



NATIONAL SECURITY AGENCY
CENTRAL SECURITY SERVICE

FY2019 National Security Agency Affirmative Action Plan

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



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Note: This is a summary of input to the MD-715 report and annual progress towards meeting EEOC-established goals for persons with disabilities in the federal workplace.

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

Section I: Efforts to Reach Regulatory Goals

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

Using the goal of 12% as the benchmark, the agency does not have a trigger involving PWD by grade level cluster in the permanent workforce for Cluster GS-1 to GS-10 (PWD). There is a trigger for Cluster GS-11 to SES (PWD). The percentage of the GS-11 to SES workforce that self-identifies as having a disability is 11.2%, which is below the goal of 12%.

Using the goal of 2% as the benchmark, the Agency does not have a trigger involving PWTD by grade level cluster in the permanent workforce.

The Agency has communicated the numerical goals to the hiring managers and/or recruiters. The goals were presented and reviewed in the annual recruitment kick-off meeting. The goals are also included on daily hiring reports and in the online hiring pipeline tool. Recruitment is regularly updated about progress made towards hiring persons with disabilities including those with a targeted disability.

Section II: Model Disability Program

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

A. PLAN TO PROVIDE SUFFICIENT AND COMPETENT STAFFING FOR THE DISABILITY PROGRAM

The Agency has designated sufficient qualified personnel to implement its disability program during the reporting period. The Agency employs one, full-time Recruitment Program Manager that processes applications and reasonable accommodation requests from PWD and PWTD in addition to answering questions from the public about hiring authorities that take disability into account. Three full-time employees in Installations and Logistics oversee compliance to the Architectural Barriers Act. A Special Emphasis Program Manager supports the special emphasis program for people with disabilities and people with targeted disabilities. Reasonable accommodation requests are executed by three full-time employees and one full-time employee who fulfills the role as a collateral duty. Compliance with Section 508 is overseen by three full-time and two part-time employees. The Agency filled the vacant Disability Program Manager position in FY2018 and has added one additional recruiter for FY2020.

The Agency has provided disability program staff with sufficient training to carry out their responsibilities during the reporting period and includes the following activities:

- National American Sign Language Day Brown-Bag events: 14 April 2018
- Brown Bag session on Disability Recruitment and Hiring with business and acquisitions organization, BM&A and Office of Reasonable Accommodations & Accessibility
- Disability Summit at the University of Maryland

- Each of the Sign Language Interpreters gained required Continuing Education Units (CEUs) to maintain national certification as a condition of their employment with the Agency. Other training includes:
 - Street Leverage Conference
 - Registry of Interpreters for the Deaf (RID) Regions 3 and 5 conferences
 - Child of Deaf Adults (CODA) conference
- The Sign Language Interpreters established an in-house training program with quarterly workshops sponsored by the Potomac Chapter of the Registry of Interpreters for the Deaf (PCRID) to earn CEUs for customized training not available in the marketplace. Sessions in FY2020 will be open to sign language interpreters across the Intelligence Community.
- Disability program staff attended specialized training and conference events to stay abreast of changes in assistive technology, accommodations law, and innovations for new accommodations
 - National ADA Symposium
 - California State University of Northridge Annual Assistive Technology Conference
 - National Employment Law Institute’s ADA and Family Medical Leave Act Compliance Update
 - National Council on Addictions Conference
 - Hearing Loss Association of America annual conference

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

The Agency has provided sufficient funding and other resources to successfully implement the disability program during the reporting period. The Office of Reasonable Accommodations & Accessibility is fully staffed and collaborates with Installations & Logistics, 508 Compliance support, and the Disability Recruitment Program Manager for external recruitment to support employees and applicants.

Section III: Program Deficiencies in the Disability Program

The Agency was deficient in posting its affirmative action plan on its public website in 2019. A draft of the affirmative action plan was completed by 30 September 2019. Posting on the Agency’s intranet and public website is targeted for 30 September 2020.

Section IV: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 CFR §1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. Identify outcomes of the agency’s recruitment program plan for PWD and PWTB.

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

The Agency uses various programs and resources to identify job applicants with disabilities, including individuals with targeted disabilities. In FY2019, the Program Manager for Disability Recruitment hosted a disability-focused recruitment event, a diversity-focused event, monthly events that highlighted different underrepresented groups and their contributions, and a Transitioning Military Information Session. Attendance at additional outreach and recruitment events included: Career Expo at Gallaudet University in Washington, D.C., University of Hawaii (Manoa & West Oahu), and the National Technical Institute for the Deaf at Rochester Institute of Technology (RIT). The Agency also exhibited at the Corporate Gray Military Friendly Career Fair, Women in Cybersecurity, Fort Meade Community Job Fair, Wounded Warriors Job Fair, Fort Meade Veterans Job Fair, Annapolis Job Fair, Bender Virtual Fair, Careers and the disabled Expo-D.C. and Disability, Diversity and IC Virtual Career Fairs.

The NSA’s External Recruitment and Hiring fulfills its Diversity Recruitment Strategic Plan through community outreach and marketing events. We research and attend specific professional events knowing the attendees will be people with both Targeted Disabilities and people with Non-Targeted Disabilities. The NSA uses the Schedule A Hiring Authority in an indirect capacity, to source, recruit, and hire underrepresented talent into the permanent

workforce. Through the involvement with the Workforce Recruitment Program, the Bender Virtual Career Fair, the Careers and the disabled Expo, and on-campus outreach events, the Agency brands our culture of diversity and inclusion. Once a year, External Recruitment and Hiring hosts a Career Invitational for people with a disability. Candidates are sourced from these programs/events and invited to interview at a full-day event. The Agency attributes success in reaching our Targeted and Non-Targeted Disability hiring goals directly to this event. The External Recruitment and Hiring division also leverages our Employee Resource Groups at the grass roots level to engage with student organizations at colleges and universities throughout the U.S. We foster relationships with both Disability Affairs and Veteran Affairs at Center for recruitment strategies; the Agency continues to track an increase in applicants who self-identify as a person with a disability or a person with a targeted disability.

NSA is already a part of the excepted service and can make appointments without having to use competitive selection like most other agencies. Therefore, NSA need not invoke Schedule A authority when individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A).

The Program Manager for Disability Recruitment sources candidates with a documented disability from a variety of channels. External Recruitment and Hiring Recruiters and Staffing Leads receive applications from the Program Manager for Disability Recruitment. Recruiters and Staffing Leads forward applicants who meet minimum qualifications and are determined to be a qualified applicant to the appropriate Hiring Managers. The Staffing Lead or the Recruiter will share with the Hiring Manager if the candidate was sourced by the Targeted Disability Resource.

The Agency has provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A). The Agency developed and released a new fully accessible Disability Awareness training in FY2019 to provide training to employees. The completion will be mandatory once every three years.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

The Agency has made efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment. Communication with professionals associated with the Maryland Rehabilitation Services as well as with the National Federation for the Blind of Maryland is established.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, there are no triggers that exist for PWD and/or PWTD among the new hires in the permanent workforce.

Using the qualified applicant pool as the benchmark, there are no triggers that exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO).

Using the relevant applicant pool as the benchmark, we were unable to determine if triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO). The Agency does not promote to work-roles therefore, reportable data does not exist for this category of the MD-715.

Using the qualified applicant pool as the benchmark, we were unable to determine if triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO). The Agency does not promote to work-roles therefore, reportable data does not exist for this category of the MD-715.

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

Pursuant to 29 CFR §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career

development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

A. ADVANCEMENT PROGRAM PLAN

The Agency currently has no special or separate opportunities for advancement for PWD. In FY2018, the Agency conducted a barrier analysis for persons with disabilities. It is implementing recommendations derived from the barrier analysis that will provide employees with career guidance, increase participation in career development programs and project opportunities advertised on the Job Enrichment Board (JEB). In FY2019, the new Affirmative Action Plan Council (AAPC) has been working to implement the recommendations from the barrier study that will improve the experience of persons with disabilities here at the agency.

B. CAREER DEVELOPMENT OPPORTUNITIES

The Agency has career development programs for early and mid to late career. The programs are diverse with inclusion of many work roles and career paths. The focus is mostly around the primary mission of the Agency and the tools to do our work. In FY2019, the new Affirmative Action Plan Council has been working to implement the recommendations from the barrier study that will improve the experience and participation of persons with disabilities in career development programs here at the agency.

In FY2019, the Agency was unable to determine if triggers existed for PWD and PWTD among the applicants and/or selectees for any of the career development programs. Triggers are unknown since not all programs collect applicant data. The Agency is meeting to explore data collection possibilities.

C. AWARDS

Using the inclusion rate as the benchmark, the Agency has a trigger involving PWD and PWTD for any level of the time-off awards, bonuses, or other incentives using the inclusion rate of PWD=12%; PWTD=2%.

Using the inclusion rate as the benchmark, the Agency does not have a trigger involving PWD or PWTD for quality step increases or performance-based pay increases.

The agency does not have other types of employee recognition programs.

D. PROMOTIONS

The agency has some triggers involving PWD among the qualified internal applicants and/or selectees for promotion to the senior grade levels.

There are no triggers for Qualified Internal PWD Applicants at the following levels: SES, Grades GS-15, GS-14 and GS-13. There are no triggers for Internal PWD Selections at the SES level.

Triggers exist for Internal PWD Selections at the following levels: Grades GS-15, GS-14 and GS-13.

Fails to meet the 4/5th rule: GG15, GG14, GG13

There are no triggers for Qualified Internal PWTD Applicants at the following levels: SES, Grades GS-15, GS-14 and GS-13. There are no triggers for Internal PWTD Selections at the SES and Grade GS-15 levels.

Triggers exist for Internal PWTD Selections at Grades GS-14 and GS-13.

Fails to meet 4/5th rule: GG14, GG13

Using the qualified applicant pool as the benchmark, the agency has triggers involving PWD among the new hires to the senior grade levels for SES, GS-15, and GS-14. There is no trigger for the GS-13 level.

Using the qualified applicant pool as the benchmark, the agency does not have triggers involving PWTD among the new hires to the senior grade levels for any level (SES, GS-15, GS-14, or GS-13).

The agency does not have triggers involving PWD among the qualified internal applicants and/or selectees for promotions to supervisor positions. NSA is rank in person Agency and there is no promotion associated with a change in position.

The Agency does not have triggers involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions. NSA is a rank in person Agency and there is no promotion associated with a change in position.

Using the qualified applicant pool as the benchmark, the agency does not have a trigger involving PWD among the selectees for new hires to supervisory positions that include executives, managers, and supervisors.

Using the qualified applicant pool as the benchmark, the agency does not have a trigger involving PWTD among the selectees for new hires to supervisory positions that include executives, managers, and supervisors. The benchmark of 12% and 2% is used for Persons with Disabilities overall and Targeted Disabilities, respectively, since applicants do not apply directly to a management position.

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

In this reporting period, the agency did not 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)). NSA is already a part of the excepted service and can make appointments without having to use competitive selection like most other agencies. Therefore, NSA need not invoke Schedule A authority.

Using the inclusion rate as the benchmark, the percentage of PWD among voluntary and involuntary separations did not exceed that of persons without disabilities for voluntary or involuntary separations (PWD).

Using the inclusion rate as the benchmark, the percentage of PWTD among voluntary and involuntary separations did not exceed that of persons without targeted disabilities for voluntary or involuntary separations (PWTD).

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

NSA is exempt from Section 508 compliance, for national security systems; however, NSA is not exempt from the requirement to make administrative software systems accessible. We have not yet posted the notice explaining employees and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint. The draft is under review with the EEOC.

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 is not posted; the draft is currently under EEOC review. Upon approval, the Agency will post.

NSA Installations & Logistics (I&L) organization is continually reviewing and surveying the buildings and exteriors to identify areas where NSA can provide improved accessibility. Existing program elements are under evaluation to determine opportunities for improvement. The Agency's Engineering Standards Board (ESB) and design discipline working groups are making continuous effort to examine Facilities Criteria, in accordance with the supplemental requirements to DoD Unified Facilities Criteria, and develop standards updates to assure and implement compliance and reasonable accommodation measures.

For new construction and renovations, Design Quality Assurance and Quality Control (QAQC) is performed by expert technical personnel to guide and verify ABA-compliant design products and includes coordination with EEOC office. Accommodation Programs include:

Automatic Door Opener Program (ADO): The Chief of I&L initiated this program to install, at a minimum, one ADO per office suite, which is over and beyond the ABA standards. This effort started in 2017 continuing through 2021, and is now an Agency standard for all new fit-ups.

Exterior Walkway Improvements: A recent study, which was completed, of the NSA campus sidewalk conditions. This initiative is entering construction for corrective action in FY2019. This will bring sidewalks up to compliance with ABA standards.

Restroom Upgrades: I&L started major restroom renovations at NSAW in 2016 continuing in 2019 to address the aging facilities and ensure all restrooms are ABA compliant. Renovations will include installing accessible fixtures to improve Agency standards tailored to Agency personnel needs.

Single User Restrooms: In 2017, Agency Senior Leadership supported the initiative to install, at a minimum, one ABA compliant Single User Restroom per location of men's and women's facilities for new construction, furnished with signage for dual gender use, to include wheelchair accessibility. This initiative has become the Agency's standard for facility improvements to follow.

Elevator Upgrades: During life cycle replacement of elevators at NSAW, elevators are being upgraded to ensure ABA compliance. Upgrades started in 2016 and are currently ongoing.

Entrance Ways: Several NSAW entranceways underwent beautification and security badging turn-style upgrades for security improvements and ensured ABA compliance. A new project to renovate a major entrance to be ABA compliant is in progress.

Cafeterias: The primary cafeteria upgrade is currently in design to execute in FY2019. With full infrastructure renovation, the cafeteria will meet the latest ABA requirements to ensure accessibility. Two other cafeterias have undergone food service upgrades and with the construction completed within the last year, now provide compliant, accessible food service for Agency personnel.

Core Renovations: The Agency is currently designing several thousand square feet of office space and common areas in a key, older building that is slated for Core renovation. Design kicked-off in FY2019 for construction in FY2020 and will bring all spaces under limits of design into ABA compliance and Agency standards above and beyond code requirements.

Intersections Adaptive Technology: I&L is expanding the traffic signaling system and tying it into existing Adaptive Technology system, which will provide ABA compliant traffic signaling and crosswalk intersection communicating.

C. REASONABLE ACCOMMODATION PROGRAM

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

Implementation of workplace accommodations occurs within 21 business days upon receipt of documentation from the employee.

The reasonable accommodation process provides guidance on how to request workplace accommodations. The process from request to implementation takes approximately 7-21 days. Mandatory Disability Awareness Training has been developed and launched in FY2019 for coworkers, managers, recruiters, and hiring managers. The course requirement must be fulfilled every 3 years. There is also sensitivity training available upon request as a workplace accommodation. Trends related to the number of requests for particular accommodations, implementation time, accommodations equipment requested, security requirements and limitations, location of employees with disabilities, and total number of accommodation requests are monitored and adjustments are made as necessary.

D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

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

The Workplace Care Attendant program has been up and running for several years now, and awarded a new contract in September 2017. Under the current contract, the nursing assistants not only meet the daily needs for toileting and feeding (Activities of Daily Living) for employees who require it, but they are also able to assist in the OHES Medical Center Acute/Urgent Care clinic providing their services as nursing assistants. Employees who need assistance with their activities of daily living are referred to the Program Manager, and a collaborative agreement between employee and assistant is made to meet the employee's needs.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

During the last fiscal year, the percentage of PWD who filed a formal EEO complaint alleging harassment was not higher than the government-wide average. During the last fiscal year, there were no complaints alleging harassment based on disability status to result in a finding of discrimination or a settlement agreement.

There were no findings of discrimination alleging harassment based on disability status during the last fiscal year for formal EEO complaints.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

During the last fiscal year, the percentage of PWD who filed a formal EEO complaint alleging failure to provide a reasonable accommodation, was not higher than the government-wide average

The agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year. The Agency is implementing a new mandatory requirement for supervisors to complete Disability Awareness training for FY2020. Further, additional sign language interpreters were hired.

Section VIII: Identification and Removal of Barriers

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

The agency has identified barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD.

The agency has established a plan to correct the barrier(s) involving PWD and/or PWTD.

Promotion rates for persons with disabilities is lower in all grades when compared to employees without a disability. The barrier is the current promotion process. In 2018, the Agency completed a full barrier analysis to determine a cause. After quantitative and qualitative analysis, final recommendations were made to eliminate the identified barriers.

In 2019, the Agency established the Affirmative Action Plan Council to support requirements outlined by EEOC and fully implement the recommendations from the barrier analysis of persons with disabilities. The Agency will monitor the implementation of the recommendations through 2021.