their application is provided to relevant hiring officials. 1) Applications received via USAJOBS are assessed by an assigned HR Specialist, then qualified candidates are referred to hiring officials for relevant vacancies. 2) Through the Selective Placement Program, Schedule A applicants can submit their application package directly to the SPPC via email. The SPPC reviews the application to determine if the person qualifies for the position and that the Schedule A letter submitted meets OPM's requirements. If all criteria are met, the candidate's resume is placed in an electronic database and forwarded to hiring managers for review when positions that match the applicant's qualifications are being filled. 3) The SPPC can also proactively search the internal database for resumes of qualified applicants. These applications are then forwarded to the hiring official with an explanation of the Selective Placement Program and the process for selection.

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

FEMA requires all hiring managers to complete a specialized training program called "Roadmap to Success: Hiring, Retaining, and Including People with Disabilities". This training is available to all managers online via the FEMA Employee Knowledge Center (FEKC). All new supervisors/managers are required to take supervisor's training within their first year of becoming a supervisor. This training provides information on recruitment and hiring of IWD/IWTD. Some Regions were provided additional training by the SPPC during regional site visits during FY 2019.

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.

FEMA has established and/or maintain contacts with "Hiring Our Heroes", Vocational Rehabilitation Services, and RecruitMilitary, all of which target IWD and Disabled Veterans; attended campus events for students with disabilities; developed relationships and partnered with disability offices at local colleges and universities; partnered with affinity groups to help recruit individuals with disabilities; partnered with the Department of Defense (DOD), Operation Warfighter (OWF) Regional Coordinators to provide briefings and guidance on applying for federal positions.

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 Yes

FEMA did meet the benchmark for PWD but not for PWTD. The percentage of "New Hires for Permanent Workforce (PWD)" is 33.57%. The percentage of "New Hires for Permanent Workforce (PWTD)" is 1.75%. FEMA will continue in its efforts to recruit, retain and promote PWD and PWTD. Table B1.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)

% of Total Applicants	0				
% of Qualified Applicants	0				
% of New Hires	0				

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

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

Disclaimer: The Applicant Tracking System labels applicants as qualified based on the applicant self-identifying as qualified but their qualifications were not verified by an HR specialist. This would cause the data to show far more qualified applicants than applicants qualified by an HR specialist, creating the appearance of triggers where there may not be triggers. Using the qualified applicant pool as the benchmark, Triggers exist for the PWD new hires in the following MCO’s: • 089 – Qualified Applicant Pool (QAP) is 9.68% and PWD permanent new hires is 9.62% (Table B6-1Per) • 0501 – QAP is 20.72% and PWD permanent new hires is 0% (Table B6-1Per(7)) Using the qualified applicant pool as the benchmark, Triggers exist for the PWTD new hires in the following MCO’s: • 089 – Qualified Applicant Pool (QAP) is 4.83% and PWTD permanent new hires is 0% (Table B6-1Per) • 0301 – QAP is 4.75% and PWTD permanent new hires is 0% (Table B6-1Per(2)) • 0343 – QAP is 12.31% and PWTD permanent new hires is 3.45% (Table B6-1Per(3)) • 2210 – QAP is 5.30% and PWTD permanent new hires is 0% (Table B6-1Per(4)) • 0501 – QAP is 9.91% and PWTD permanent new hires is 0% (Table B6-1Per(7)) • 089 – QAP is 3.39% and PWTD temporary new hires is 2.49% (Table B6-1Temp) • 0301 – QAP is 3.47% and PWTD temporary new hires is 1.06% (Table B6-1Temp(2)) • 0343 – QAP is 4.01% and PWTD temporary new hires is 0% (Table B6-1Temp(3)) • 2210 – QAP is 4.11% and PWTD temporary new hires is 1.18% (Table B6-1Temp(4)) • 0501 – QAP is 1.79% and PWTD permanent new hires is 0% (Table B6-1Temp(7))

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	

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

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

Relevant applicant pool data is not available. Identifying which current DHS employees would qualify for a job series they are not currently in is a difficult undertaking. The Human Capital offices do not adjudicate applicant qualifications until an applicant applies for a specific position, and the applicant may qualify based on experience obtained prior to entry into their current job series, or into DHS. DHS has not attempted to develop an estimate for job series-relevant applicant pools to date. Based on this, we are not attempting to tabulate relevant applicant pools for this reporting cycle.

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 Yes

Disclaimer: The Applicant Tracking System labels applicants as qualified based on the applicant self-identifying as qualified but their qualifications were not verified by an HR specialist. This would cause the data to show far more qualified applicants than applicants qualified by an HR specialist, creating the appearance of triggers where there may not be triggers. Using the qualified applicant pool as the benchmark, Triggers exist for PWD among employees promoted in the following MCO's: • 2210 – Qualified Internal Applicants (QIA) is 26.09% and PWD permanent employees promoted is 0% (Table B6-1Per(4)) Using the qualified applicant pool as the benchmark, Triggers exist for PWTD among employees promoted in the following MCO's: • 089 – QIA is 2.08% and PWTD permanent employees promoted is .93% (Table B6-1Per) • 0343 – QIA is 2.22% and PWTD permanent employees promoted is 1.37% (Table B6-1Per(3)) • 2210 – QIA is 4.35% and PWTD permanent employees promoted is 0% (Table B6-1Per(4)) • 089 – QIA is 8.11% and PWTD temporary employees promoted is 1.44% (Table B6-1Temp) • 0301 – QIA is 3.47% and PWTD temporary employees promoted is 1.06% (Table B6-1Temp(2)) • 0343 – QIA is 7.14% and PWTD temporary employees promoted is 2.56% (Table B6-1Temp(3))

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.

FEMA provided career/professional development programs for their employees, including PWD. The competitive opportunities were announced via USAJOBS and many other internal programs were opened to all employees. In FY 2019, opportunities were provided for employees to gain management and leadership skills to accomplish their career objectives. For example, workshops on developing Individual Development Plans and Leadership Competencies were offered. All employees were encouraged to participate in FEMA-wide developmental opportunities, as well as Federal Government-wide career development programs. Additionally, FEMA initiated and engaged Employee Resource Groups, including Disability Integration, to implement career development programs. This will continue in FY 2020.

B. CAREER DEVELOPMENT OPPORTUNITES

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

FEMA provided oversight for leader development programs, rotational assignments, mentoring, policy and guidance, and professional development to roughly 700 employees nation-wide, to include PWD. The Leadership Developmental Programs, such as Future Leaders, FEMA Fellows, and Excellence in Government Fellows offer a variety of activities, courses, and learning opportunities for FEMA employees to build proficiency in core leadership competencies. Internship positions are posted on USAJOBS and are open to all qualified candidates.

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
Mentoring Programs	n/a	n/a	n/a	n/a	n/a	n/a
Training Programs	n/a	n/a	n/a	n/a	n/a	n/a
Other Career Development 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 (%)
Fellowship Programs	n/a	n/a	n/a	n/a	n/a	n/a
Coaching 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 N/A
- b. Selections (PWD) Answer N/A

Currently the OCLO does not collect disability data for training participants.

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

Currently the OCLO does not collect disability data for training participants.

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

a) Using the Inclusion rate as the benchmark, FEMA has a trigger involving PWD for the following Awards, Bonuses & Incentives. (Table B9-2) • Time-Off Awards 21-30 hours • Cash Awards - \$1,000 - \$1,999 • Cash Awards - \$2,000 - \$2,999 • Cash Awards - \$3,000 - \$3,999 • Cash Awards - \$4,000 - \$4,999 b) Using the Inclusion rate as the benchmark, FEMA has a trigger involving PWTD for the following Awards, Bonuses & Incentives. (Table B9-1) • Time-Off Awards 1-10 hours • Time-Off Awards 11-20 hours • Time-Off Awards 21-30 hours • Time-Off Awards 31-40 hours • Cash Awards - \$1,000 - \$1,999 • Cash Awards - \$2,000 - \$2,999 • Cash Awards - \$3,000 - \$3,999 • Cash Awards - \$4,000 - \$4,999 • Cash Awards - \$5,000 – or more

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

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

Using the Inclusion rate as the benchmark, FEMA has a trigger involving PWD for the Performance Pay Increase and a trigger for the Quality step increase and performance-based pay increase. (Table B9-2).

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Performance Based Pay Increase	0	0.00	0.00	0.00	0.00

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

a. Other Types of Recognition (PWD)

Answer N/A

b. Other Types of Recognition (PWTD)

Answer N/A

FEMA 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 Yes

ii. Internal Selections (PWD)

Answer No

b. Grade GS-15

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer Yes

c. Grade GS-14

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer No

d. Grade GS-13

i. Qualified Internal Applicants (PWD)

Answer No

ii. Internal Selections (PWD)

Answer No

The Applicant Tracking System labels applicants as qualified based on the applicant self-identifying as qualified but their qualifications were not verified by an HR specialist. This would cause the data to show far more qualified applicants than applicants qualified by an HR specialist, creating the appearance of triggers where there may not be triggers. FEMA has a trigger involving PWD among the selectees for promotions to the senior grade levels for the following (Table B7-1): Grade GS-15 • Internal Selections – The Qualified Internal Applicants (QIA) is 10.26% and the Internal Selections (PWD) is 9.68%.

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

a. SES

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

b. Grade GS-15

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

c. Grade GS-14

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

d. Grade GS-13

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

The Applicant Tracking System labels applicants as qualified based on the applicant self-identifying as qualified but their qualifications were not verified by an HR specialist. This would cause the data to show far more qualified applicants than applicants qualified by an HR specialist, creating the appearance of triggers where there may not be triggers. FEMA has a trigger involving PWTB among the selectees for promotions to the senior grade levels for the following (Table B7-1): a) Grade GS-15 • Internal Selections – The Qualified Internal Applicants (QIA) is 2.56% and the Internal Selections (PWTB) is 0%. b) Grade GS-13 • Internal Selections - The QIA is 3.85% and the Internal Selections (PWTB) is 3.23%.

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

The Applicant Tracking System labels applicants as qualified based on the applicant self-identifying as qualified but their qualifications were not verified by an HR specialist. This would cause the data to show far more qualified applicants than applicants qualified by an HR specialist, creating the appearance of triggers where there may not be triggers. FEMA is meeting this benchmark.

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

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

The Applicant Tracking System labels applicants as qualified based on the applicant self-identifying as qualified but their qualifications were not verified by an HR specialist. This would cause the data to show far more qualified applicants than applicants qualified by an HR specialist, creating the appearance of triggers where there may not be triggers. FEMA has a trigger involving PWTD among the following senior grade levels: • New Hires to GS-14 (PWTD) – The Qualified External Applicants is 5.07% and PWTD External Selections is 0%. • New Hires to GS-13 (PWTD) - The Qualified External Applicants is 5.28% and PWTD External Selections is 2%.

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

Due to the limited availability of applicant flow data and relevant applicant data, FEMA is unable to identify the participation rates by disability distribution for qualified internal applicants. FEMA has a trigger involving PWD among the selectees for promotions to the senior grade levels for the following (Table B8-1): a) Supervisors • Internal Selections – The Qualified Internal Applicants is 42.86% and the Internal Selections (PWD) is 20.75%.

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

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

Due to the limited availability of applicant flow data and relevant applicant data, FEMA is unable to identify the participation rates by disability distribution for qualified internal applicants. FEMA has a trigger involving PWTD among the selectees for promotions to the senior grade levels for the following (Table B8-1): a) Executives • Internal Selections - the Qualified Internal Applicants (QIA) is 2.56% and the Internal Selections (PWTD) is 1.72%. b) Supervisors • Internal Selections – The Qualified Internal Applicants is 14.29% and the Internal Selections (PWTD) is 4.72%

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

Disclaimer: The Applicant Tracking System labels applicants as qualified based on the applicant self-identifying as qualified but their qualifications were not verified by an HR specialist. This would cause the data to show far more qualified applicants than applicants qualified by an HR specialist, creating the appearance of triggers where there may not be triggers. FEMA is meeting this benchmark. .

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- a. New Hires for Executives (PWTD) Answer No
 - b. New Hires for Managers (PWTD) Answer Yes
 - c. New Hires for Supervisors (PWTD) Answer No

Disclaimer: The Applicant Tracking System labels applicants as qualified based on the applicant self-identifying as qualified but their qualifications were not verified by an HR specialist. This would cause the data to show far more qualified applicants than applicants qualified by an HR specialist, creating the appearance of triggers where there may not be triggers. FEMA has a trigger involving PWTD among the selectees for new hires to Managers position. The Qualified External Applicants is 5.54% and the External Selections was 0%.

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer Yes

FEMA has met this benchmark.

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

a. Voluntary Separations (PWD) Answer No

b. Involuntary Separations (PWD) Answer Yes

Using the Inclusion rate of 4.09% as a benchmark for involuntary separations (PWD), FEMA has a trigger for Involuntary Separations (PWD).

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

a. Voluntary Separations (PWTD) Answer Yes

b. Involuntary Separations (PWTD) Answer No

Using the Inclusion rate of 6.19% as a benchmark for voluntary separations (PWTD), FEMA has a trigger for voluntary Separations (PWTD).

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
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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.

FEMA encourages all employees to complete the Department of Homeland Security’s Exit Survey when leaving the agency. In FY19, FEMA did not assess exit interview results and other data sources for triggers.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

<https://www.fema.gov/accessibility> <https://training.fema.gov/devres/508.aspx>

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.

FEMA is in the process of revamping the Public facing website and will include this information.

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.

In FY19, FEMA's Section 504 Implementation Plan was approved and sets forth concrete steps to strengthen the Agency's approach to providing equal access to individuals with disabilities under Section 504 of the Rehabilitation Act. The Plan is based on data collected during a six-month self-evaluation process that assessed FEMA's public-facing programs and activities and their compliance with Section 504. Based on the results of the FEMA Self-Evaluation, below are the overarching potential shortfalls in program access for individuals with disabilities and opportunities for strengthening compliance with Section 504: 1. Public information and platforms for distributing information, including public events and meetings, may be inaccessible; 2. Trainings and exercises may not be inclusive of people with disabilities; 3. Publicizing the rights of people with disabilities in connection with FEMA's public facing programs and activities, including those carried out by contractors, may be inconsistent and not widely distributed, displayed, and understood; 4. Disaster assistance and recovery programs may not consistently meet the disability related needs of disaster survivors; and 5. Facilities may not be fully accessible. The Plan covers these five potential shortfalls in program access for individuals with disabilities and offers strategies to address each of them and to strengthen compliance with Section 504. For each of the five potential shortfalls and corresponding actions, FEMA offers a proposed timeline and the FEMA program offices responsible for addressing it. The Office of Equal Rights has designated staff with support from its Equal Rights Cadre to work with other FEMA program offices to carry out the Plan. Funding to address the potential gaps and barriers to program access for individuals with disabilities and to strengthen compliance with Section 504 must be designated annually as a line item for use by program offices with public-facing activities. Some programmatic changes required to address potential gaps in program access for individuals with disabilities and to strengthen compliance with Section 504 may also require expenditure of funds.

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 FY19 FEMA trained its RA staff on DHS's Accessibility Case Management System (ACMS) but insufficient resources and some technology changes with ACMS served as a barrier to accurately capturing RA processing time frames.

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 Office of Equal Rights provides funding for reasonable accommodations which does not impact individual office budgets and therefore, promotes the timely processing of RA cases. Supervisors and managers receive mandatory training as part of a Trilogy Training, which includes EEO laws and rules.

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.

FEMA intends to update its reasonable accommodation policy manual in FY20, to include information on Personal Assistance Services. Once completed and approved, FEMA intends to provide agency-wide training and post information online and in the FEMA Weekly online newsletter.

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 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.

FEMA reached settlement agreements for 2 complaints alleging harassment based on disability status. The corrective measures were financial settlements.

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.

FEMA reached settlement agreements for 5 complaints involving alleged failure to provide a reasonable accommodation. The corrective measures were financial settlements.

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

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>Promotions of PWD and PWTD employees in Mission Critical Occupations (MCO's).</p>							
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>							
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>N/A Barriers need to be identified</p>							
<p>Objective</p>	<p>To increase the promotion of PWD and PWTDs in the Identified permanent and temporary MCO's (2210, 0089, 0343, 2210, 0301).</p> <table border="1" data-bbox="483 1066 649 1213"> <tr> <td>Date Objective Initiated</td> <td>Feb 29, 2020</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Dec 31, 2020</td> </tr> </table>				Date Objective Initiated	Feb 29, 2020	Target Date For Completion Of Objective	Dec 31, 2020
Date Objective Initiated	Feb 29, 2020							
Target Date For Completion Of Objective	Dec 31, 2020							
<p>Responsible Officials</p>	<p>Michael Looney Disability Program Manager</p>							
<p>Target Date (mm/dd/yyyy)</p>	<p>Planned Activities</p>	<p>Sufficient Staffing & Funding (Yes or No)</p>	<p>Modified Date (mm/dd/yyyy)</p>	<p>Completion Date (mm/dd/yyyy)</p>				
<p>09/30/2020</p>	<p>Conduct a barrier analysis to identify barriers to promotions for PWD/PWTDs in MCOs.</p>	<p>No</p>						
<p>12/31/2020</p>	<p>Update FEMA RA Procedures to assist PWD/PWTD employees with performing essential functions of positions.</p>	<p>Yes</p>						
<p>Fiscal Year</p>	<p>Accomplishments</p>							
<p>2019</p>	<p>N/A - New planned activities for FY19</p>							

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>PWTD new hires into the permanent workforce and Mission Critical Occupations.</p>							
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Targeted Disabilities</p>							
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>N/A Barriers need to be identified</p>							
<p>Objective</p>	<p>Increase the hiring of PWTD into Mission Critical Occupations</p> <table border="1" data-bbox="487 934 779 1081"> <tr> <td>Date Objective Initiated</td> <td>Feb 29, 2020</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2020</td> </tr> </table>				Date Objective Initiated	Feb 29, 2020	Target Date For Completion Of Objective	Sep 30, 2020
Date Objective Initiated	Feb 29, 2020							
Target Date For Completion Of Objective	Sep 30, 2020							
<p>Responsible Officials</p>	<p>Michael Looney Disability Program Manager</p>							
<p>Target Date (mm/dd/yyyy)</p>	<p>Planned Activities</p>	<p>Sufficient Staffing & Funding (Yes or No)</p>	<p>Modified Date (mm/dd/yyyy)</p>	<p>Completion Date (mm/dd/yyyy)</p>				
<p>09/30/2020</p>	<p>PWD/PWTD Hiring Information Session for FEMA Managers</p>	<p>Yes</p>						
<p>09/30/2020</p>	<p>DHS PWD/Veteran Career Fair</p>	<p>Yes</p>						
<p>09/30/2020</p>	<p>Conduct a barrier analysis to identify the barrier for PWTD new hires in the permanent workforce and MCOs.</p>	<p>No</p>						
<p>Fiscal Year</p>	<p>Accomplishments</p>							
<p>2019</p>	<p>New planned activities for FY19.</p>							

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?		PWD and PWTDD receiving time-off awards, bonuses, or other incentives at a lower rate than employees without disabilities.						
STATEMENT OF BARRIER GROUPS:		<i>Barrier Group</i> People with Disabilities People with Targeted Disabilities						
BARRIER ANALYSIS: Provide a description of the steps taken and data analyzed to determine cause of the condition.								
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.		N/A Barriers need to be identified						
Objective		Increase the rate of PWD and PWTDDs receiving time-off awards, bonuses or other incentives. <table border="1"> <tr> <td>Date Objective Initiated</td> <td>Feb 29, 2020</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Dec 31, 2020</td> </tr> </table>			Date Objective Initiated	Feb 29, 2020	Target Date For Completion Of Objective	Dec 31, 2020
Date Objective Initiated	Feb 29, 2020							
Target Date For Completion Of Objective	Dec 31, 2020							
Responsible Officials		Michael Looney Disability Program Manager						
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)				
09/30/2020	Conduct a barrier analysis to determine the barriers to PWD/PWTDD receiving awards.	No						
09/30/2020	Review FEMA training on performance management to identify areas to provide awareness about PWD/PWTDDs and reasonable accommodations to allow employees to perform essential functions of their job.	Yes						
12/31/2020	Update FEMA RA Procedures to assist PWD/PWTDD employees with performing essential functions of positions.	Yes						
Fiscal Year	Accomplishments							
2019	N/A New planned activities for FY19							

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>Promotions of PWD and PWTDS among the qualified internal and external selectees to the senior grade levels</p>							
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>							
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>N/A Barriers need to be identified</p>							
<p>Objective</p>	<p>Increase the promotions of PWD and PWTDS among the qualified internal and external selectees to the senior grade levels.</p> <table border="1" data-bbox="483 989 649 1129"> <tr> <td>Date Objective Initiated</td> <td>Feb 29, 2020</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Dec 31, 2020</td> </tr> </table>				Date Objective Initiated	Feb 29, 2020	Target Date For Completion Of Objective	Dec 31, 2020
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<p>Target Date (mm/dd/yyyy)</p>	<p>Planned Activities</p>	<p>Sufficient Staffing & Funding (Yes or No)</p>	<p>Modified Date (mm/dd/yyyy)</p>	<p>Completion Date (mm/dd/yyyy)</p>				
<p>12/31/2020</p>	<p>Update FEMA RA Procedures to assist PWD/PWTD employees with performing essential functions of positions.</p>	<p>Yes</p>						
<p>09/30/2020</p>	<p>Conduct a barrier analysis to identify the barriers for promotions PWD/PWTDS in senior grade level positions.</p>	<p>No</p>						
<p>Fiscal Year</p>	<p>Accomplishments</p>							
<p>2019</p>	<p>N/A New planned activities for FY19</p>							

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:		Rate of PWD among involuntary separations and rate of PWTDD among voluntary separations exceed that of persons without disabilities.		
Provide a brief narrative describing the condition at issue.				
How was the condition recognized as a potential barrier?				
STATEMENT OF BARRIER GROUPS:		<i>Barrier Group</i>		
		People with Disabilities		
		People with Targeted Disabilities		
BARRIER ANALYSIS:				
Provide a description of the steps taken and data analyzed to determine cause of the condition.				
STATEMENT OF IDENTIFIED BARRIER:		N/A Barriers need to be identified		
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.				
Objective		Determine the factors contributing to the separations of PWD and PWTDDs at FEMA.		
		Date Objective Initiated	Feb 29, 2020	
		Target Date For Completion Of Objective	Dec 31, 2020	
Responsible Officials		Michael Looney Disability Program Manager		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
12/31/2020	Update FEMA RA Procedures to assist PWD/PWTDD employees with performing essential functions of positions.	Yes		
09/30/2020	Review the exit survey data to determine the reasons for PWD/PWTDD separations.	Yes		
09/30/2020	Provide specific questions on exit survey to assist with determining the factors contributing to separations by PWD and PWTDDs.	Yes		
Fiscal Year	Accomplishments			
2019	N/A New planned activities for FY19			

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