

## 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 plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

#### Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 C.F.R. § 1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with reportable and 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)	Yes 0	No 0
b. Cluster GS-11 to SES (PWD)	Yes 0	No 0

The NCUA was above the 12 percent benchmark for onboard PWD's at the end of FY2018, this figure was 12.8 percent. PWDs at each of the two grade level clusters at the end of FY2018 were as follows:

21.43 percent of NCUA staff CU-10 and below reported a disability.

12.09 percent of NCUA staff CU-11 and above reported a disability.

EEOC 501 regulations specify that employees not paid under the General Schedule can be compared by salary to those under the General Schedule based on salary cut-offs at the Washington, DC Locality. When the CU pay scale was converted to the GS scale at each of the two clusters, the NCUA was also above the benchmark at each level.

18.90 percent of employees paid a total salary at the GS-10 and below level reported a disability.

11.12 percent of employees paid a total salary at the GS-11 and above level reported a disability.

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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)	Yes 0	No 0
b. Cluster GS-11 to SES (PWTD)	Yes 0	No 0

The NCUA was above the 2 percent benchmark for onboard PWTD’s at the end of FY2018, this figure was 3.06 percent. PWTDs at each of the two grade level clusters at the end of FY2018 were as follows:

8.33 percent of NCUA staff CU-10 and below reported a Targeted disability.

2.63 percent of NCUA staff CU-11 and above reported a Targeted disability.

EEOC 501 regulations specify that employees not paid under the General Schedule can be compared by salary to those under the General Schedule based on salary cut-offs at the Washington, DC Locality. When the CU pay scale was converted to the GS scale at each of the two clusters, the NCUA was also above the benchmark at each level.

6.30 percent of employees paid a total salary at the GS-10 and below level reported a Targeted disability.

2.18 percent of employees paid a total salary at the GS-11 and above level reported a Targeted disability.

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

The agency’s Office of Minority and Women Inclusion corresponded with all NCUA directors and offices informing managers about the new disability codes. NCUA launched a new HR system which allows staff to update disability information without the need to submit a form.

## 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.

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**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.

**Yes 0**      No 0

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	
Processing applications from PWD and PWTD	6		6	Lisa Bazemore, Lead Human Resources Specialist, Office of Human Resources, mbazemore@ncua.gov
Answering questions from the public about hiring authorities that take disability into account	6		6	Lisa Bazemore, Lead Human Resources Specialist, Office of Human Resources mbazemore@ncua.gov
Processing reasonable accommodation requests from applicants and employees	2		2	Stephanie Smith, Senior EEO Specialist, Office of Minority and Women Inclusion, ssmith@ncua.gov
Section 508 Compliance	3	1		Nickol Davenport, Website AdminiOffstrator/Section 508 Coordinator, Office of the Chief Information Officer, edavenport@ncua.gov
Architectural Barriers Act Compliance	1			Alejandro Holguin, Facilities Manager,

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				Office of the Chief Financial Officer/Division of Procurement and Facilities Management, aholguin@ncua.gov
Special Emphasis Observances for PWD and PWTD	1			Carmen Reynolds, EEO Specialist, Office of Minority and Women Inclusion, creynolds@ncua.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.

Yes 0                  No 0

OMWI and OHR staff attend yearly disability workshops at the Federal Dispute Resolution Conference and/or EEOC’s Examining Conflicts in Employment Laws (EXCEL) training conference.

Additionally, human resources staff are provided on the job training regarding the sourcing, use and processing of various hiring appointing authorities, and their associated required documentation. New specialists are trained by senior specialists on the agency disability program and responsibilities.

**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.

Yes 0                  No 0

**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 APPLICANTS WITH DISABILITIES**

1. Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.

The NCUA participates in a number of activities to enhance outreach to individuals with disabilities. These efforts include:

- Maintaining a "talent bank" of Schedule A applicants who apply for agency positions.
- Utilizing LinkedIn Recruiter and the USAJOBS Resume Mining tool to significantly expand the outreach footprint to diverse applicants, including those with disabilities.
- Offering the Workforce Recruitment Program Services as an additional resource for managers to source potential applicants to fill vacant NCUA positions, in addition to the regular competitive recruitment process.

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.

The agency utilizes all available and appropriate hiring authorities to employ persons with disabilities. The NCUA's recruitment/outreach efforts included the following:

- Utilizing LinkedIn to improve outreach efforts. This tool allows the NCUA to expand outreach efforts to a more diverse pool of applicants, to include targeting and connecting with various disabled veterans groups and communities in LinkedIn.
- The Office of Human Resources (OHR) distributes NCUA vacancy announcements to over 550 diverse organizations, colleges and universities. This outreach effort includes veterans' organizations and organizations focused on hiring individuals with disabilities.
- All NCUA vacancy announcements are posted on targeted websites to ensure maximum distribution to a diverse audience, which includes individuals with disabilities.
- The NCUA maintains a talent bank of Schedule A applicants, which includes disabled veterans who apply for positions with the agency.

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- The NCUA uses the USAJobs Resume Mining database to search for highly qualified individuals with disabilities and/or veterans with a disability rating of 30% or more.

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.

The Disability Recruitment Program Manager utilizes a searchable Schedule A candidate database for hiring managers. Specialist discuss the process and review the Schedule A database with managers for every recruitment, and managers are encouraged to consider all available candidates prior to posting the vacancy. Additionally, once vacancy announcements are posted, each specialist is responsible for confirming the eligibility of qualified Schedule A candidates prior to issuing certificates to the hiring managers.

Applying to a vacancy announcement: Schedule A candidates may apply to agency postings through a vacancy announcement. Candidates who apply to a vacancy announcement are reviewed to determine their qualifications and eligibility. Thereafter, qualified candidates are forwarded to the hiring official on a referral list for consideration.

Contacting our Schedule A Coordinator: Once the candidate's application and supporting documentation are received, the coordinator will conduct a qualifications analysis of all materials submitted. After a careful review, candidates are notified of their status (qualified/not qualified). Afterwards, qualified candidates are added to the agency's Schedule A database. Each HR Specialist is required to review the database (prior to posting the vacancy announcement) and refer qualified candidates to the hiring official (at the hiring official's request).

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.

Yes 0

No 0

N/A 0

The agency has a supervisory orientation program (New Supervisor Training) and a resource center for employees that are newly appointed into supervisory positions. The resource center tools provide an overview of training requirements as well as immediate access to external training, webinars, and job aids.

The Schedule A job aid tools covers the hiring authority details, and also answers several commonly asked questions. In addition to the supervisory training and resource center tools provided to managers, each specialist is responsible for educating managers on the Schedule A hiring authority and process during the recruitment/hiring process.

**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 Human Resources distributes all vacancy announcements to over 550 diverse organizations. This includes organizations focused on hiring individuals with disabilities.

**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)  | Yes 0 | No 0 |
| b. New Hires for Permanent Workforce (PWTD) | Yes 0 | No 0 |

Table B8 indicates the agency hired 3 PWD (and 0 PWTD) out of a total of 86 permanent new hires. This represents 3.5 percent PWD new hires and 0 percent for PWTD, which suggests a trigger exist for both PWD and PWTD among new hires in the permanent workforce.

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.

- |                             |       |      |
|-----------------------------|-------|------|
| a. New Hires for MCO (PWD)  | Yes 0 | No 0 |
| b. New Hires for MCO (PWTD) | Yes 0 | No 0 |

After a review of table B8 and confirmation from the agency's human resources department, none of the 3 PWD new hires were hired for MCOs. As such 0 percent of the new hires were PWD or PWTD, which suggests a trigger exist for both PWD and PWTD among new hires in the permanent workforce.

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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.

- |  |       |      |
|--|-------|------|
| a. Qualified Applicants for MCO (PWD)  | Yes 0 | No 0 |
| b. Qualified Applicants for MCO (PWTD) | Yes 0 | No 0 |

Table B6P (relevant applicant pool): - 12.89 percent for PWDs - 3.03 percent for PWTDs  Table B7P (Qualified of those identified) - 3.52 percent for PWDs - 2.82 percent for PWTDs
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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.

- |                              |       |      |
|------------------------------|-------|------|
| a. Promotions for MCO (PWD)  | Yes 0 | No 0 |
| b. Promotions for MCO (PWTD) | Yes 0 | No 0 |

Table B9:  There were 2 qualified applications received for PWTD and 0 selections.
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## 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.

The NCUA's primary occupation is the Credit Union Examiner (CUE). Entry level CUEs are advertised and recruited as a career ladder position with promotion opportunity to a target level of CU-12. CUEs are provided extensive training to develop and reach the full performance level. As a result, 9 individuals with disabilities in this series (as identified on the SF-256) and 19 employees in this series with disabled veteran status were promoted in FY 18.

Note: All CUE announcements are open to Schedule A candidates.

## **B. CAREER DEVELOPMENT OPPORTUNITIES**

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

Leadership developmental training opportunities are offered through the Division of Training and Development. The programs are designed to provide competency-based leadership training. These programs include:

The Aspiring Leader Program: a program offered by the Graduate School's Center for Leadership and Management.

The Executive Leadership Program: a 9-month program offered to non-supervisors. Participants complete a variety of activities including a developmental detail, formal training sessions, etc.

The Management Development Program: an 18-month developmental program for non-supervisors. Candidates gain experience in defining project scopes, delegating work, developing others, etc.

The Excellence in Government Fellows: a 12-month program for supervisors/managers. Candidates are able to enhance their skills through a combination of coursework, action-learning projects, executive coaching and government-wide networking. Fellows remain in their full-time jobs, meet every six weeks and spend a total of 24 days in session.

The NCUA Executive Training Program: an 18-month program for senior level supervisors. This program is designed to help prepare employees to transition from supervisory/managerial positions into senior leadership positions within the agency.

The Executive Coaching Program: a 12-month program for the NCUA's executive staff. The program is designed to help managers become more highly effective leaders, reinforce leadership competencies, enhance performance, etc.

In addition, the agency offers a series of training opportunities through its internal training catalog, external training organizations, agency shadowing assignments and opportunities to participate in short-term details assignments. The agency also provides career development opportunities through its agency-wide mentorship program.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate. [Collection begins with the FY 2018 MD-715 report, which is due on February 28, 2019.]



**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)                      Yes 0                      No 0
- b. Awards, Bonuses, & Incentives (PWTD)                      Yes 0                      No 0

Table B13 shows there were only four time off awards given in 2018. Of those four, one was given to a PWD, another was given to a PWTD, and the remaining two were given to non-disabled staff

Looking at the total cash awards, there were no significant differences between PWD and ND, and the 4/5 rule also did not indicate any differences - therefore, no triggers identified for PWD awards.

There was no significant difference between PWTD and ND likely due to the small size of the PWTD group, even though there is a definite trend visible (79.5% vs. 64.71%; Any Cash Award by category ND, PWD, PWTD as compared to the Current Year Totals on B1, per EEOC guideline for this calculation). When breaking this down to the categories of Cash Awards \$100-500, and \$500 + the numbers were also too small to show a significant difference. Regardless, a difference was identified using the 4/5 rule for the Cash Awards \$500+ category between PWTD and both PWD and ND groups, which appears to be a trigger in this category.

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)    Yes 0                      No 0
- b. Pay Increases (PWTD)    Yes 0                      No 0

The Quality Step Increase section of Table B13 does not apply to NCUA because the agency is on a merit-pay system. Because of the four rating levels incorporated within NCUA’s current merit-pay system, trigger identification of pay increases would be outside the boundaries of a barrier analysis, and therefore a N/A response is necessary for both a. and b. above.

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)                      Yes 0                      No 0                      N/A 0
- b. Other Types of Recognition (PWTD)                      Yes 0                      No 0                      N/A 0

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**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.

a. SES

i. Qualified Internal Applicants (PWD)	Yes 0	No 0
ii. Internal Selections (PWD)	Yes 0	No 0

b. Grade GS-15

i. Qualified Internal Applicants (PWD)	Yes 0	No 0
ii. Internal Selections (PWD)	Yes 0	No 0

c. Grade GS-14

i. Qualified Internal Applicants (PWD)	Yes 0	No 0
ii. Internal Selections (PWD)	Yes 0	No 0

d. Grade GS-13

i. Qualified Internal Applicants (PWD)	Yes 0	No 0
ii. Internal Selections (PWD)	Yes 0	No 0

For SSP, there was no AFD information available.

For CU-15, table B11’s Relevant PWD was 10.37% and Qualified was 10.49%, and there were no selections.

For CU-14, table B11’s Relevant PWD was 5.48% and Qualified was 6.81%, and there were no selections.

For CU-13 table B11’s Relevant PWD was 13.95% and Qualified was 4.85%, and the selection was 4.35%.

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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.

a. SES

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0

b. Grade GS-15

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0

c. Grade GS-14

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0

d. Grade GS-13

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0

For SSP, there was no AFD information available.

For CU-15, table B11’s Relevant PWTD was 1.24% and Qualified was 5.24%, and there were no selections.

For CU-14, table B11’s Relevant PWTD was 1.37% and Qualified was 5.72%, and there were no selections.

For CU-13 table B11’s Relevant PWTD was 2.66% and Qualified was 4.85%, and there were no selections.

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.

a. New Hires to SES (PWD)	Yes 0	No 0
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b. New Hires to GS-15(PWD)	Yes 0	No 0
c. New Hires to GS-14 (PWD)	Yes 0	No 0
d. New Hires to GS-13(PWD)	Yes 0	No 0

There was no AFD for the SSP level.

The below were answer yes for b, c, and d above based on the government's overall goal for PWDs:

There were 28 qualified at the CU-15 level with 0 hires.

There were 25 qualified at the CU-14 level with 0 hires.

There were 23 qualified at the CU-13 level with 1 hire, which is 4.35 percent.

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.

a. New Hires to SES (PWTD)	Yes 0	No 0
b. New Hires to GS-15 (PWTD)	Yes 0	No 0
c. New Hires to GS-14 (PWTD)	Yes 0	No 0
d. New Hires to GS-13 (PWTD)	Yes 0	No 0

There was no AFD for the SSP level.

The below were answered yes for b, c, and d above based on the government's overall goal for PWTDs:

There were 14 qualified at the CU-15 level with 0 hires.

There were 21 qualified at the CU-14 level with 0 hires.

There were 11 qualified at the CU-13 level with 0 hires.

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

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applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

a. Executives

- |  |       |      |
|--|-------|------|
| i. Qualified Internal Applicants (PWD) | Yes 0 | No 0 |
| ii. Internal Selections (PWD)          | Yes 0 | No 0 |

b. Managers

- |  |       |      |
|--|-------|------|
| i. Qualified Internal Applicants (PWD) | Yes 0 | No 0 |
| ii. Internal Selections (PWD)          | Yes 0 | No 0 |

c. Supervisors

- |  |       |      |
|--|-------|------|
| i. Qualified Internal Applicants (PWD) | Yes 0 | No 0 |
| ii. Internal Selections (PWD)          | Yes 0 | No 0 |

The Office of Personnel Management provides applicant flow data to the NCUA. OPM does not provide any identifying information, including whether an applicant is a current employee. OPM’s rules of behavior and subsequent direction to the NCUA, in order to protect the integrity of the selection process, prevent the agency from matching demographic information provided by employees to specific job vacancies. It is for this reason, this office is unable to identify whether a position has supervisory status.



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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.

a. Executives

- i. Qualified Internal Applicants (PWTD)      Yes 0      No 0
- ii. Internal Selections (PWTD)      Yes 0      No 0

b. Managers

- i. Qualified Internal Applicants (PWTD)      Yes 0      No 0
- ii. Internal Selections (PWTD)      Yes 0      No 0

c. Supervisors

- i. Qualified Internal Applicants (PWTD)      Yes 0      No 0
- ii. Internal Selections (PWTD)      Yes 0      No 0

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The Office of Personnel Management provides applicant flow data to the NCUA. OPM does not provide any identifying information, including whether an applicant is a current employee. OPM's rules of behavior and subsequent direction to the NCUA, in order to protect the integrity of the selection process, prevent the agency from matching demographic information provided by employees to specific job vacancies. It is for this reason, this office is unable to identify whether a position has supervisory status.

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.

- |                                    |       |      |
|------------------------------------|-------|------|
| a. New Hires for Executives (PWD)  | Yes 0 | No 0 |
| b. New Hires for Managers (PWD)    | Yes 0 | No 0 |
| c. New Hires for Supervisors (PWD) | Yes 0 | No 0 |

The Office of Personnel Management provides applicant flow data to the NCUA. OPM does not provide any identifying information, including whether an applicant is a current employee. OPM's rules of behavior and subsequent direction to the NCUA, in order to protect the integrity of the selection process, prevent the agency from matching demographic information provided by employees to specific job vacancies. It is for this reason, this office is unable to identify whether a position has supervisory status.

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.

- |                                     |       |      |
|-------------------------------------|-------|------|
| a. New Hires for Executives (PWTD)  | Yes 0 | No 0 |
| b. New Hires for Managers (PWTD)    | Yes 0 | No 0 |
| c. New Hires for Supervisors (PWTD) | Yes 0 | No 0 |

The Office of Personnel Management provides applicant flow data to the NCUA. OPM does not provide any identifying information, including whether an applicant is a current employee. OPM's rules of behavior and subsequent direction to the NCUA, in order to protect the integrity of the selection process, prevent the agency from matching demographic information provided by employees to specific job vacancies. It is for this reason, this office is unable to identify whether a position has supervisory status.

## Section V: Plan to Improve Retention of Persons with Disabilities

To be a 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 personal assistance services.

### **A. VOLUNTARY AND INVOLUNTARY SEPARATIONS**

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

Yes 0      No 0      **N/A 0**

NCUA did not have any eligible Schedule A staff for conversion in 2018.

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)	<b>Yes 0</b>	No 0
b. Involuntary Separations (PWD)	Yes 0	<b>No 0</b>

In 2018, there were 115 total separations, 112 voluntary - 82 No Disability, 6 Not Identified, and 24 People with Disabilities (5 PWTD) - and 3 involuntary (2 ND, 1 PWD). Within voluntary separations there was a statistical difference between ND (8.85%) and PWD (16.9%) which is reflected in the total separations (9.06% vs. 17.61%). There were no statistical differences identified within the involuntary

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separations. This analysis indicates a trigger between PWD and ND for voluntary separations.

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)	Yes 0	No 0
b. Involuntary Separations (PWTD)	Yes 0	No 0

There were no statistical differences between PWTD voluntary separations (14.71%) and the ND (8.85%) or PWD (16.9%), likely due to small numbers involved, although this should be watched since it is a similar trend to PWD and likely would be significant if higher numbers were involved. Any interventions on PWD would also apply to PWTD and have positive impact.

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.

In the last 180 days, no respondents identifying with a disability have taken the exit survey.

## **B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES**

Pursuant to 29 C.F.R. § 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.

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The internet address on the NCUA'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. (Note: The NCUA's reasonable accommodation policy includes Section 508 for accommodation purposes—including filing a complaint, but the policy does not go into details regarding the Section 508 statute.) This is where the accessibility statement lives on NCUA.gov: <https://www.ncua.gov/About/Pages/open-government/accessibility-limited-english-proficiency.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.

The NCUA intends to amend the Accessibility Statement contained at its public website at <https://www.ncua.gov/accessibility-statement> to include notice of employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint. This update will be completed by September 30, 2019.

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.

Description of any programs, policies, or practices that the NCUA has undertaken, or plans to undertake, during the 2018 fiscal year, designed to improve accessibility of agency technology. The first iteration of the Section 508 Policy was recently approved and distributed December of 2017. We can now follow said guidance and enforce accessibility requirements for information technology products/services. OCIO created a Section 508 Resource Center on our internal NCUA Central site here: <http://ncuacentral/ocio/Pages/section508.aspx>. The site offers training resources available to staff and contractors, as well as other resources for meeting and learning about accessibility. There is also a dashboard available within NCUA Central that allows staff to view the progress of improving accessibility for the most utilized sites and applications. The dashboard is available at: <http://ncuacentral/ocio/Pages/Dashboard.aspx>. OCIO has identified, and continues to actively identify, areas that need remediation and/or updating. New NCUA content has to be accessible before it is posted on the public-facing websites. The OCIO works with content owners/creators to remediate deficiencies. Accessibility language has been updated in the Communications Manual, and it has also been included in the soon-to-be published web posting procedures instruction to staff.

**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.)

10-20 business 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.

Timely processing of requests; timely providing approved accommodations; conducting training for managers and supervisors; consulting with managers, supervisors, and employees on the process and the laws governing reasonable accommodations; and being proactive regarding the needs of persons with disabilities.

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

Pursuant to 29 C.F.R. § 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.

Managers and supervisors were provided information and guidance on personal assistance services. The OMWI sent a memorandum dated October 17, 2017 directly to all the agency directors, managers, supervisors, and to each individual NCUA office mailbox explaining the new PAS update, as well as the law behind it. The memorandum also included a "Questions and Answers" document from the EEOC.

There have been no requests to date for this service. The reasonable accommodation policy is being updated to incorporate PAS. Once the draft is approved and finalized, the policy will be distributed to all agency personnel.

## 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?  
Yes 0      No 0      **N/A 0**
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?  
Yes 0      No 0      **N/A 0**
3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

N/A.

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

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?  
Yes 0      **No 0**      N/A 0
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?  
Yes 0      **No 0**      N/A 0

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

The agency had no findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year.

## 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?

Yes 0      **No 0**

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

Yes 0      No 0      **N/A 0**

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.

<b>Trigger 1</b>	There are triggers for individuals with disabilities and individuals with targeted disabilities in the areas of new hires, promotions, and awards.	
<b>Barrier(s)</b>	Not yet identified	
<b>Objective(s)</b>	Review policies, practices and procedures that may be creating a barrier for the employment and career advancement of individuals with disabilities and targeted disabilities.	
<b>Responsible Official(s)</b>		<b>Performance Standards Address the Plan?</b> (Yes or No)
OMWI and OHR Directors		Yes
<b>Barrier Analysis Process Completed?</b> (Yes or No)		<b>Barrier(s) Identified?</b> (Yes or No)
No		No
<b>Sources of Data</b>	<b>Sources Reviewed?</b> (Yes or No)	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	Onboard; new hires, separations, applicant flow for mission critical occupation and internal merit promotions; separations, awards



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Complaint Data (Trends)	No	Not		
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	N/A		
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	Yes	In the last 180 days, no respondents identifying with a disability have taken the exit survey.		
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes			
Other (Please Describe)	Principal Examiner Test Data	Demographic as well as data regarding attempts and success failure in passing promotional test.		
<b>Target Date</b> (mm/dd/yyyy)	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding</b> (Yes or No)	<b>Modified Date</b> (mm/dd/yyyy)	<b>Completion Date</b> (mm/dd/yyyy)
12/31/2019	Root cause analysis/ Further adverse impact analysis of PE test	Yes		
<b>Fiscal Year</b>	<b>Accomplishments</b>			
2017	Adverse impact analysis of PE test			

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

The NCUA is working with the Office of Personnel Management to continue the barrier analysis of the Principal Examiner (PE) process. OPM is developing questions to survey recent managers of participants of PE exam

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

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The NCUA utilized services from the Office of Personnel Management (OPM) to evaluate the Principal Examiner (PE) promotional process for adverse impact. The PE test is the process through which NCUA examiners obtains promotions. The results of this test and adverse impact relative to individuals with disabilities were evaluated by agency leadership in its Talent Management Council and plans have been established to evaluate any contributing barriers in the coming year.

The TMC worked with OHR and OPM to develop a survey for examiners and for supervisory examiners. OPM and OHR convened focus groups to define the appropriate questions to determine the successful preparation techniques of the examiners who passed the PE test. The results from the survey will be used to identify best practices and to establish whether certain groups received differing levels of preparation from their supervisory examiners. The survey will be issued in the fall of 2019.

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.

Once the identified planned activities have been completed, the agency will address any needed corrective activity.