

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.

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

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

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

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

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical Goal	--	12%		2%	
Grades GS-1 to GS-10	1779	629	35.36	90	5.06
Grades GS-11 to SES	5665	1821	32.14	202	3.57

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

The goals are communicated from the Department of Homeland Security Strategic Recruitment Diversity and Inclusion to the Coast Guard. The goals are then provided to Coast Guard Recruiters, HR Operations Division, HR Specialists, etc. Monthly updates on the hiring goals are also provided to those who are involved with the hiring process.

Section II: Model Disability Program

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

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

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

Answer Yes

The CG designated sufficient qualified personnel to implement its current disability program during the reporting period. However, in future years, the CG may need additional personnel to properly implement compliance relating to section 501, section 504, as well as the planned expansion of the reasonable accommodation program.

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	
Answering questions from the public about hiring authorities that take disability into account	0	0	2	Victoria.Council@cgexchange
Processing reasonable accommodation requests from applicants and employees	1	0	1	Kristi.Mowry@cgexchange
Architectural Barriers Act Compliance	1	0	0	Nicholas.D.Herndon@uscg
Processing applications from PWD and PWTD	0	0	2	Victoria.Council@cgexchange
Special Emphasis Program for PWD and PWTD	1	0	0	Caroline Mapp Person with Disabilities Program Manager Civil RightsRA@uscg.mil
Section 508 Compliance	1	1	0	Dr. Eleanor Thompson Branch Chief Section.508@uscg.mil

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

Answer Yes

All CG employees are required to undergo Civil Rights Awareness training on a triennial basis. In addition, the CG provides mandatory training to managers on hiring PWD and PWTD through the Cornerstone Leadership Training. The CG also provides training opportunities for managers and supervisors on providing reasonable accommodations. The CG promotes “Schedule A” training that is available for supervisors through the CG’s automated learning management system. In addition, the CG disability

program staff attended the District of Columbia's Department on Disability Services Disability Awareness session on "Persons Who Are Blind and Low Vision." The CG's disability staff also attended the DHS Office for Civil Rights and Civil Liberties on "Racism, Micro-inequities, and Micro-affirmations in the workplace" addressing the importance of recognizing and resolving micro-inequities in the workplace.

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

The CG provided sufficient funding and other resources that aided in successfully implementing its disability program. The CG has partnerships with and uses the Department of Transportation, Computer Accommodations Program, and the Disability Resource Center to provide reasonable accommodations and personal assistance services.

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.
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Objective	Provide guidance and resources necessary to ensure that the agency can process accommodation requests within the time frame set forth in its reasonable accommodation procedures, which is within 15 business days; share analyses with leadership, working groups and field staff to promote timeliness.		
Target Date	Sep 30, 2020		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019	September 30, 2019	Analyze late accommodation approvals to see if there is a common factor that can be addressed.
	Sep 30, 2019	September 26, 2019	Guidance regarding service animals provided.
	Oct 22, 2019	October 22, 2019	Meet with civil rights Regional Directors to discuss how to address late accommodations.
	Jan 7, 2020	January 27, 2020	Quarterly review of accommodation requests.
	Jan 31, 2020	January 30, 2020	Develop a Reasonable Accommodation Promotion Plan to educate the workforce and management officials about reasonable accommodation procedures and timeframe.
	Jan 31, 2020		Review the current Reasonable Accommodation Promotion Plan to educate the workforce and management officials about reasonable accommodation procedures and timeframe.
	Apr 7, 2020	April 10, 2020	Quarterly review of accommodation requests.
	Apr 30, 2020	April 30, 2020	Civil rights and human resources collaboration on guidance regarding the reassignment process.
	Aug 7, 2020	August 25, 2020	Quarterly review of accommodation requests.
	Aug 30, 2020	January 30, 2020	Obtain approval and implement the Reasonable Accommodation Promotion Plan.
	Dec 31, 2020	December 17, 2020	Meet with civil rights Regional Directors to discuss how to address late accommodations and provide training to CRSPs and managers.
	Jan 31, 2021	April 12, 2021	Quarterly review of accommodation requests.
	Mar 31, 2021		Meet with Regional Directors to review the progress in enhancing timelines of the RA process
	Mar 31, 2021	December 17, 2020	Meet with Civil rights and human resources to follow up on procedures regarding the reassignment process.
	Apr 30, 2021		Quarterly review of accommodation requests.
	Jun 30, 2021	July 27, 2021	Review status of timeliness.
	Jun 30, 2021		Review status of timeliness.
	Nov 30, 2021		Meet with Regional Directors to review the progress in enhancing timelines of the RA process.
	Dec 31, 2021		Initiated monthly review of accommodation requests.
	Feb 28, 2022		Perform analysis and review of RAs.
	Mar 31, 2022		Make an assessment of the Civil Rights Awareness Training.
Jul 31, 2022		Review status of timeliness.	
Jul 31, 2022		Provide RA training to Managers and Supervisors.	
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2021	Met with directors to discuss timelines concerns. The agency provided six training sessions for RA request procedures to all managers and supervisors. The training was virtual via Teams. The agency hired two new Attorneys' Advisors to work with the disability program. The activities ultimately resulted in a decrease of the time average to process of RAs. The new days average is 8.6 days.	
	2019	A review of late accommodation approvals found that they usually involved reassignment and service animals.	
	2019	Service animal guidance was disseminated to the civil rights staff and posted on the civil rights website.	

<i>Fiscal Year</i>	<i>Accomplishment</i>
2020	A meeting was held with the civil rights Regional Directors and timeliness regarding accommodation approval was addressed.

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.

The CG established partnerships with diverse organizations with a target audience of PWD/PWTD. The CG participated in Equal Opportunity Publications (EOP) Career Expo. The CG will consider using as potential sources to hire PWD/PWTD.

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

Individuals requesting consideration as Schedule A persons with disabilities applicants are encouraged to apply for all CG job openings posted. The vacancy announcements includes information for applicants on how to apply using the Schedule A authority or any other non-competitive authority such as 30% or more disabled veteran. CG hiring managers are encouraged to use the 30% or more disabled veterans and the Schedule A hiring authorities. Hiring managers may contact the CG Selective Placement Program Coordinator or the Veterans Program Manager to discuss hiring authorities and to develop recruitment strategies to hire persons with disabilities using the Schedule A and 30% or more disabled veterans hiring authority.

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

Applicants applying under a hiring authority that takes disability into account are required to provide the appropriate documentation that is reviewed for eligibility. Once determined eligible and qualified, applicants are referred to appropriate selecting officials.

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

Answer Yes

The CG provides mandatory training to managers on hiring PWD and PWTD through the Cornerstone Leadership Training. The CG also promotes “Schedule A” training. The CG’s Office of Civilian Human Resources Operations conducted a series of training sessions for hiring managers on Civilian Hiring Authorities that included information on the Schedule A and 30% or more Disabled Veterans hiring authorities.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

Describe the agency’s efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

The CG will continue to maintain and create collaborative partnerships with organizations that target PWD/PWTD and use as sources for recruitment and hiring. The CG will also continue to educate managers on issues that target PWD/PWTD. In addition, the CG will continue to promote and utilize the CAP program to retain employees with disabilities. The CG plans to expand and strengthen its relationships with organizations that advance the employment of PWD/PWTD such as Equal Opportunity Publications Careers & the disabled, the DC Metro Divisions of Vocational Rehabilitative Services, Ability Magazine, etc. through participating in career fairs, training sessions, and by disseminating information on upcoming DHS webinars and current CG job openings.

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

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	2172	19.71	0.00	6.22	0.00
% of Qualified Applicants	2040	20.34	0.00	6.37	0.00
% of New Hires	179	25.70	0.00	3.35	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

The new hires qualified applicant pool rate for the Contracting (1102) MCO among PWTD was 5.09% compared with their selection percentage of 2.74%. PWTD new hires selections for the Contracting MCO were lower than their participation rate among the qualified applicant pool. The new hires qualified applicant pool rate for the Information Technology (IT) MCO (2210) among PWTD was 7.93% compared with their selection percentage of 3.77%. PWTD new hires selections for the IT MCO were lower than their participation rate among the qualified applicant pool.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
1102 CONTRACTING	73	30.14	2.74
2210 INFORMATION TECHNOLOGY MANAGEMENT	106	22.64	3.77

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 was not available for comparison to qualified internal applicants.

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

The qualified applicant pool (QAP) rate for promotion to the Contracting (1102) MCO among PWD was 40.00% compared with their selection rate of 19.57%. For PWTD the QAP rate for promotion was 13.33% compared with their selection rate of 0.00%. The PWD and PWTD promotion rate to the Contracting MCO were lower than their participation rate among the QAP. The QAP rate for promotion to the IT (2210) MCO among PWD was 42.86% compared with their selection rate of 15.38%. For PWTD the QAP was 28.57% compared with their selection rate of 0%. PWD and PWTD promotions to the IT MCO were lower than their participation rate among the QAP.

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.

The CG Civilian Career Management Team (CCMT) advertises professional and leadership development opportunities, detail opportunities, and provides career mapping information. CG employees are able to view and apply to detail opportunities online through the CCMT website..

B. CAREER DEVELOPMENT OPPORTUNITES

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

The Office of Leadership offers DHS Leader development opportunities such as the DHS Mentoring Program, DHS SES CDP, OPM Federal Internal Coach Training Program, DHS Rotational Assignments and Joint Duty program. In addition, individual professional communities such as acquisitions and contracting, marine inspection etc. manage their own career development activities. These are areas where career ladders/career development tools and programs are in place.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	NA	NA	NA	NA	NA	NA

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Fellowship Programs	NA	NA	NA	NA	NA	NA
Mentoring Programs	1351	1351	--	--	--	--
Training Programs	--	282	--	--	--	--
Coaching Programs	NA	NA	NA	NA	NA	NA
Detail Programs	NA	NA	NA	NA	NA	NA
Other Career Development Programs	NA	NA	NA	NA	NA	NA

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

a. Applicants (PWD) Answer N/A

b. Selections (PWD) Answer N/A

Participation in the CG’s career development program does not qualify a participant for a promotion to a senior grade level upon completion.

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

Participation in the CG’s career development program does not qualify a participant for a promotion to a senior grade level upon completion.

C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

a. Awards, Bonuses, & Incentives (PWD) Answer Yes

b. Awards, Bonuses, & Incentives (PWTD) Answer Yes

The time-off awards inclusion rate for PWD and PWTD for 11 – 30 hours was 4.45% and 1.52% respectively. The rate for employees with no disability was 8.35%. PWD and PWTD time-off awards for 11 – 30 hours inclusion rate was lower than the rate of employees with no disability. Also, the cash awards inclusion rate for PWD and PWTD for \$501 - \$5000 and more was 75.34% and 80.18% respectively. The rate for employees with no disability was 87.10%. PWD cash awards for \$501 - \$5000 and more inclusion rate was lower than the rate of employees with no disability. PWTD cash awards for \$501 - \$999 and \$2000 - \$5000+ inclusion rate was lower than the rate of employees with no disability.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	673	9.95	6.28	11.59	9.74
Time-Off Awards 1 - 10 Hours: Total Hours	5869	88.46	53.68	107.62	85.95
Time-Off Awards 1 - 10 Hours: Average Hours	8.72	0.31	0.15	2.83	-0.02
Time-Off Awards 11 - 20 hours: Awards Given	284	1.91	3.82	0.61	2.08
Time-Off Awards 11 - 20 Hours: Total Hours	4798	32.78	64.10	9.76	35.79
Time-Off Awards 11 - 20 Hours: Average Hours	16.89	0.61	0.29	4.88	0.05
Time-Off Awards 21 - 30 hours: Awards Given	338	2.54	4.53	0.91	2.75
Time-Off Awards 21 - 30 Hours: Total Hours	8846	66.13	118.69	25.30	71.47
Time-Off Awards 21 - 30 Hours: Average Hours	26.17	0.92	0.46	8.44	-0.07
Time-Off Awards 31 - 40 hours: Awards Given	1559	20.71	15.67	20.43	20.75
Time-Off Awards 31 - 40 Hours: Total Hours	59461	819.05	581.05	817.07	819.31
Time-Off Awards 31 - 40 Hours: Average Hours	38.14	1.40	0.65	12.20	-0.02
Time-Off Awards 41 or more Hours: Awards Given	100	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	1612	15.53	19.00	18.29	15.16
Cash Awards: \$501 - \$999: Total Amount	952242.96	8363.69	11684.99	9624.16	8198.71
Cash Awards: \$501 - \$999: Average Amount	590.72	19.01	10.72	160.40	0.50
Cash Awards: \$1000 - \$1999: Awards Given	616	6.39	7.20	7.93	6.19
Cash Awards: \$1000 - \$1999: Total Amount	895610.32	9178.90	10557.11	11845.53	8829.87
Cash Awards: \$1000 - \$1999: Average Amount	1453.91	50.71	25.56	455.60	-2.28
Cash Awards: \$2000 - \$2999: Awards Given	1368	13.90	16.41	13.72	13.93
Cash Awards: \$2000 - \$2999: Total Amount	3286514.3	33785.19	39265.84	32700.64	33927.14
Cash Awards: \$2000 - \$2999: Average Amount	2402.42	85.75	41.73	726.68	1.86
Cash Awards: \$3000 - \$3999: Awards Given	2000	21.52	22.61	19.51	21.79
Cash Awards: \$3000 - \$3999: Total Amount	7083898.65	77023.29	79672.61	69055.63	78066.14
Cash Awards: \$3000 - \$3999: Average Amount	3541.95	126.27	61.43	1078.99	1.57

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$4000 - \$4999: Awards Given	1085	10.30	13.15	13.11	9.94
Cash Awards: \$4000 - \$4999: Total Amount	4905907.28	46875.15	59248.17	59948.02	45164.09
Cash Awards: \$4000 - \$4999: Average Amount	4521.57	160.53	78.58	1394.14	-0.93
Cash Awards: \$5000 or more: Awards Given	755	7.69	8.73	7.62	7.70
Cash Awards: \$5000 or more: Total Amount	4171552.24	42755.10	48111.90	41864.20	42871.71
Cash Awards: \$5000 or more: Average Amount	5525.23	196.12	96.03	1674.57	2.62

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If “yes”, please describe the trigger(s) in the text box.

- a. Pay Increases (PWD) Answer No
- b. Pay Increases (PWTD) Answer Yes

The quality step increase (QSI) inclusion rate for PWD was 2.47% and 1.52% for PWTD respectively. The QSI rate for employees with no disability was 3.03%. PWD and PWTD QSI inclusion rate was lower than the rate of employees with no disabilities.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	19	0.18	0.23	0.00	0.20

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

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

The Coast Guard did not have any other types of recognition during FY 21 that captured automated PWD/PWTD information.

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 Yes

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

a. Relevant applicant pool data was not available for comparison to qualified internal applicants. Also, applicant flow data was not available for internal applicants for promotions to SES positions. b. Relevant applicant pool data was not available for comparison to the rate of PWD qualified internal applicants for promotions to GS-15 positions. The qualified internal applicants rate for PWD was 26.32 % compared to the internal selection rate of 25.00%. PWD were selected for promotions to GS-15 positions at a rate lower than their rate among qualified internal applicants. c. Relevant applicant pool data was not available for comparison to the rate of PWD qualified internal applicants for promotions to GS-14 positions. The qualified internal applicants rate for PWD was 37.09 % compared to the internal selection rate of 20.00%. PWD were selected for promotions to GS-14 positions at a rate lower than their rate among qualified internal applicants. d. Relevant applicant pool data was not available for comparison to the rate of PWD qualified internal applicants for promotions to GS-13 positions.

2. Does your agency have a trigger involving PWTDD 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 (PWTDD) Answer N/A
 - ii. Internal Selections (PWTDD) Answer N/A
- b. Grade GS-15
 - i. Qualified Internal Applicants (PWTDD) Answer N/A
 - ii. Internal Selections (PWTDD) Answer Yes
- c. Grade GS-14
 - i. Qualified Internal Applicants (PWTDD) Answer N/A
 - ii. Internal Selections (PWTDD) Answer Yes
- d. Grade GS-13
 - i. Qualified Internal Applicants (PWTDD) Answer N/A
 - ii. Internal Selections (PWTDD) Answer Yes

a. Relevant applicant pool data was not available for comparison to qualified internal applicants. Also, applicant flow data was not available for internal applicants for promotions to SES positions. b. Relevant applicant pool data was not available for comparison to the rate of PWTDD qualified internal applicants for promotions to GS-15 positions. The qualified internal applicants rate for PWTDD was 13.16 % compared to the internal selection rate of 0.00%. PWTDD were not among selectees for promotions to GS-15 positions although they were among qualified internal applicants. c. Relevant applicant pool data was not available for comparison to the rate of PWTDD qualified internal applicants for promotions to GS-14 positions. The qualified internal applicants rate for PWTDD was 13.09 % compared to the internal selection rate of 2.22%. PWTDD were selected for promotions to GS-14 positions at a

rate significantly lower than their rate among qualified internal applicants. d. Relevant applicant pool data was not available for comparison to the rate of PWTD qualified internal applicants for promotions to GS-13 positions. The qualified internal applicants rate for PWTD was 10.75 % compared to the internal selection rate of 1.75%. PWTD were selected for promotions to GS-13 positions at a rate significantly lower than their rate among qualified internal applicants.

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

a. New hires applicant flow data for PWD promotions to SES positions was incomplete. Three new hires were selected to SES positions. b. The new hires qualified applicant pool rate for PWD was 27.78% for promotions to GS-15 positions, compared to their selection rate of 15.00%. PWD new hires for promotions to GS-15 positions selections were lower than their participation rate among the qualified applicant pool.

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 Yes
- c. New Hires to GS-14 (PWTD) Answer Yes
- d. New Hires to GS-13 (PWTD) Answer Yes

a. New hires applicant flow data for PWTD promotions to SES positions was incomplete. Three new hires were selected to SES positions. b. The new hires qualified applicant pool rate for PWTD was 12.04% for promotions to GS-15 positions, compared to their selection rate of 5.00%. PWTD new hires for promotions to GS-15 positions selections were much lower than their participation rate among the qualified applicant pool. c. The new hires qualified applicant pool rate for PWTD was 9.11% for promotions to GS-14 positions, compared to their selection rate of 4.23%. PWTD new hires for promotions to GS-14 positions selections were lower than their participation rate among the qualified applicant pool. d. The new hires qualified applicant pool rate for PWTD was 8.36% for promotions to GS-13 positions, compared to their selection rate of 2.70%. PWTD new hires for promotions to GS-13 positions selections were lower than their participation rate among the qualified applicant pool.

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 No

b. Managers

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

ii. Internal Selections (PWD) Answer Yes

c. Supervisors

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

ii. Internal Selections (PWD) Answer No

a. Relevant applicant pool data was not available for comparison, to qualified internal applicants for promotions to executive positions. b. Relevant applicant pool data was not available for comparison, to qualified internal applicants for promotions to manager positions. The qualified internal applicants' rate for PWD was 32.34 % compared to their internal selection rate of 9.09%. The selection rate for PWD for internal promotions to manager positions was significantly lower than their rate among the qualified applicant pool. c. Relevant applicant pool data was not available for comparison to qualified internal applicants, for promotions to supervisor positions.

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

a. Executives

i. Qualified Internal Applicants (PWTB) Answer N/A

ii. Internal Selections (PWTB) Answer Yes

b. Managers

i. Qualified Internal Applicants (PWTB) Answer N/A

ii. Internal Selections (PWTB) Answer Yes

c. Supervisors

i. Qualified Internal Applicants (PWTB) Answer N/A

ii. Internal Selections (PWTB) Answer Yes

a. Relevant applicant pool data was not available for comparison, to qualified internal applicants for promotions to executive positions. The qualified internal applicants' rate for PWTB was 15.79 % compared to their internal selection rate of 0.00%. PWTB were not selected for executive positions, although they were among the qualified applicant pool. b. Relevant applicant pool data was not available for comparison, to qualified internal applicants for promotions to manager positions. The qualified internal applicants' rate for PWTB was 13.17 % compared to their internal selection rate of 0.00%. PWTB were not selected for manager positions, although they were among the qualified applicant pool. c. Relevant applicant pool data was not available for comparison to qualified internal applicants, for promotions to supervisor positions. The qualified internal applicants' rate for PWD was 7.25% compared to their internal selection rate of 4.40%. The selection rate for PWTB for internal promotions to supervisor positions was lower than their rate among the qualified applicant pool.

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 Yes

b. New Hires for Managers (PWD) Answer No

c. New Hires for Supervisors (PWD)

Answer No

a. The new hires qualified applicant pool rate for PWD was 21.67% for promotions to executive positions, compared to their selection rate of 0.00%. PWD were not among new hire selections for promotions to executive positions, although they were among qualified applicants.

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 Yes

b. New Hires for Managers (PWTD)

Answer Yes

c. New Hires for Supervisors (PWTD)

Answer Yes

a. The new hires qualified applicant pool rate for PWTD was 6.67% for promotions to executive positions, compared to their selection rate of 0.00%. PWTD were not among new hire selections for promotions to executive positions, although they were among qualified applicants. b. The new hires qualified applicant pool rate for PWTD was 9.17 % for promotions to management positions, compared to their selection rate of 2.46%. PWTD selection rates among new hires for promotions to management positions, was lower than their rate among qualified applicants. c. The new hires qualified applicant pool rate for PWTD was 9.09% for promotions to supervisor positions, compared to their selection rate of 5.49%. PWTD selection rate among new hires for promotions to supervisor positions was lower than their rate among qualified applicants.

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 No

The CG converted six (6) of 45, (13%) of eligible Schedule A employees with a disability in eligible for conversion in FY 2021. The Selective Placement Program Coordinator (SPPC) provides a list of Schedule A employees eligible for conversion to the Office of Civilian Human Resources Operations, CG-123 for subsequent dissemination to management. The POC’s will continue to monitor and provide a list at the end of each quarter.

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

a. Voluntary Separations (PWD)

Answer Yes

b. Involuntary Separations (PWD)

Answer Yes

The voluntary and involuntary separation inclusion rate for PWD was 6.49% and 2.79%. The voluntary and involuntary separation rate for employees without disabilities was 5.67% and 2.27% respectively. PWD voluntarily and involuntarily separated at rates higher than persons without disabilities. Triggers exist for PWD among voluntary and involuntary separations.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	38	0.38	0.43
Permanent Workforce: Resignation	160	2.54	1.40
Permanent Workforce: Retirement	360	3.87	4.00
Permanent Workforce: Other Separations	186	2.37	1.89
Permanent Workforce: Total Separations	744	9.16	7.72

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

a. Voluntary Separations (PWTD) Answer Yes

b. Involuntary Separations (PWTD) Answer Yes

The voluntary and involuntary separation inclusion rate for PWTD was 10.06% and 2.44%. The voluntary and involuntary separation rate for employees without disabilities was 5.67% and 2.27% respectively. PWTD voluntarily and involuntarily separated at rates higher than persons without disabilities. A trigger exist for PWTD among voluntary and involuntary separations.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	38	0.00	0.43
Permanent Workforce: Resignation	160	4.48	1.65
Permanent Workforce: Retirement	360	5.37	3.90
Permanent Workforce: Other Separations	186	2.39	2.03
Permanent Workforce: Total Separations	744	12.24	8.02

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.

Of the total 263 (184 voluntary/79 involuntary) employees with disabilities who separated, 41 (33 voluntary/8 involuntary) were PWTD. The CG’s separation process affords employees who are separating from the agency an opportunity to provide feedback through an exit survey. Only a minute number of employees with disabilities who separated utilized the exit survey to provide feedback. As a result, the CG was unable to capture a sufficient sample of responses to provide an explanation for why PWD and PWTD left the agency.

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 as follows: <https://www.uscg.mil/access/access/>

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

The internet address is as follows: <https://www.uscg.mil/access/access/>

- Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

The CG is currently in the process of implementing and evaluating its 504 compliance plan agency-wide. The CG adopted the use of the ACMS database to process RA request agency wide. We initially obtained 2 licenses but are in the process to acquire several more to ensure we can provide oversight to RA requests agency wide and improve the process.

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.

- Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

The CG processed accommodation requests in an average of 8.6 days in FY 2021 compared to 12.6 days in FY 2020. The CG attributes this improvement to the greater awareness of reasonable accommodation procedures and efforts to enhance the process.

- 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 CG continues to explore improving effectiveness by adopting a new RA database. The CG adopted from DHS the Accessibility Compliance Management system (ACMS) to assist to process RA requests. CG continues to explore improving effectiveness by hiring two new attorneys' advisors, which one of them is serving as the new Disability Program Manager. The CG is also continuing to update and evaluate its policies and procedures to improve efficiency and clarity. The agency provided 94 Reasonable Accommodations during FY21. The amount for purchases for FY 21 was \$4,293.15. DRC filled 84 request for interpreters. The total cost for interpreters was \$24,817.95. The total number of RA request provided in FY 21 including purchases and interpreters was 199. The total amount of money expended during FY21 for purchases and interpreters was \$29,111.10. The CG is also continuing to update and evaluate its policies and procedures to improve efficiency and clarity. The agency average to process the Reasonable Accommodation Request for FY21 was 8.6 days.

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

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

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

The CG has its RA and PAS procedures available on its website and in its Civil Rights Manual. The CG also provided training to the workforce on its updated RA and PAS procedures. Additionally, the CG tracks RA and PAS. The CG currently has a partnership with the Disability Resource Center that allows for PAS and RA at no cost to the Agency.

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 No

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

N/A

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer Yes

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

Answer Yes

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

The agency has appointed a POC in procurement division to ensure all purchases of equipment and devices are timely. This person will be also the main POC to discuss any potential issues and address any delays. The agency also hire two attorney advisors to work and provide oversight to the Persons with disabilities program and to the RA Process. The recent acquisition of ACMS will also be a great tool to ensure the program is in compliance.

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 Yes

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

Answer Yes

- 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

Source of the Trigger:		EEO Complaint(s)				
Specific Workforce Data Table:		Workforce Data Table - B1				
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?		The percentage of formal complaints alleging harassment based on disability in FY17 was 17.2%. This percentage was lower than the government-wide average of 18.1% in FY17. In FY18, the percentage of PWD filing a formal EEO complaint alleging harassment decreased to 15.1%. This percentage was lower than the government-wide average of 19.7% in FY18. During FY19, the percentage of these type of complaints increased to 24.5%. The government-wide average is not available for FY19.				
STATEMENT OF BARRIER GROUPS:		<i>Barrier Group</i> People with Disabilities				
Barrier Analysis Process Completed?:		N				
Barrier(s) Identified?:		N				
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.		Barrier Name	Description of Policy, Procedure, or Practice			
		Lack of sufficient training and education among employees and management how to properly handle PWD	Lack of sufficient training and education among employees and management has resulted in a misunderstanding of how to properly handle PWD. This creates conflict which may result in the filing of formal complaints.			
Objective(s) and Dates for EEO Plan						
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description	
01/01/2018	03/31/2018	Yes			Educate all employees and management on how to properly address issues that may arise with PWD.	
Responsible Official(s)						
Title		Name		Standards Address The Plan?		
Persons with Disabilities Program Manager		Michael Brenyo		Yes		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activities			Sufficient Staffing & Funding?	Modified Date	Completion Date
02/28/2018	Create and receive approval for a training module that can be integrated into the Civil Rights Awareness training that address harassment in the workplace related to disability and how to appropriately address issues.			Yes		02/21/2018
03/31/2018	Integrate training module and provide training to all employees.			Yes		02/21/2018

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
07/31/2018	Review complaint activity to see if the number of PWD alleging harassment have decreased, review and revise training as required.	Yes	09/30/2018	09/30/2018
02/28/2018	Reaffirm commitment to training and information sharing. Schedule regular training for Agency employees.	Yes		02/28/2019
07/31/2019	Review complaint activity to see if the number of PWD alleging harassment have decreased, review and revise training as required.	Yes		07/31/2019
03/01/2019	Conduct mid-year review of harassment based complaints. Address concerns or issues as required.	Yes		03/01/2019
08/01/2019	Conduct near end-of-year review of harassment based complaints and continue to address issues as they become apparent.	Yes		08/01/2019
03/01/2020	Conduct mid-year review of harassment based complaints. Address concerns or issues as required.	Yes		09/22/2020
08/01/2020	Conduct near end-of-year review of harassment based complaints and continue to address issues as they become apparent.	Yes		09/22/2020
08/30/2020	Complete a written analysis of reviews conducted thus far and provide outcomes and recommendations.	Yes	09/23/2021	
Report of Accomplishments				
Fiscal Year	Accomplishment			
2020	Reviewed complaint activity, performed training, updated procedures and policies.			
2019	PWDPM provided training to 15 human resources personnel regarding accommodation process and procedure.			
2019	Inter-departmental working group established to address issues that overlap civil rights, human resources, and the legal department.			
2018	Began training workforce on new RA and PAS procedures as of 09/18/2018. PWDPM trained 28 employees and approximately 50 civil rights staff members. Civil rights staff conducts regular training with workforce.			
2019	Reviewed complaint activity.			
2018	Completed training slides for new CRA module.			
2018	Reviewed complaint activity.			
2019	Civil Rights Manual updated with new RA and PAS procedures.			

Source of the Trigger:		EEO Complaint(s)				
Specific Workforce Data Table:		Workforce Data Table - B1				
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?		The percentage of formal complaints alleging failure to provide reasonable accommodation in FY17 was 12.1%. This percentage was lower than the government-wide average of 12.5% in FY17. In FY18, the percentage of PWD filing a formal EEO complaint alleging failure to provide a reasonable accommodation increased to 18.9%. This percentage was higher when compared to the government-wide average of 13.5% in FY18. The percentage of these type of complaints for FY19 was 18.4%. During FY20, these complaints decreased to 12.20%, far below the federal average.				
STATEMENT OF BARRIER GROUPS:		<i>Barrier Group</i> People with Disabilities				
Barrier Analysis Process Completed?:		Y				
Barrier(s) Identified?:		Y				
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.		Barrier Name	Description of Policy, Procedure, or Practice			
		Lack of sufficient training and education among employees and management	Lack of sufficient training and education among employees and management has resulted in a misunderstanding of how to properly handle reasonable accommodations. This creates conflict which may result in the filing of formal complaints.			
Objective(s) and Dates for EEO Plan						
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description	
01/01/2018	02/28/2018	Yes		09/30/2020	Educate all employees and management on how to properly address situations that may arise out of reasonable accommodation requests.	
Responsible Official(s)						
Title		Name		Standards Address The Plan?		
Persons with Disabilities Program Manager		Michael Brenyo		Yes		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activities			Sufficient Staffing & Funding?	Modified Date	Completion Date
02/28/2018	Create and receive approval for a training module that can be integrated into the Civil Rights Awareness training that address accommodations in the workplace and how to appropriately handle them.			Yes		02/21/2018
03/31/2018	Integrate training module and provide training to all employees.			Yes		02/21/2018

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
07/31/2018	Review complaint activity to see if the number of PWD alleging failure to accommodate have decreased, review and revise training as required.	Yes	09/30/0018	09/30/2018
02/28/2018	Reaffirm commitment to training and information sharing. Schedule regular training for Agency employees.	Yes		02/28/2019
07/31/2019	Review complaint activity to see if the number of PWD alleging failure to accommodate have decreased, review and revise training as required.	Yes		07/31/2019
03/01/2019	Conduct mid-year review of accommodation based complaints. Address concerns or issues as required.	Yes		03/01/2019
08/01/2019	Conduct near end-of-year review of accommodation based complaints and continue to address issues as they become apparent.	Yes		08/01/2019
03/01/2020	Conduct mid-year review of harassment based complaints. Address concerns or issues as required.	Yes		09/22/2020
08/01/2020	Conduct near end-of-year review of harassment based complaints and continue to address issues as they become apparent.	Yes		09/22/2020
Report of Accomplishments				
Fiscal Year	Accomplishment			
2018	Began training workforce on new RA and PAS procedures as of 09/18/2018. PWDPM trained 28 employees and approximately 50 civil rights staff members. Civil rights staff conducts regular training with workforce.			
2018	Reviewed complaint activity.			
2019	Civil Rights Manual updated with new RA and PAS procedures.			
2019	Reviewed complaint activity.			
2019	PWDPM provided training to 15 human resources personnel regarding accommodation process and procedure.			
2020	Reviewed complaint activity, performed training, updated procedures and policies.			
2018	Completed training slides for new CRA module.			
2019	Inter-departmental working group established to address issues that overlap civil rights, human resources, and the legal department.			
2021	The goal was met as the current average is below the Federal average.			

Source of the Trigger:		Workforce Data (if so identify the table)			
Specific Workforce Data Table:		Workforce Data Table - B9			
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:		During FY19, the benchmark for cash awards is 89%. The inclusion rate for PWD and PWTD was 79%. FY20: The time-off awards inclusion rate for PWD and PWTD for 1 – 30 hours was 20.96% and 19.00% respectively. The rate for employees with no disability was 34.42%. PWD and PWTD time-off awards for 1 – 30 hours inclusion rate was lower than the rate of employees with no disability. Also, the cash awards inclusion rate for PWD and PWTD for \$1000 - \$5000 and more was 70.47% and 68.85% respectively. The rate for employees with not disability was 81.45%. PWD cash awards for \$1000 - \$5000 and more inclusion rate was lower than the rate of employees with no disability. PWTD cash awards for \$1000 - \$2999 and \$4000 - \$5000+ inclusion rate was lower than the rate of employees with no disability.			
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			
Barrier Analysis Process Completed?:		N			
Barrier(s) Identified?:		N			
STATEMENT OF IDENTIFIED BARRIER:		Barrier Name		Description of Policy, Procedure, or Practice	
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.		Conduct further analysis to determine if there is a barrier.		To be determined.	
Objective(s) and Dates for EEO Plan					
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
02/28/2020	03/31/2020	Yes			Review employees' awards data .
Responsible Official(s)					
Title		Name		Standards Address The Plan?	
Chief, Office of Workforce Relations		Joanne Turner		Yes	
Planned Activities Toward Completion of Objective					
Target Date	Planned Activities			Sufficient Staffing & Funding?	Modified Date
10/23/2020	To be determined.			Yes	
Report of Accomplishments					
Fiscal Year	Accomplishment				

Source of the Trigger:	Workforce Data (if so identify the table)					
Specific Workforce Data Table:	Workforce Data Table - B1					
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?	During FY19, the voluntary separation inclusion rate for PWTB is 9.7% compared to 7.7% for persons without disabilities. FY20: The voluntary and involuntary separation inclusion rate for PWTB was 5.92% and 1.25%. The voluntary and involuntary separation rate for employees without disabilities was 5.01% and 2.20% respectively. PWTB voluntarily separated at a rate higher than persons without disabilities. FY21: The voluntary and involuntary separation inclusion rate for PWTB was 5.42% and 2.65%. The voluntary and involuntary separation rate for employees without disabilities was 5.01% and 2.20% respectively. PWTB voluntarily and involuntarily separated at rates higher than persons without disabilities. Triggers exist for PWTB among voluntary and involuntary separations. The voluntary and involuntary separation inclusion rate for PWTB was 5.92% and 1.25%. The voluntary and involuntary separation rate for employees without disabilities was 5.01% and 2.20% respectively. PWTB voluntarily separated at a rate higher than persons without disabilities. A trigger exist for PWTB among voluntary separations.					
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> People with Disabilities					
Barrier Analysis Process Completed?:	N					
Barrier(s) Identified?:	N					
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.	Barrier Name		Description of Policy, Procedure, or Practice			
	Conduct further analysis to determine if there is a barrier.		To be determined.			
Objective(s) and Dates for EEO Plan						
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description	
07/30/2021	02/28/2022	Yes			Identify and implement best practices for recruiting and retaining PWD and PWTB.	
Responsible Official(s)						
Title		Name		Standards Address The Plan?		
Chief, Office of Workforce Relations		Joanne Turner		Yes		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activities			Sufficient Staffing & Funding?	Modified Date	Completion Date
05/31/2020	Research Federal government and private sector best practices for recruiting and retaining PWD and PWTBs.			Yes	12/31/2021	
Report of Accomplishments						
Fiscal Year	Accomplishment					

Source of the Trigger:	Other					
Specific Workforce Data Table:	Workforce Data Table - B1					
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?	During FY19, conversion of all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service.					
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> People with Targeted Disabilities					
Barrier Analysis Process Completed?:	N					
Barrier(s) Identified?:	N					
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.	Barrier Name		Description of Policy, Procedure, or Practice			
	Conduct further analysis to determine if there is a barrier.		To be determined.			
Objective(s) and Dates for EEO Plan						
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description	
06/30/2020	06/30/2020	Yes		08/28/2020	Monitor and notify the Office of Civilian Human Resources Operations of all Schedule A employees eligible for conversion to the competitive service.	
Responsible Official(s)						
Title		Name		Standards Address The Plan?		
Chief, Office of Workforce Relations		Joanne Turner		Yes		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activities			Sufficient Staffing & Funding?	Modified Date	Completion Date
06/30/2020	The Selective Placement Program Coordinator (SPPC) will begin sending a list of Schedule A employees eligible for conversion to the Office of Civilian Human Resources Operations at the end of each quarter.			Yes		08/28/2020

Report of Accomplishments	
Fiscal Year	Accomplishment
2020	The CG converted six (6) of 19 Schedule A employees with a disability in FY 2020. The Selective Placement Program Coordinator (SPPC) provides a list of Schedule A employees eligible for conversion to the Office of Civilian Human Resources Operations, CG-123 for subsequent dissemination to management. The SPPC will continue to provide a list at the end of each quarter.

Source of the Trigger:	Workforce Data (if so identify the table)					
Specific Workforce Data Table:	Workforce Data Table - B13					
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?	The benchmark for QSIs is 2.76%. The inclusion rate for PWTD was 2.49%. FY20: The quality step increase (QSI) inclusion rate for PWTD was 0.93%. The QSI rate for employees with no disability was 2.95%. PWTD QSI inclusion rate was lower than the rate of employees with no disabilities.					
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> People with Targeted Disabilities					
Barrier Analysis Process Completed?:	N					
Barrier(s) Identified?:	N					
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.	Barrier Name		Description of Policy, Procedure, or Practice			
	Persons with Targeted Disabilities Quality Step Increase Rate		Awards distribution.			
Objective(s) and Dates for EEO Plan						
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description	
06/30/2020	06/30/2021	Yes			Increase the inclusion rate for QSIs for PWTD to meet or exceed the rate of those without disabilities.	
Responsible Official(s)						
Title		Name		Standards Address The Plan?		
TBD		TBD		Yes		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activities			Sufficient Staffing & Funding?	Modified Date	Completion Date
08/30/2020	TBD			Yes		
Report of Accomplishments						
Fiscal Year	Accomplishment					

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

Barrier #2: FY20 - Some of the complaint reviews were performed later than anticipated in the determination of the effective manner. effective manner.

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

Barrier #1 and Barrier #2: By more fully educating employees and managers on their obligations and responsibilities related to the RA and PAS process, it helps to eliminate possible areas of conflict which may develop. It ensures a more collaborative and solution based approach to requests. A review of complaint activity has helped identify possible areas of improvement. The updated civil rights manual should help address some difficulty related to the accommodation process. One of the inter-departmental working group's goals is to address accommodation related issues before they become more serious. Barrier#1: FY20 - Regular reviews of complaint activity helped ensure the CG could remedy any issues that may develop. Updated training and procedures helped address issues relating to disability related complaints. Barrier #2: FY20 - By monitoring reasonable accommodation complaint activity, we were positioned to better remedy any issues that may have developed. The training and updated procedures helped address issues related to the accommodation process.

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.

Barrier #1: It is possible that as more individuals become aware of their rights and options regarding harassment based on disability, the number of complaints as a percentage may rise in the short term. USCG will continue to provide training and information to employees and managers to further educate them on the RA and PAS process. FY20 - The number of harassment complaints are trending downward, but they are not below the federal average. Further training and guidance may aid in supporting this downward trend. Barrier #2: There is still a trigger because it exceeds the government-wide average. USCG will continue to provide training and information to employees and managers to further educate them on the RA and PAS process. Feedback from the employees/managers and the complaints themselves will be analyzed to develop possible ways through which the trigger can be improved. FY20 - The CG successfully obtained a percentage that is below the federal average. This trigger is corrected.