

U.S. SECURITIES AND
EXCHANGE COMMISSION

FISCAL YEAR 2019

EQUAL EMPLOYMENT OPPORTUNITY

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

Some information referenced in this report has been redacted to protect privacy. Please contact the Director of the SEC's Office of Equal Employment Opportunity at 202-551-6040 or OEEO@sec.gov to request access to non-public information.

CONTENTS

SPECIAL PROGRAM PLAN FOR THE RECRUITMENT, HIRING, ADVANCEMENT, AND RETENTION OF PERSONS WITH DISABILITIES	1
Section I: Efforts to Reach Regulatory Goals	1
Section II: Model Disability Program	5
Plan to Provide Sufficient & Competent Staffing for the Disability Program	5
Plan to Ensure Sufficient Funding for the Disability Program	6
Section III: Plan to Recruit and Hire Individuals with Disabilities	7
Plan to Identify Job Applicants with Disabilities	7
Plan to Establish Contacts with Disability Employment Organizations	10
Progression Towards Goals (Recruitment and Hiring)	10
Section IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities	15
Advancement Program Plan	15
Career Development Opportunities	16
Awards	21
Promotions	24
Section V: Plan to Improve Retention of Persons with Disabilities	33
Voluntary and Involuntary Separations	33
Accessibility of Technology and Facilities	36
Reasonable Accommodation Program	38
Personal Assistance Services Allowing Employees to Participate in the Workplace	41
Section VI: EEO Complaint and Findings Data	42
EEO Complaint Data Involving Harassment	42
EEO Complaint Data Involving Reasonable Accommodation	42
Section VII: Identification and Removal of Barriers	43

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SPECIAL PROGRAM PLAN FOR THE RECRUITMENT, HIRING, ADVANCEMENT, AND RETENTION OF PERSONS WITH DISABILITIES

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C FR § 1614 203(e)) and MD-715 require agencies to describe how their plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

SECTION I: EFFORTS TO REACH REGULATORY GOALS

EEOC regulations (29 C FR § 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 2019, that salary was \$69,581. 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.

For employees with salaries below a GS-11, step 1, the Agency achieved the numerical goal for PWD participation; 43.75% of employees in this cluster were PWD compared to the 12% benchmark. See Table B5-1.

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In FY 2019, SEC included permanent and temporary employees hired under authorities that take disability into account as PWD under hiring authority 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 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 included in the total PWD workforce for purposes of utilization analysis. This action added 41 permanent employees to the PWD workforce data. The workforce data tables included with this report¹ and the analyses described in Parts J and below reflect this change. Prior year data for such employees was updated for comparison.

For employees with locality adjusted salaries above a GS-11, step 1, the Agency did not achieve the numerical goal involving PWD; 8.59% 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 2.24 percentage points since the end of FY 2015. Between FY 2015 and FY 2019, the participation of PWD in the total workforce increased from 6.57% to 8.64%; 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 previously described, the SEC achieved the numerical goal established for PWTD in the lower salary cluster during FY 2019. In the lower salary cluster, 6.25% of 16 permanent employees are PWTD. The numerical goal for PWTD among higher salaried employees was five one hundredths of a percent below the goal; 1.95% of higher salaried employees are PWTD.

¹ In the workforce data Tables B1 through B9 accompanying this report, such employees are reported under the column titled "Other PWD" and combined with self-identified employees in the column titled "Total PWD". As per guidance from EEOC, in EEOC's data portal, FedSEP, SEC reports such persons in Tables B1 through B9 in the column labeled: "Disability (02-03, 06-99)".

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

Hiring goals for PWTB (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 are PWTB 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 and continued to support managers in FY 2019. The HCRA provides, among other key human capital metrics, aggregate data on the disability status for self-identified PWD and PWTB. 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.

Throughout FY 2019 and particularly during National Disability Employment Awareness Month in October 2018, 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 Interests 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 an updated 2020-2022 Recruitment Strategy, which describes the support and collaboration necessary from senior leadership, OEEA, 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

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.

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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 more.

OEEEO led periodic meetings with a cross-functional working group comprised of representatives from OHR and OMWI, including those who support recruiting, to discuss MD-715 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 FR § 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	13	0	0	Kai Petty, <i>Lead HR Specialist</i> Office of Human Resources pettyka@sec.gov
Answering questions from the public about hiring authorities that take disability into account	13	0	0	Kai Petty, <i>Lead HR Specialist</i> Office of Human Resources pettyka@sec.gov
Processing reasonable accommodation requests from applicants and employees	3	0	0	Dia Gonsalves, <i>Disability Program Officer</i> Office of Human Resources gonsalvesd@sec.gov
Section 508 Compliance	1	0	0	Sharvon Jones, <i>Governance Branch</i> , 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 Jinhee Kim, RA, LEED AP, Architect, OSO-OBO KimJin@sec.gov Carla Hairston; NCIDQ, COEE, OSO-OBO HairstonC@sec.gov
Special Emphasis Program for PWD and PWTD	2	0	0	Xiya Li, Branch Chief Office of Human Resources lixiy@sec.gov Kai Petty, <i>Lead HR Specialist</i> Office of Human Resources pettyka@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 No

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-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.

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. Since focusing on these efforts under OHR's *2018-2019 Recruitment Strategy*, the SEC has realized an increase in the overall representation of people with disabilities through effective recruitment and outreach efforts that identify the Agency as an employer of choice.

Despite the government shutdown, the Agency maintained a physical recruitment presence in FY 2019. The SEC attended over 17 career fairs and events supporting efforts in building pipelines for future employment.

The SEC is committed to being a model employer for people with disabilities; as such, the SEC introduced a more direct and streamlined approach to the general hiring process using the Schedule A hiring authority for persons with disabilities. This streamlined approach required all external hiring requests be filtered through the Selective Placement Program Coordinator (SPPC) for review. The SPPC referred qualified applicants to hiring managers prior to or concurrently with the general staffing 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 FR § 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 2019, the Special Programs Manager continued to source potential candidates from available resources such as OPM’s Shared List of People with Disabilities

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/odep/
- OWF—Operation Warfighter Program: warriorcare.dodlive.mil/carecoordination/operation-warfighter/

- 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 partnered with the DIAC to host the first Hiring Manager's Forum on Schedule A Disability and Veterans' hiring authorities in an effort to further educate SEC hiring managers and promote the use of such authorities. The event was sponsored by SEC leadership and featured an in-depth presentation by the Special Hiring Programs Manager, a panel discussion with senior managers from across the Agency who shared their experience using Schedule A to hire staff, and a Q&A session.

In FY 2019, 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.

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In FY 2019, the Agency successfully recruited and hired staff through Schedule A following two years of no Schedule A hiring. In addition, recruitment under Schedule A procedures led to the eventual hire of a veteran with a service-connected disability directly into the competitive service. DIAC and the Disability Program Office will continue to promote such successful Schedule A hiring to support the Agency's *Strategic Recruitment Plan* amongst hiring managers.

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 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 SEC is currently exploring a potential partnership with Broad Futures, which is a DC-based organization that places students with learning disabilities into government and private sector internships. The SEC plans to explore this partnership further in FY 2020.

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

The SEC continued the pilot of the *Operation Warfighter Program (OWF)* during FY 2019. 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. The SEC is finalizing program policies and procedures and plans to implement Agency-wide in FY 2020.

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

Data from FY 2019 presented in Table B1 were reviewed for evidence of differences in hiring into the permanent workforce. The Agency did not achieve a 12% participation rate for PWD among new hires in the permanent workforce. The Agency did achieve the numerical goal of 2% participation of PWTD among permanent new hires. In FY 2019, the Agency hired 53 permanent employees, among them were five (9.43%) employees who are PWD and three (5.66%) PWTD.

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	<input checked="" type="checkbox"/>	No	0
b. New Hires for MCO (PWTD)	Yes	0	No	<input checked="" type="checkbox"/>

In FY 2019, Table B6 was 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 two out of five of the MCO positions, securities compliance examiner and economist, and no PWTD were found in the qualified applicant pool for accountants. PWD were found in the qualified applicant pools for attorneys, accountants, and IT management specialists; qualified applicants for attorney and IT management positions also included PWTD. In FY 2019, the SEC hired and onboarded a total of 53 permanent staff employees. Among these newly hired staff members were 39 persons in MCO positions, 28 attorneys, eight IT management specialists, two securities compliance examiners, and one accountant. Three of those 39 (7.69%) newly onboarded MCO permanent staff were PWD and two were also PWTD. [Redacted to protect privacy.] These were the only PWD or PWTD hired into MCO positions during FY 2019.

To assess these differences, the percentage of PWD in the permanent new hires for each occupation was compared to the qualified applicant pool (QAP). As described above, 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 in Table B6 reflect the pool of qualified applications for permanent vacancies announced through USAJOBS during FY 2019. In FY 2019, OPM implemented a number of actions to help agencies in their analysis of AFD: (1) made information about appointment type (permanent or temporary) available for each vacancy; (2) created a variable so that agencies can more easily identify supervisory versus non-supervisory vacancies; and (3) changed

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AFD so that all applications submitted by the same applicant reflected a unique identifier, providing valuable data for agencies to analyze and identify demographic trends for successful and unsuccessful applicants. In future years' reports, we anticipate fully leveraging OPM's FY 2019 changes to AFD, namely, the ability to identify trends in successful and unsuccessful applicants based on demographic groups.

Table B6 also presents data on permanent *new hires* 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. Triggers comparing the composition of PWD and PWTD in applicant flow versus new hire data should be interpreted with these differences in mind.

Triggers were observed for PWD in the hiring of permanent staff attorneys and accountants. For PWTD, triggers were found for the attorney and IT management occupations.

PWD represent 3.57% of 28 newly hired permanent staff attorneys, which is below their participation (5.34%) in the QAP. For attorneys, the QAP for PWTD was 1.13%; no PWTD (0.00%) were hired as permanent staff attorneys.

One newly hired permanent employee in FY 2019 was an accountant, who was neither PWD nor PWTD. Two PWD were found among the QAP for accountant at 1.96%; this difference represents a trigger for the accountant occupation amongst PWD. No PWTD were found in the QAP for accountants, and none were hired; as such, no difference in participation was observed.

For securities compliance examiner vacancies posted in FY 2019, no PWD or PWTD were found in the QAP, and none were hired. As such, no difference in participation was observed.

For IT management, eight employees were hired as permanent staff in FY 2019. The QAP was 18.96% PWD and 2.68% PWTD, and PWD participation among new hires exceeds that of the QAP, and PWTD also exceeded their participation amongst the QAP. [Redacted to protect privacy.]

Finally, for economists, no permanent staff economist positions were posted in FY 2019; as such, there was no opportunity to observe triggers in the hiring of permanent staff economists.

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 2019 data presented in Table B6, 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 four of the SEC’s MCOs, i.e., attorney, accountant, securities compliance examiner, and IT management. Differences were also identified between the RAP and QAP for PWTD within the internal competitive promotion data for the MCOs of attorney, accountant, securities compliance examiner, and IT management.

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 5.54%, and PWD represented 4.52% of the qualified internal applicants. The RAP for PWTD was 1.15%, and PWTD were 0.00% 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 PWD and PWTD.

For accountants, the RAP for PWD was 5.51%, and PWD were 13.33% of the qualified internal applicants. However, no PWD were referred or selected. The RAP for PWTD was 0.90%, and no PWTD applied, suggesting a negligible difference.

For securities compliance examiners, the RAP for PWD was 7.45%, and PWD represented 5.56% of the qualified internal applicants. The RAP for PWTD was 1.55%, and no PWTD applied.

For IT management, the RAP for PWD was 11.90%. There was a decline in percentage PWD from the applied stage (16.71%) to the qualified stage (8.67%) that brought the percentage of qualified applicants below the RAP. The RAP for PWTD was 1.12%, and PWTD represented 0.67% of the qualified internal applicants, suggesting a negligible difference.

For economists, no vacancies were posted for permanent promotion. As such, no PWD or PWTD were found in either the RAP or the qualified internal applicant pool; therefore, no difference was found in participation for this occupation.

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 No
b. Promotions for MCO (PWTD) Yes No

The selection data indicate a difference for PWD in the attorney, accountant, securities compliance examiner, and IT management occupations. No competitive promotions were made amongst permanent staff economists in FY 2019. There was no opportunity to observe triggers for this MCO.

A difference was observed among PWD attorneys. The QAP for PWD was 4.52%, and PWD represented 2.78% of selections. There were no PWTD in the QAP, and as such there was no basis for comparison.

For accountants, the QAP for PWD was 13.33% (two applicants), and no PWD were selected. There were no PWTD in the QAP, and as such there was no basis for comparison.

For securities compliance examiners, the QAP for PWD was 5.56% (one applicant), and no PWD were selected. For IT management specialists, the QAP for PWD was 8.67%, and PWD were 11.11% of selections, indicating an increase in percentage PWD from the qualified to the selection stage. For PWTD, the QAP for IT management specialists was 0.67% (one applicant), and no PWTD were selected.

SECTION IV: PLAN TO ENSURE ADVANCEMENT OPPORTUNITIES FOR EMPLOYEES WITH DISABILITIES

Pursuant to 29 C FR § 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 CHCO 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 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

Continued on the next page

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 2019, OHR and SECU also:

- Developed and worked with NTEU to administer 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 FY 2019. The data gleaned from the competency survey will be used to enhance the value of the new LEAP career path options.

The Agency supports employees in pursuing leadership development through a variety of program offerings, including both individual coaching and an Agency-wide 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.

OHR's Human Capital Strategy Group continued working on 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 early FY 2019, the Agency successfully launched a pilot mentoring program leading to the first cohort of 30 participants who will receive mentoring throughout FY 2019. In the first wave, 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. The SEC held formal events throughout FY 2019 to help guide the mentoring relationship toward success. The Inaugural Mentoring Program celebrated its finale event on June 26, 2019. Positive feedback about the program informed the Agency's decision to institute the program ongoing. In late FY 2019, OCOO was pleased to announce the launch of the next Mentoring Program cohort. On September 23, 2019, 103 employees registered interest in participating in the next mentoring cohort. Thirty employees were paired with mentors for the next cohort. The SEC's Mentoring Program will provide career development and support to these 30 employees from October of 2019 until the Capstone event scheduled for June 16, 2020. Formal program events for both mentors and participants are scheduled quarterly and facilitated by OCOO and SECU experts. The SEC held an orientation session for both mentors and participants on October 28 and 29, 2019.

Participation among PWD and PWTD in the Agency's career development opportunities is provided on page 150.

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

Career Development Opportunities ¹	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	103	0	5.83%	0.00%	0.97%	0.00%
Fellowship Programs	183	16	1.64%	0.00%	0.55%	0.00%
Mentoring Programs	93 ¹	30	13.98%	13.33%	3.23%	3.33%
Coaching Programs	NA	NA	NA	NA	NA	NA
Training Programs	1,386	1,386	10.68%	10.68%	1.80%	1.80%
Detail Programs	178	16	1.69%	6.25%	1.12%	6.25%
Other Career Development Programs	NA	NA	NA	NA	NA	NA

¹ Two applicants for the mentoring program, who are serving under temporary appointments, were not included in this analysis.

Training Programs data show demographic data for all permanent employees' registrations for training in LEAP and completed training opportunities during FY 2019. There is no competition for training class registration. All eligible employees who register or apply are invited or selected to complete the training course. Applicant and selectee participation records are thus identical. These Applicant registration and Selectee participation records may include more than one training opportunity per employee, representing both mandatory and elective courses. Therefore, the total registration and participation data exceed the total number of employees.

Detail Programs summarize information only for Temporary Promotions announced for competitive selection by the Agency. These data do not reflect detail opportunities that do not include a change to the employee's personnel record, e.g., a detail to a job in the same pay grade and location.

Notes: With more limited hiring in FY 2019, there was no recruitment or hiring of applicants for Internship programs.

The SEC does not currently have Detail Programs or Other Career Development Programs as defined for inclusion here.

Demographic data on applicants for the Agency's Fellowship Programs are not currently captured. Neither are such data captured for participants in Coaching Programs to protect the confidential relationship between employee and coach.

The SEC's Mentoring Program was open for registration. Applications for the program were reviewed and paired with volunteers to serve as mentors from among the Agency's leadership cadre.

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

a. Applicants (PWD) Yes **X** No 0
 b. Selections (PWD) Yes **X** No 0

From the Career Development Opportunities table above, data on the participation of PWD and PWTD in applications or selections for various programs were reviewed

For the Agency’s economist and accountant Fellows programs, the Agency noted a difference in the participation of PWD among (external) applicants for these programs and eventual selections for positions. While 1 64% of applicants were PWD, none of the Fellows hired were PWD (0 00%)

No selections, of persons with or without disability, were eventually made among applicants for a Pathways Student Internship posting

Within the Agency’s mentoring program, the Agency found no evidence of a trigger in the participation rate among those who expressed interest in the next cohort of the mentoring program (i e , applicants) as compared to participation of PWD in the permanent workforce. While 8 72% of all permanent staff are PWD, PWD represent 13 98% of those employees who expressed interest in the mentoring program and 13 33% of those selected for mentoring. The participation rate of PWD among those selected to participate in the mentoring program for FY 2020 (i e , Selectees) approximates their participation among those expressing interest.

Aggregate PWD participation in training programs approved on standard form 182 through the Agency’s learning management system, LEAP, exceeds their participation on rolls; 10 68% of training requiring separate approval on SF-182 were completed by PWD, compared to 8 72% of permanent employees who are PWD. PWD participation in training was higher than that among permanent employees; this difference was statistically significant ($X^2 = 27.85, p < 0.001$)

Data about Detailed employees show evidence of a difference disadvantaging PWD among those who applied for Temporary Promotion and no trigger among those selected. While 1 69% of applicants for temporary promotion were PWD, PWD represent 8 72% of permanent staff employees. A larger proportion of persons selected for a Temporary Promotion or Detail were PWD (6 25%) than were found among applicants (1 69%)

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 **X** No 0
 b. Selections (PWTD) Yes **X** No 0

From the Career Development Opportunities table in Section IV 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

Similar to the PWD data for the Agency’s economist and accountant Fellows programs combined, the Agency noted a difference in the participation of PWTD among (external) applicants for these programs and eventual selections for positions While 0 55% of applicants were PWTD, none of the Fellows hired (0 00%) were PWTD

No selections, of persons with or without disability, were eventually made among applicants for a Pathways Student Internship posting

Within the Agency’s mentoring program, the Agency noted no difference that disadvantaged PWTD in the participation rate among those who expressed interest in the mentoring program (i e , applicants), as compared to PWTD among permanent staff While 1 97% of the Agency’s permanent staff are PWTD, PWTD were 3 23% of those employees who expressed interest in the mentoring program The participation of PWTD among employees selected for mentoring in FY 2020 (3 33%) exceeds that among applicants No evidence of triggers were found in these data

In the aggregate, training records show that PWTD participated in training programs approved on SF-182 through LEAP at rates below their participation on rolls; 1 88% of training opportunities requiring special approval were completed by PWTD, compared to 1 97% of PWTD permanent employees

Data about Detailed employees show evidence of a difference disadvantaging PWTD among those who applied for Temporary Promotion and no trigger among those selected While 1 67% of applicants for temporary promotion were PWTD, PWTD represent 1 97% of permanent staff employees A larger proportion of persons selected for a Temporary Promotion or Detail were PWTD (6 25%) than were found among applicants (1 67%)

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

Table B9-2 presents information on awards distributed to employees during the year as part of its employee recognition program. The EEOC has suggested that agencies consider awards distribution based on inclusion rates, the degree to which each employee group is distributed across workforce indicators, e.g., awarded or separated. Please note this analysis requires aggregating data to the person level as presented in Table B9-2. Employees who received at least one award in any particular award category are counted once in this table.

Aggregated data enables inclusion to be calculated as the proportion for all PWD and PWTD who received each type or category of award. In contrast, Table B9-1 presents participation rates among awards distributed. One employee can and often does receive more than one award in a year. In Table B9-1, one employee is represented more than once if he or she received more than one award in that category. Differences in calculation should be noted when interpreting data from Tables B9-1 and B9-2.

The inclusion rate for PWD was calculated by comparing the number and percent of employees with disabilities 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 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.

The Agency did not find a trigger in the distribution of time-off awards less than 10 hours. There was a negligible difference among PWD for time-off awards of 11-40 hours. The inclusion rate for PWD at 25.54% was less than half a percentage point lower than the inclusion rate for persons with no disability at 25.99%. The inclusion rate for PWTD (26.19%) was greater than that of persons with no targeted disability (25.94%).

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For cash awards, the Agency found triggers for PWD for cash awards of \$1,000-\$1,999 and \$3,000 or more

For cash awards of \$1,000-\$1,999, the inclusion rate for PWD was 19 89%, and the inclusion rate for people with no disability was 30 23% For cash awards of \$3,000 or more, the inclusion rate for PWD was 0 81%, and the inclusion rate for people with no disability was 2 18%

For cash awards, the Agency found triggers for PWTD in the award categories of \$1,000 to \$1,999 and for the category of awards greater than \$3,000

For cash awards of \$1,000-\$1,999, the inclusion rate for PWTD was 13 10%, and the inclusion rate for people with no targeted disability was 29 65% For cash awards of \$3,000 or more, the inclusion rate for PWTD was 0 00%, and the inclusion rate for people with no targeted disability was 2 10%

The Agency is actively researching the observed differences in the distribution of discretionary awards as part of our barrier analysis program, described earlier in this plan, *supra*

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 No trigger was found in performance-based pay increases

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) The inclusion rate for PWD was 100 27%, and for people without disabilities and those who did not self-identify with a disability, it was 100 10% This was because some employees separated

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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 101.19%, 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 100.10%.

3. If the Agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.

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

In FY 2019, the Agency did not offer other formal recognition programs for which demographic data, including disability status, are captured in the human resource data systems. The Agency recognizes the value of recognition to support PWD and PWTD in the workforce; trigger analysis is not conducted for programs such as the SEC Honorary Awards program or any of the several honors programs offered by Division Directors.

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 0	No X

d. Grade GS-13

Qualified Internal Applicants (PWD)	Yes X	No 0
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 SK-grade levels This combination was made to conform analyses to the format provided, though the actual RAPs for the individual SK-levels differ

Table B7 presents the relevant FY 2019 data to assess whether triggers exist with regard to promotions to senior grade levels Of 1,972 qualified internal applications for senior grade level positions, 307 (15 57%) 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 the SES, GS-15, and GS-14 equivalent senior grades For the GS-13 equivalent grade level, a difference was observed

Among internal selections, differences were observed for the SES and GS-15 equivalent levels, but not the GS-14 or GS-13 equivalent levels Of the 86 internal promotions to senior grade levels in Table B7, seven (8 14%) were PWD, which is lower than their availability in the QAP at 15 57% The following presents data for each grade level equivalent

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At the SES equivalent level, the RAP, comprised of all employees at grade levels SK-14 and higher, was 6.69% PWD, and among qualified internal applicants, a larger proportion (10.98%) were PWD. None of the employees selected for SO positions were PWD.

At the GS-15 equivalent level, the RAP, comprised of employees at grades SK-14, SK-15, and SK-16, was 6.72%, while the participation of PWD among qualified internal applicants was greater at 18.20%. The Agency noted a difference involving internal selections for senior grade levels at GS-15 equivalent grade levels; 2.86% of selections were PWD compared to their participation among qualified internal applicants at 18.20%.

At the GS-14 equivalent level, PWD exceeded the relevant benchmarks at the qualified and selected stages. The RAP, comprised of employees at grades SK-13, SK-14, and SK-15, was 8.02%, and the participation of PWD among qualified internal applicants was 13.67%. On the other hand, 14.29% of selections were PWD compared to 13.67% of qualified internal applicants.

At the GS-13 equivalent level, the Agency noted a difference at the qualified and selected stages. The RAP, comprised of employees at the SK-12 level, was 16.84%, and the participation of PWD among qualified internal applicants was 10.77%. Among selections for internal promotions at the SK-13 level, 12.50% were PWD, and 10.77% 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 0	No X
Internal Selections (PWTD)	Yes X	No 0

d. Grade GS-13

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

Applying the same comparisons to PWTD as described above for PWD, the Agency presents information on trigger identification for PWTD in promotions to senior grade levels. Of 1,972 qualified internal applications for senior grade level positions, 38 (1.93%) were submitted by PWTD. Of the 86 promotions to senior grade levels in Table B7, none (0.00%) were PWTD. 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 the GS-13 equivalent senior grade level and among selectees at all of the equivalent senior grade levels. No differences were observed in the qualified applicant pools for the GS-14, GS-15, or SES equivalent grade levels. The following presents data for each grade level.

At the SES equivalent, SO, grade level, the Agency notes that the RAP was 1.35% PWTD, and the participation among qualified internal applicants of PWTD was 1.22%. Zero selections for SO positions were PWTD among the qualified internal applicants.

At the GS-15 equivalent level, the RAP was 1.36%, and among the qualified internal applicants, 1.70% were PWTD. For the internal selections to GS-15 equivalent positions; no selections were PWTD.

At the GS-14 equivalent level, the RAP was 1.58% while 2.30% of the qualified internal applicants were PWTD. None of the selections were PWTD.

At the GS-13 equivalent level, the Agency observed a difference involving PWTD among qualified internal applicants. The RAP was 6.32%, and the participation of PWTD among qualified internal applicants was 2.05%. None of the PWTD qualified internal applicants 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 X	No 0
b. New Hires to GS-15 (PWD)	Yes 0	No X
c. New Hires to GS-14 (PWD)	Yes X	No 0
d. New Hires to GS-13 (PWD)	Yes X	No 0

Applying the same grade equivalencies that were previously described, the Agency presents information on trigger identification for PWD new hires to senior grade levels based on reviewing Table B6. Among the 53 newly hired staff members in FY 2019 were 48 persons hired into senior grade level positions, three SOs, six into GS-15 equivalent positions, 21 into GS-14 equivalent position positions, and 18 into GS-13 equivalent positions. Four of those 48 (8.33%) newly hired permanent staff in senior grade levels identified as PWD. The following evaluates participation of PWD in each senior grade equivalent level.

The QAP from Table B7 summarizes data where the applicant self-identified with a disability and qualified for the position. Data in this table describe vacancies for permanent positions with the SEC that were posted in USAJOBS with a closing date during the fiscal year. In contrast, Table B7 also presents data on *new hires* onboarded during the course of the fiscal year; some of whom 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 onboarded 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 SES equivalent level, the QAP was 1.37% PWD, and none of the three newly hired permanent SOs identified as PWD.

At the GS-15 equivalent level, the QAP was 11.89% PWD, and 33.33% of the permanent new hires for those positions identified as PWD. [Redacted to protect privacy.]

At the GS-14 equivalent levels, the QAP was 10.81% PWD while 4.76% newly hired permanent staff were PWD. [Redacted to protect privacy.]

At the GS-13 equivalent level, the QAP was 13.27% PWD, while 5.56% of the new hires to GS-13 equivalent 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	0	No	<input checked="" type="checkbox"/>
b. New Hires to GS-15 (PWTD)	Yes	0	No	<input checked="" type="checkbox"/>
c. New Hires to GS-14 (PWTD)	Yes	<input checked="" type="checkbox"/>	No	0
d. New Hires to GS-13 (PWTD)	Yes	0	No	<input checked="" type="checkbox"/>

Applying the same grade equivalencies that were described above in the section on promotions, the Agency presents information on trigger identification for PWTD new hires to senior grade levels. 4.17% of the newly hired permanent staff in senior grade levels were PWTD. [Redacted to protect privacy.]

For the senior grade level equivalent GS-14 level, the Agency found a trigger in the difference in participation of PWTD between qualified applicants and among new hires. Because no PWTD were found among the qualified applicants for SES/SO positions, no trigger was identified at that level.

More detail about each senior grade level follows in descending order by level.

At the GS-15 equivalent level, the QAP was 1.40%; 16.67% of new hires were PWTD. [Redacted to protect privacy.]

At the GS-14 equivalent level, the QAP was 2.01% PWTD; none of the newly hired GS-14 equivalent staff were PWTD.

At the GS-13 equivalent level, the QAP was 1.76% PWTD, and 5.56% of new hires 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	<input checked="" type="checkbox"/>
Internal Selections (PWD)	Yes	<input checked="" type="checkbox"/>	No	0
b. Managers				
Qualified Internal Applicants (PWD)	Yes	0	No	<input checked="" type="checkbox"/>
Internal Selections (PWD)	Yes	<input checked="" type="checkbox"/>	No	0
c. Supervisors				
Qualified Internal Applicants (PWD)	Yes	<input checked="" type="checkbox"/>	No	0
Internal Selections (PWD)	Yes	0	No	<input checked="" type="checkbox"/>

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.

FY 2019 data underlying Table B8 are relevant for assessing whether triggers exist with regard to promotions to supervisory or managerial positions. Among the promotions in FY 2019 were 77 persons promoted to a leadership position at the supervisor, manager, or executive level, eight SOs, 19 managers, and 50 supervisors. 9.09% of those promoted identified as PWD. [Redacted to protect privacy.] The following evaluates participation of PWD in each leadership level.

For the executive and manager levels, the participation of PWD in the qualified internal applicant pool exceeds that in the RAP. Therefore, no triggers were found in the QAP data for executives and managers. There was a slight difference at the supervisor level. The QAP for PWD was 7.50%, which fell below the RAP of 8.90%.

Differences were found when comparing PWD selections into leadership positions to the qualified internal applicant pools at the executive and manager levels, but not the supervisor level. 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 6.43% PWD, and the qualified internal applicants were 10.98% 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 10.98% of the qualified internal applicants were PWD.

For managers, the RAP, comprised of permanent supervisors at the SK-13 through SK-15 levels, was 7.43%, and the qualified internal applicant pool was 16.62%. Among the SK-17 manager selections noted in internal competitive promotion data 5.25% were PDW. [Redacted to protect privacy.]

For supervisors, the RAP, comprised of both supervisory and non-supervisory employees at the SK-12 through SK-14 levels, was 8.90% PWD, and the qualified internal applicants were 17.50% PWD. However, there was a difference found for internal selections. 12.00% PWD were among the internal selections for first level supervisor positions compared to 17.50% of the QAP. [Redacted to protect privacy.]

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

Applying the same grade equivalencies that were described previously, the Agency presents information on trigger identification for PWTD internal promotions to supervisory positions from Table B8. None of the promotions were PWTD. The following evaluates participation of PWTD in each leadership level. *[Redacted to protect privacy.]*

For all three leadership levels, there was no difference between the participation of PWTD in the qualified internal applicant pool compared to the RAP. However, differences were found when comparing PWTD selections into leadership positions to the qualified internal applicant pools for all three leadership levels. 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 1.29% PWTD and 1.22% 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 eight employees promoted to SO positions.

For managers, the RAP was 1.14% PWTD and 1.36% of the qualified internal applicants were PWTD. The Agency identified a difference involving internal selections; no PWTD were selected out of 17 manager promotions, though 1.36% of the qualified internal applicants were PWTD.

For supervisors, the RAP was 1.94%, and 1.74% of the qualified internal applicants were PWTD. None of those selected for supervisory positions were PWTD.

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 previously, the Agency presents information on trigger identification for PWD new hires into leadership positions Table B8 is relevant for assessing whether differences exist with regard to applicants and new hires in supervisory positions for PWD (*this question*) and PWTD (*see the next question*) A difference was found in FY 2019 new hire data for PWD at the executive and supervisor levels

The SEC hired 53 new staff members in FY 2019 22 22% newly hired permanent staff in leadership positions were PWD in manager positions [*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

The QAP from Table B8 summarizes data where the applicant self-identified with a disability and qualified for the position 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, Table B8 also presents data on *new hires* onboarded during the course of the fiscal year; some of whom 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 differences in mind

For executives, the QAP was 1 37% PWD, and none of the newly-hired permanent executives identified as PWD For managers, PWD participation of 66 67% among newly hired managers exceeds their participation in the QAP at 5 83% [*Redacted to protect privacy.*] For supervisors, no PWD were newly hired into supervisory positions, while 13 80% 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 0	No X
b. New Hires for Managers (PWTD)	Yes 0	No X
c. New Hires for Supervisors (PWTD)	Yes X	No 0

A difference was found in FY 2019 new hire data for PWTD at the supervisor level, but not at the executive or manager levels 11 11% of newly hired permanent staff in leadership positions identified as PWTD [Redacted to protect privacy.]

For executives, no PWTD (0 00%) were found in the qualified applicant pool, so there was no opportunity to observe a trigger No PWTD were onboarded or selected as new hires for executive positions in FY 2019

For managers, the qualified applicant pool was 0 97% PWTD, and 33 33% of the newly-hired permanent managers was PWTD For supervisors, the qualified applicant pool was 1 53% PWTD, and none of the newly-hired permanent supervisors identified as PWTD [Redacted to protect privacy.]

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. One employee was converted to the competitive service under the Schedule A hiring authority during FY 2019 within two years of the Schedule A appointment. A review of records for other Schedule A employees, who were hired or transferred to the SEC and remain on rolls at the close of FY 2019, confirms that all were converted to competitive service within two years of 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 0 No **X**

Table B1 provides FY 2019 data on voluntary and involuntary separation by disability. These data were used to calculate the inclusion rates. More information about inclusion rates is provided above in the analysis of awards. 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 2019 data show that PWD separated at higher rates than those with no disability.

Continued on the next page

For voluntary separations, the percentage of PWD exceeded that of persons without disabilities. The inclusion rate for PWD was 5.11%, and for people without disabilities, including those who did not self-identify, the inclusion rate was 3.34%.

For involuntary separations, the percentage of PWD did not exceed that of persons without disabilities. There were no separations for PWD (inclusion rate of 0.00%), and for people without disabilities, including those who did not self-identify, the inclusion rate was 0.03%.

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 <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| b. Involuntary Separations (PWTD) | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

Using data from Table B1 to calculate the inclusion rates for PWTD, the following was found in FY 2019 data. 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).

For voluntary separations, the percentage of PWTD exceeded that of persons without disabilities. The inclusion rate for PWTD was 5.95%, and for people without disabilities, including those who did not self-identify, the inclusion rate was 3.44%. For involuntary separations, the percentage of persons without targeted disabilities exceeded that of PWTD. There were no separations among PWTD, and for people without targeted disabilities, the inclusion rate was 0.02%.

- 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](https://www.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, exploring the involuntary separation of this small volume of the PWD employee population may be informative. With that caveat, OEEO gathered data in FY 2019 about the reasons for involuntarily removing PWD to uncover any preventive action or support needed for current and future employees. Specifically, based on technical assistance suggested by EEOC's Office of Federal Operations (OFO), OEEO gathered qualitative data about PWD who were involuntarily separated from the Agency during FY 2017 and FY 2018. Data sources included records gathered as part of relevant EEO complaint activity filed by separated PWD prior to departure and interviews with the supervisors of these former PWD employees. The data included a small number of employees. [Redacted to protect privacy.] No patterns in results were evident that would form the basis for additional action.

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 51 employees who completed the exit survey in FY 2019, two self-identified as having a disability (3.92%)—and both employees reported that they were provided reasonable accommodation.

The small number of separating employees who self-identified with a disability and completed the 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 2019 the Agency analyzed information from the exit survey across two fiscal years (FY 2018 and FY 2019) to support more general conclusions about why employees with disabilities left the SEC.

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In FY 2019, 56% 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 overwhelmingly 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: 100% agreed that their workgroup was open to diverse viewpoints and backgrounds (compared to 73% of employees who did not report a disability); 89% agreed that their supervisor/team lead treated them with respect (versus 81%); 100% agreed their co-workers fostered an cohesive work environment (versus 77%); and 100% agreed policies and programs promoted diversity in the workplace (versus 60%). The results of the exit survey suggest employees who separated and indicated a disability were much 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 recently updated 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 included 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. An SEC Administrative Regulation (SECR) and SEC Operating Procedures (SECOP) setting forth the complaint process related to Sections 504 and/or 508 and the Architectural Barriers Act is drafted, expected to be finalized in FY 2020, and will be 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 is posted on SEC gov (http://www.sec.gov/disability/sec_access.htm) This page contains the required notice explaining employees' and applicants' rights under the Architectural Barriers Act, including how to file a complaint.

- 3 Describe any programs, policies, or practices that the Agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology

SEC continues to improve upon current practices in place to ensure all *Information and Communication Technology* (ICT) is accessible to internal and external parties, as mandated by the Rehabilitation Act of 1973. The Agency's testing and validation process includes dedicated resources, testing tools, documented test processes, and a remediation process. The majority of ICT products and tools are tested before they are deployed. Upon completion of testing, project teams are notified of the defects and are instructed to submit, for approval, a Remediation Plan, indicating a definitive timeline in which the vendor will make the respective product 508 compliant.

The Office of Public Affairs has been instrumental in educating SEC staff on the guidelines and importance of Section 508 of the Rehabilitation Act. Training courses have been offered, as well as "how to" videos that inform staff of the process with making electronic information technologies accessible to all parties. Further, all Agency Contracting Officer Representatives (CORs) are required to complete Section 508 training in both FY 2019 and in FY 2020.

The Office of Information Technology will be active in supporting the SEC Administrative Regulation that defines roles and responsibilities of SEC staff to address formal Section 508 Complaint Procedures related to accessibility of IT programs and services.

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 2019, 57% of initial requests for accommodation were processed within 20 business days.

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The overall time frame for processing RA requests in FY 2019 was affected by a number of organizational and business process changes that resulted in a 15% decrease from the FY 2018 timeliness result of 72%. Specifically, in FY 2019, changes to the procurement process for the purchase and installation of equipment and assistive technology impacted SECs ability to provide accommodations timely. In addition, the SEC initiated more consultations with medical experts at the Federal Occupational and Health (FOH) to complete medical reviews of employees with a wide range of conditions in an effort to improve their ability to do their jobs and maintain a high level of productivity. In FY 2019, medical reviews completed by FOH were processed in 37.8 days on average. Implementation of the new RA policy and operational procedures have also impacted efforts to implement a case management system in FY 2020. In FY 2021 an assessment will be conducted to determine whether the FY 2020 acquisition review of a new Human Resources Service Delivery (HRSD) module will be a viable option for automating the RA workflow and case tracking for RA. The implementation of an automated RA system is expected to address timeliness standards set by the new SEC RA policy. Changes to the RA policy and operational procedures will likely necessitate updates to training, job aids, notices, and other information sources in FY 2020 and beyond. The Agency is currently engaged in a review for system design of an automated electronic case management system for processing RA requests.

In the meantime, a more structured set of processes and procedures were developed and used in FY 2019 for capturing data related to processing RA requests. The time frame for processing initial requests for RA during FY 2019 was 22.9 days; RA requests, excluding AHT were processed in 28.9 days; and requests for AHTs were processed in 11.7 days, respectively.

2. Describe the effectiveness of the policies, procedures, or practices to implement the Agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

The 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 will replace the resource guide, "*Disability Accommodation Procedures*," with a new RA policy and operational procedures in FY 2020. This new guidance will be available on the interactive portal 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.

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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 2019, the SEC processed 119 Temporary Medical Telework (TMT) requests, processed 133 RA requests, of which 34 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.

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 will continue in FY 2020 and beyond. While the project was delayed in FY 2019, 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.

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 CHCO 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.

Requests and information relative to Personal Assistance Services (PAS) remain available on *AskHR* interactive portal. The SEC intends to publish the new RA policy and operational procedures approved by the EEOC in FY 2020. During FY 2019, the Agency continued the review of the electronic case management system's business requirements, the new policy, and related procedural changes that support RA for employees and applicants for employment. Furthermore, changes to RA procedures will likely necessitate updates to training, job aids, notices, and other information sources in FY 2020 and beyond.

Personal Assistance Services Allowing Employees to Participate in the Workplace

Pursuant to 29 C FR § 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.

In FY 2018, the Disability Program Office updated the Agency's Disability Accommodation Procedures to include information related to the PAS that was made available on the *AskHR* interactive portal. In FY 2019, a new policy and operational procedures was established and approved by the EEOC for implementation. The SEC intends to publish the revised RA policy and operational procedures in FY 2020 that include information regarding PAS and submission requirements that will be made available on *AskHR*. In addition, the Agency modified its current contact for Personal Assistant and Reader Services to enhance the level of support and ensure consistent delivery of health care services. In FY 2019, employee usage of PAS services increased 25%. [Redacted to protect privacy.] The SEC continues to use the PAS form to capture requests. Data from this form will provide information that may be used to understand program adoption and effectiveness going forward.

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 2019, 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 **X** No 0 N/A 0

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

During FY 2019, 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

Analyses of Persons with Disability and Targeted Disability in the Workforce

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?
<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 of Part J 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>

Source of the Trigger	Specific Workforce Data Table
Workforce Data Table (if so identify the table)	Tables B1 through B9
EEO Complaint(s)	
Grievance(s)	
Climate Assessment Survey	
Exit Interview(s)	

Source of the Trigger	Specific Workforce Data Table
Anecdotal	
Other	

EEO Group(s) Affected by Trigger

EEO Group	
Persons with Disability	X
Persons with Targeted Disability	X

Barrier Analysis Process

Source of the Trigger	Source 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
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 Interviews with the managers of PWD involuntarily separated during FY 2018 to uncover any preventable reasons for separation
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

Source of the Trigger	Source Reviewed? (Yes or No)	Identify Information Collected
Other (Please Describe)	Yes	<p>Laws and federally mandated hiring and promotions policies, practices, and procedures applicable to recruitment and retention of persons with disabilities</p> <p>The Agency's hiring and promotions policies, practices, and procedures applicable to people with disabilities, including those with targeted disabilities</p> <p>Selection case files (hiring and promotions) from FY 2014 and FY 2015</p> <p>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</p> <p>Information about best practices in recruiting PWD in the federal government and private industry</p>

Status of Barrier Analysis Process

Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
No	No

Statement of Identified Barrier(s)

Barrier Name* (required)	Description of Policy, Procedure, or Practice
No barrier has yet been identified pending further analysis.	<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 OEEEO 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; and • 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 the affirmative action plan for PWTD; and employment programs, especially reasonable accommodation and disability programs, supportive of PWD and PWTD.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Staffing & Funding (Yes or No)	Modified Date From (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)	Objective
10/01/2015	10/31/2020	Yes	09/30/2020		<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 the revised 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)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Chief Human Capital Officer, OHR	Jamey McNamara	Yes
Director, OEEO	Peter J. Henry	Yes

Planned Activities toward Completion of Objective

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	OEEEO 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.	Yes		11/6/2017
01/31/2018	The Agency will establish a cross-functional working group with representatives from OEEEO and OHR to develop action plans and implement required and recommended activity under Section 501 of the Rehabilitation Act of 1973.	Yes		11/02/2017
03/31/2019	OEEEO will gather data to determine the reasons for removal of PWD by reviewing data on file from any specific EEO activity and interviewing the supervisors of PWD who were involuntarily separated in FY 2017 and FY 2018.	Yes		3/31/2019
10/31/2020	OEEEO will implement feasible changes to the workforce data tables providing information on PWD and PWTD in collaboration with a shared service provider.	Yes	09/30/2019	

Report of Accomplishments

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 New Perspectives 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.

Fiscal Year	Accomplishments
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. As the Agency prepares for implementation of the revised regulation in FY 2018, OEEO will leverage or expand this prior work to include the population of persons with disabilities in the workforce.</p> <p>Representatives from OEEO and OHR implemented a number of actions responsive to the recommendations from the original study of the SEC's PWTB 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 PWTB; • 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 PWTB, including reviewing the impact of revised disability and targeted disability categories in the revised SF-256 as they influence participation of PWD and PWTB; • Verifying the hiring and assignment of a Special Programs Manager within OHR focused on supporting the recruitment, hiring, development, and retention of PWD and PWTB; 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 PWTB. <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 PWTB 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
2018	<p>The following provides detail about OEE0's analytic work in support of this analysis during FY 2018.</p> <ol style="list-style-type: none"> 1. OEE0 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. OEE0 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, OEE0 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. OEE0 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. OEE0 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. OEE0 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, OEE0 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, OEE0 and OHR established a strong cross functional approach to supporting PWD and PWTD in the Agency's workforce, while leveraging OMWI's EAG network. In recognition of this partnership, leaders in OHR and OEE0 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).</p> <p>OHR and OEE0 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 OEE0 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 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%. • OHR will partner with OMWI and DIAC to improve PWD participation in future mentoring program offerings.
2019	<p>The following provides detail about OEEO's analytic work in support of this analysis during FY 2019.</p> <ol style="list-style-type: none"> 1. 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 39 veterans who received hiring preference based on a service connected disability, as PWD. 2. 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. Workforce data demonstrate the steady participation of PWD and PWTD meeting the goals established for both PWD and PWTD among lower salaried employees and PWTD among employees in the higher salary cluster. More work will be needed to meet the participation of PWD in the higher salary cluster. 3. With respect to awards and recognition, OEEO ran multiple regressions to assess the influence of various factors on awards distribution outcomes aggregated by award amounts, award hours, and award counts. Data were analyzed for five years, FY 2013 through FY 2017. The sample sizes were small, limiting the reliability of the inconsistent effects found for PWD. 4. Based on technical assistance suggested by EEOC's Office of Federal Operations (OFO), OEEO gathered qualitative data about the involuntary separation of PWD during FY 2019. Data sources included records gathered as part of relevant EEO complaint activity filed by separated PWD prior to departure and interviews with the supervisors of former PWD employees. The data included a small number of employees. No patterns in results were evident that would form the basis for additional action. 5. OEEO reviewed separations data among PWD in FY 2019. A larger proportion of the PWD population separated from the Agency, as has been found in prior years. More often than is found for persons with no disability, PWD separate through voluntary retirement; 60.00% of PWD separations were due to voluntary retirement, unfortunately an additional 10.00% of the separated PWD died during FY 2019. By way of comparison, among the separated employees identified as having no disability, 28.46% retired and 0.81% died during FY 2019. The relationship between age, disability, and retirement is a key explanatory variable to understand separation data for PWD. 6. Relatedly, OEEO worked with OHR to evaluate the perceptions of separated employees who are PWD from the Agency's Exit Survey. These analyses are summarized in other sections of this report. 7. OEEO led an inter-Agency working group to support the implementation of changes to procedures required or suggested by the revised Section 501 regulation. This working group met two times in FY 2019 and continued to provide support for agencies seeking to improve conditions for PWD across the government. In total 14 agencies are represented. The working group helps agencies share best practices and support their own workforce more effectively. In early FY 2020, OEEO facilitated this working group's visibility and achievement in a presentation at the monthly EEO Director's meeting, thereby, increasing the group's influence in the EEO community. 8. In FY 2019, OEEO collaborated with cross functional intra-Agency representatives to develop and publish a suite of interactive web pages sharing tips for working inclusively with PWD in the workforce. These tips include resources both within the Agency and externally hosted focused on helping supervisors and coworkers gain a deeper understanding of how their words and actions may impact PWD differently based on their particular experiences. This effort involved strong participation from DIAC, OHR, OMWI, and the Office of Public Affairs. The resources were compiled between July and September and made available to the workforce during National Disability Employment Awareness Month (NDEAM).

Fiscal Year	Accomplishments
2019 (continued)	<p>9. In concert with launching the disability inclusion tips, DIAC, OHR, OMWI, and OEEO hosted invited speakers whose expertise and study focuses on self-identification and support for PWD (among other groups). That event closed out a highly successful set of NDEAM events including an eyeglasses donation drive in support of the Lion's Club's well known program.</p> <p>10. OPA continued to expand the support for PWD when they are interacting with SEC staff and resources. During FY 2019, the external website was modified for increased accessibility to a wider range of members of the public.</p> <p>11. OEEO continued to work on implementing the changes required by OFO's instructions for MD-715 2.0. Working with data experts in other agencies, OEEO leads the community to understand better the implications of 2.0 design for reporting and analysis. In particular, OEEO supported work in the following areas:</p> <ul style="list-style-type: none"> — Suggested enhancements to the data provided about applicant flow data (AFD) from OPM's USAStaffing systems. These suggestions helped to ensure that the revised reporting from AFD included variables to distinguish supervisory roles and the hiring of permanent versus temporary staff. — Summarized and analyzed differences in self-identification for internal SEC staff from the records of applicants, even those who are also SEC staff, filed on the applicant profile in USAStaffing. Among data in AFD over the five year period from FY 2012 to FY 2018, more than 30% of the records are coded as "I do not wish to identify my disability." Over the same time period, self-identification among internal employees grew so that in FY 2019 more than 85% of staff are specifically identified as to their disability status. The differences in results from AFD compared to internal records suggests need for additional work to encourage applicants to self-identify in OPM's records so as to provide a clearer and more accurate picture of the government's efforts to recruit PWD into federal service. — Engaged with contracted resources to complete the work necessary for updating and expanding the EEO-AT for MD-715 2.0. As found in the annual program status report, OEEO completed the 2.0 design. OEEO also worked to align workforce analysis by race and gender with the operational definitions that workforce underlie analysis by disability in this plan. Consistent definitions will help ensure OEEO's continued influence through data driven practical analytics going forward.

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, 2020

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 seven years, the Agency achieved the goals established under Section 501 of the Rehabilitation Act for both PWTD and PWD at the lower salary levels. 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 2019:

- The permanent workforce of PWTD experienced net growth of 12 persons or 16.67%, which outpaces the 7.13% 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 1.97%. PWTD among higher salaried employees increased from 1.50% to 1.95% (56 to 83 PWTD employees).
- The permanent PWD workforce experienced net growth of 141 persons or 66.82%. Participation of PWD rose from 5.60% in the total workforce to 8.72% and from 4.93% to 8.59% among higher salaried employees, with an additional 158 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. OEEEO 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 2019, representatives of OEEO and OHR initiated and completed actions intended to address the recommendations to improve equal employment opportunity. These actions were completed in FY 2019. The Agency will be implementing additional required and recommended actions during FY 2020 and beyond. In the meantime, the plan to address identified triggers for PWD and PWTD focuses on developing SEC's capability to generate and review the data called for in this Part. Further analysis of the PWD and/or PWTD population will be considered under the framework for prioritizing barrier analysis work embedded in our Agile project planning approach.

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