

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 benchmark at each of the grade level clusters at the end of FY17.

25.8 percent of employees CU-10 and below reported a disability.

13.1 percent of employees CU-11 and above reported a disability.

Additionally, 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, D.C. locality. When the CU pay scale was converted to the GS scale at each of the clusters, the NCUA was also above the benchmark at each level.

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

14.1 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 benchmark at each of the grade level clusters at the end of FY17.

7.5 percent of employees CU-10 and below reported a targeted disability.

3.0 percent of employees CU-11 and above reported a targeted disability.

Additionally, 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, D.C. locality. When the CU pay scale was converted to the GS scale at each of the clusters, the NCUA was above the benchmark at both of the clusters.

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

3.2 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 sent out correspondence to all agency directors and offices informing managers of the new disability 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

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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

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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	1			Stephanie Smith, Senior EEO Specialist, Office of Minority and Women Inclusion, ssmith@ncua.gov
Section 508 Compliance	1			Nickol Davenport, Website Administrator/Section 508 Coordinator, Office of the Chief Information Officer, edavenport@ncua.gov
Architectural Barriers Act Compliance	1			Alejandro Holguin, Facilities Manager, Office of the Chief Financial

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				Officer/Division of Procurement and Facilities Management, aholguin@ncua.gov
Special Emphasis Program for PWD and PWTD	1			Carmen Reynolds, Special Emphasis Program Manager, 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

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 training regarding various hiring appointing authorities, required documentation, etcetera, on the job. New specialists are trained by senior specialists on the 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 participated in a number of activities to enhance outreach to individuals with disabilities. These efforts included:

- Attending outreach and job fair events targeting veterans and people with disabilities. The job fairs were sponsored by Equal Opportunity Publications and consisted of career expos for minorities, women, people with disabilities, and wounded warriors.
- Maintaining a database of Schedule A applicants who apply for agency positions.
- Using LinkedIn Recruiter and the USAJOBS Resume Mining tool to significantly expand outreach to diverse applicants.
- Using Bender Consulting Services as an avenue for managers to identify qualified candidates in addition to the competitive recruitment process to fill positions.

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 uses all available and appropriate hiring authorities to employ persons with disabilities. During , the NCUA's recruitment and outreach efforts were limited due to the federal hiring freeze. In addition, the NCUA implemented a comprehensive agency-wide reform plan. The plan included an evaluation of the agency's business model and a streamlined recruitment and outreach approach. Nonetheless, the NCUA's recruitment/outreach efforts included the following:

- Used LinkedIn to improve outreach efforts. This tool allowed the NCUA to expand outreach efforts to a more diverse pool of applicants by targeting and connecting with various groups of veterans with disabilities and communities in LinkedIn.
- The Office of Human Resources distributed NCUA vacancy announcements to more than 550 diverse organizations, colleges, and universities. This included veterans' organizations and organizations focused on hiring individuals with disabilities.
- All NCUA vacancy announcements were posted on targeted websites to ensure maximum distribution to a diverse audience.

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- The NCUA database of Schedule A applicants included veterans with disabilities who applied for positions with the agency.
- The NCUA used the USAJobs Resume Mining database to search for highly qualified individuals with disabilities and/or veterans whose disability is 30 percent or more.
- The agency participated in job fairs sponsored by Equal Opportunity Publications. These targeted individuals with disabilities and veterans. These job fairs consisted of career expositions for minorities, women, people with disabilities, and wounded warriors.

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 uses a searchable Schedule A candidate database for hiring managers. Managers are encouraged to consider all available candidates prior to posting a 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.

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 an orientation program and a resource center for employees newly appointed into supervisory positions. The tool provides an overview of training requirements and immediate access to external training, webinars, and job aids.

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 distributed all vacancy announcements to more than 550 diverse organizations. This included 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 |

8.11 percent of permanent new hires were persons with disabilities compared to the 12 percent benchmark. There was limited hiring in FY2017 due to a hiring freeze. The prior year percentage for permanent new hires was closer to the benchmark at 11.6 percent.

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 |

Triggers do not exist.

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 |

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, through its rules of behavior and subsequent direction, in order to protect the integrity of the selection process, prevents the agency from matching demographic data to specific individuals applicants. The only demographic data OPM currently provides on internal employees is for internal merit vacancies. There were a limited number of internal merit vacancies for the agency’s mission critical occupational series (0580 – Credit Union Examiner) as indicated in Table B9. Evaluation of this data shows that there is a trigger for qualified applicants with disabilities for positions in the 0580 series. Persons with disabilities made up 4.82 percent of the qualified applicants but 6.99 percent of the relevant applicant pool.

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 |

Using the qualified applicant pool in table B9, which provides applicant data on competitive internal merit vacancies audited during the fiscal year, there are triggers for persons with disabilities and persons with targeted disabilities. None of the selections in these areas were individuals with disabilities.

It is important to note that within the 0580 series, 5.7 percent of employees promoted within the fiscal year, including career ladder and temporary promotions, were individuals with disabilities. Of those employees, 0.81 percent were persons with targeted disabilities.

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 to 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, 7 individuals with disabilities in this series (as identified on the SF-256) and 20 employees in this series with disabled veteran status were promoted in FY 17.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

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Leadership development training opportunities were offered through the Office of Human Resources Division of Training and Development. The programs are designed to provide competency-based leadership training. These programs included:

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, and more.

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

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 executives 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, and more.

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.]

Career Development Opportunities						

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Coaching Programs						
Training 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.

- a. Applicants (PWD) Yes 0 No 0
- b. Selections (PWD) Yes 0 No 0

As indicated in table B12, triggers exist for applicants at the CU-5 through 12 and the CU-15 through senior staff levels. The difference at the CU-15 through senior staff is less than 1 percentage point. Please note that the agency did not recruit for a number of its career development programs during FY17, so the number of applicants was small.

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

- a. Applicants (PWTD) Yes 0 No 0
- b. Selections (PWTD) Yes 0 No 0

As indicated in Table B12, triggers do not exist.

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

Using data from table B13, there are triggers for persons with disabilities and persons with targeted disabilities for cash awards (cash awards include gift cards). In terms of

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time off awards, there was only one time off award of 9+ hours that went to a person without a disability/targeted disability, so the discrepancy is minimal.

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 NCUA does not have quality step increases. The agency has merit-based pay increases based on performance ratings and corresponding merit pools. In 2018, the agency will consolidate merit pools that will result in approximately a 50 percent reduction in the number of groups. Because the NCUA has a small number of employees, the larger groups will assist in results that are more measurable than those resulting from evaluation of very small groups. The agency will develop a plan to evaluate merit-based pay increases for the new pools by disability status for reporting for 2018.

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

The NCUA presents annual awards to recognize extraordinary contributions made by employees during the prior year. These honors come with monetary awards, which are represented in question C1. In evaluating triggers for this program based on the inclusion rate, there is a trigger for persons with disabilities. Of permanent employees with disabilities, 3.7 percent were selected for recognition while 4.8 percent of permanent employees without disabilities were selected.

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

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 applicants. The only demographic data OPM currently provides specifically regarding internal employees is relative to internal merit vacancies. There were a limited number of internal merit vacancies, only at the CU-13 and CU-14 grade levels, for this analysis as indicated in Table B11. Based on this limited data, there were triggers at these grade levels for persons with disabilities compared to the benchmark. At the CU-13 level, the relevant applicant pool is 6.23 percent, while persons with disabilities accounted for 5.80 percent of the qualified applicants. Similarly, no persons with disabilities were selected while these applicants made up 5.80 percent of qualified applicants. At the CU-14 level, the relevant applicant pool is 7.28 percent, while persons with disabilities accounted for zero percent of the qualified applicants. There was no trigger at the selection stage at the CU-14 level compared to the qualified stage for persons with disabilities.

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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

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 applicants. The only demographic data OPM currently provides specifically regarding internal employees is relative to internal merit vacancies. There were a limited number of internal merit vacancies, only at the CU-13 and CU-14 grade levels, for this analysis as indicated in Table B11. Based on this limited data, there was a trigger for persons with targeted disabilities at the GS-13 level at the selection stage. Persons with targeted disabilities represented 1.45 percent of applicants at the qualified stage but none were selected.

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

OPM applicant flow data was used for the qualified applicant pool benchmark. For FY17, this includes all vacancies at each level that was audited during the reporting period. Excluding internal merit promotion vacancies, the data provides the only qualified applicant pool benchmark available to measure new hires that came on board during the fiscal year. While the applicant pool and new hires onboard is not a direct comparison, the comparison broadly suggests a trigger at the senior staff, CU-14, and CU-13 levels. At each of these levels, none of the new hires were individuals with disabilities which was below the qualified applicant pool availability.

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

OPM applicant flow data was used as the qualified applicant pool benchmark. For FY17, this includes all vacancies at each level that was audited during the reporting period. OPM's data does not specify whether the applicant is internal or external to the agency. Excluding internal merit promotion vacancies, the data provides the only qualified applicant pool benchmark available to measure new hires that came on board during the fiscal year. There was a trigger for persons with targeted disabilities at the CU-13 and CU-14 levels. The qualified applicant pool included little more than 1 percent persons with targeted disabilities at both levels. However, no persons with targeted disabilities came on board as a new hire during the fiscal year at this level. As indicated previously, the qualified applicant pool and new hires onboard is not a direct comparison, but offers some indication of a trigger.

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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.

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 applicants. The only demographic data OPM currently provides specifically regarding internal employees is relative to internal merit vacancies. There were only two internal merit vacancies for supervisory positions. No individuals with disabilities applied to these vacancies.

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

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c. Supervisors

- | | | |
|---|-------|------|
| i. Qualified Internal Applicants (PWTD) | Yes 0 | No 0 |
| ii. Internal Selections (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 applicants. The only demographic data OPM currently provides specifically regarding internal employees is relative to internal merit vacancies. There were only two internal merit vacancies for supervisory positions. No individuals with targeted disabilities applied to these vacancies.

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 |

OPM applicant flow data was used for the qualified applicant pool benchmark. For FY17, this includes all vacancies at each level that was audited during the reporting period. OPM's data does not specify whether the applicant is internal or external to the agency. Excluding internal merit promotion vacancies, the data provides the only qualified applicant pool benchmark available to measure new hires that came on board during the fiscal year.

There is a trigger involving persons with disabilities for new hires to the senior service (executives). However, the difference is small. The qualified applicant pool included 1.5 percent qualified individuals with disabilities, whereas none of the onboard new senior service hires identified as an individual with a disability.

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 |

OPM applicant flow data was used for the qualified applicant pool benchmark. For FY17, this includes all vacancies at each level that was audited during the reporting period. OPM's data does not specify whether the applicant is internal or external to the agency. Excluding internal merit vacancies, the data provides the only qualified applicant pool benchmark available to measure new hires that came on board during the fiscal year.

There is a trigger involving persons with targeted disabilities for new hires to manager/supervisor positions. However, the difference is small. None of the new hires to these positions were persons with targeted disabilities; 1.9 percent of the qualified applicant pool were persons with targeted disabilities.

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

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

There is a trigger for involuntary separations for persons with disabilities. However, the difference is small. The inclusion rate for persons with disabilities is 1.2 percent versus 0.7 percent for those without disabilities.

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

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

Triggers do not exist.

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.

Using the inclusion rate as a benchmark, there is a trigger for involuntary separations for persons with disabilities. However, there was a small number of involuntary separations during the fiscal year. There were two persons with disabilities who involuntarily separated during the fiscal year. Of the two, one died and the other separated in lieu of involuntary action.

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.

<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.

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Individuals can contact the NCUA to file a complaint. Notice of rights and responsibilities under the Architectural Barriers Act and specifics on how to file a complaint will be included on the public-facing website.

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.

With regard to technology, the first iteration of the Section 508 Policy was recently approved and distributed in December of 2017. The agency's Office of the Chief Information Officer (OCIO) created a Section 508 Resource Center on the internal NCUA website. On that site is training available to staff and contractors as well as other resources for meeting and learning about accessibility. There is also a dashboard available that allows staff to see the progress of improving accessibility of the most used sites and applications on the NCUA internal site. The OCIO has identified, and continues to actively identify, areas that need remediation and/or updating. Content has to be accessible before it is posted on the public-facing websites so the OCIO works with content owners to remediate deficiencies. Accessibility language has been updated in the agency's communications manual as well as included in the soon-to-be published web posting procedures instruction to staff.

In the coming year, the agency will add automatic door openers on two parking garage levels and in some other doors in common areas in its central office in Alexandria, VA.

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.

The NCUA is consistently timely in processing requests, approving accommodations, conducting training for managers and supervisors, 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. There have been no requests to date for this service.

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

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.

N/A. With regard to question B1, 2 out of 6 formal complaints alleged failure to accommodate.

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.

Trigger 1	There are triggers for individuals with disabilities and individuals with targeted disabilities in the areas of new hires, promotions, and awards.
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Barrier(s)	Not yet identified			
Objective(s)	Review policies, practices and procedures that may be creating a barrier for the employment and career advancement of individuals with disabilities and targeted disabilities.			
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)		
OMWI and OHR Directors		Yes		
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)		
No		No		
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected		
Workforce Data Tables	Yes	Onboard; new hires, separations, applicant flow for mission critical occupation and internal merit promotions; separations, awards		
Complaint Data (Trends)	No			
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			
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.		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
12/31/2018	Root cause analysis / Further adverse impact analysis of PE test	Yes		

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Fiscal Year	Accomplishments
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 analyzed and will continue to analyze data relative to individuals with disabilities and targeted disabilities. Further work is needed to identify and verify barriers in policies, procedures, and/or practices that cause the triggers.

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

The NCUA used 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.

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.

To the extent the NCUA identifies barriers for individuals with disabilities in policies, practices, or procedures that are the root cause(s) of triggers, the agency will develop and implement an action plan to eliminate the identified barriers.