

U.S. SECURITIES AND
EXCHANGE COMMISSION

FISCAL YEAR 2018

EQUAL EMPLOYMENT OPPORTUNITY

AFFIRMATIVE ACTION PLAN FOR THE
RECRUITMENT, HIRING, ADVANCEMENT, AND
RETENTION OF PERSONS WITH DISABILITIES

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AFFIRMATIVE ACTION 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.

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

This report presents results for both persons with disabilities (PWD) and persons with targeted disabilities (PWTD) calculated in cluster results based on the locality adjusted salary specified in the revised regulations implementing Section 501 of the Rehabilitation Act of 1973, compared to the locality adjusted salary of a GS-11, step 1, in the Washington, DC area. For FY 2018, that salary was \$68,036. Participation of PWD and PWTD are presented to assess against the specific numerical goals found in EEOC regulations to identify the presence of any triggers. A trigger is a trend, difference, variance, outlier, or anomaly that suggests the need for further inquiry into a particular policy, practice, procedure, or condition. Statistics are only a starting point for analysis, which considers the totality of the circumstances.

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For employees with salaries below a GS-11, step 1, the Agency achieved the numerical goal for PWD participation; 35.00% of employees in this cluster were PWD compared to the 12% benchmark.

For employees with locality adjusted salaries above a GS-11, step 1, the Agency did not achieve the numerical goal involving PWD; 8.64% of employees in this cluster were PWD compared to the 12% benchmark. While the numerical goal was not achieved, the current participation rate represents an increase of 2.29 percentage points since the end of FY 2015.

In FY 2018, SEC implemented plans to include permanent and temporary employees hired under authorities that take disability into account as PWD pursuant to EEOC regulation. In this report, permanent and temporary employees who are not self-identified on standard form 256 (SF-256) and whose personnel record documents veterans' preference for hiring as "*CPS—preference based on compensable service-connected disability of 30% or more*" are now included in the total PWD workforce data tables. Similarly, permanent and temporary employees not self-identified on SF-256 and whose personnel record documents that they were hired or converted into the competitive service under Schedule A, part u (5 C.F.R. § 213.3102(u) *Appointment of persons with intellectual disabilities, severe physical disabilities, or psychiatric disabilities*) are now included in the total PWD workforce for purposes of utilization analysis. This action added 40 permanent employees to the PWD workforce data; 39 in the higher salary cluster, and one in the lower salary cluster. Prior year data for such employees was updated for comparison.

As described in Section VII below, the Agency has conducted an annual resurvey of the workforce since FY 2015. Data show steady increase in self-identification among employees after each annual resurvey. Trend data also show positive impact from the changes made to SF-256 in October 2016 and again from the more inclusive definition described above related to Section 501 of the Rehabilitation Act. Between FY 2015 and FY 2018, the participation of PWD in the total workforce increased from 6.57% to 8.76%, participation increased in both the lower and higher salary clusters.

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

Applying the same salary clusters to PWTD as described in Section I, the SEC achieved the numerical goals established for PWTD in both the lower and higher salary clusters during FY 2018. In the lower salary cluster, 5.00% of permanent employees are PWTD; 2.01% of higher salaried employees are PWTD.

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

Hiring goals for PWTD (i.e., 2% of the total workforce) are communicated to hiring managers during quarterly Office of Human Resources Steering Committee meetings. Additionally, metrics for disability hiring are published monthly and at the end of the year by the SEC’s Office of the Chief Operating Officer. The overall percentage of employees who identify as PWTD is posted in the *Diversity Dashboard* sponsored by OMWI and the Diversity Council.

To augment these information sources, OHR implemented the *Human Capital Reporting & Analytics (HCRA)* dashboard in the second half of FY 2018. The HCRA provides, among other key human capital metrics, aggregate data on the disability status for self-identified PWD and PWTD. A series of data filters enable leaders to understand employee gains and losses within their particular Division or Office for specific occupations, grades, and duty stations. OHR plans to use this information to support Human Capital strategic planning efforts.

Throughout FY 2018 and particularly during National Disability Employment Awareness Month, the Agency hosted events that focused on inclusion of persons with a disability. As described later, these events were often sponsored and/or hosted by the Disability Issues Advisory Committee (DIAC). In opening and/or closing remarks, leaders noted the Agency’s goals for recruiting and hiring PWD, frequently mentioning the high value such employees bring to the Agency’s mission.

Relatedly, OHR has developed a *2018–2019 Recruitment Strategy*, which describes the support and collaboration necessary from senior leadership, OEEEO, and OMWI to recruit a diverse candidate base. The *Recruitment Strategy* includes the following goals, among others:

- Build a pipeline of qualified Schedule A applicants; and
- Improve Veteran recruitment efforts.

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The *Recruitment Strategy* specifically denotes an objective to “*Increase workforce representation for people with disabilities and people with targeted disabilities.*” Specific strategies and tasks in the plan for recruitment explain how this objective will be accomplished.

For specific hiring actions, OHR continues to address special hiring authorities, including Schedule A, in conversations with hiring managers to reinforce progress toward achieving numerical goals. A checklist is used by OHR Staffing specialists when vacant positions are identified to ensure hiring managers understand all their options for filling positions, including using Schedule A and veterans’ hiring authorities for those applicants with a service-connected disability of 30% or greater.

Beginning in July 2018, OEEEO led periodic meetings with a cross-functional working group comprised of representatives from OHR and OMWI, including those who support recruiting, to discuss the Management Directive 715 Report and the Agency’s progress related to equal employment opportunity, participation, and inclusion of employees and applicants for employment. For these meetings, OEEEO provided up-to-date information from the Agency workforce data tables and highlighted areas for discussion, including goals and progress related to the participation and inclusion of PWD and PWTD.

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.

Plan to Provide Sufficient & Competent Staffing for the Disability Program

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

Yes **X** No 0

The Agency designates talent acquisition resources and FTE to Special Programs classification, recruitment, and staffing in support of the disability program.

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	Number of Full-Time Equivalent Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	12	0	0	Stephen Brown, Assistant Director, Office of Human Resources, brownst@sec.gov
Answering questions from the public about hiring authorities that take disability into account	12	0	0	Stephen Brown, Assistant Director, Office of Human Resources, brownst@sec.gov
Processing reasonable accommodation requests from applicants and employees	2	1	0	Dia Gonsalves, Disability Program Officer, Office of Human Resources, gonsalvesd@sec.gov
Section 508 Compliance	0	1	0	Sharvon Jones, Governance Branch, Office of Information Technology, jonessh@sec.gov
Architectural Barriers Act Compliance	0	0	3	Ray Ferrari, RA, LEED AP, Architect, Office of Support Operations (OSO)-Office of Building Operations (OBO), FerrariR@sec.gov ; Jillian Bates, RA, LEED AP, Architect, OSO-OBO; Carla Hairston, Program Analyst, OSO-OBO HairstonC@sec.gov
Special Emphasis Program for PWD and PWTD	2	0	0	Stephen Brown, Assistant Director, Office of Human Resources, brownst@sec.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 **X** No 0

The two-and-a-half full-time employees who work on the disability program staff came to the Agency with significant HR experience in the federal government, but were new to reasonable accommodation programs and the responsibilities inherent in responding to reasonable accommodation requests. They received on-the-job training from the Disability Program Officer and departing Reasonable Accommodation Coordinator and periodically attended training programs and reviewed recent case law to stay apprised of the current developments in this area. Additionally, the Disability Program Officer, representing the half full-time employee, also responded to reasonable accommodation requests when possible while managing a diverse portfolio of other HR programs. The Disability Program Officer completed courses specific to recruiting, accommodating, hiring, and retaining PWD via OPM’s HR University and the SEC’s Learning Management System, LEAP, in addition to the general training received.

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More generally, all of the SEC's HR specialists have completed training courses related to staffing and placement offered by the USDA Graduate School or OPM and through various other platforms. The Agency's training and development office also offers learning options that include processing applications for PWD. The Agency will continue these practices in the future.

Changes are planned in line with implementation of requirements and recommendations under Section 501 of the Rehabilitation Act. Those changes will require more focused and specific training on related policy and procedure post implementation for both HR specialists and disability program staff.

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.

Yes No

The Agency was resourced adequately during the reporting period to implement the disability program successfully.

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.

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.

OHR continued to take steps toward improving the participation of PWD and PWTD in applicant pools. As outlined in OHR's *2018–2019 Recruitment Strategy*, the SEC will begin to realize an increase in the overall representation of people with disabilities by using effective recruitment and outreach efforts that identify the Agency as an employer of choice.

The SEC hosted its third annual *Informational and Networking Event for Individuals with Disabilities* at SEC Headquarters. This event continues to prove successful in building a pipeline of applicants for future vacancies. Through this event, the SEC is able to reinforce its commitment to becoming a model employer for PWD by providing guests the opportunity to learn more about the SEC's mission, hear about the Agency's benefits and reasonable accommodations, and network with SEC hiring managers.

Despite limited hiring in FY 2018, the Agency maintained a physical recruitment presence. SEC attended over 17 career fairs and events supporting efforts in building pipelines for future employment. Most notably, it attended the *AmeriCorps Vista Career Fair* and the *Bowie State University Veterans Career Fair*, which both proved to be successful resources for attracting potential candidates. These events allowed the SEC to reach a key constituency and promote a variety of positions.

In FY 2019, the SEC will introduce a more direct and streamlined approach in encouraging hiring managers to utilize the Schedule A hiring authority. OHR will present prospective candidates to every hiring manager seeking to fill vacant positions externally prior to initiating general hiring procedures. OHR believes this approach is a win-win for all stakeholders by providing an opportunity for prospective candidates to be considered first-hand by hiring managers and potentially shortening an often lengthy hiring process.

OHR will continue to leverage the DIAC for recruitment resources and assistance. Further, OHR will continue to retain and review applications from people with disabilities for future openings and will conduct targeted outreach to connect with qualified candidates by collaborating with community-based partners such as nonprofit organizations, national and local disability organizations, and federally funded state and local employment programs.

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 a variety of available resources that support hiring through Schedule A and other hiring authorities that take disability into account. During FY 2018, the Special Programs Manager continued to source potential candidates from available resources such as OPM's Shared List of People with Disabilities and the Workforce Recruitment Program.

The Special Programs Manager receives notifications and newsletters from the following groups and transmits information to OHR staff engaged in recruiting:

- EARN—Employer Assistance Resource Network: askearn.org
- JAN—Job Accommodation Network: askjan.org
- ODEP—Office of Disability Employment Policy, Department of Labor: dol.gov/agencies/odep

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 following describes two procedures for processing applications under the Schedule A hiring authority for persons with disabilities, one used in response to a specific vacancy posting and the other for unsolicited Schedule A applications.

The Office of Human Resources processes Schedule A applications in response to a Job Opportunity Announcement (JOA).

Applicants who wish to be considered for a specific vacancy under the Schedule A hiring authority must submit the appropriate documentation when applying for a current open JOA. The SEC defers to the OPM-identified appropriate documentation. Applications are reviewed by HR specialists to determine if the applicant is minimally qualified as identified in the JOA. If the applicant is minimally qualified, that individual is referred to the hiring manager on a separate certificate of eligible candidates. HR specialists provide written guidance to hiring managers via email that explains how Schedule A applicants can be selected once the certificate has been issued.

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The Office of Human Resources also processes unsolicited Schedule A applications.

Applicants who wish to be considered under the Schedule A hiring authority, outside the process for a specific vacancy posting, must submit the appropriate documentation as identified by OPM with their application. The Special Programs Manager will proactively contact the prospective applicant if the individual did not submit the required documentation. The application will not be processed until the appropriate documentation is received.

Resumes submitted directly to the Special Programs Manager are reviewed to determine the potential job series the applicant may be suitable for based on the knowledge, skills, and abilities identified on the applicant's resume. Building a pool of qualified candidates is important to the SEC; as such, the Agency has developed a *Schedule A Resume Database*.

The SEC process for hiring starts with a Staffing Action Request Form (SARF) submitted by the hiring manager. When a SARF is received by OHR, the Special Programs Manager compiles a certificate of eligible candidates from the database per the job series and refers candidates to hiring managers. In some cases, the Special Programs Manager conducts a one-on-one consultation with the hiring manager to discuss the certificate of eligible candidates, as appropriate.

The SEC's administrative regulations on its Veterans Employment Program provides instruction for hiring veterans with disabilities and was last updated in January 2017. The Agency's administrative regulations are available upon request.

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

Yes **X**

No 0

N/A 0

OHR developed a *2018–2019 Recruitment Strategy*, which describes the Agency's commitment to educating the SEC workforce on special programs for people with disabilities. In addition, OHR and DIAC co-sponsored a *Disability Resources Showcase* in which all SEC employees, including hiring managers, were invited to learn about several disability resources, including the Schedule A hiring authority.

In FY 2018, periodic training occurred with each hiring manager who requested to fill a position. The hiring checklist used by the staffing specialists contains a Schedule A section that is discussed in depth during the one-on-one hiring conversation. The specialist trains the hiring manager on the various procedures of the Schedule A hiring process and offers it as a course of action where applicable.

The Disability Program Manager speaks at DIAC meetings/events on a regular and recurring basis on a variety of topics, including the hiring authorities that take disability into account.

Plan to Establish Contacts with Disability Employment Organizations

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

The SEC's Special Programs Manager continued to maintain established partnerships with 14 organizations that assist PWD in securing and maintaining employment. The Special Programs Manager updates the SEC's list of affinity organizations to maintain contact and foster relationships for recruitment events and candidate sourcing.

The Special Programs Manager maintains an ongoing relationship with the SEC's DIAC and the Veterans Committee.

In an effort to expand outreach, the SEC piloted the *Operation Warfighter Program (OWF)* during FY 2018. OWF is an internship program created by the Department of Defense that matches qualified wounded, ill, and injured service members with non-funded federal internships for them to gain valuable work experience during recovery and rehabilitation. SEC is finalizing program policies and procedures and plans to implement Agency-wide in FY 2019.

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

Hiring Data from FY 2018 were reviewed for evidence of differences in hiring into the permanent workforce. In FY 2018, the participation rate for both PWD and PWTD was 8.33%. [Redacted to protect privacy.]

From these data, the Agency did not achieve a 12% participation rate for PWD among new hires in the permanent workforce. In FY 2018, the participation of PWD among permanent new hires was 8.33%.

The Agency achieved the numerical goal of 2% participation of PWTD among permanent new hires. In FY 2018, the participation of PWTD among permanent new hires was 8.33%.

The hiring freeze at SEC, implemented early in FY 2017 and continuing through most of FY 2018, impacted hiring and affected efforts toward increasing the participation of PWD.

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 X	No 0
b. New Hires for MCO (PWTD)	Yes 0	No X

FY 2018 data were reviewed for evidence of triggers in the hiring of permanent employees into MCO positions. From these data, no PWD or PWTD applicants were found qualified for three out of five of the MCO positions, accountant, IT management, and economist. PWD were found in the qualified applicant pools for attorneys and securities compliance examiners; qualified applicants for attorney also included PWTD. In FY 2018, the SEC hired relatively few permanent employees, a total of 24 permanent staff employees. Among these newly hired staff members were 19 persons in MCO positions, nine attorneys, nine IT management specialists, and one economist. Two of those 19 (10.53%) newly hired MCO permanent staff were both PWD and PWTD.

At the same time, the limited number of qualified PWD and PWTD applicants did not result in differences when comparing qualified applicants to permanent new hires in any of the Agency’s MCOs. No triggers were found for PWD or PWTD when comparing their participation among permanent new hires to the qualified applicants pools (QAP) for attorney, accountant, securities compliance examiner, IT management, or economist positions.

To assess these differences, the percentage of PWD in the permanent new hires for each occupation was compared to the qualified applicant pool (QAP). The applicant flow data summarizes the phases of the hiring process through selection for vacancies that were posted and closed through USAJOBS during the fiscal year. The data summarized here reflect the pool of qualified applications for permanent and/or temporary vacancies announced through USAJOBS during FY 2018.

In contrast, permanent *new hires* were on boarded during the course of the fiscal year. Some newly hired staff applied for a vacancy posted in a prior fiscal year or may have elected not to volunteer demographic information. Differences may be observed in comparing the demographic statistics of the QAP and that of *new hires* on boarded in FY 2018. Triggers comparing the composition of PWD and PWTD in applicant flow versus new hire data should be interpreted with these differences in mind.

PWD represent 22.22% and PWTD were 22.22% of newly hired permanent staff attorneys. That PWD and PWTD participation among new hires exceeds their participation in the QAP. For attorneys, the QAP was 1.38% PWD, and the QAP for PWTD was 0.59%. There were 12 temporary attorneys hired, and nine newly hired permanent attorneys.

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None of the newly hired permanent employees in FY 2018 were accountants. There were nine total new hires, all of whom were temporary. Similarly, none of the QAP for accountant positions was PWD or PWTD; as such, no difference in participation was observed. For securities compliance examiner vacancies posted in FY 2018, the QAP was 2.78% PWD and 0.00% PWTD. No permanent staff securities compliance examiners were hired in FY 2018; therefore, there was a difference observed between available PWD in the QAP compared to those hired. There was no opportunity to observe a difference in participation among newly hired staff and the QAP for PWTD.

For IT management, nine employees were hired as permanent staff in FY 2018. The QAP was 0.00% for both PWD and PWTD, and none (0.00%) of the newly hired staff were PWD or PWTD. No difference is observed in these data; participation in the QAP equaled that among newly hired IT management staff.

Finally, for economists, the QAP was 0.00% for PWD and PWTD because no vacancies were available in applicant flow for economist hiring. There was one permanent new hire, who did not identify as PWD or PWTD. Four temporary economists were also hired. No difference was observed in the participation of PWD or PWTD between the QAP and newly hired permanent staff economist.

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 **X** No 0
- b. Qualified Applicants for MCO (PWTD) Yes **X** No 0

In the FY 2018 data, differences were identified in the participation of PWD in the qualified internal applicants for competitive promotions as compared to the relevant applicant pool (RAP) within three of the SEC’s MCOs, i.e., attorney, securities compliance examiner, and economist. Differences were also identified for PWTD within the internal competitive promotion data for the MCOs attorney, accountant, securities compliance examiner, and IT management.

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The RAP was defined for each MCO based on the number of employees holding a qualifying occupation series and in the SK-levels encumbered at the Agency between SK-11 and SK-16. Specifically, for attorneys, the RAP included all employees in the 0905 series. For accountants, the RAP included all employees in the 0510 series. For securities compliance examiners, the RAP included all employees in the 1831 and the 0501, Financial Administration and Program series. For the information technology management occupation, the RAP included all employees in the 2210 series, and for the economist occupation, the RAP included all employees in the 0110 series.

For attorneys, the RAP for PWD was 5.25%, and PWD represented 4.27% of the qualified internal applicants. The RAP for PWTD was 1.25%, and PWTD were 0.95% of the qualified internal applicants for attorneys. The Agency observed a small difference between the RAP and the qualified applicants for attorney internal promotions of PWTD.

For accountants, the RAP for PWD was 5.81%, and PWD were 9.09% of the qualified internal applicants. Participation of PWD exceeded the RAP for accountants. However, participation on PWTD was lower among the qualified internal applicants than available in the RAP for accountants. The RAP for PWTD was 1.01%, and none of the qualified internal applicants were PWTD (0.00%).

For securities compliance examiners, the RAP for PWD was 8.92%, and PWD represented 4.65% of the qualified internal applicants. The RAP for PWTD was 1.54%, and PWTD were 0.00% of the qualified internal applicants.

For IT management, the RAP for PWD was 11.48%, and PWD represented 15.38% of the qualified internal applicants. The RAP for PWTD was 0.74%, and PWTD represented 0.00% of the qualified internal applicants. Relatively larger differences in participation were observed for both the IT management and securities compliance examiner data compared to the other MCOs, especially for PWD.

For economists, the RAP was 1.32% for PWD, and none (0.00%) of the qualified internal applicants were PWD. No PWTD were found in either the RAP or the qualified internal applicant pool; therefore, no difference was found in the participation of PWTD.

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 X	No 0
b. Promotions for MCO (PWTD)	Yes 0	No X

In the FY 2018 data for internal competitive promotions in MCOs, 4.17% were PWD. [Redacted to protect privacy.] In reviewing these data further, a difference was observed when comparing participation of PWD among those selected for promotion with their participation among the qualified internal applicant pool (QAP) in the attorney, securities compliance examiner, and IT management occupations.

For PWTD, no participation differences were found, except that for attorneys, PWTD participation among those selected for promotion exceeded the QAP. For accountants, securities compliance examiners, IT management, and economists, no PWTD were available in the QAP, and none were selected for promotion.

In the attorney occupation, the QAP for PWD was 4.27%, and a smaller proportion, 1.54%, of those promoted were PWD. The attorney QAP for PWTD was 0.95%, and a larger proportion, 1.54%, of those promoted were PWTD.

The participation of PWD and PWTD among those promoted to accountant positions exceeded or equaled their respective QAP. In the accountant occupation, the QAP for PWD was 9.09% and 0.00% for PWTD. Of the accountants promoted, 14.29% were PWD; none were PWTD. [Redacted to protect privacy.]

In the securities compliance examiner occupation, the QAP for PWD was 4.65% and 0.00% PWTD. None of the employees selected for promotion were PWD or PWTD. [Redacted to protect privacy.]

In the IT management occupation, the QAP was 15.38% for PWD, and 14.29% of the selections were PWD. The QAP for PWTD was 0.00%, and 0.00% of selections were PWTD. [Redacted to protect privacy.]

In the economist occupation, neither PWD nor PWTD were found in the QAP, and none were selected. There were two selections for economist promotion.

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.

Advancement Program Plan

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

To promote equal employment opportunity, the Agency takes a number of steps to ensure that opportunities for advancement are open and available to all, including PWD and PWTD in the workforce. Information about training, mentoring programs, and career development options is widely shared with the workforce. The following describes efforts to promote opportunities for advancement.

- OHR updated and maintains a user-friendly, interactive portal, *AskHR*, on the SEC's intranet, which provides employees with information about hiring, compensation and benefits, employee development, performance management, and disability accommodations, among a number of other topics. In addition, all employees receive a daily communication, *SEC Today*, which highlights important information about events and opportunities for details, training, and SEC staff accomplishments.
- The Chief Human Capital Officer is an active member of the SEC Veterans Committee, which hosts a website that includes information concerning veterans' benefits, to include a link to the *Feds Hire Vets* website that highlights special hiring authorities for veterans.
- DIAC regularly communicates with its membership, which includes PWD and PWTD, about its own activities, other events, developmental opportunities, and job postings or support available to the workforce. These more targeted communications help ensure that PWD and PWTD are aware of the available options and any processes for requesting participation or enrollment.

Career Development Opportunities

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

The SEC provides numerous opportunities for employees to acquire the skills and certifications needed to succeed in their technical positions and to progress in their careers. Classroom-style and e-Learning programs offer an extensive array of learning opportunities in technical areas (e.g., courses on Hedge Funds, Mutual Funds, and Credit Derivatives, etc.) as well as in leadership development to SEC senior leaders and non-supervisory staff alike. Among the variety of learning and development offerings, the SEC offers the three career development training programs highlighted below. Data on participation in these programs is captured along with other training program data in Section IV.2.b below.

- The *Women in Leadership* program is offered once a year under the auspices of the Brookings Institution. Each year, the SEC provides either managers (SK-15 and SK-17 supervisors) or non-managerial staff (SK-14 and SK-16 levels) the opportunity to participate in this leadership development program. Program participants from across federal agencies learn how to strengthen leadership qualities and explore key elements of senior leadership success while maintaining authenticity and balance.
- The *EIG Fellows* Program, coordinated by the Partnership for Public Service, strengthens the leadership skills of experienced federal employees through a combination of innovative coursework, best practices benchmarking, challenging action-learning projects, executive coaching, and government-wide networking. This program is offered to SEC employees in the SK-14 to SK-17 (a mix of supervisory and non-supervisory) levels. SEC's EIG Fellows attend facilitated sessions at SEC Headquarters to share what they are learning and to explore how this information can be applied to improve organizational performance, workplace relationships, and productivity.
- The *Aspiring Leaders* program is an interactive blended-learning program designed to strengthen the leadership and management skills of SEC non-supervisory (SK-13 and SK-14) employees. The program covers: critical leadership skills for effective supervision; first-line management responsibilities; understanding government policy, process, and regulations relevant to management; and increasing self-awareness through guided self-assessments and feedback.

The SEC's robust training program also offers seminars targeted to specific audiences, including Senior Officers, managers, and employees, covering relevant subject matter. In FY 2018, OHR continued to implement enhancements to its learning management system, LEAP. Within this system's MyCareer@SEC module, employees can find information about career paths mapped to their current position, the responsibilities and occupational requirements of positions in that career path, and options for training and development that would enable

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them to progress toward their career goals. SECU established initial career paths in FY 2017 based on prior projects to define competency requirements for a variety of occupations. In FY 2018, OHR and SECU also:

- Developed and worked with NTEU to finalize a Competency Assessment Survey to inform workforce planning efforts and shape the future of SEC-wide training and development programs. The survey was launched in September 2018, and data collection continued into the new fiscal year. The data gleaned from the competency survey will be used to enhance the value of the new LEAP career path options.
- Expanded offerings under the Career Horizons program that provide individualized support for employees in creating development plans and pursuing career growth.

The Agency supports employees in pursuing leadership development through a variety of program offerings, including both individual coaching and a new pilot mentoring program. Since 2012, 144 managers have completed a 12-session coaching engagement with an external coach. Coaching with an internal certified executive coach is not tracked, nor is demographic information captured, due to confidentiality.

Late in FY 2017, OHR conducted a Leadership Interest Survey to gather data from all SK-15 and SK-17 managers. Survey data from SEC management staff were analyzed in early FY 2018 to inform SECU's leadership development offerings going forward. Additionally, OHR's Human Capital Strategy Group began a long term, multi-year planning effort for a leadership development program similar to the SES Candidate Development Programs offered by other federal agencies.

Relatedly, in summer 2018, the Agency successfully launched a pilot mentoring program leading to the first cohort of 30 participants who will receive mentoring throughout FY 2019. In total, 142 permanent employees submitted a statement of interest in the program. On a first come, first serve basis, 30 participants were accepted into the mentoring program and matched with volunteer mentors with deep technical expertise and/or leadership experience. Employees, who expressed interest in the program who were not matched with mentors for this program offering were placed on a wait list for a future program offerings. The SEC held an orientation session for both mentors and participants, and will hold formal events throughout FY 2019 to help guide the mentoring relationship toward success.

Participation among PWD and PWTD in the Agency's career development opportunities is provided below.

The participation rate of 6.90% PWD among those selected to participate in the pilot mentoring program (i.e., Selectees) exceeded their participation among those expressing interest (5.63%). As such, no trigger was noted for the selections into the Agency’s pilot mentoring program.

Aggregate PWD participation in training programs through the Agency’s learning management system, LEAP, exceeds their participation on rolls; 10.69% of training opportunities (both mandatory and elective) were completed by PWD, compared to 8.76% of permanent employees who are PWD. PWD participation in training was higher than that among permanent employees; this difference was statistically significant ($X^2 = 27.85$, $p < .0001$). No evidence for lower rates of participation for PWD was found in the Agency’s training program.

For other Career Development Opportunities, demographic data specific to disability status are not captured or maintained. The Agency will continue to offer such programming and to focus communication efforts to encourage participation of PWD and PWTD as described above, *supra*.

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	<input checked="" type="checkbox"/>	No	0
b. Selections (PWTD)	Yes	0	No	<input checked="" type="checkbox"/>

From the Career Development Opportunities table in Section IV.B.2 above, data on the participation of PWTD in various programs were reviewed for equality of employment opportunity in the applications or selections for these programs.

Within the Agency’s pilot mentoring program, the Agency notes a difference in the participation rate among those who expressed interest in the mentoring program (i.e., applicants), as compared to PWTD among permanent staff. While 2.02% of the Agency’s permanent staff are PWTD, no (0.00%) PWTD expressed interest in the pilot mentoring program. The Agency will share information about future offerings of this program through DIAC and other channels to encourage greater interest among PWTD. Given that no PWTD expressed interest in the program, none were selected. No trigger was noted for selections into the mentoring program.

In the aggregate, training records show that PWTD participated in training programs through LEAP at rates just above their participation on rolls; 2.27% of training opportunities (both mandatory and elective) were completed by PWTD, compared to 2.02% of PWTD permanent employees. No evidence of a trigger or significant difference was found for the participation (i.e., selections) of PWTD in training programs data.

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

The inclusion rate for PWD was calculated by comparing the number and percent of employees with disabilities (PWD) who received at least one award in each applicable program element to the number and percent of employees without a disability (this category combines persons with no disability and those who did not identify as having a disability) who received at least one award in each applicable program element.

The inclusion rate for PWTD was calculated by comparing the number and percent of employees with targeted disabilities (PWTD) who received at least one award in each applicable program element to the number and percent of employees without a targeted disability (this category combines persons with no disability, those who did not identify as having a disability, and those with a disability that is not targeted) who received at least one award in each applicable program element.

For both PWD and PWTD, the Agency found lower inclusion rates in: time-off awards of nine (9) hours or more and cash awards of more than \$500. No trigger was found disadvantaging PWD or PWTD in the distribution of time-off awards less than nine (9) hours or cash awards of \$100 to \$500.

For time-off awards of more than nine hours, the inclusion rate for PWD was 29.32%, and the inclusion rate for people with no disability was 32.39%. The inclusion rate for PWTD was 23.86%, and the inclusion rate for people with no targeted disability was 32.29%.

For cash awards of more than \$500, the inclusion rate for PWD was 40.05%, and the inclusion rate for people with no disability was 52.58%. The inclusion rate for PWTD was 32.95%, and the inclusion rate for people with no targeted disability was 51.86%.

For time-off awards of one to nine hours, the inclusions rates were: 38.22% for PWD and 37.69% for persons with no disability. The PWTD inclusion rate was 48.86% and for those with no targeted disability, it was 37.51%.

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For cash awards of \$100 to \$500, the inclusion rate for PWD was 34.29%, and the inclusion rate for people with no disability was 25.37%; the inclusion rate for PWTD was 44.32%, and the inclusion rate for people with no targeted disability was 25.78%.

The Agency is actively researching the observed differences in the distribution of discretionary awards as part of our barrier analysis program.

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

To address the question posed here, the following summarizes data from performance-based pay increases distributed under the Agency’s *Performance Management Program* and the nature of action (NOA) code 891, *Regular Performance Pay*, in accordance with EEOC instruction for presenting these data. Performance-based awards at the SEC are also recorded under NOA Codes 885 and 886 for performance rating based lump sum awards. In FY 2018, a significant proportion of the employee population received lump sum payments under NOA Code 885 and/or 886 rather than a pay increase under NOA Code 891.

The inclusion rate was calculated by comparing the number and percent of employees who received a performance-based pay increase (NOA 891) among PWD to the number and percent of employees with no disability (this group includes those who did not identify as having a disability). No difference in performance rating based pay increases was found for PWD. The inclusion rate for PWD was 71.20%, and for people without disabilities and those who did not self-identify with a disability, it was 66.46%.

The inclusion rate for PWTD was calculated by comparing the number and percent of PWTD who received a performance-based pay increase (NOA 891) to the number and percent of employees without a targeted disability (i.e., the combined total of persons with no disability, those who do not identify as having a disability, and those with a disability that is not targeted) who received such a performance-based pay increase. No difference was found in performance rating based pay increases. The inclusion rate for PWTD was 73.86%, and for people without targeted disabilities (including those with no disability, those who did not self-identify as having a disability, and those with a disability that is not targeted), it was 66.73%.

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

In FY 2018, OEEO analyzed data from the Agency’s gift card recognition program since the program’s inception in late FY 2016 through FY 2017. This analysis was completed under the barrier analysis program’s research into the distribution of discretionary cash and time-off awards. Among all gift card recipients in this time period, 105 were PWD (12.06%), and 20 were PWTD (2.30%). This participation of PWD and PWTD in the gift card program exceeded their participation of permanent staff on rolls (participation rates of permanent staff for PWD was 8.76%, and for PWTD was 2.02%).

Further, inclusion of PWD (27.49%) among gift card recipients, when considered against the total PWD permanent staff at the end of FY 2018, exceeded that of the combination of persons with no disability and those who did not self-identify (18.91%). Similarly the inclusion rate for PWTD (22.73%) gift card recipients exceeded that of those with no targeted disability (19.60%). Consistent with analyses conducted on discretionary cash and time-off awards; lower value gift card awards were used to recognize PWD and PWTD more frequently than employees with no disability.

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
 Qualified Internal Applicants (PWD) Yes 0 No **X**
 Internal Selections (PWD) Yes **X** No 0

b. Grade GS-15
 Qualified Internal Applicants (PWD) Yes 0 No **X**
 Internal Selections (PWD) Yes **X** No 0

c. Grade GS-14
 Qualified Internal Applicants (PWD) Yes 0 No **X**
 Internal Selections (PWD) Yes **X** No 0

d. Grade GS-13

Qualified Internal Applicants (PWD)	Yes	0	No	X
Internal Selections (PWD)	Yes	X	No	0

The SEC crosswalks the Agency’s SK alternative pay plan’s senior grade levels to the General Schedule according to the following equivalencies: SES = SO and EX; GS-15 = SK-15 and SK-17; GS-14 = SK-14 and SK-16; GS-13 = SK-13. We note that the relevant applicant pools (RAP) for the SK grade equivalencies of the GS-14 and GS-15 levels combine data across two SK-grade levels. This combination was made to conform analyses to the format provided, though the actual RAPs for the individual SK-levels differ.

FY 2018 data were reviewed to assess whether triggers exist with regard to promotions to senior grade levels. Of 972 qualified internal applications for senior grade level positions, 148 (15.23%) were submitted by PWD. The Agency was successful in supporting PWD in their interest in and application for senior grade level positions. There were no triggers identified among qualified internal applicants to senior grades.

Differences were observed among selectees for all senior grade levels. Of the promotions to senior grade levels, 5.88% were PWD, which is lower than their availability in the QAP at 15.23%. [*Redacted to protect privacy.*] The following presents data for each grade level equivalent.

At the SO level, the RAP, comprised of all employees at grade levels SK-14 and higher, was 6.69%, and among qualified internal applicants, a larger proportion (14.00%) were PWD. None of the employees selected for SO positions were PWD.

At the SK-15 and SK-17 levels (GS-15 equivalent), the RAP, comprised of employees at grades SK-14, SK-15, and SK-16, was 6.74%, while the participation of PWD among qualified internal applicants was greater at 15.46%. The Agency noted a difference involving internal selections for senior grade levels at the SK-15 and SK-17 levels; 5.17% of selections were PWD compared to their participation among qualified internal applicants at 15.46%.

At the SK-14 and SK-16 levels (GS-14 equivalent), the RAP, comprised of employees at grades SK-13, SK-14, and SK-15, was 7.94%, and the participation of PWD among qualified internal applicants was 13.11%. On the other hand, 7.02% of selections were PWD compared to 13.11% of qualified internal applicants.

At the SK-13 level (GS-13 equivalent), the RAP, comprised of employees at the SK-12 level, was 17.89%, and the participation of PWD among qualified internal applicants was 36.67%. Among selections for internal promotions at the SK-13 level, 11.11% were PWD, and 36.67% of the qualified internal applicants were PWD.

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

Qualified Internal Applicants (PWTD)	Yes	0	No	X
Internal Selections (PWTD)	Yes	X	No	0

b. Grade GS-15

Qualified Internal Applicants (PWTD)	Yes	0	No	X
Internal Selections (PWTD)	Yes	X	No	0

c. Grade GS-14

Qualified Internal Applicants (PWTD)	Yes	X	No	0
Internal Selections (PWTD)	Yes	0	No	X

d. Grade GS-13

Qualified Internal Applicants (PWTD)	Yes	X	No	0
Internal Selections (PWTD)	Yes	0	No	X

Applying the same comparisons to PWTD as described in Section IV.D.1, the Agency presents information on trigger identification for PWTD in promotions to senior grade levels. Of 972 qualified internal applications for senior grade level positions, 24 (2.47%) were submitted by PWTD. Of the promotions to senior grade levels, 1.47% were PWTD. [*Redacted to protect privacy.*] Overall, the Agency was successful in supporting PWTD in their interest in and application for senior grade level positions at the highest levels and was less successful in selecting PWTD for those promotions.

Differences were observed in the qualified applicant pools for both the GS-13 and GS-14 equivalent senior grade levels and among selectees for both the GS-15 and SES equivalent senior grade levels. The following presents data for each grade level.

At the SO level, the Agency notes that the RAP was 1.41% PWTD, and the participation among qualified internal applicants of PWTD was 3.00%. Zero selections for SO positions were PWTD among the qualified internal applicants who were 3.00% PWTD.

At the SK-15 and SK-17 level (GS-15 equivalent), the RAP was 1.39%, and among the qualified internal applicants, 3.54% were PWTD. For the internal selections to grades SK-15 and SK-17, 3.54% of the qualified internal applicant pool was PWTD, and 1.72% of selections for SK-15 or SK-17 positions were PWTD.

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At the SK-14 and SK-16 level (GS-14 equivalent), the Agency observed a difference among qualified internal applicants. The RAP was 1.59% while 0.66% of the qualified internal applicants were PWTDD. Selections were 1.75% PWTDD; therefore, no difference was found among selectees.

At the SK-13 level (GS-13 equivalent), the Agency observed a difference involving PWTDD among qualified internal applicants. The RAP was 5.96%, and the participation of PWD among qualified internal applicants was 0.00%. The Agency did not have a trigger involving internal selections. None of the qualified internal applicants were PWTDD, and 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	<input checked="" type="checkbox"/>	No	0
b. New Hires to GS-15 (PWD)	Yes	0	No	<input checked="" type="checkbox"/>
c. New Hires to GS-14 (PWD)	Yes	<input checked="" type="checkbox"/>	No	0
d. New Hires to GS-13 (PWD)	Yes	<input checked="" type="checkbox"/>	No	0

Applying the same grade equivalencies that were described in Section IV, the Agency presents information on trigger identification for PWD new hires to senior grade levels. Among the newly hired staff members in FY 2018 and persons hired into senior grade level positions, 9.09% newly hired permanent staff in senior grade levels identified as both PWD and PWTDD. [Redacted to protect privacy.] The following evaluates participation of PWD in each grade equivalent level.

Because no permanent staff PWD employees were hired into senior grade levels for the GS-13, GS-14, or SES equivalent positions, participation of PWD was higher among the QAP than among newly hired senior grade staff for each of those grade level equivalencies. At the GS-15 equivalent, SK-15 and SK-17 level, there was no trigger for the permanent new hires for either PWD or PWTDD because 33.33% of the newly hired staff at those levels were both PWD and PWTDD. [Redacted to protect privacy.] The following describes trigger analysis at each grade equivalent level SES, GS-15, GS-14, and GS-13.

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As described above, the QAP includes data where the applicant self-identified with a disability and qualified for permanent and temporary SEC vacancies that were posted in USAJOBS with a closing date during the fiscal year. In contrast, data on *new hires* on boarded during the course of the fiscal year includes applicants who applied for a vacancy posted prior to the start of the fiscal year. Differences may be observed in the demographic statistics of those selected versus those on boarded as *new hires*. Triggers comparing the composition of PWD and PWTD in applicant flow versus new hire data should be interpreted with these difference in mind.

At the SO level, the QAP was 4.83% PWD, and none of the newly hired permanent SOs identified as PWD. [Redacted to protect privacy.] At the SK-15 and SK-17 levels (GS-15 equivalent), the QAP was 1.96% PWD, and 33.33% of the permanent new hires for SK-15 and SK-17 positions identified as PWD. [Redacted to protect privacy.] At the SK-14 and SK-16 levels, the QAP was 10.65% while none of the permanent new hires to SK-14 and SK-16 positions identified as PWD. [Redacted to protect privacy.] At the SK-13 level, the QAP was 4.55% while none of the new hires to SK-13 positions identified as PWD. [Redacted to protect privacy.]

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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>
b. New Hires to GS-15 (PWTD)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
c. New Hires to GS-14 (PWTD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
d. New Hires to GS-13 (PWTD)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Applying the same grade equivalencies that were described in Section IV and the data reviewed in Section IV above, the Agency presents information on trigger identification for PWTD new hires to senior grade levels. Of the newly hired permanent staff in senior grade levels, 9.09% were PWTD in SK-15 or SK-17 positions. [Redacted to protect privacy.]

For two of the senior grade level positions, the Agency found a trigger in differences in participation of PWTD between qualified applicants and among new hires. Because no PWTD employees were hired into senior grade level positions in the SO or the SK-14 and SK-16 (GS-14 equivalent) positions, participation of PWTD was higher among the QAP than among newly hired senior grade staff for each of those grade level equivalencies.

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For two of the senior grade level positions, the Agency found no evidence for a trigger between qualified applicants and among new hires. At the SK-15 and SK-17 level (GS-15 equivalent), there was no trigger for the permanent new hires for either PWD or PWTD. For SK-13 (GS-13 equivalent) positions, there was no opportunity to observe a difference for PWTD newly hired staff. No PWTD were available in the QAP, and none were selected.

More detail about each senior grade level follows in descending order by level. At the SO level, the Agency found a difference involving PWTD among new hires. The QAP was 0.97%, and none of the permanent new hires to SO positions identified as PWTD. [Redacted to protect privacy.] At the SK-15 and SK-17 levels, the QAP was 1.12%, and of the permanent new hires to SK-15 and SK-17 positions, 33.33% were PWTD. [Redacted to protect privacy.] At the SK-14 and SK-16 levels, the QAP was 1.61%, and none of the permanent new hires to SK-14 and SK-16 positions were PWTD. At the SK-13 level, the qualified applicant pool was 0.00% and there were no permanent new hires who were PWTD. [Redacted to protect privacy.]

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

Qualified Internal Applicants (PWD)	Yes 0	No X
Internal Selections (PWD)	Yes X	No 0

b. Managers

Qualified Internal Applicants (PWD)	Yes 0	No X
Internal Selections (PWD)	Yes X	No 0

c. Supervisors

Qualified Internal Applicants (PWD)	Yes 0	No X
Internal Selections (PWD)	Yes X	No 0

The SEC cross-walked the Agency’s alternative pay plan supervisory levels to the Executive, Manager, and Supervisor levels according to the following equivalencies: Executives = SO; Managers = SK-17 and the supervisory Administrative Law Judges in pay plan Administrative Law (AL); and Supervisors = employees or positions at SK-levels below SK-17 who hold supervisory status. We note that, similar to the senior grade level equivalencies, the relevant applicant pools (RAP) for supervisory levels at the Agency combine data across multiple SK levels. This combination was made to conform analyses to the format provided, though the actual RAPs for the specific leadership levels differ.

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FY 2018 data were reviewed to assess whether triggers exist with regard to promotions to supervisory positions. Among the promotions in FY 2018 to a leadership position at the supervisor, manager, or executive level, 5.88% identified as PWD. The following evaluates participation of PWD in each leadership level. *[Redacted to protect privacy.]*

For all three leadership levels, the participation of PWD in the qualified internal applicant pool exceeds that in the RAP. However, differences were found when comparing PWD selections into leadership positions to the qualified internal applicant pools at all three leadership levels. As found for senior grade levels, overall, the Agency was successful in supporting PWD in their interest in and application for leadership roles and was less successful in selecting PWD for those promotions.

For executives, the Agency had a trigger involving internal selections. The RAP, comprised of permanent managers with supervisory status at the SK-17 level, was 6.33%, and the qualified internal applicants were 14.00% PWD. Therefore, no trigger was found for qualified internal applicants. However, the Agency found lower participation of PWD among selections. None of the internal selections for SO positions identified as PWD, while 14.00% of the qualified internal applicants were PWD.

For managers, the RAP, comprised of permanent supervisors at the SK-13 through SK-15 levels, was 7.34%, and the qualified internal applicant pool was 16.06%. The SK-17 manager selections noted in internal competitive promotion data included 3.7% PWD. *[Redacted to protect privacy.]*

For supervisors, the Agency did not have a trigger involving qualified internal applicants. The RAP, comprised of both supervisory and non-supervisory employees at the SK-12 through SK-14 levels, was 8.98% PWD, and the qualified internal applicants were 14.94% PWD. There was a difference found for internal selections; 14.94% of the qualified internal applicants identified as PWD, and 7.22% were selected.

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

Qualified Internal Applicants (PWTD)	Yes 0	No X
Internal Selections (PWTD)	Yes X	No 0

b. Managers

Qualified Internal Applicants (PWTD)	Yes 0	No X
Internal Selections (PWTD)	Yes X	No 0

c. Supervisors

Qualified Internal Applicants (PWTD)	Yes X	No 0
Internal Selections (PWTD)	Yes 0	No X

Applying the same grade equivalencies that were described in Section IV, the Agency presents information on trigger identification for PWTD internal promotions to supervisory positions. Promotions to the supervisory level included 1.47% PWTD. *[Redacted to protect privacy.]* The following evaluates participation of PWTD in each leadership level.

For the manager and executive levels, the participation of PWTD in the qualified internal applicant pool exceeds that in the RAP. Such was not true for the supervisor level where a difference in participation between the RAP and qualified internal applicants was noted. Further, differences were found when comparing PWTD selections into leadership positions to the qualified internal applicant pools for both managers and executives. As found for senior grade levels, overall, the Agency was successful in supporting PWTD in their interest in and application for senior leadership roles and was less successful in selecting PWTD for those promotions.

For executives, the RAP was 1.52% PWTD and 3.30% of the qualified internal applicants were PWTD. The Agency did identify a difference in participation for PWTD involving internal selections; no PWTD were among the employees selected for SO positions. *[Redacted to protect privacy.]*

For managers, the RAP was 1.13% PWTD and a larger proportion 4.24% of the qualified internal applicants were PWTD. The Agency identified a difference involving internal selections; no PWTD were selected out of manager selections, though 4.24% of the qualified internal applicants were PWTD. *[Redacted to protect privacy.]*

For supervisors, the RAP was 2.00%, and the Agency noted that a smaller proportion (1.29%) of the qualified internal applicants were PWTD. However, the Agency found stronger participation of PWTD among those selected for supervisory positions at 2.06% as compared to their availability among qualified internal applicants at 1.29%.

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 X	No 0
b. New Hires for Managers (PWD)	Yes 0	No X
c. New Hires for Supervisors (PWD)	Yes X	No 0

Applying the same grade equivalencies that were described in Section IV, the Agency presents information on trigger identification for PWD new hires into leadership positions. Data from FY 2018 was used to assess whether differences exist with regard to applicants and new hires in supervisory positions for PWD (this question) and PWTD (*see the next question*). An anomaly was found in FY 2018 new hire data for PWD at the executive level.

Among the newly hired staff members in FY 2018, 22.22% of newly hired permanent staff in leadership positions were both PWD and PWTD. [*Redacted to protect privacy.*] The following evaluates participation of PWD in each leadership level. Because no permanent staff PWD employees were hired into either SO or supervisor positions, participation of PWD was higher among the QAP than among newly hired leaders. At the manager level, there was no trigger for the permanent new hires for either PWD or PWTD.

As described above, the QAP data where the applicant self-identified with a disability and qualified for the position was analyzed. Data in this pool describe vacancies for permanent and temporary positions with the SEC that were posted in USAJOBS with a closing date during the fiscal year. In contrast, data on *new hires* on boarded during the course of the fiscal year, some of whom applied for a vacancy posted prior to the start of the fiscal year, was also analyzed. Differences may be observed in the demographic statistics of those selected versus those on boarded as *new hires*. Triggers comparing the composition of PWD and PWTD in applicant flow versus new hire data should be interpreted with these differences in mind.

For executives, the QAP was 4.83%, and none of the newly-hired permanent executives identified as PWD. For managers, PWD participation of 40.00% among newly hired managers exceeds their participation in the QAP at 2.40%. [*Redacted to protect privacy.*] For supervisors, no PWD were newly hired into supervisory positions, while 1.56% of the QAP were PWD.

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 X	No 0
b. New Hires for Managers (PWTD)	Yes 0	No X
c. New Hires for Supervisors (PWTD)	Yes 0	No X

Differences were found in FY 2018 new hire data for PWTD at the executive level, but no differences were found at the manager or supervisor levels. Of the newly hired permanent staff in leadership positions 22.22% were both PWD and PWTD in manager positions. [*Redacted to protect privacy.*]

For executives, the qualified applicant pool was 0.97% PWTD. However, no PWTD were selected as new hires for executive positions in FY 2018. For managers, the qualified applicant pool was 1.60% PWTD, and 40.00% of the newly-hired permanent managers were PWTD. For supervisors, the qualified applicant pool was 0.00% PWTD, and none of the newly-hired permanent supervisors were PWTD. The manager and supervisor data do not suggest the presence of a trigger.

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 to 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.

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 **X** No 0 N/A 0

The SEC maintains discretion on conversions to a career or career-conditional appointment among employees on Schedule A appointments. As a general practice, those Schedule A employees who were not converted voluntarily accepted a new Schedule A appointment within the Agency. Ten employees were converted to the competitive service under the Schedule A hiring authority during FY 2018. Seven of those employees were converted within two years of first entering on duty with the SEC. Three employees were successfully converted to the competitive service during FY 2018 after serving multiple Schedule A appointments; these employees were converted within two years of being placed into their most recent Schedule A appointment.

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

FY 2018 data on voluntary and involuntary separation by disability were used to calculate the inclusion rates. Inclusion rates were calculated as the number of PWD who separated among all PWD in the workforce, compared to the same proportion among persons with no disability (this category is combined with those who did not self-identify as having a disability). FY 2018 data show that PWD separated at higher rates than those with no disability.

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For voluntary separations, the percentage of PWD exceeded that of persons without disabilities. The inclusion rate for PWD was 4.19%, and for people without disabilities, including those who did not self-identify, the inclusion rate was 3.92%. For involuntary separations, the percentage of PWD exceeded that of persons without disabilities. The inclusion rate for PWD was 0.52%, and for people without disabilities, including those who did not self-identify, the inclusion rate was 0.05%.

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

Inclusion rates were calculated as the number of PWTD who separated among all PWTD in the workforce, compared to that same proportion among persons with no disability (this group also includes those who did not self-identify as having a disability and those with a disability that is not targeted).

No evidence of differentially higher separation among PWTD was found in FY 2018 data. For voluntary separations, the percentage of employees with no targeted disability exceeded that of PWTD. The inclusion rate for PWTD was 1.14%, and for people without targeted disabilities, it was 4.00%.

For involuntary separations, the percentage of persons without targeted disabilities exceeded that of PWTD. The inclusion rate for PWTD was 0.00%, and for people without targeted disabilities, the inclusion rate was 0.09%.

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.

To understand the reasons why PWD were separating from the Agency, voluntary separation data were more closely reviewed, combined with other demographic information about employees with disabilities. Analysis considered any trends in employee separation by Division or Office, by occupation, by grade, and by age. The most influential trend observed in these data was a relationship between age and disability. The largest portion of voluntary separations for PWD and PWTD were retirements from federal service. The Bureau of Labor Statistics has similarly documented the age profile of the U.S. population of PWD (Source: bls.gov/spotlight/2018/labor-force-characteristics-of-people-with-a-disability/home.htm).

The very small number of PWD separated under involuntary conditions limits the reliability of general conclusions from these data. [Redacted to protect privacy.] At the same time, even this small volume represents a proportion of the PWD employee population, such that exploring the involuntary separations may be informative. With that caveat, OEEO plans to gather data about the reasons for removing involuntarily separated PWD to uncover any preventive action or support needed for current and future employees.

The SEC invites all departing employees to complete an exit survey during their last pay period on SEC rolls. This survey asks exiting employees to self-identify if they have a disability and whether or not an accommodation was needed or provided. Among 83 employees who completed the exit survey in FY 2018, seven self-identified as having a disability (8.43%). Among exiting employees who reported a disability in FY 2018, two reported that they were provided reasonable accommodation.

The small number of separating employees who self-identified with a disability and completed an exit survey limits the reliability of conclusions to be drawn from these data about the reasons why those employees left the Agency. To this end, in FY 2018 the Agency analyzed information from the exit survey across two fiscal years to support more general conclusions about why employees with disabilities left the SEC.

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Across FY 2017 and FY 2018, 60% of employees who separated and reported a disability indicated they left the SEC due to retirement. Of note, all departing employees who self-identified as having a disability were slightly more positive when responding to items on the exit survey related to diversity and inclusion when compared to employees who did not report a disability: 90% agreed that their workgroup was open to diverse viewpoints and backgrounds (compared to 79% of employees who did not report a disability); 90% agreed that their supervisor/team lead treated them with respect (versus 81%); 80% agreed their co-workers fostered an cohesive work environment (versus 79%); and 80% agreed policies and programs promoted diversity in the workplace (versus 70%). The results of the exit survey suggest employees who separated and indicated a disability were more satisfied with SEC diversity and inclusion efforts than other separated employees.

The analyses described here were completed as part of the in-process barrier analysis for PWD and PWTD described more fully in Section VII, *infra*.

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.

Information specific to the accessibility of SEC facilities and technology under Sections 504 and 508 of the Rehabilitation Act is not currently consolidated into one specific notice or resource. Such information can be gathered from a variety of sources, including 17 C.F.R. §§ 200.601 to 200.670, *Enforcement of Nondiscrimination on the Basis of Handicap in Programs or Activities Conducted by the Securities and Exchange Commission* (SEC 504 regulations), SEC Administrative Regulation 24-10 (SECR 24-10), *Information and Communication Technology (ICT) Section 508/Accessibility Program*, and SEC Administrative Regulation 11-3 (SECR 11-3), *Leasing Program*.

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Information about the SEC's Accessibility/Disability Program is posted on SEC.gov: sec.gov/disability/sec_access.htm and sec.gov/accessibility/sec-accommodation-procedures.pdf. SEC is in the process of updating the Accessibility page of SEC.gov with applicable complaint-filing procedures under both Sections 504 and 508 of the Rehabilitation Act and the Architectural Barriers Act. Updates will include an explanation of the Rehabilitation Act and Architectural Barriers Act, informal processes for providing feedback about accessibility of facilities and technology to SEC, contact information and specific complaint processes for filing a formal claim related to accessibility, and additional resources for individuals to learn more. *A draft SEC Operating Procedure setting forth the complaint process related to Sections 504 and/or 508 and the Architectural Barriers Act is expected to be finalized in FY19, and posted on SEC.gov thereafter.*

Every SEC vacancy announcement posted to USAJOBS includes information about obtaining accommodations, including alternative methods to apply. The name of SEC's Special Programs Manager serving as the Selective Placement Program Coordinator (SPPC) is posted on OPM's website. OHR has built a separate page providing more in-depth information about hiring PWD (sec.gov/ohr/sec-disability-program-page.html). This page includes a link to an online form (sec.gov/forms/ADA4Applicants) for requesting accommodations in the technology-enabled job application process and information on alternate methods for contacting the Disability Program at the SEC.

The SEC also currently posts information on how to file an EEO complaint under, *inter alia*, Section 501 of the Rehabilitation Act at sec.gov/eeoinfo/eeocomplaints.htm.

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.

Information specific to the accessibility of facilities under the Architectural Barriers Act is not currently consolidated into one specific notice or resource. Such information can be gathered from a variety of sources.

Information about the SEC's Disability Program and accommodation procedures is posted on SEC.gov (sec.gov/disability/sec_access.htm and sec.gov/accessibility/sec-accommodation-procedures.pdf). These resources provide information on accessibility in workspace modifications and appropriate response to other requests, including requests to make the SEC program accessible to disabled members of the public. The SEC posts information on how to file an EEO complaint at sec.gov/eeoinfo/eeocomplaints.htm. In line with the Agency's plans for implementing the required and recommended elements of Section 501 of the Rehabilitation Act,

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the Agency will update the SEC website with applicable procedures under the Architectural Barriers Act related to the accessibility of facilities.

Such updates are intended to address the required notice explaining employees' and applicants' rights under Section 508 and the Architectural Barriers Act as well as other policy and procedural changes to support reasonable accommodation for employees and applicants for employment. Updates will include contact information and specific complaints processes for issues related to accessibility under both Section 508 of the Rehabilitation Act and the Architectural Barriers Act.

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.

Regarding the accessibility of technology, the Agency developed a *Technology Strategic Plan* to cover the years 2018–2020. The plan's technology priorities include improvements to the information technology (IT) operational environment and technology delivery model to provide high levels of system and infrastructure reliability and availability. Some initiatives within the plan will help provide high-quality user support and best-in-class infrastructure that benefit PWD and PWTB. These initiatives also support accessibility to SEC's technology for employees, applicants, and members of the public.

The Agency will conduct a review of plans for the IT operational environment found in the *Technology Strategic Plan* against the required and recommended elements for technology accessibility embedded in Section 508. The Agency will revise current policy and procedure, as appropriate, related to accessibility of facilities as required by the Architectural Barriers Act during FY 2019.

Reasonable Accommodation Program

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

The SEC has established a reasonable accommodation (RA) processing timeline of 20 business days from the day of request to fulfillment, absent extenuating circumstances. Excluding the provision of adjustable height tables (AHTs), in FY 2018, 72% of initial requests for accommodation were processed within 20 business days.

SEC is currently engaged in a system design of an automated electronic case management system for processing RA requests.

In the meantime, tools and a more structured set of procedures were developed and used in FY 2018 for capturing data related to processing RA requests. From those data, the SEC notes a significant improvement in processing timeliness for those requests closed out during the year. The time frame for processing initial requests for RA during FY 2018 was 13.2 days, a greater than 40% decrease from the 22.3 days reported in FY 2017.

Data reviewed on requests for specific types of RA identified the need for additional focus on requests for AHT. In FY 2018, that focus led to notable improvement in processing efficiency for AHT as a RA. During FY 2018 requests for AHT were processed in 11 days, an almost 50% improvement over the processing time of 21.6 days reported for such requests in FY 2017.

RA requests, excluding requests for AHT, were processed in 14 days during FY 2018, which also represents a significant (>37% decrease) improvement over the 22.3 days reported for such requests in FY 2017.

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.

After a steady increase in participation over the past six years, in FY 2018 the Agency achieved the goals established under Section 501 of the Rehabilitation Act for both PWTD and PWD at the lower salary levels and for PWTD among higher salaried employees. In FY 2018, OEEEO and OHR established a strong cross functional approach to supporting PWD and PWTD in the Agency's workforce, while leveraging OMWT's strong EAG network. In recognition of this partnership, leaders in OHR and OEEEO were invited to share their thoughts in a cross Agency panel discussion at the July meeting of the *Federal Exchange on Employment with Disabilities* (FEED).

The interactive portal, *AskHR*, on the Agency's intranet provides employees with information about reasonable accommodation and the processes for making requests. To support employees in making such a request, the Agency has made available a comprehensive resource guide, "*Requesting Accommodations at SEC*," for everyone involved in the accommodations process. It explains how persons with disabilities should request accommodations, how requests are processed, and, as applicable, how requestors may seek review of decisions where a request has been denied.

The SEC provides temporary accommodations to employees with short-term medical conditions even when the condition does not constitute a covered disability when supervisory officials and the Disability Program Office decide that it is appropriate to do so. In FY 2018, the SEC processed 112 Temporary Medical Telework (TMT) requests, processed 151 RA requests, of which 38 were requests for telework as a reasonable accommodation.

All new SEC managers participate in mandatory training regarding the reasonable accommodation process as part of the LD 307 *Fundamentals of Human Resource Management* training. Additionally, the SEC's *New Employee Orientation* includes a presentation on the following programs and processes: RA, TMT, Telework, and Leave (i.e., annual/sick, advance leave, and FMLA, etc.). This information is included in the New Employee Handbook and made available on the *AskHR* portal.

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In FY 2018, the SEC revisited and revised the business requirements to implement an electronic case management system that would allow employees to request reasonable accommodations personally and privately. While the project was delayed in FY 2018, OHR did create RA and TMT Request and Agreement forms to simplify the process for employees making requests; to ensure current, accurate, and complete information is obtained to reduce processing times; and to improve the reliability of records indicating customer approval of the reasonable accommodation(s) provided. On September 26, 2018, OHR's Disability Program Office hosted a *Conversation with OHR* information session to introduce the new procedures for submitting RA requests to all interested employees. This session was announced and marketed to all employees and managers through *SEC Today*. This session also discussed the anticipated launch of procedures for requesting personal assistance services (PAS) described below.

Additionally, OHR continues to find ways to strengthen the current manual tracking process, including tracking timeliness for processing RA requests, and meeting on a monthly basis with the Chief Human Capital Officer to review and discuss timeliness and processing of all RA cases. The Agency will continue its efforts to implement the business requirements for the electronic case management system.

Further, the Disability Program Office updated the Agency's RA policy to include requests for PAS. The revised policy was sent to EEOC for approval during FY 2018 and the EEOC provided written comments on February 5, 2019. During FY 2019, the Agency will review the electronic case management system's business requirements, the new policy, and related procedural changes that support RA for employees and applicants for employment. This review will address coverage of required and recommended elements defined under Section 501 of the Rehabilitation Act. Changes to RA procedures will likely necessitate updates to training, job aids, notices, and other information sources in FY 2019 and beyond.

Finally, to understand better how the Agency can support PWD and PWTD, OHR updated the exit survey. As of September 2018, the Agency's survey of departing staff, who self-identified as PWD asks: "What accommodations, personal assistance, or other support could improve the inclusion and advancement of individuals with disabilities at the SEC?"

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.

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.

The Disability Program Office updated the Agency's RA policy to include requests for PAS. The revised policy was sent to EEOC for approval during FY 2018 and the EEOC provided written comments on February 5, 2019. While that policy was under revision and review in FY 2017, the Agency entered into a contract to support employees needing PAS. In FY 2018, OHR developed procedures for employees to submit confidential requests for PAS through *AskHR*. The new form used to capture requests will provide information that may be used to understand program adoption and effectiveness going forward. The Agency announced the new PAS form and procedures to employees on October 1, 2018.

SECTION VI: EEO COMPLAINT AND FINDINGS DATA

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 **X** 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 **X** 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.

During FY 2018, the Agency did not have any findings of discrimination alleging harassment based on disability status.

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 **X** 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 **X** 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.

During FY 2018, the Agency did not have any findings of discrimination involving the failure to provide reasonable accommodation.

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 **X**

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

Yes 0 No 0 N/A **X**

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	<p>There was a lower-than-expected participation rate of Persons with Targeted Disabilities (PWTD) in the total workforce and in promotions to higher level positions when this study was initiated based on data from FY 2014. The participation rate of PWTD in the SEC's workforce was less than 1% in FY 2014 based on the then-current Standard Form 256 (SF-256) <i>Self Identification of Disability</i>. Participation of PWTD in the permanent workforce has increased based on the revised categories reflected in the new October 2016 version of the SF-256 to 2.02% in FY 2018.</p> <p>In FY 2018 data, the participation rate of Persons with Disabilities (PWD) in the total permanent workforce and among higher salaried employees as documented in responses to earlier sections is below the goal of 12% established by Section 501 of the Rehabilitation Act. The participation rate of higher salaried employees is 8.64%.</p> <p>Participation of PWD, and sometimes PWTD, among new hires and internal competitive promotions to mission critical, senior grade level, and leadership positions and among those who were selected for career development is below their availability in the relevant or qualified applicant pools. Further, the participation rate of PWD and PWTD among employees receiving higher value awards and for PWD among those separating from the Agency in both FY 2017 and FY 2018 exceeded that expected based on their participation in the total workforce and in comparison to persons with no disability.</p>
Barrier(s)	No barrier has been identified.
Objective(s)	<p>While the Agency has not identified specific policies, practices, or procedures that represent a barrier that affects employment opportunity for PWD or PWTD, representatives of OEEO and OHR agreed to take action toward enhancing equal employment opportunity for persons with targeted disabilities in the following areas:</p> <ul style="list-style-type: none"> • Develop and implement policies and procedures specific to the recruitment, hiring, advancement, and retention of persons with disabilities (PWD) or persons with targeted disabilities (PWTD) that are aligned with the federal government-wide flexibilities and requirements for affirmative action; • Enhance consistency and structure in the posting, screening, and interview processes for selection; • Create awareness on the part of hiring managers and subject matter experts (or others involved in the Agency's recruitment and selection processes) about the requirements for, and flexibilities available under, government-wide programs supporting PWD and PWTD; and employment programs, especially reasonable accommodation and disability programs, supportive of PWD and PWTD. <p>The objective of these efforts will be to continue to implement action plans developed to address the experience of PWTD and expand those plans to cover PWD in line with EEOC regulations. Additional action will focus on:</p> <ul style="list-style-type: none"> • Analysis of quantitative and qualitative data, including employee perceptions among the population of PWD and PWTD; • Implementing the recommended and required actions under Section 501 of the Rehabilitation Act of 1973; • Implementing, as feasible, revisions to the workforce data tables presenting information on PWD and PWTD, as per instruction from EEOC; and • Reviewing and updating agreed-upon action plans to address the broader population of PWD and/or to cover Section 501 regulatory changes.

Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
Title	Name	
Chief Human Capital Officer, OHR	Jamey McNamara	Yes
Director, OEEO	Peter J. Henry	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	Workforce data tables and participation rates for PWD and PWTD from FY 2011 – FY 2018 Demographic information related to retention for separated and on rolls PWD
Complaint Data (Trends)	Yes	EEO complaint activity filed between FY 2012 – FY 2017 to identify any trends in complaints filed by PWD or PWTD
Grievance Data (Trends)	Yes	Grievances filed by persons with disability between FY 2012 and FY 2018
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	Not applicable
Climate Assessment Survey (e.g., FEVS)	Yes	Federal Employee Viewpoint Survey (FEVS) data to compare responses from persons with disabilities to those with no disability Responses from PWD and PWTD to a <i>Workplace Experience Survey</i> conducted at the SEC during FY 2018
Exit Interview Data	Yes	Responses provided by PWD to the Agency's exit survey data from FY 2016 through FY 2018
Focus Groups	No	
Interviews	Yes	Interviews with subject matter experts in OHR and OMWI and subject matter experts in disabled student service offices at Gallaudet University and Rochester Institute of Technology
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Reports and regulations related to the employment of PWD and PWTD in the federal workforce offered by OPM, EEOC, DOL/ODEP, EARN, and other agencies and supporting organizations
Other (Please Describe)	Yes	Laws and federally mandated hiring and promotions policies, practices, and procedures applicable to recruitment and retention of persons with disabilities The Agency's hiring and promotions policies, practices, and procedures applicable to people with disabilities, including those with targeted disabilities Selection case files (hiring and promotions) from FY 2014 and FY 2015 Research literature, collective bargaining agreement language, and reports to better understand career development, promotion, retention, or recruiting and hiring processes related to PWD and PWTD Information about best practices in recruiting PWD in the federal government and private industry

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (From) (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
11/30/2017	OEE0 will conduct a <i>Workplace Experience Survey</i> of the Agency workforce to explore employee perceptions among the population of PWD and PWTD as well as those without disabilities on, among other topics, the recruitment, hiring, promotion, recognition, and retention of talent. This action was completed on November 6, 2017.	Yes		11/6/2017
01/31/2018	The Agency will establish a cross-functional working group with representatives from OEE0 and OHR to develop action plans and implement required and recommended activity under Section 501 of the Rehabilitation Act of 1973. This action was completed on November 2, 2017.	Yes		11/02/2017
03/31/2019	To help determine the reasons for removal of PWD, OEE0 review files from any specifically related EEO activity and interview the supervisors of PWD who were involuntarily separated in FY 2017 and FY 2018. This action was completed by March 31, 2019.	Yes		03/31/2019
09/30/2019	In collaboration with internal and contracted IT support, OEE0 will identify a feasible approach(es) to address the set of B workforce data tables as per current instruction for the FY 2019 report.	Yes	02/28/2019	
03/31/2020	OEE0 will summarize and interpret the research results the basis for identifying any areas of opportunity for improvement in ensuring equal employment opportunity among PWD and PWTD in the workforce.	Yes	12/31/2019	
05/31/2020	To the extent areas needing improvement in supporting PWD and/or PWTD are found, the SEC will begin to develop an action plan to help foster equal employment opportunity.	Yes	03/31/2020	
09/30/2020	OEE0 will begin to design an evaluation plan to monitor results based on the work completed on this study.	Yes		

Fiscal Year	Accomplishments
2018	<p>The following provides detail about OEEO's analytic work in support of this analysis during FY 2018.</p> <ol style="list-style-type: none"> 1. OEEO conducted a <i>Workplace Experience Survey</i> of the Agency workforce to explore employee perceptions of, among other topics, promotional opportunity, recruitment, and hiring for leadership positions. OEEO analyzed 1,360 responses and narrative comments from 469 employees. Among the respondents were 90 responses from employees who self-identified as having a disability other than those targeted and 34 responses from PWTD. Analyses compare responses on a variety of index and item level results. PWD and PWTD reported more favorable perceptions in the areas of: interview processes, availability of information about the EEO process and related policies, supervisory relations, work team inclusion, and training for success within occupation. 2. In line with implementation of Section 501 requirements, OEEO facilitated the Agency's decision to include persons hired under authorities that take disability into account as PWD. This action allowed the Agency to target support, development, and retention efforts toward two persons hired under Schedule A, part u and 38 veterans, who received hiring preference based on a service connected disability, as PWD. 3. OEEO used a series of self-service workforce data summary tools to review the demographic composition and disability status data within specific occupations of the entire workforce, newly hired staff, AFD, and separations by critical organizational characteristics. 4. OEEO analyzed the increase in self-identification from five-year trend data. Analysis uncovered the positive impact of annual employee demographic resurveys and more inclusive definitions of PWD and PWTD between FY 2013 and FY 2018. Specifically, we observed a 0.93% point increase in self-identified PWD after the first annual employee resurvey in FY 2015, an additional 0.90% point increase after the changes to SF-256, and a 0.66% point increase as a result of the resurvey in FY 2018. 5. OEEO analyzed the number and percent of complaint records filed by PWD between FY 2013 and FY 2017. Results were concerning in the relative volume of complaint activity filed by PWD. The inclusion rate of PWD among formal or informal EEO complaint related activity was three times that of persons with no disability. Further, complaint activity for PWD was more likely to lead to the formal stage. 6. With respect to retention, OEEO investigated turnover data for PWD and PWTD among those who separated the Agency in FY 2016 through FY 2018. These data revealed that PWD separations were more frequently due to retirement as compared to separations among persons with no disability; almost half of the PWD separations (48.00%) were coded for retirement, compared to about one third (34.75%) of separations among persons with no disability. Further review of these data established a correlation between age, disability, and retirement. PWD represent more than twice the proportion of the separations for employees over the age of 60 (17.24%) as compared to their participation among separations for persons under 40 (6.44%). On average, PWD in the Agency workforce are older (PWD average age = 49.32; No Disability average age = 46.88, $t = -4.68$, $p < .001$), and, therefore, more likely to be eligible for retirement. <p>As further explored below, OEEO and OHR established a strong cross functional approach to supporting PWD and PWTD in the Agency's workforce, while leveraging OMMWI's EAG network. In recognition of this partnership, leaders in OHR and OEEO were invited to share their thoughts in a cross Agency panel discussion at the July meeting of the <i>Federal Exchange on Employment with Disabilities</i> (FEED).</p> <p>OHR and OEEO jointly sponsored a resurvey of the workforce in July and August 2018 following successful resurvey efforts in prior years. OHR provided each employee individualized information showing their current demographic and disability coding. Pre- and post-analysis of the resurvey effort showed that 57 employees had their disability information change in some way with a net increase of 22 PWD (6.8%) and six PWTD (7.4%).</p> <p>To understand better how the Agency can support PWD and PWTD, OHR updated the exit survey. As of September 2018, the Agency's survey of departing staff, who self-identify as PWD asks: "What accommodations, personal assistance, or other support could improve the inclusion and advancement of individuals with disabilities at the SEC?" OHR plans to use and share the information with other stakeholders, including OEEO and DIAC in support of current and future employees with disabilities.</p> <p>OHR continued to make significant enhancements to the SEC's training and development programs, which provide support for the career growth of PWD. As described above in Part J, Section IV, the SEC added to the offerings within its career development program.</p> <ul style="list-style-type: none"> • OHR developed and worked with NTEU to finalize a Competency Assessment Survey to inform workforce planning efforts and shape the future of SEC-wide training and development programs. The survey was launched in September 2018, and data collection continued into the new fiscal year. • In early FY 2018, OHR-SECU implemented development plans for specific occupations or combinations of occupations in the Agency's learning management system, LEAP. The development plan for examiners and accountants includes suggested developmental activities and training classes focused on specific technical knowledge and skill. Further, LEAP provides career path information based on the career ladders and occupational series to enable employees to identify the next step in development within occupation or to find lateral transfer opportunities based on competency profile similarity. These tools support employees in pursuing career growth within the Agency. • SECU expanded offerings under the <i>Career Horizons</i> program that provide individualized support for employees in creating development plans and pursuing career growth.

Fiscal Year	Accomplishments
2018 (continued)	<p>In recognition of the critical importance of mentoring to support career development, the Agency considered options for and developed a pilot mentoring program. In June and July of 2018, a pilot was successfully launched leading to the first cohort of 30 participants. An orientation session for both mentors and participants was held on September 28, 2018. Throughout FY 2019, mentors will meet with participants on a periodic basis. Formal events are planned to help guide the mentoring relationship toward success. To encourage participation among PWD, DIAC shared information about the mentoring program with their membership by quarterly meetings and their shared mailing list.</p> <ul style="list-style-type: none"> • In total, 142 permanent employees submitted a statement of interest in the program. Among them, eight (5.63%) were PWD, for an inclusion rate of 2.09%. By way of comparison, the inclusion rate of persons with no disability and those who did not self-identify among applicants was 3.37%. • On a first come, first serve basis, 30 participants were accepted into the mentoring program (29 permanent and one temporary employee) and matched with volunteer mentors with either or both deep technical expertise and leadership experience. The 29 permanent employee participants include two (6.90%) PWD, for an inclusion rate of 0.52%. The inclusion rate of persons with no disability among participations was 0.68%. <p>OHR will partner with OMWI and DIAC to improve PWD participation in future mentoring program offerings.</p>
2017	<p>In January 2017, the EEOC issued revised regulations under the federal government's obligation to engage in affirmative action for people with disabilities that modified Section 501 of the Rehabilitation Act of 1973. This revision addresses the hiring, retention, and career opportunity for persons with disabilities and those with targeted disabilities. OEEO had previously initiated barrier analysis focused on persons with targeted disabilities.</p> <p>Representatives from OEEO and OHR implemented a number of actions responsive to the recommendations from the original study of the SEC's PWTD workforce, including:</p> <ul style="list-style-type: none"> • Reviewing best practices and recommendations from OPM and the EEOC regarding the employment of PWD and PWTD; • Publishing revised policy on Requirements for Screening and Interviewing Job Candidates that requires documentation for each hiring action; • Developing an enhanced communication plan, including open information sessions, on the requirements under the revised policy for screening and interviewing job candidates (these sessions improve transparency and further educate SEC employees on available career opportunities and resources); • Conducting training open to all employees and mandatory training for anyone involved in the hiring or promotions process; • Increasing the quality of interaction between HR specialists and hiring managers toward more strategic conversation and the consideration of hiring options that take disability into account; • Reviewing OHR's FY 2017 Strategic Recruitment Plan; • Resurveying the workforce in July and August of 2017 to encourage review of employee data and self-identification of disability; • Continuing to evaluate workforce and applicant flow data to determine progress towards removing the potential barriers for PWTD, including reviewing the impact of revised disability and targeted disability categories in the revised SF-256 as they influence participation of PWD and PWTD; • Verifying the hiring and assignment of a Special Programs Manager within OHR focused on supporting the recruitment, hiring, development, and retention of PWD and PWTD; and • Developing an enhanced communications plan, in concert with DIAC, which included hosting guest speakers, events, and open information sessions supporting the population of PWD and PWTD. <p>In Quarter (Q2) and Q4 of FY 2017, representatives from OEEO and OHR worked together on transitioning to the new October 2016 version of SF-256 Self-Identification of Disability. OHR recoded employees on rolls against the categories of disability on the new form in Q2 of FY 2017. OHR and OEEO jointly sponsored a resurvey of the workforce in July and August 2017 (Q4). As part of this resurvey effort, OHR provided each employee individualized information showing their current demographic and disability coding. The resurvey encouraged employees to verify and update their disability information. Employees could update their personal information through either employee self-service or with individualized support from OHR for personnel processing. The resurvey of the workforce included a broad-based outreach and communications campaign to all employees, to include messaging describing the value of self-identification, as suggested by OPM's Office of Diversity and Inclusion. Pre- and post-analysis of the resurvey effort showed that 76 employees had their disability information change in some way with a net increase of 20 persons with disabilities (7%) and three persons with targeted disabilities (3%).</p> <p>Further, to support the accurate reporting of information about PWD and PWTD from FPPS, OEEO contracted with a service provider to develop an automated tool that extracts, accurately codes, summarizes, and provides reporting on demographic information about employees and applicants for employment. This tool, the Equal Employment Opportunity-Analytic Tool (EEO-AT), was used to generate the data for workforce data tables in this report as well as the responses to data-related questions. The EEO-AT provides for more efficient and accurate summary data, more effective interface with FedSEP, and greater facility for OEEO to respond to anticipated and future changes to reporting demographic information.</p>

Fiscal Year	Accomplishments
2016	<p>OHR engaged in the following recruitment/outreach initiatives:</p> <ul style="list-style-type: none"> • Partnered with the Department of the Army's <i>Wounded Warriors</i> Program and Department of Labor to successfully implement a <i>Disability Hiring Event</i>, which resulted in the direct hire of two persons with disabilities; • Participated in two Career Fairs: <i>EOP Career Fair</i> and <i>Veterans' Resource Expo</i>; • Partnered with George Mason University and implemented the MASON Life Program at the SEC and sponsored internships for students with intellectual and physical disabilities; • Partnered with DIAC to solicit participation in career fairs and leverage their professional networks/partnerships with other organizations; • Explored recruiting strategies among various federal and state rehabilitation centers and affinity groups; and • Attended and sponsored the <i>New Perspectives</i> training conference. <p>OHR completed the following:</p> <ul style="list-style-type: none"> • Training managers and supervisors to ensure they are aware of how the Schedule A hiring authority is used by the SEC to hire persons with severe disabilities and the role of managers/supervisors in the recruitment and hiring process; • Surveying disability organizations at universities near the SEC Home Office and Regional Offices to obtain information to improve recruitment of applicants with disabilities; • Using the Hiring Checklist in strategic conversations with hiring managers to ensure they are aware of flexibilities available to hire persons with disabilities; • Implementing and monitoring compliance with the Agency's selection policy memorandum outlining the requirements for screening and interviewing job candidates (published on September 26, 2016); and • Developing and refining targeted recruitment strategy and performance metrics to measure effectiveness of the Agency's outreach efforts to applicants with disabilities.

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

Updates to the EEOC's timelines, instructions, and requirements under MD-715 2.0 extended the timeline for implementing feasible changes to workforce data tables providing information on PWD and PWTD in collaboration with a shared service provider. The modified date is September 30, 2019.

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

As described in other sections above, after a steady increase in participation over the past six years, the Agency achieved the goals established under Section 501 of the Rehabilitation Act for both PWTD and PWD at the lower salary levels and for PWTD among higher salaried employees by the end of FY 2018. Because of the relatively small size of the PWD and PWTD populations, small changes in workforce participation, year over year, can have large impacts on the observed rates of change. Nonetheless, the SEC notes the following indications of growth within this employee population. From FY 2013 to FY 2018:

- The permanent workforce of PWTD experienced net growth of 16 persons or 22.22%, which outpaces the 9.47% net growth in the total permanent workforce over that same time period. Participation of PWTD in the total permanent workforce rose from 1.81% to 2.02%. PWTD among higher salaried employees increased from 1.54% to 2.01% (60 to 87 PWTD employees).
- The permanent PWD workforce experienced net growth of 159 persons or 71.30%. Participation of PWD rose from 5.60% in the total workforce to 8.76% and from 5.14% to 8.62% among higher salaried employees, with an additional 175 persons in higher salaried jobs identified as PWD.

Trend data over time revealed that increased participation resulted from greater self-identification based on employee resurveys, changes to categories defining PWD, and a general increase in the proportion of SEC staff in higher salaried jobs. OEEO will continue to monitor the PWD and PWTD workforce participation for signs of continued or accelerated growth and consider effects of underreporting on these statistics.

Data from SF-256s collected prior to October 2016 were recharacterized in line with the definitions found in the revised form in order to estimate over-time trends. Accordingly, the numbers of employees who are reported in this trend analysis as PWTD and/or PWD in prior years may underestimate the workforce due to the addition of disability and targeted disability categories.

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.

Triggers from the original study of PWTD continue to require focused attention toward improvement. Starting in FY 2016 and through FY 2018, representatives of OEEEO and OHR initiated and completed actions intended to address the recommendations to improve equal employment opportunity. These actions were completed in FY 2018. The Agency will be implementing additional required and recommended actions during FY 2019 and beyond.



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