

**MD-715 – Part J**  
**Special Program 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 |

There are no triggers by grade level for PWD (36.67%) as to the Cluster GS-1 to GS-10 or for Cluster GS-11 to SES for PWD (14.77%) compared to the permanent population which totals 940 employees.

\*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 |

There are no triggers by grade level for PWTD (5%) as to the Cluster GS-1 to GS-10 or for Cluster GS-11 to SES for PWTD (3.1%) compared to the permanent population which totals 940 employees.

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

During the first quarter FY20, the Office of Economic Impact and Diversity (OEID) communicated the numerical goals to key Human Resources personnel and the agency's Administrative Officers, all of whom work with the hiring managers on recruitment. OEID updated the Diversity Dashboard for manager and supervisor reference.

**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

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	
Section 508 Compliance	0	1	0	Nathan Alarid Webmaster
Special Emphasis Program for PWD and PWTD	0	1	0	LaKischa Cook EEO Specialist
Processing applications from PWD and PWTD	0	5	0	Valerie De Marquez Supervisory Human Resources Specialist demarquez@wapa.gov
Architectural Barriers Act Compliance	0	6	0	HQ and Regional Facilities Managers
Processing reasonable accommodation requests from applicants and employees	0	6	0	Don Gerrish Supervisory Human Resources Specialist gerrish@wapa.gov
Answering questions from the public about hiring authorities that take disability into account	0	10	0	Valerie De Marquez Supervisory Human Resources Specialist demarquez@wapa.gov

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

Answer Yes

Disability program personnel are expert HR specialists with a solid understanding of flexible hiring authorities to include Schedule A. Human Resources Business Partners and WAPA's local reasonable accommodation coordinators received periodic updates on reasonable accommodation issues and procedures and participated in reasonable accommodation training for managers and supervisors. Future training is also planned by the Department of Energy's Corporate Reasonable Accommodation Program Manager.

## 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

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## Section III: 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.

WAPA relies on varied recruitment resources to include: Use of Schedule A authority via USAjobs which includes all Government- wide merit announcements; Partnership with VA VOC Rehab in multiple states; Compilation and use of applicant file for 30% service connected veterans & candidates who qualify under the Schedule A authority; Relationships with local disability organizations, and universities/colleges student organizations; Participation in the Workforce Recruitment Program.

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

WAPA uses the following hiring authorities: Schedule A; 30% Disabled Veterans; VRA; VEOA.

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.

SF 15; VA letter designating compensable disability; VOC Rehab letter; Medical documents The majority are sent to the hiring official through a referral certificate based on applicant's self-nomination via USAjobs and/or HR staffers screen resumes on file for all vacancies. Many other considerations are through the unsolicited process which includes Schedule A and Provisional appointments.

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 PMA SSC HR Business Partners (HRBP) team provides consultation with hiring officials for every recruitment action. In these meetings, the HRPB experts provide guidance on hiring authorities for the hiring official's consideration and explore in-depth the possibilities of noncompetitive hiring flexibilities. These discussions include Schedule A and veterans authorities. These situational discussions lead to a more robust level of understanding and consideration of the hiring options. Moreover, the HRBP team, in consult, refers the hiring official to the EEO Dashboard which provides on-time organizational RNO information so the hiring official better understands the context of the demographics within the unit. To compliment the one-on-one guidance and discussions, the HRBP team has provided several instances of local trainings/ presentations regarding hiring authorities and flexibilities for supervisors. Moreover, the HRBP team partnered with a VA representative to provide a deep-dive briefing on the VA's Non-Paid Work Experience program which also included specifics related to 30% Disabled Veteran Hiring. Lastly, supervisors have access to the DOE desk reference on hiring flexibilities, and are required to complete annual trainings in Learning Nucleus e.g. A Roadmap to Success: Hiring, Retaining, and Including People with Disabilities and Veteran Employment Training.

**B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS**

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

The agency's efforts include: Partnering with VOC Rehab; Participation in the Transition Assistance program; Sharing announcements with disability programs at universities and colleges; Attending employer boards; Participation in job/career fairs.

**C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)**

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If "yes", please describe the triggers below.

- a. New Hires for Permanent Workforce (PWD) Answer No
- b. New Hires for Permanent Workforce (PWTD) Answer Yes

There are no triggers for PWD FY20 new hires however the hiring of PWTD falls lower than the 2% requirement and was 1.59%.

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

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

There are triggers for PWD in the AD 303 Power System Dispatchers at 7.1%, GS 850 Electrical Engineer at 0%, WB with only 2%. There are triggers for PWTD for the AD 303 Power System Dispatchers at 0%, GS 850 Electrical Engineer at 0%, GS 1130 Public Utilities Specialist at 0%, GS 2210 Information Technology Specialists at 0%.

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

Based on the available data, there are no triggers. However, the data is incomplete. WAPA continues to have difficulty with reliable applicant flow data for a valid barrier analysis, and will begin to use USA Staffing in July 2021 and continue to work with the PMA Shared Service Center to resolve this issue.

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 N/A

b. Promotions for MCO (PWTD) Answer N/A

See previous answer.

### Section IV: 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.

WAPA relies on varied recruitment resources to include: Use of Schedule A authority via USAjobs which includes all Government- wide merit announcements; Partnership with VA VOC Rehab in multiple states; Compilation and use of applicant file for 30% service connected veterans & candidates who qualify under the Schedule A authority; Relationships with local disability organizations, and universities/colleges student organizations; Participation in the Workforce Recruitment Program.

#### B. CAREER DEVELOPMENT OPPORTUNITES

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

WAPA uses the following hiring authorities: Schedule A; 30% Disabled Veterans; VRA; VEOA

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	363	20				
Training Programs		11		0		0
Fellowship Programs						
Mentoring Programs						
Coaching Programs						
Detail Programs						
Other Career Development Programs						

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

WAPA will continue to work with the Shared Service Center for accurate applicant flow data as they relate to career development.

4. Do triggers exist for PWTB 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 (PWTB) Answer N/A
- b. Selections (PWTB) Answer N/A

WAPA will continue to work with the Shared Service Center for accurate applicant flow data as they relate to career development.

### C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTB 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 (PWTB) Answer Yes

Inclusion Rates for PWD and PWTB consistently are lower in all levels of time-off awards with the exception of PWD in the 31-40 our category: 1-10 hours: 31.03 (No Disability), 26.09 (PWD), 27.5 (PWTB) 11-20 hours: 65.23 (No Disability), 53.62 (PWD), 35.00 (PWTB) 21-31 hours: 12.41 (No Disability), 9.18 (PWD), 7.5 (PWTB) 31-40 hours: 13.29 (No Disability), 14.49 (PWD), 12.5 (PWTB) 41 + hours: 4.46 (No Disability), 3.38 (PWD), 0.00 (PWTB) Cash Awards indicate that a trigger only exists in the \$500 and under category with a 70.72 (No Disability), 57.49 (PWD) and 50 (PWTB). However in all other cash award categories the inclusion rates for PWD and PWTB exceed those with a disability. For example, in the \$2000-\$2999 category: 26.25 (No Disability), 29.95 (PWD) and 42.50 (PWTB).

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTB 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 (PWTB) Answer No

QSIs awarded in FY20 indicate that both PWD (2.90) and PWTB (2.50) have inclusion rates that exceed those without disabilities (2.39).

3. If the agency has other types of employee recognition programs, are PWD and/or PWTB 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 (PWTB) Answer N/A

WAPA has a recognition program known as Gold Star, SOAR, and TOWER awards which allows for employees to be recognized for their achievements with gift cards of \$50, money, and time off, respectively.

### D. PROMOTIONS

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

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

d. Grade GS-13

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

ii. Internal Selections (PWD) Answer N/A

OEID will utilize USA Staffing and work with the PMA SSC HR to obtain relevant internal promotion applicant flow data.

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

a. SES

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

ii. Internal Selections (PWTB) Answer N/A

b. Grade GS-15

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

ii. Internal Selections (PWTB) Answer N/A

c. Grade GS-14

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

ii. Internal Selections (PWTB) Answer N/A

d. Grade GS-13

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

ii. Internal Selections (PWTB) Answer N/A

OEID will utilize USA Staffing and work with the PMA SSC HR to obtain relevant internal promotion applicant flow data.

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

a. New Hires to SES (PWD) Answer N/A

b. New Hires to GS-15 (PWD) Answer N/A

c. New Hires to GS-14 (PWD) Answer N/A

d. New Hires to GS-13 (PWD) Answer N/A

OEID will utilize USA Staffing and work with the PMA SSC HR to obtain relevant internal promotion applicant flow data.

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

a. New Hires to SES (PWTB) Answer N/A

b. New Hires to GS-15 (PWTB) Answer N/A

c. New Hires to GS-14 (PWTB) Answer N/A

d. New Hires to GS-13 (PWTB) Answer N/A

OEID will utilize USA Staffing and work with the PMA SSC HR to obtain relevant internal promotion applicant flow data.

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

a. Executives

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

ii. Internal Selections (PWD) Answer N/A

b. Managers

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

ii. Internal Selections (PWD) Answer N/A

c. Supervisors

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

ii. Internal Selections (PWD) Answer N/A

OEID will utilize USA Staffing and work with the PMA SSC HR to obtain relevant internal promotion applicant flow data.

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

a. Executives

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

ii. Internal Selections (PWTD) Answer N/A

b. Managers

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

ii. Internal Selections (PWTD) Answer N/A

c. Supervisors

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

ii. Internal Selections (PWTD) Answer N/A

OEID will utilize USA Staffing and work with the PMA SSC HR to obtain relevant internal promotion applicant flow data.

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

a. New Hires for Executives (PWD) Answer N/A

b. New Hires for Managers (PWD) Answer N/A

c. New Hires for Supervisors (PWD) Answer N/A

OEID will utilize USA Staffing and work with the PMA SSC HR to obtain relevant internal promotion applicant flow data.

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 N/A

b. New Hires for Managers (PWTD) Answer N/A

c. New Hires for Supervisors (PWTD) Answer N/A

OEID will utilize USA Staffing and work with the PMA SSC HR to obtain relevant internal promotion applicant flow data.

**Section V: 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 CFR § 213.3102(u)(6)(i))? If "no", please explain why the agency did not convert all eligible Schedule A employees.

Answer No

The Shared Service Center reports that there were 13 Schedule A appointments in FY20. There was one employee that was converted timely within the specified timeframe that were appointed under Schedule A.

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

Involuntary separations indicate a trigger in PWD (1.42 or 3 people) vs non-disabled (0.31 or 4 people). Voluntary separations also yield a trigger driven by retirements and not resignations. Retirement inclusion rates are 3.76 (Not Disabled), 5.21 (PWD). Resignation rate of 0.95 in PWD is less than the 1.49 inclusion rate of non-disabled persons.

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

Involuntary separations indicate a trigger in PWTD (2.5) vs the 0.31 non-disabled inclusion rate. Voluntary separations have a trigger as well driven by 3 retirements in the PWTD category which is a 7.5 inclusion rate vs the 3.76 rate of non-disabled people.

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.

Exit interviews suggested that WAPA should participate in targeted recruitment of disabled employees.

## B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

<https://www.wapa.gov/Pages/508-compliance.aspx>

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

<https://www.wapa.gov/Pages/508-compliance.aspx>

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.

<https://www.wapa.gov/Pages/508-compliance.aspx>

## 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 processing time was less than thirty days.

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

The agency LRACs and supervisors received training from the DOE reasonable accommodation coordinator in FY20 contributing to timely decisions.

## 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.

WAPA did not have any PAS requests in FY20. The agency will rely upon DOE for a blanket purchase agreement to ensure available vendors in the event a request is received.

## Section VI: EEO Complaint and Findings Data

### A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer Yes

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Answer Yes

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

Government Average: Harassment - 20.82%; 3 allegations of Harassment based on disability of the 6 total allegations or 50%. No findings of discrimination; One case filed in a previous year was settled in the reporting period.

### 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.

Government Average: Failure to Accommodate - 14.02%. 6 allegations involving RA in total. 3 of which were based on disability or 50%. No Settlements or Findings.

## Section VII: 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

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.

WAPA did not have any PAS requests in FY20. The agency will rely upon DOE for a blanket purchase agreement to ensure available vendors in the event a request is received.

## Section VI: EEO Complaint and Findings Data

### A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer Yes

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Answer Yes

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

Government Average: Harassment - 20.82%; 3 allegations of Harassment based on disability of the 6 total allegations or 50%. No findings of discrimination; One case filed in a previous year was settled in the reporting period.

### 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.

Government Average: Failure to Accommodate - 14.02%. 6 allegations involving RA in total. 3 of which were based on disability or 50%. No Settlements or Findings.

## Section VII: 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

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.

WAPA did not have any PAS requests in FY20. The agency will rely upon DOE for a blanket purchase agreement to ensure available vendors in the event a request is received.

## Section VI: EEO Complaint and Findings Data

### A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer Yes

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Answer Yes

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

Government Average: Harassment - 20.82%; 3 allegations of Harassment based on disability of the 6 total allegations or 50%. No findings of discrimination; One case filed in a previous year was settled in the reporting period.

### 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.

Government Average: Failure to Accommodate - 14.02%. 6 allegations involving RA in total. 3 of which were based on disability or 50%. No Settlements or Findings.

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<b>Source of the Trigger:</b>	Workforce Data (if so identify the table)					
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B2					
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	PWTD are separating for reasons other than retirement at a rate 1.67% higher than their participation rate in FY20.					
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i> People with Targeted Disabilities					
<b>Barrier Analysis Process Completed?:</b>	Y					
<b>Barrier(s) Identified?:</b>	Y					
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b>		<b>Description of Policy, Procedure, or Practice</b>			
	PWTD are separating for reasons other than retirement at a rate (4.40%) higher than their inclusion		Possible promotion or retention issues for PWTD resulting in a higher separation rate.			
<b>Objective(s) and Dates for EEO Plan</b>						
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>	
10/01/2017	09/30/2020	Yes			Despite the small sample size, this trigger has carried over from the previous year and merits further attention. The objective for this plan is to identify what barriers, if any, may be contributing to the departures.	
<b>Responsible Official(s)</b>						
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>		
Equal Employment Manager		Charles Montanez		No		
<b>Planned Activities Toward Completion of Objective</b>						
<b>Target Date</b>	<b>Planned Activities</b>			<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>	<b>Completion Date</b>
09/30/2021	Collect exit interview surveys and analyze the results.			Yes		
<b>Report of Accomplishments</b>						
<b>Fiscal Year</b>	<b>Accomplishments</b>					
2019	Collected and analyzed results of exit interview survey results.					

<b>Source of the Trigger:</b>	Workforce Data (if so identify the table)					
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B2					
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	Continue permanent new hire rates for PWD and PWTD. The total for PWD was 15.87% and for PWTD was 1.59% in FY20.					
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i>					
	People with Disabilities People with Targeted Disabilities					
<b>Barrier Analysis Process Completed?:</b>	Y					
<b>Barrier(s) Identified?:</b>	Y					
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b>	<b>Description of Policy, Procedure, or Practice</b>				
	Hire and retain PWD and PWTD	WAPA needs to continue encouraging the use of the Diversity Dashboard, Schedule A hires, and other hiring practices.				
<b>Objective(s) and Dates for EEO Plan</b>						
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>	
10/01/2018	09/30/2021	Yes			Use the dashboard for workforce demographics that displays quarterly disability information by region and major occupation and share with hiring officials in all regions.	
<b>Responsible Official(s)</b>						
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>		
Equal Employment Manager		Charles Montanez		No		
<b>Planned Activities Toward Completion of Objective</b>						
<b>Target Date</b>	<b>Planned Activities</b>			<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>	<b>Completion Date</b>
09/30/2021	Confer with the Shared Service Center regarding dashboard use and provide training to the HR Business Partners. Market use throughout WAPA through announcements, regional and HQ briefings and demonstrations, development of an FAQ site and creation of a Knowledge Management video.			Yes		

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
2019	WAPA's use of the dashboard educated HR and hiring managers and resulted in exceeding the EEOC's hiring goals for PWD and PWTD with a hiring rate of 15.87% for PWD and for 1.59% for PWTD in FY20.

<b>Source of the Trigger:</b>	EEO Complaint(s)
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<b>Specific Workforce Data Table:</b>	Workforce Data Table - B1
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<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	As compared to the government average, allegations of disability discrimination equal 50% of formal complaints filed in FY20. During this reporting period WAPA only had 6 total complaints so the sample size is small. The 3 alleged disability discrimination formal complaints involved both harassment and reasonable accommodation. Reasonable accommodation training was provided to LRACs and to managers and supervisors. Relative to the harassment allegations, these were fact specific and personnel decisions were made specific to the complainants. Thus, there is no barrier we can discern at this time.
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<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i> People with Disabilities
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<b>Barrier Analysis Process Completed?:</b>	Y
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<b>Barrier(s) Identified?:</b>	Y
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<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<table border="1"> <tr> <th>Barrier Name</th> <th>Description of Policy, Procedure, or Practice</th> </tr> <tr> <td> </td> <td> </td> </tr> </table>	Barrier Name	Description of Policy, Procedure, or Practice		
Barrier Name	Description of Policy, Procedure, or Practice				

**Objective(s) and Dates for EEO Plan**

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description

**Responsible Official(s)**

Title	Name	Standards Address The Plan?
Equal Employment Manager	Charles Montanez	Yes

**Planned Activities Toward Completion of Objective**

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
2020	In FY20, LRAC training was provided and Reasonable Accommodation training was provided to all managers and supervisors.

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

The COVID 19 Pandemic impacted resources and workflow in FY20.

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

The Department of Energy's emphasis on veteran and disability hiring goals resulted in increased targeted recruitment efforts and Schedule A hires giving a boost to total PWTD employed.

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.

Resources and staffing impacts will allow for a better partnership with Regional offices and management to identify triggers and barriers in FY21.