

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 |

*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	1703	604	35.47	86	5.05
Grades GS-11 to SES	5882	1926	32.74	204	3.47

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

Hiring goals are communicated from DHS to the Coast Guard's Recruitment Team. The hiring goals are provided to Coast Guard's Strategic Workforce Planning and Human Resources Analysis Office for monitoring and monthly tracking towards the hiring goals.

Section II: Model Disability Program

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

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

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

Answer Yes

The agency hired an attorney in August 2021 who manages its Disability Program. This individual serves as CG’s Disability Program Manager and works with other collateral-duty personnel in this role in implementing the disability program.

- 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	
Architectural Barriers Act Compliance	1	0	0	Nicholas.D.Herndon@uscg
Answering questions from the public about hiring authorities that take disability into account	0	0	2	Victoria.Council@cgexcha
Processing reasonable accommodation requests from applicants and employees	1	0	1	Kristi.Mowry@cgexchange
Processing applications from PWD and PWTD	0	0	2	Victoria.Council@cgexcha
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

- 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

The Disability Program Manager completed the Disability Program Manager Course at DEOMI during this 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

The CG provided sufficient funding and other resources that aided in successfully implementing its disability program. The CG partnered with and used 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	April 15, 2021	Quarterly review of accommodation requests.
	Jun 30, 2021	July 27, 2021	Review status of timeliness.
	Nov 30, 2021	February 4, 2022	Meet with Regional Directors to review the progress in enhancing timelines of the RA process.
	Dec 31, 2021	February 4, 2022	Initiated monthly review of accommodation requests.
	Feb 28, 2022	March 17, 2022	Perform analysis and review of RAs.
	Mar 31, 2022	July 18, 2022	Make an assessment of the Civil Rights Awareness Training.
	Jul 31, 2022	July 31, 2022	Review status of timeliness.
	Jul 31, 2022	July 27, 2022	Provide RA training to Managers and Supervisors.
	Sep 30, 2023		Review current policy for timeline assessment and any areas for processing time improvements to complete all requests within timeframes.
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.	

<i>Fiscal Year</i>	<i>Accomplishment</i>
2022	<ul style="list-style-type: none"> • Implemented a reasonable accommodation requests (RA) monthly reporting requirement to monitor processing timeliness and identify gaps. • Developed and implemented use of a reasonable accommodation processing packet job aide for processing RA requests. • Conducted multiple training sessions on RAs for managers, supervisors, and Civil Rights Service Providers. • Improved the initial processing time of RA requests to under 15 days from 30+ days.
2019	Service animal guidance was disseminated to the civil rights staff and posted on the civil rights website.
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 PWTDD

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 Selective Placement Program Coordinator in the Office of Civilian Human Resources Workforce Management is the POC for Schedule A applicants. The coordinator works closely with the Office of Civilian Human Resources Operations and shares applicants’ resumes who have applied to the JOA on USAJOBS as an opportunity to apply Schedule A to eligible applicants.

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 PWTDD for positions in the permanent workforce

Individuals requesting consideration as Schedule A persons with disabilities applicants are encouraged to apply for all USCG job openings that are posted. The vacancy announcements clearly communicate to all applicants how to apply using the Schedule A authority or any other non-competitive authority such as 30% or more disabled veteran. Coast Guard 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 Manager 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 who self-disclose their disability, provide the appropriate documentation, and are determined qualified for the position are referred to the selecting official with other non-competitive eligibles.

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 Learning Management System (LMS) provides annual training to hiring managers/supervisors on the use of hiring authorities that include Schedule A hiring.

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 Office of Civilian Human Resources Workforce Management has taken a proactive approach to recruitment. The CG reached out to all Vocational Rehabilitation agencies in the DC Metro area and held informational sessions on how to navigate USAJOBS, mock interviewing, and how to write a Federal resume. CG held a national webinar for all vocational rehabilitation agencies to provide tips in how to navigate USAJOBS, how to successfully apply for JOA’s and how to write Federal resumes. More than 20 agencies participated in the webinar, and it was recorded for those who could not attend. FY22 included four (4) informational PWD sessions and five (5) recruitment events for PWD.

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	7318	4.43	0.00	1.91	0.00
% of Qualified Applicants	6969	4.41	0.00	1.91	0.00
% of New Hires	150	27.33	0.00	3.33	0.00

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

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

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
1102 CONTRACTING	37	29.73	2.70
2210 INFORMATION TECHNOLOGY MANAGEMENT	113	26.55	3.54

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 No

b. Promotions for MCO (PWTD) Answer Yes

The qualified applicant pool (QAP) rate for promotion for the Information Technology (IT) MCO for PWTD was 4.00% compared with their selection rate of 0%. PWTD promotions for the IT MCO was 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 CG provides a variety of career and leadership development opportunities for its employees. These include an open enrollment for the mentoring program, leadership training programs and other career training programs. The CG tracks selectees and available program seats but does not track individual applicants for programs except for the mentoring program, where enrollment is open to every person who applies on an open basis. All information in the mentoring program is self-submitted and unverified. There are no applicants or selectees as used in the below table. The mentoring program is creating a disability focused online community to connect and empower both members with PWD and PWTD, as well as their peers and supervisors.

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
Fellowship Programs	NA	NA	NA	NA	NA	NA
Mentoring Programs	NA	NA	NA	NA	NA	NA
Training Programs	NA	NA	NA	NA	NA	NA
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

For time-off awards 1-10 hours, PWD and PWTD inclusion rate was 9.44% and 9.63% respectively. Persons with no disabilities rate was 10.46%. Therefore, a trigger exists for PWD and PWTD. Also, time-off awards for 11-20 hours for PWD rate was 2.10% compared with persons with no disabilities rate of 2.45%. A trigger exists for PWD for this award category. Except for the cash award category for \$1,000 - \$1,999 for PWTD, PWD and PWTD inclusion rate for all other cash awards was lower than persons with no disabilities. For cash awards \$501 - \$599 PWD and PWTD inclusion rate was 17.51% and 16.15% respectively compared with person with no disabilities rate of 17.69%; cash awards \$1,000 - \$1,999 inclusion rate for PWD was 6.20% compared with persons with no disability rate of 7.09%; cash awards \$2,000 to \$2,999 inclusion rate for PWD was 11.44% and 11.80% for PWTD compared with persons with no disabilities rate of 13.39%; cash awards \$3,000 - \$3,999 inclusion rate for PWD and PWTD was

22.12% and 20.81% respectively compared with persons with no disability rate of 25.85%; cash awards \$4,000 - \$4,999 inclusion rate for PWD and PWTD was 11.61% and 11.49% respectively compared with persons with no disability rate of 13.55%; and cash award \$5,000 and over inclusion rate for PWD and PWTD was 8.24% and 8.39% respectively compared with persons with no disability rate of 9.71%. A trigger exists for all cash awards categories.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 1 - 10 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 1 - 10 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Total Amount	0	0.00	0.00	0.00	0.00

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

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

a. Pay Increases (PWD) Answer Yes

b. Pay Increases (PWTD) Answer No

The inclusion rate for PWD quality step increases (QSI) was 2.58% compared with persons with no disabilities rate of 2.97%. PWD inclusion rate for QSIs was lower than persons with no disability. A trigger exists.

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

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

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

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

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

a. (i) Relevant applicant data was not available for comparison. (ii) Qualified applicant pool data was not available for comparison.
 b. (i) Relevant applicant data was not available for comparison. c. (i) Relevant applicant data was not available for comparison. d.
 (i) Relevant applicant data was not available for comparison.

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

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

a. SES - (i) Relevant applicant pool data was not available for comparison. (ii) Qualified applicant pool data was not available for comparison. b. GS-15 - (i) Relevant applicant pool data was not available for comparison. c. GS-14 - (i) Relevant applicant pool data was not available for comparison. (ii) PWTD qualified applicant pool rate was 3.00% compared with their selection rate of 1.47%. A trigger exists. d. GS-13 - (i) Relevant applicant pool data was not available for comparison. (ii) PWTD qualified applicant

pool rate was 2.59% compared with their selection rate of 1.15%. A trigger exists.

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

a. SES - Qualified applicant pool data was not available for comparison.

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 No
- d. New Hires to GS-13 (PWTD) Answer Yes

a. SES – Qualified applicant pool data was not available for comparison. b. GS-15 - The new hires qualified applicant pool rate for PWTD was 1.55% compared to their 0% selection rate. A trigger exists. d. GS-13 - The new hires qualified applicant pool rate for PWTD was 2.20% compared to their 2.08% selection rate. A trigger exists.

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 No
- c. Supervisors
 - i. Qualified Internal Applicants (PWD) Answer N/A
 - ii. Internal Selections (PWD) Answer No

a. Executives - (i) Relevant applicant pool data was not available for comparison. b. Managers - (i) Relevant applicant pool data was not available for comparison. c. Supervisors - (i) Relevant applicant pool data was not available for comparison.

6. Does your agency have a trigger involving PWTDD 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 (PWTDD) Answer N/A

ii. Internal Selections (PWTDD) Answer No

b. Managers

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

ii. Internal Selections (PWTDD) Answer Yes

c. Supervisors

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

ii. Internal Selections (PWTDD) Answer No

a. Executives - (i) Relevant applicant pool data was not available for comparison. b. Managers - (i) Relevant applicant pool data was not available for comparison. (ii) - The qualified applicant pool rate for PWTDD was 2.97% compared to their 0.00% selection rate. A trigger exists. c. Supervisors - (i) Relevant applicant pool data was not available for comparison.

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

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 PWTDD 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 (PWTDD) Answer Yes

b. New Hires for Managers (PWTDD) Answer Yes

c. New Hires for Supervisors (PWTDD) Answer No

a. Executives - The new hires qualified applicant pool rate for PWTDD was 1.39% compared to their 0% selection rate. A trigger exists. b. Managers - The new hires qualified applicant pool rate for PWTDD was 2.02% compared to their 1.43 % selection rate. A

trigger exists.

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

- 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 10 (25%) of 40 eligible Schedule A employees after two years of service. This is an increase since the last reporting period and continues to be a focused effort for improvement to convert eligible Schedule A employees from excepted service to career service.

- 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 8.75% and 3.03%. The voluntary and involuntary separation rate for employees without disabilities was 6.31% and 2.39% respectively. PWD voluntarily and involuntarily separated at rates higher than persons without disabilities. Triggers exist for PWD among voluntary and involuntary separations.

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	18	0.24	0.17
Permanent Workforce: Resignation	248	3.34	2.38
Permanent Workforce: Retirement	403	5.32	3.92
Permanent Workforce: Other Separations	216	2.76	2.14
Permanent Workforce: Total Separations	885	11.65	8.62

- 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

The voluntary and involuntary separation inclusion rate for PWTD was 10.25% and 1.55%. The voluntary and involuntary separation rate for employees without disabilities was 6.31% and 2.39% respectively. PWTD voluntarily separated at a rate higher than persons without disabilities. A trigger exists for PWTD among voluntary separations.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	18	0.00	0.20
Permanent Workforce: Resignation	248	3.07	2.67
Permanent Workforce: Retirement	403	7.06	4.27
Permanent Workforce: Other Separations	216	1.53	2.37
Permanent Workforce: Total Separations	885	11.66	9.51

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.

Office of Workforce Relations is gathering preliminary information in Exit Surveys through root cause analysis to examine trends.

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/>

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 FY23, the CG plans to review the reasonable accommodation policy and forms to incorporate recent changes outlined in the Pregnant Workers Fairness Act (PWFA) and the Providing Urgent Maternal Protections (PUMP) For Nursing Mothers Act. The CG continues to explore a reasonable accommodations database with robust features that offer interactive secure communications with privacy protection for information or documents.

C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

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

The average timeframe for processing initial requests for reasonable accommodations for all USCG regions was approximately 10 days (9.93).

- 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.

Enforcing the practice of reducing the amount of time each region processes reasonable accommodation requests has resulted in a faster processing time from 30 days or more to under 15 days. This practice includes ensuring that each region reports monthly to HQ on the number or reasonable accommodation requests received, time frames from the receipt of the request to temporary accommodation (if provided) to denial or approval of the request, and any other tolling of the time (search for reassignment, medical documentation pending receipt). Additionally, the Disability Program Manager monitors processing times quarterly and notifies CG regions if their processing of reasonable accommodation requests are too slow or if they are right on track, while also reaching out to each regional director to provide any additional assistance or training if they are exceeding the 15-day processing time.

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.

Training has been conducted twice for managers, supervisors and staff at DEOMI by the Disability Program Manager on PAS to help them understand the requirements and how to provide assistance to their employees who are in need of such assistance.

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.

There were no findings of discrimination in FY22 alleging Harassment based on disability status.

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 No

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

There were no findings of discrimination for failure to accommodate during FY22.
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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 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: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	The previous 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 no 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. The CG’s FY22 data showed triggers continue to exist across multiple awards categories. (See Part J; Section IV – C (2))					
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	
02/28/2020	03/31/2020	No	08/30/2024		Increase the inclusion rate of time-off and cash awards for persons with disabilities and persons with targeted disabilities to meet or exceed the rate of persons without disabilities.	
Responsible Official(s)						
Title		Name		Standards Address The Plan?		
Chief, Office of Workforce Relations		Ryan Smith		No		
Chief, Equity, Policy, and Complaints Division		TBD		Yes		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activities			Sufficient Staffing & Funding?	Modified Date	Completion Date
04/01/2022	Review awards policy and procedures, and application of such.			Yes		04/01/2022
08/30/2024	Prepare report of analysis results.			Yes		

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
08/30/2024	Collect, review, and analyze relative data to identify recurring themes and trends.	No		
08/30/2024	Develop and implement action items to communicate equity in awards and identified issues.	No		
Report of Accomplishments				
Fiscal Year	Accomplishment			
2022	<ul style="list-style-type: none"> • The Civil Rights Directorate submitted a budget request for a contractor, conducted market research, and drafted a statement of work in an effort to procure a vendor to conduct a barrier analysis. • The Office of Workforce Relations began the process of updating CG’s awards instruction and will include language to help address this issue. 			

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:		The previous voluntary and involuntary separation inclusion rate for PWD was 5.42% and 2.65%. The voluntary and involuntary separation rate for employees without disabilities was 5.01% and 2.20% respectively. PWD voluntarily and involuntarily separated at rates higher than persons without disabilities. Triggers exist for PWD among voluntary and involuntary separations. The voluntary and involuntary separation inclusion rate for PWTD was 5.92% and 1.25%. The voluntary and involuntary separation rate for employees without disabilities was 5.01% and 2.20% respectively. PWTD voluntarily separated at a rate higher than persons without disabilities. A trigger exists for PWTD among voluntary separations. The CG's FY22 data showed triggers continue to exist. (See Part J – Section V; A (2-3))				
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.		TBD		TBD		
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	No	12/30/2023		Decrease the voluntary and involuntary separation inclusion rate for PWD and voluntary separation inclusion rate for PWTD to below the rate of those without disabilities.	
Responsible Official(s)						
Title		Name		Standards Address The Plan?		
Civil Rights Directorate Chief, Equity, Policy, and Complaints Division		TBD		Yes		
Chief, Office of Workforce Relations		Ryan Smith		No		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activities			Sufficient Staffing & Funding?	Modified Date	Completion Date
09/01/2022	Implement CG Exit Survey.			Yes		09/01/2022
05/13/2022	Review and analyze exit survey data.			Yes	12/30/2023	
12/30/2022	Develop and implement Remote Work Policy.			Yes		10/27/2022

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
01/30/2023	Issue Remote Work Program guidance and program requirements to civilian workforce.	Yes		11/02/2022
12/30/2023	Establish CG Engagement Steering Committee to emphasize participation in FEVS, Exit Survey, and other CG Surveys and role of employee engagement in improving workforce morale, recruitment and retention.	Yes		
12/30/2023	Develop 2023 CG Employee Engagement Action plan with goal to increase participation in employee feedback platforms in order to improve targeted action planning.	Yes		
Report of Accomplishments				
Fiscal Year	Accomplishment			
2022	<ul style="list-style-type: none"> • The Civil Rights Directorate submitted a budget request for a contractor, conducted market research, and drafted a statement of work in an effort to procure a vendor to conduct a barrier analysis. • The Coast Guard issued Remote Work Policy October 27, 2022. In addition, an ANCHR (Advisory Notice from Civilian Human Resources) was issued on November 2, 2022, to all civilian employees announcing the Remote Work Program requirements and eligibility. • Coast Guard implemented the CG Exit Survey to collect improved data on separating civilian employees. Data collection is underway. 			

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?	All Schedule A employees are not converted to permanent positions after two years of satisfactory performance.				
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		
	TBD		TBD		
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	08/30/2024		Convert Schedule A employees to permanent positions after two years of satisfactory performance.
Responsible Official(s)					
Title		Name		Standards Address The Plan?	
Civil Rights Directorate Chief, Equity, Policy, and Complaints Division		TBD		Yes	
Chief, Office of Civilian Human Resources Operations		Diane Beatrez		No	

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2020	The Selective Placement Program Coordinator (SPPC) will continue sending a list of Schedule A employees eligible for conversion to the Office of Civilian Human Resources Operations at the end of each quarter. The DEIA liaison in the Office of Civilian Human Resources Operations will reach out to hiring managers and HR specialists and send them list of those Schedule A eligible employees on a quarterly basis.	Yes		08/28/2020
01/30/2022	Responsible POC's will monitor quarterly.	Yes		
10/01/2022	Send reminders to management team about pending Schedule A conversions.	Yes		
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.			
2022	<ul style="list-style-type: none"> • The Civil Rights Directorate submitted a budget request for a contractor, conducted market research, and drafted a statement of work in an effort to procure a vendor to conduct a barrier analysis. • The CG converted 10 eligible Schedule A employees to permanent positions. 			
2021	Established a process where a list of eligible Schedule A candidates for conversion is sent to the Office of Civilian Human Resources Operations. Converted nine eligible Schedule A employees to permanent positions.			

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: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Prior 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. The CG's FY22 data showed a trigger exist for PWD. (See Part J – Section IV; C (2))					
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			
	TBD		TBD			
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	09/30/2024		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?		
Civil Rights Directorate Chief, Equity, Policy, and Complaints Division		TBD		Yes		
Chief, Office of Workforce Relations		Ryan Smith		No		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activities			Sufficient Staffing & Funding?	Modified Date	Completion Date
05/31/2022	Review policy and procedures, and application of such.			Yes		05/31/2022
05/31/2022	Conduct trend analysis of QSI distribution data.			Yes		05/31/2022
09/30/2024	Update policy to include language for equitable distribution of QSI's.			Yes		

Report of Accomplishments	
Fiscal Year	Accomplishment
2022	<ul style="list-style-type: none">• The Civil Rights Directorate submitted a budget request for a contractor, conducted market research, and drafted a statement of work in an effort to procure a vendor to conduct a barrier analysis.• The Office of Workforce Relations began the process of updating CG's awards instruction and will include language to help address this issue.• Conducted trend analysis of QSI distribution data.

Source of the Trigger:	Workforce Data (if so identify the table)				
Specific Workforce Data Table:	Workforce Data Table - B8				
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?	Previous PWTD participation rate among internal applicants for promotions to SES positions was 3.57%. The qualified internal applicants' rate for PWTD was 0.00 % compared to the internal selection rate of 0.00%. Although PWTD were among internal applicants for promotions to SES positions, they were not among qualified internal applicants and internal selectees. The new hires qualified applicant pool rate for PWD was 8.93% for promotions to SES positions, compared to their selection rate of 0.00%. PWD were not among new hires selectees for promotions to SES positions, although they were among qualified applicants. The new hires qualified applicant pool rate for PWTD was 3.77% for promotions to SES positions, compared to their selection rate of 0.00%. PWTD were not among new hires selectees for promotions to SES positions, although they were among qualified applicants. The qualified internal applicants' rate for PWTD was 2.12 % compared to their internal selection rate of 0.00%. PWTD were not among internal selections for promotions to executive positions, although they were among qualified applicants. The new hires qualified applicant pool rate for PWTD was 3.27% for promotions to executive positions, compared to their selection rate of 0.00%. PWTD were not among internal selections for promotions to executive positions, although they were among qualified applicants. Data for FY22 showed triggers continue to exist. Data for FY22 showed triggers continue to exist. (See Part J – Section IV (D))				
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		
	TBD		TBD		
Objective(s) and Dates for EEO Plan					
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
10/01/2020	09/30/2022	Yes	08/30/2024		Increase the internal selections and new hires rate of persons with disabilities and persons with targeted disabilities for promotions to management and senior level positions to meet or exceed the respective groups' participation qualified applicants' rate.
Responsible Official(s)					
Title		Name		Standards Address The Plan?	
Civil Rights Directorate Chief, Equity, Policy, and Complaints Division		TBD		Yes	
Deputy Assistant Commandant for Human Resources		Dr. D.M. Navarro		No	

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
04/30/2022	CG-1 will send an email to all selecting officials to consider PWD, PWTD applicants when SES vacancies occur to enhance promotion.	Yes	06/10/2022	10/31/2022
09/30/2022	Conduct outreach to Disability organizations to post JOAs to increase the number of qualified applicants.	Yes	08/30/2024	
Report of Accomplishments				
Fiscal Year	Accomplishment			
2022	<ul style="list-style-type: none"> • The Civil Rights Directorate submitted a budget request for a contractor, conducted market research, and drafted a statement of work in an effort to procure a vendor to conduct a barrier analysis. • CG-1D sent an email to all Flag Officers and SESs to encourage recruiting and applications for a diverse candidate pool. 			

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

Barrier #1: FY20 - Some of the complaint reviews were conducted later in order to collect the data in a more effective manner.
 Barrier #2: FY20 - Some of the complaint reviews were performed later than anticipated in order to collect the data in a more 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.