Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

October 4, 2019
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To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 CFR §1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with targeted disabilities in the federal government.

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If “yes”, describe the trigger(s) in the text box.
   a. Cluster GS-1 to GS-10 (PWD) Answer No
   b. Cluster GS-11 to SES (PWD) Answer No

MCC is a small organization with relatively low turnover. Therefore, opportunities for staffing vacancies are limited. MCC makes every effort to fill positions carefully and methodically and considers all appropriate hiring authorities when developing hiring and advancement plans.

*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d) (7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If “yes”, describe the trigger(s) in the text box.
   a. Cluster GS-1 to GS-10 (PWTD) Answer No
   b. Cluster GS-11 to SES (PWTD) Answer No

MCC is a small organization with relatively low turnover. Therefore, opportunities for staffing vacancies are limited. MCC makes every effort to fill positions carefully and methodically and considers all appropriate hiring authorities when developing hiring and advancement plans.

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

MCC communicates goals applicable to MCC personnel system to our managers and supervisory through routine meetings and supervisory training.

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

A. Plan to Provide Sufficient & Competent Staffing for the Disability Program

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

MCC has designated and utilizes trained and experienced HR professional in its disability program and has had no complaints in the current reporting period or in the past several years.

2. Identify all staff responsible for implementing the agency’s disability employment program by the office, staff employment status, and responsible official.

<table>
<thead>
<tr>
<th>Disability Program Task</th>
<th># of FTE Staff By Employment Status</th>
<th>Responsible Official (Name, Title, Office Email)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Full Time</td>
<td>Part Time</td>
</tr>
<tr>
<td>Section 508 Compliance</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Architectural Barriers Act Compliance</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Processing applications from PWD and PWTD</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Answering questions from the public about hiring authorities that take disability into account</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If “yes”, describe the training that disability program staff have received. If “no”, describe the training planned for the upcoming year.
Answer No

MCC utilizes trained and experienced HR professionals in its disability program, and has had no complaints in the current reporting period or past several years. MCC has scheduled the following upcoming training. MD-715 9/20/2019 Barrier Analysis 9/21/2019

B. Plan to Ensure Sufficient Funding for the Disability Program

1. Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If “no”, describe the agency’s plan to ensure all aspects of the disability program have sufficient funding and other resources
Answer Yes

N/A

Section III: Program Deficiencies in the Disability Program

<table>
<thead>
<tr>
<th>Brief Description of Program Deficiency</th>
<th>D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Special Emphasis Program for PWD and PWTD</td>
<td></td>
</tr>
<tr>
<td>Processing reasonable accommodation requests from applicants and employees</td>
<td></td>
</tr>
</tbody>
</table>
Section IV: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency’s recruitment program plan for PWD and PWTD

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

MCC is a small organization with relatively low turnover therefore, opportunities for staffing vacancies are limited, but we strive to fill positions methodically and consider all hiring authorities when developing hiring plans. MCC vacancies are posted on the USAJOBS website which has connections to jobseekers and, most importantly, to various state vocational rehabilitation agencies. These established connections provide the most direct and efficient access to MCC vacancies. With established access to MCC vacancies, state vocational agencies are important starting points to providing potential applicants with disabilities to many job placement services, such as resume writing, that helps individuals with disabilities.

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.

MCC have used the Schedule A hiring authority to hire competitive and non-competitive employees to include interns.

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.
When individuals with disabilities apply for MCC vacancies, MCC Human Resources Specialist reviews the applicant’s documentation and, if within the qualified group, the resumes are forwarded for consideration within the established MCC hiring/advancement process. Determinations on eligibility are made during the initial screening process. To help prevent potential biases arising during the initial stages, determination on appropriate hiring authorities are not made or discussed with managers at the time of referral when applying through an open competition. MCC interviewing officials are encouraged to prepare interview questions and ask the same questions to all candidates. Those managers are aware of and are trained in the PWD/PWTD program and its requirements.

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If “yes”, describe the type(s) of training and frequency. If “no”, describe the agency’s plan to provide this training.
Answer Yes

An MCC HR Specialist educates the hiring managers of the Schedule A hiring flexibilities at the onset of the recruitment process. The HR Specialist describes the benefits of using these flexibilities for the applicant and MCC. As a result, all hiring managers are trained on the appropriate use of hiring flexibilities for hiring people with disabilities.

B. Plan to Establish Contacts with Disability Employment Organizations

MCC has new leadership and is fully staffed. As a result, MCC plans to participate in career job fairs at least two to three times a year, including the Equal Opportunity Publications — Career Expo and the Recruit Military All Veterans Career Fair. Both organizations assist PWD, including PWTD, in securing and maintaining employment. MCC will send out vacancy announcements directly to the organizations below and build a working partnerships with these organizations.

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.
   1. New Hires for Permanent Workforce (PWD) Answer No
   2. New Hires for Permanent Workforce (PWTD) Answer No
MCC is a small organization with relatively low turnover. Therefore, opportunities for staffing vacancies are limited. MCC makes every effort to fill positions carefully and methodically and considers all appropriate hiring authorities when developing hiring and advancement plans.

<table>
<thead>
<tr>
<th>New Hires</th>
<th>Total (#)</th>
<th>Reportable Disability</th>
<th>Targeted Disability</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Permanent Workforce (%)</td>
<td>Temporary Workforce (%)</td>
</tr>
<tr>
<td>% of Total Applicants</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>% of Qualified Applicants</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>% of New Hires</td>
<td>0</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

1. New Hires for MCO (PWD) Answer N/A
2. New Hires for MCO (PWTD) Answer N/A

MCC is a small organization with relatively low turnover. Therefore, opportunities for staffing vacancies are limited. MCC makes every effort to fill positions carefully and methodically and considers all appropriate hiring authorities when developing hiring and advancement plans.

<table>
<thead>
<tr>
<th>New Hires to Mission-Critical Occupations</th>
<th>Total (#)</th>
<th>Reportable Disability</th>
<th>Targetable Disability</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Qualified Applicants (%)</td>
<td>New Hires (%)</td>
</tr>
<tr>
<td>Numerical Goal</td>
<td>-</td>
<td>12%</td>
<td>2%</td>
</tr>
</tbody>
</table>

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

1. Qualified Applicants for MCO (PWD) Answer N/A
2. Qualified Applicants for MCO (PWTD) Answer N/A
MCC is a small organization with relatively low turnover. Therefore, opportunities for staffing vacancies are limited. MCC makes every effort to fill positions carefully and methodically and considers all appropriate hiring authorities when developing hiring and advancement plans.

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

1. Promotions for MCO (PWD) Answer N/A
2. Promotions for MCO (PWTD) Answer N/A

Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

A. Advancement Program Plan

Describe the agency's plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

Describe the agency's plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.
MCC advertises training opportunities to all employees, including employees with disabilities, and encourages employees at all levels within the organization to enhance their knowledge, skills, and abilities through formal training, job rotation, details, and self-development opportunities. MCC also provides funding, which allows employees to attend external training, conferences, certification courses, and management and leadership development training. Managers are encouraged to use developmental assignments or detailees from within MCC as a tool for resourcing special projects. Doing so provides opportunities for employees to gain experience in other areas of the agency. In addition, MCC encourages employees to maintain Individual Development Plan (IDP). The IDP allows employees to identify competencies or technical skills to be enhanced and developed.

B. Career Development Opportunities

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

All employees can self-identify training opportunities, both internally and externally to MCC. All employees are required to complete an Individual Development Plan identifying their short- and long-term goals and training requested.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate.

<table>
<thead>
<tr>
<th>Career Development Opportunities</th>
<th>Total Participants</th>
<th>PWD</th>
<th>PWTD</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Applicants (#)</td>
<td>Selectees (#)</td>
<td>Applicants (%)</td>
</tr>
<tr>
<td>Mentoring Programs</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Other Career Development Programs</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Coaching Programs</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Training Programs</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Detail Programs</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
   1. Applicants (PWD) Answer N/A
   2. Selections (PWD) Answer N/A

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4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
   1. Applicants (PWTD) Answer N/A
   2. Selections (PWTD) Answer N/A

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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.
   1. Awards, Bonuses, & Incentives (PWD) Answer No
   2. Awards, Bonuses, & Incentives (PWTD) Answer No

All employees, to include PWD/PWTD, who exceed performance targets are considered for monetary awards as well as recognition through the agency award program.
<table>
<thead>
<tr>
<th>Time-Off Awards</th>
<th>Total (#)</th>
<th>Reportable Disability %</th>
<th>Without Reportable Disability %</th>
<th>Targeted Disability %</th>
<th>Without Targeted Disability %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Time-Off Awards: 1-9 hours: Total Time-Off Awards Given</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Time-Off awards: 9+ hours: Total Time-Off Awards Given</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Cash Awards</th>
<th>Total (#)</th>
<th>Reportable Disability %</th>
<th>Without Reportable Disability %</th>
<th>Targeted Disability %</th>
<th>Without Targeted Disability %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash Awards: $10 0 - $500: Total Cash Awards Given</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Cash awards: $501+: Total Time Cash Awards Given</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

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.
   1. Pay Increases (PWD) Answer No
   2. Pay Increases (PWTD) Answer No
All employees, to include PWD/PWTD, who exceed performance targets are considered for monetary awards as well as recognition through the agency award program. The agency does not have step increases, but performance based pay increases are based upon budget available and outstanding performance.

<table>
<thead>
<tr>
<th>Other Awards</th>
<th>Total (#)</th>
<th>Reportable Disability %</th>
<th>Reportable Disability %</th>
<th>Targeted Disability %</th>
<th>Without Targeted Disability %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Quality Step Increases (QSI): Total QSIs Awarded</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Performance Based Pay Increase</td>
<td>0</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

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.
   1. Other Types of Recognition (PWD) Answer N/A
   2. Other Types of Recognition (PWTD) Answer N/A

Promotions

4. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
   1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
      a. SES
The small size of MCC, budget restraints, FTE ceilings, and the limited turnover of vacancies reduces the need and benefit for formal trigger devices. MCC’s human resources staff closely monitors this situation and to recommend additional resources to enhance a more formal approach.

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

   a. SES
   i. Qualified Internal Applicants (PWTD) Answer N/A
   ii. Internal Selections (PWTD) Answer N/A

   a. SES
   i. Qualified Internal Applicants (PWTD) Answer N/A
   ii. Internal Selections (PWTD) Answer N/A

   b. Grade GS-15
   i. Qualified Internal Applicants (PWTD) Answer N/A
   ii. Internal Selections (PWTD) Answer N/A

   c. Grade GS-14
   i. Qualified Internal Applicants (PWTD) Answer N/A
   ii. Internal Selections (PWTD) Answer N/A

   d. Grade GS-13
   i. Qualified Internal Applicants (PWTD) Answer N/A
   ii. Internal Selections (PWTD) Answer N/A

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3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the
applicant data is not available for your agency, and describe your plan to provide the data in the text box.
   1. New Hires to SES (PWD) Answer N/A
   2. New Hires to GS-15 (PWD) Answer N/A
   3. New Hires to GS-14 (PWD) Answer N/A
   4. New Hires to GS-13 (PWD) Answer N/A

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4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
   1. New Hires to SES (PWTD) Answer N/A
   2. New Hires to GS-15 (PWTD) Answer N/A
   3. New Hires to GS-14 (PWTD) Answer N/A
   4. New Hires to GS-13 (PWTD) Answer N/A

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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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
   a. Executives
      i. Qualified Internal Applicants (PWD) Answer N/A
      ii. Internal Selections (PWD) Answer N/A
   b. Managers
      i. Qualified Internal Applicants (PWD) Answer N/A
      ii. Internal Selections (PWD) Answer N/A
   c. Supervisors
      i. Qualified Internal Applicants (PWD) Answer N/A
      ii. Internal Selections (PWD) Answer N/A

The small size of MCC, budget restraints, FTE ceilings, and the limited turnover of vacancies reduces the need and benefit for formal trigger devices. MCC’s human resources staff closely monitors this situation and to recommend additional resources to enhance a more formal approach.
6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
   a. Executives
      i. Qualified Internal Applicants (PWTD) Answer N/A
      ii. Internal Selections (PWTD) Answer N/A
   b. Managers
      i. Qualified Internal Applicants (PWTD) Answer N/A
      ii. Internal Selections (PWTD) Answer N/A
   c. Supervisors
      i. Qualified Internal Applicants (PWTD) Answer N/A
      ii. Internal Selections (PWTD) Answer N/A

The small size of MCC, budget restraints, FTE ceilings, and the limited turnover of vacancies reduces the need and benefit for formal trigger devices. MCC’s human resources staff closely monitors this situation and to recommend additional resources to enhance a more formal approach.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
   a. New Hires for Executives (PWD) Answer N/A
   b. New Hires for Managers (PWD) Answer N/A
   c. New Hires for Supervisors (PWD) Answer N/A

The small size of MCC, budget restraints, FTE ceilings, and the limited turnover of vacancies reduces the need and benefit for formal trigger devices. MCC’s human resources staff closely monitors this situation and to recommend additional resources to enhance a more formal approach.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
   a. New Hires for Executives (PWTD) Answer N/A
   b. New Hires for Managers (PWTD) Answer N/A
   c. New Hires for Supervisors (PWTD) Answer N/A

The small size of MCC, budget restraints, FTE ceilings, and the limited turnover of vacancies reduces the need and benefit for formal trigger devices. MCC’s human resources staff closely monitors this situation and to recommend additional resources to enhance a more formal approach.
Section IV: Plan to Improve Retention of Persons with Disabilities

To be model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace assistance services.

A. Voluntary and Involuntary Separations

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

   The agency does not currently have an Schedule A hires.

2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.
   a. Voluntary Separations (PWD) Answer No
   b. Involuntary Separations (PWD) Answer No

<table>
<thead>
<tr>
<th>Separations</th>
<th>Total #</th>
<th>Reportable Disabilities %</th>
<th>Without Reportable Disabilities %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permenant Workforce</td>
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<tr>
<td>Total Separations</td>
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<tr>
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<tr>
<td>Involuntary Separations</td>
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<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If “yes”, describe the trigger below.
   a. Voluntary Separations (PWTD) Answer No

Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities | October 4, 2019
b. Involuntary Separations (PWTD) Answer No

<table>
<thead>
<tr>
<th>Separations</th>
<th>Total #</th>
<th>Targeted Disabilities %</th>
<th>Without Targeted Disabilities %</th>
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<tr>
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<tr>
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<tr>
<td>Involuntary Separations</td>
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</tbody>
</table>

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.

N/A

B. Accessibility of Technology and Facilities

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

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

https://www.mcc.gov/careers/reasonable-accommodations

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.

www.mcc.gov

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.

MCC uses a host of technology tools to include VPN Connector, shared resources, personal laptops, CISCO IP Communicator and Skype for Business.

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.)

   Average timeframe to respond to a request for a reasonable accommodation is five (5) 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 Reasonable Accommodations Coordinator who works with employees and supervisors to understand and respond to requests for accommodations. Supervisors and managers are provided training on the process and employees are also made aware of the process and procedures. Requests for an accommodation are responded to within five (5) business days.

D. Personal Assistance Services Allowing Employees to Participate in the Workplace

Pursuant to 29 CFR §1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.

1. 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.

MCC has a PAS process in place and properly advertised internally and externally. In recent years, including the current reporting period, MCC has had no requests for PAS.

Section VII: EEO Complaint and Findings Data

A. EEO Complaint Data Involving Harassment

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the governmentwide average?
   Answer No
2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?
   Answer No
3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

B. EEO Complaint Data Involving Reasonable Accommodation

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?
   Answer No
2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?
   Answer No
3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

Section VIII: Identification and Removal of Barriers

Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?
   Answer No
2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?
   Answer N/A
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.

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

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

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.