

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 PWDs at the end of FY2019. This figure was 12.9 percent. PWDs at each of the two grade level clusters at the end of FY2019 were as follows:

- 19.1 percent of NCUA staff CU-10 and below reported a disability.
- 12.3 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 (cutoff was GS10 Step 10 base salary compared to CU base salary).

- 15.4 percent of employees paid a total salary at the GS-10 and below level equivalent reported a disability.
- 12.4 percent of employees paid a total salary at the GS-11 and above level equivalent reported a disability.

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2.

3. 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 PWTDs at the end of FY2019; this figure was 2.9 percent. PWTDs at each of the two grade level clusters at the end of FY2019 were as follows:

- 5.3 percent of NCUA staff CU-10 and below reported a targeted disability.
- 2.7 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 (cutoff was GS10 Step 10 base salary compared to CU base salary).

- 4.2 percent of employees paid a total salary at the GS-10 and below level equivalent reported a targeted disability.
- 2.8 percent of employees paid a total salary at the GS-11 and above level equivalent reported a targeted disability.

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

In 2017, the EEOC changed the disability codes. The agency’s Office of Minority and Women Inclusion informed all NCUA directors and managers about the new disability codes and resurveyed the workforce to update employees’ disability status. Upon completion, the NCUA exceeded the EEOC PWD and PWTD goals. Thereafter, the NCUA launched a new HR system which allows staff to update disability information without the need to submit a form. Employees were informed and encouraged to review their codes to ensure accuracy. Additionally, new data reporting is being put in place so that managers are aware of current demographics and disability levels of their office.

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

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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

4. 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

5.

6. 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 Full Time Staff	# of Part Time Staff	# of Collateral Duty Staff	Responsible Official (Name, Title, Office, Email)
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 Administrator/Section 508 Coordinator, Office of External Affairs and Communications, edavenport@ncua.gov

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Disability Program Task	# of Full Time Staff	# of Part Time Staff	# of Collateral Duty Staff	Responsible Official (Name, Title, Office, Email)
Architectural Barriers Act Compliance	1			Alejandro Holguin, Facilities Manager, Office of the Chief Financial Officer, aholguin@ncua.gov
Special Emphasis Observances for PWD and PWTD	1			Carmen Reynolds, EEO Specialist, Office of Minority and Women Inclusion, CReynolds@ncua.gov

7.

8. 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 receive 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

9. 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

10. 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.
- Participating in targeted outreach events sponsored by *Career Expo for People with Disabilities & Wounded Warrior*, *National Association for the Deaf*, and *Careers & the Disabled* magazine.
- Expanding the NCUA's outreach through LinkedIn Recruiter and the USAJOBS Resume Mining tool to reach 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 positions, in addition to the regular competitive recruitment process.
- Posting a full-page ad in *DiversAbility* magazine sponsored by DiversityComm.

11. 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. The NCUA's recruitment and outreach efforts included the following:

- Using LinkedIn. 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.
- Distributing 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.

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- Posting All NCUA vacancy announcements on targeted websites to ensure maximum distribution to a diverse audience, which includes individuals with disabilities.
- Maintaining a talent bank of Schedule A applicants, which includes disabled veterans who apply for positions with the agency.
- Using the USAJobs Resume Mining database to search for highly qualified individuals with disabilities and/or veterans with a disability rating of 30% or more.

12. 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 to assist hiring managers. Human Resources hiring specialists 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.

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.

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). 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).

13. 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 and a resource center for employees who 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 cover the hiring authority details and answer several commonly asked questions. In addition to the supervisory training and resource center tools, each HR 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

14. 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 more than 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 8 PWD (including 2 PWTD) out of a total of 94 permanent new hires. This represents 8.5 percent PWD new hires and 2.1 percent for PWTD, which suggests a trigger may exist for PWD among new hires in the permanent workforce. Although below the goal for PWD, these numbers are slightly up from 2018.

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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

Zero percent of the new hires for mission critical occupations (series 0580) were PWD (of 23 referred) or PWTD (of 10 referred), which suggests a trigger may exist for both PWD and PWTD among new hires in the permanent mission critical workforce.

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 B9P (relevant applicant pool):

- PWD: 12.96 percent
- PWTD: 3.04 percent

Table B9P (Qualified of those identified)

- PWD: 9.49 percent
- PWTD: 4.17 percent

15.

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 B9P:

Qualified Applicant Pool:

- PWD: 9.49 percent
- PWTD: 4.17 percent

Internal Selections:

- PWD: 2.33 percent
- PWTD: 2.33 percent

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

16. 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 CUE positions 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.

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

B. CAREER DEVELOPMENT OPPORTUNITIES

17. 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:

- Aspiring Leader Program: a program offered by the Graduate School's Center for Leadership and Management.
- 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.
- Management Development Program: an 18-month developmental program for non-supervisors. Candidates gain experience in defining project scopes, delegating work, developing others, etc.
- 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.

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- NCUA Executive Training Program: an 18-month program for senior level supervisors. This program prepares employees to transition from supervisory or managerial positions into senior leadership positions within the agency.
- 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 detail assignments. The agency also provides career development opportunities through its agency-wide mentorship program.

NOTE: These programs are not presented in Tables A/B12 & 20 because they are available for a grade range and are not reported in the format in those tables.

18. 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	Total Applicants (#)	Total Selectees (#)	PWD Applicants (%)	PWD Selectees (%)	PWTD Applicants (%)	PWTD Selectees (%)
Internship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Fellowship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Mentoring Programs	63	60	8	7	2	2
Coaching Programs	29	29	3	3	0	0
Training Programs	N/A	N/A	N/A	N/A	N/A	N/A
Detail Programs	N/A	N/A	N/A	N/A	N/A	N/A
Other Career Development Programs	58	19	7	1	0	0

19.

20. 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

21. 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

There were no PWTD applicants to the Leadership Development Programs; this may be a potential trigger. Since there were no PWTD applicants, selections cannot be identified as a trigger or not, this would be N/A. Coaching is offered for senior staff and supervisors, and there is only one supervisor with targeted disability.

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 eight time-off awards given in 2019.
 1-10 hours: 3 ND, 1 PWD (surpasses workforce percentage) (no PWTD)
 11-20 hours: 4 ND

For cash awards, the majority of employees (1,443) received \$500 or less, with 37 PWD employees receiving awards in this category. This shows a lower representation than those with no disability, but 58 PWD received cash awards of \$501 or more. The PWTD group was close to workforce percentage for less than \$999, although fewer received higher awards (these awards had lower numbers overall).

	PWD	PWTD
Workforce	12.91	2.94
≤ \$500	2.56	2.91
\$501-\$999	11.84	2.19
\$1000-\$1999	13.33	1.03
\$2000-\$2999	14.29	0.00

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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 – it is not an award similar to a QSI, since the vast majority of employees receive a merit raise yearly. The NCUA has not conducted an analysis of potential differentials in merit pay increases for PWD / PWTD employees as compared to other similarly situated employed in the same occupations or grades. The NCUA may incorporate this element in future iterations of its barrier analysis process.

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 |

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 |

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- 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

- There was only one senior staff position announced in 2019, resulting in only three applicants. Only one was categorized as qualified (not the one PWD applicant); no selections were made.
- There was one CU-15 announcement with three applications, two qualified, and one selection. There were no PWD applications received.
- There were three CU-14 announcements with 28 applications and three selections. No PWD applications were received.
- There were 14 CU-13 announcements with 401 applications, including 39 PWDs; 177 qualified, including 13 PWDs; 21 selections, including one PWD, were made.

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**

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- There was only one senior staff position announced in 2019, resulting in only three applicants and no PWTD. Only one was categorized as qualified; no selections were made (No PWTDs in CU15 to apply; this is the potential trigger).
- There was one CU-15 announcement with three applications. Two qualified and one was selected. No PWTD applied (Two PWTDs in CU14).
- There were three CU-14 announcements with 28 applications, and three selections. There were no PWTD applications (Three PWTDs in CU13).
- There were 14 CU-13 announcements with 401 applications. Eighteen were PWTDs. Of the 177 qualified applicants, four were PWTDs. There were 21 selections including one PWTD.

22.

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
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

The NCUA did not hire for CU-15 or senior staff positions externally in 2019. There were eight applicants for CU-14 positions: three qualified, one was referred, and none were selected. There were 20 applicants for CU-13 positions: 11 qualified, one was referred, and none were selected. Because no applicants were selected from a total applicant pool of 572 for CU-13, and 221 for CU-14, no trigger was identified.

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

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The NCUA did not hire for CU-15 or senior staff positions externally in 2019. There were six applicants to CU-13 positions: two qualified, one was referred, and none were selected. Because no applicants were selected from a total applicant pool of 572 for CU13, and 221, for CU14, no trigger was identified.

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 NCUA does not identify a separate “manager” category. Executives (senior staff) are also managers, so we choose to use that category. Supervisors here are those that are not senior staff.

There was one executive internal announcement, with three applicants (one PWD who was not qualified, but the percentage surpassed Relevant Applicant Pool); no selection was made. Because the relevant applicant pool does contain PWD and PWTD, a trigger may be present although there were no hires from any category from the announcement.

There were four supervisory vacancies with no PWD applicants.

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.

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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

There were no PWTD applications for executive or supervisor vacancies because they are not in the relevant applicant pool.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box.

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

There were no external hire announcements for executives or supervisors in FY19; the NCUA has no manager category because executives are also managers.

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

There were no external hire announcements for executives or supervisors in FY19; the NCUA has no manager category because the executives are also managers.

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

The NCUA did not have any Schedule A staff eligible for conversion in 2019.

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

In 2019, there were 91 separations: 43 were retirements, 28 were resignations, 3 were removals, and 16 were other separations. Percentages for PWDs were below workforce representation, while those with no disability were higher than workforce representation for retirement and resignation (there were 7 PWDs out of 91 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.

Voluntary Separations (PWTD) Yes 0 No 0

Involuntary Separations (PWTD) Yes 0 No 0

In 2019, there were 91 separations: 43 were retirements, 28 were resignations, 3 were removals, and 16 were other separations. Percentages for PWTDs were higher than workforce representation, but this was due to the very small number of PWTDs who separated (3 PWTDs out of 91 total separations). This was still

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considered a trigger since the separation percentage was 3.3, while the workforce representation was 2.94.

- 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 survey data is not available for review. This is a new program and between 2018 and 2019 there are only 11 exit surveys available.

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.**

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 is <https://www.ncua.gov/About/Pages/open-government/accessibility-limited-english-proficiency.aspx>. (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.)

- 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 amended 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, and included a description of how to file a complaint.

- 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.**

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The Section 508 Policy was approved and distributed December of 2017. The Office of the Chief Information Officer created a Section 508 Resource Center on our internal NCUA Central site. This offers training resources for staff and contractors, as well as other resources for meeting and learning about accessibility. There is also a dashboard available within NCUA's intranet that allows staff to view the progress of improving accessibility for the most highly visited sites and applications. The Office of the Chief Information Officer 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 Office of the Chief Information Officer works with content owners and creators to remediate deficiencies. Accessibility language has been updated in the Communications Manual.

In 2019, the 508 Compliance team began the transition from the Office of the Chief Information Officer to the Office of External Affairs and Communications to streamline the process of making public content accessible. This transition will be complete in 2020.

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's program includes timely processing of requests; providing timely approvals of accommodation requests; 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.

On July 10, 2020, the EEOC's Agency Oversight Division within the Office of Federal Operations provided the OMWI office feedback and guidance based on their (EEOC's) review of the updated draft reasonable accommodation instruction. The OMWI office is currently revising the instruction to incorporate the edits required by the EEOC. Once the instruction is approved and finalized, it will be distributed to all agency personnel. Guidance on PAS services is incorporated into the updated instruction. To this date, there have been no requests for PAS services.

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.

There was only one complaint involving harassment due to disability and there has been no finding of discrimination.

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.

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.

Trigger 1	There are triggers for individuals with disabilities and individuals with targeted disabilities in the areas of new hires, promotions, and awards.
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.

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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)	Yes	
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	Demographics and data regarding attempts and success or 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)
12/31/2021	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 is working with the Office of Personnel Management to continue the barrier analysis of the Principal Examiner (PE) process.

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 obtain promotions. The results of this test and adverse impact relative to individuals with disabilities are being evaluated by agency leadership in its Talent Management Council (TMC).

The NCUA worked closely with OPM on the NCUA Examiner Career Development and Principal Examiner Certification Program Preparation Project. The NCUA developed short-term and long-term strategies to address barriers identified within the 2019 survey. The short-term strategies put into place include a community of practice (discussion board) for SEs and examiners, enhanced PE Exam resources made available to examiners, and early exposure to examiners of the PE Certification Program and potential career progression opportunities with detailed briefings offered during their first twelve (12) months of employment with the NCUA. Long-term strategies are being developed with the NCUA and OPM.

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.