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NATIONAL SECURITY AGENCY  
CENTRAL SECURITY SERVICE

**NSA FY2024 Performance relative to  
FY2024 Strategic Plan for the Recruitment,  
Hiring, Advancement, and Retention of Persons  
With Disabilities**

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**Note:** This report is a summary of input to the Management Directive-715 (MD-715) report and annual progress toward meeting Equal Employment Opportunity Commission (EEOC)-established goals for persons with disabilities in the federal workplace.

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

retention of applicants and employees with disabilities.

The federal government recognizes that qualified individuals with certain disabilities face significant employment barriers beyond those faced by individuals with the broader range of disabilities. The federal government refers to those disabilities as targeted disabilities, which include, but are not limited to: blindness or serious vision loss, deafness or serious hearing loss, paralysis, missing extremities, traumatic brain injury, intellectual disabilities, significant mobility impairments, etc.

## 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%<sup>1</sup> as the benchmark, the Agency does not have a trigger involving persons with disabilities (PWD) by grade level cluster in the permanent workforce for Cluster GS-1 to GS-10 or for Cluster GS-11 to SES.

Using the goal of 2% as the benchmark, the Agency does not have a trigger involving persons with targeted disabilities (PWTD) by grade level cluster in the permanent workforce for Cluster GS-1 to GS-10 or for Cluster GS-11 to SES.

NSA's Talent Identification & Acquisition Office presented and reviewed the goals for the approaching fiscal year as part of the annual recruitment kick-off meeting that occurred in Q4 of the hiring fiscal year.

NSA identified various tradecraft tools that are used to build an expert workforce. The goals are also included on the weekly report to the NSA Director and listed on the online hiring dashboard. Agency leaders receive a quarterly update on recruitment for progress made toward hiring PWD, including PWTD.

## 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 disability program, and oversee any other disability hiring and advancement program the agency has in place.*

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<sup>1</sup> NSA received guidance from the EEOC Oversight Division that federal agencies, in 2025, should continue efforts to meet the regulatory goals for PWD (12%) and PWTD (2%) as stated in 29 CFR 1614.203 d (7).

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

NSA designated sufficient qualified personnel to implement its disability program during the reporting period.

The Agency employed the following staff to implement its disability program during the reporting period:

- Five full time employees and one collateral duty employee to process reasonable accommodation requests from applicants and employees.
- One full time employee and 11 collateral duty employees to oversee compliance with the Architectural Barriers Act (ABA).
- Two full time employees and one collateral duty employee to process applications from PWD and PWTD.
- One full time employee to oversee the Agency's Disability Program.
- Four full time employees and one collateral duty employee to oversee compliance with Section 508 of the Rehabilitation Act of 1973 as amended. Please note, all of the Agency's developers focus on Section 508 compliance across all efforts.
- Two full time employees and one collateral duty employee to answer questions from the public about hiring authorities that take disability into account.

NSA provided the disability program staff with sufficient training to carry out their responsibilities during the reporting period.

Each Reasonable Accommodations Manager (RAM) received at least 20 hours of continuing education in the past year. RAMs obtained additional training through the National Employment Law Institute, focusing on specific issues regarding legal aspects of workplace accommodations for individuals with disabilities. RAMs also completed specific training to maintain their certifications and licensure in the nursing, employee assistance, and social work fields.

The Office of Reasonable Accommodation Services provided quarterly, in-house training sessions for the Sign Language Interpreting (SLI) team, in addition to leadership, customer service, and career development trainings that the SLIs attended individually through the National Cryptologic University (NCU). The SLIs gained and enhanced extra-linguistic knowledge of the environment in which they interpret through completion of courses and activities as part of the Job Quality Standard and by acquiring Continuing Education Units to maintain their required professional certifications.

Agency Realtime Captioners completed required training to maintain their professional realtime captioning certifications. The captioners individually attended leadership, career development, and Contracting Officer's Representative training through NCU.

## B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

NSA provided sufficient funding, and other resources, to successfully implement its disability program during the reporting period.

The need for reasonable accommodations resources increased due to the rise in PWD/PWTD hiring, increase in the number of complex accommodations requests, and expansion of services. NSA is proactively seeking ways to bolster resources to meet this increased demand, including increased staffing for Reasonable Accommodations Managers and Personal Assistance Services.

In FY24, the Office of Reasonable Accommodation Services (ORAS) continued partnering with the National Cryptologic University (NCU) to obtain access/accounts for uncleared Sign Language Interpreter (SLI) contractors for NSA's at-home training platform in support of unclassified interpreting requests for Deaf and Hard-of-Hearing (DHH) employees working, and attending training, from home. This allowed ORAS to reallocate cleared SLIs to requests located in classified spaces.

The need for SLI services increased Agency-wide. NSA hired more DHH employees, especially across the Cryptologic Centers. In turn, the demand was felt by civilian and contractor interpreters. Temporary Duty demands skyrocketed, which took away from fulfilling requirements here at NSA-Washington. Over the next fiscal year, NSA seeks to hire one interpreter at NSA-Georgia and two interpreters at NSA-Texas.

In FY24, NSA made progress to better support the needs of the DHH community, and others at the Agency, by hiring additional realtime captioners to bring the Captioning team up to full capacity.

## Section III: 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 PWTD.*

### A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

NSA uses the Department of Labor's Workforce Recruitment Program (WRP) database to source candidates for the annual Disability Hiring Invitational. All persons seeking employment at NSA, including those with a disability, must apply online at [www.IntelligenceCareers.gov](http://www.IntelligenceCareers.gov).

NSA's External Recruitment and Hiring division fulfills its Recruitment Strategic Plan through outreach and marketing events. The External Recruitment and Hiring division fosters relationships with both Disabilities Affairs and Veteran Affairs at Center for Academic Engagement schools via the Campus Ambassador Program.

NSA's external hiring is under the authorization of the Department of Defense Intelligence Community Defense Civilian Intelligence Personnel Systems, rather than the hiring authority of Schedule A. All positions are in the Excepted Service, therefore, NSA need not invoke Schedule A authority.

The Program Manager for Disability Recruitment sources candidates with a documented disability from a variety of channels. Applications are shared with the External Recruitment, Hiring Recruiters, and Staffing Leads. Applicants who meet minimum qualifications, and are determined to be qualified applicants, are forwarded to the appropriate Hiring Managers.

The Agency offers a fully accessible training, for all employees, that provides an overview of, and increases the awareness of, reasonable accommodations and accessibility in the workplace. The training is mandatory, and must be completed once every three years.

#### B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

In alignment with EEO laws and federal regulations, NSA has contacts with professionals associated with Maryland Rehabilitation Services as well as with the National Federation for the Blind and National Technical Institute for the Deaf.

#### C. PROGRESSION TOWARD GOALS (RECRUITMENT AND HIRING)

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

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

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 MCOs. Reportable data is not defined for feeder jobs by occupants 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 MCOs. NSA does not promote to occupations. Therefore, data is not reported for this category of the MD-715.



## Section IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities

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

### A. ADVANCEMENT PROGRAM PLAN

NSA has a comprehensive, top-to-bottom approach to ensuring equal advancement opportunities for all eligible employees.

In FY24, the Agency officially closed its PWD barrier analysis after implementing all the recommendations (nearly 20), produced by the study, focused on mitigating barriers in the areas of promotion and career opportunity limitations; additional support needed for supervisors; accessibility; and accommodations.

In Q4, NSA implemented the final recommendation from the PWD barrier analysis — Agency guidance to assist supervisors in assessing employees' job performance. A group of NSA cross-organization personnel developed the resource, which includes frequently asked questions and offers practical guidance that includes Agency-centric examples.

NSA recognizes the PWD/PWTD workforce has unique needs related to promotion readiness and preparedness for the promotion process, which has the potential to impact career advancement. At the grass-roots level, the PWD workforce leads by hosting sessions for PWD/PWTD to boost promotion readiness. While NSA offers standardized promotion readiness courses, the PWD workforce's trainings focus on topics that have been of special interest to the PWD/PWTD workforce, including promotion package writing skills and a comprehensive session on NSA's promotion process.

Additionally, the PWD workforce organizes opportunities for employees to participate in promotion package review sessions geared specifically toward helping PWD/PWTD effectively communicate accomplishments and tying them to larger Agency initiatives and goals.

In an effort to provide additional notice of available vacancy ads, NSA organizations share vacancy announcements in internal newsletters to reach the widest pool of qualified applicants, including those with disabilities.

The PWD workforce also partners with NSA's Career Guidance Center to provide career-focused, skill-building, and information sessions tailored specifically for the PWD workforce.

## B. CAREER DEVELOPMENT OPPORTUNITIES

The Agency annually hosts formal and informal career development opportunities for all employees. NSA's Mentoring and Shadowing Resource Center promotes and facilitates a variety of enterprise-wide mentoring activities.

The Director's Skills Enrichment Program is open to employees Grades 12-14 via application process. The purpose of the program is to develop effective prospective leaders in the workforce through experiential opportunities focused on skill development and mission exposure, as well as mentoring and networking.

NSA operates dozens of corporate development programs to help shape the workforce through accelerated development of knowledge, skills, and abilities to meet mission demands. The development programs — which fall under the categories of language and intelligence development; STEM development; and leadership, professional, and corporate development — leverage all opportunities to accelerate professional development and produce employees who can solve complex, multidiscipline Agency problems.

The Career Guidance Center (CGC) is the primary resource to help all employees wanting to take advantage of career planning activities including career exploration, self-assessments, internal job search assistance, interviewing enhancement, shadowing and assistance with creating internal staffing documents. A CGC career advisor regularly solicits input from the PWD workforce on CGC services, personally invites the PWD workforce to events, and shares information about upcoming career development opportunities.

Triggers do not exist for PWD or PWTD among applicants and/or selectees for any of NSA's career development programs. The absence of triggers is mostly due to the extremely small group sizes.

## C. AWARDS

NSA has triggers involving PWD and PWTD for some levels of time off awards, bonuses, or other incentives.

NSA does not have a trigger involving PWD or PWTD for quality step increases or performance-based pay increases.

NSA does not have other types of employee recognition programs.

## D. PROMOTIONS

NSA has a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to one of the senior grade levels.



There is a trigger for internal PWD selections to Grade GS-14.

There is not a trigger for qualified internal PWD applicants for Grade GS-14.

No triggers exist for qualified internal PWD applicants or internal PWD selections at the SES, Grade GS-15, or Grade GS-13 levels.

NSA has a trigger involving PWTB among the qualified internal applicants and/or selectees for promotions to two of the senior grade levels.

There is a trigger for internal PWTB selections to Grades GS-13 and GS-14. Fails to meet 4/5th rule: GG-14, GG-13.

There is not a trigger for qualified internal PWTB applicants for Grades GS-13 and GS-14.

No triggers exist for qualified internal PWTB applicants or internal PWTB selections at the SES or Grade GS-15 levels.

Using the qualified applicant pool as the benchmark, the Agency does not have a trigger involving PWD or PWTB among the new hires to the senior grade levels.

NSA does not have a trigger involving PWD or PWTB 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.

NSA does not have a trigger involving PWD or PWTB among the selectees for new hires to supervisory positions. NSA applicants do not apply directly to a management or executive position.

## **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 assistance services.*

### **A. VOLUNTARY AND INVOLUNTARY SEPARATIONS**

NSA's external hiring is under the authorization of the Department of Defense Intelligence Community Defense Civilian Intelligence Personnel Systems, rather than the hiring authority of Schedule A. All positions are in the Excepted Service; therefore, NSA need not involve 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.

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.

## 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.*

The NSA Notice explaining employees' and applicants' rights under Section 508 of the Rehabilitation Act as amended, including a description of how to file a complaint, is available at <https://www.nsa.gov/nsa-accessibility/>.

The NSA Notice explaining employees' and applicants' rights under the Architectural Barriers Act (ABA), including a description of how to file a complaint, was revised in 2022 to ensure clarity and prominence on the Agency's website. It is available at <https://www.nsa.gov/ABA/>.

NSA leads the way with our integrated approach to facility and information technology (IT) accessibility. We have built cross-functional teams and trained accessibility experts and resources in our various organizations to ensure accessibility is prioritized at the ground level of IT and facility projects.

One of our cross-functional teams is NSA's Enterprise Accessibility Council (EAC). Chartered in November 2021, the EAC executes a prioritized action list for accessibility advocacy and awareness across all Agency organizations. The EAC consists of representatives from various organizations and is chaired by senior executives from Installations & Logistics (I&L) and the Deputy Chief Information Officer. Looking ahead, the group will continue to pursue ongoing projects to progress accessibility efforts in the area of pedestrian travel distance challenges as well as procedures for occupant and personal notifications.

An internal working group partnered with the Well-Being Services Emergency Management Team to draft and finalize a guidance tool to better equip the workforce with information about evacuation procedures for individuals with disabilities impacting their mobility. Enhancements included specific details regarding PWD emergency preparedness communicated via webpage content, mass messages to the workforce, and recommendations scalable across multiple sites.

Another group completed the foundational work necessary to begin a pilot for speech-to-text accessibility solutions. The group is collaborating with NSA's Capabilities Directorate to test platforms and evaluate technology for handheld speech-to-text solutions.

Outside of our various cross-functional teams and working groups, our I&L 10-year plan includes both continual review and building/exterior surveys to identify potential accessibility improvements. I&L surveyed one major building at NSA headquarters and two remote command sites in CY2024. Planning is underway for three sites in FY25 under the 10-year schedule stipulated in the Accessibility Sustainment Plan. For new construction and renovations, expert technical personnel perform design quality assurance and quality control to guide and verify ABA-compliant design products in partnership with Equal Employment Opportunity & Accessibility (EEOA).

In FY24, I&L continued leveraging experiential input from the PWD workforce on new facility features. Feedback is implemented to improve usability of the features beyond minimum compliance. Employees can report facility accessibility concerns to I&L and track how they are being handled via a notification system.

Additionally, I&L inaugurated two new trainings into the National Cryptologic University: Architectural Barriers Act Standards Training and An Introduction to Universal Design. Available to the entire workforce, the courses serve to increase awareness, technical understanding of compliance tactics, and promote the mindset of accessibility as a base requirement for facilities, services, digital products, and processes.

In FY24, I&L completed planning to provide the Architectural Barriers Act Standards Training as mandatory training to targeted I&L work roles starting in 1QFY25. All new NSA buildings will now comply with ABA requirements to ensure physical accessibility including our newest mission facility, completed in FY23.

From an IT accessibility perspective, NSA's IT 508 Compliance and Accessibility team is located within the office of our Chief Information Officer. In FY24, NSA completed the third iteration of the IC Accessibility Program Maturity Model, an IT accessibility self-assessment tool through which an Intelligence Community (IC) agency can better understand the maturity of its IT accessibility mission and processes. NSA remains self-assessed as "Emergent" with processes that are functional and promising.

The NSA 508 Compliance Program Management Office has consistently made improvements in the auditing and rating of IT accessibility products and applications. The newest version of NSA's IT Accessibility score sheet was released in January 2024 encompassing additional Web Content Accessibility Guidelines (WCAG 2.1 AA and AAA) for increased clarity of IT accessibility requirements and usability functions in line with the Agency's Information and Communication Technology Accessibility policy. For the first time, these trainings and compliance efforts have extended beyond the main

headquarters to field sites in the extended enterprise. The Capabilities Directorate scored hundreds of products and tools on the NSA IT infrastructure, in addition to auditing and driving IC and IT initiatives, and continued to host Accessibility 101 sessions and integrated sessions into the FIRST2 Years Program for new employees.

Finally, in October of 2024, NSA also supported the second annual IC-wide IT Accessibility Symposium, hosted at the National Geospatial-Intelligence Agency, by leading panels and hosting sessions.

### 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.*

Absent extenuating circumstances, reasonable accommodation requests are processed (including providing the accommodation, if approved) as soon as possible, and no later than 30 business days from the date the request is made. This 30-day business period includes the five days in which the Agency's Office of Reasonable Accommodations & Accessibility (ORAA) must contact the requestor after a request for a reasonable accommodation is made.

In Q1 of FY24, NSA's Equal Employment Opportunity & Accessibility (EEOA) group established the Office of Reasonable Accommodation Services (ORAS). That office is home to the experts who implement specific accommodation services such as sign language interpreting, realtime captioning, personal assistance services, and reasonable accommodations administrative assistance.

ORAS was created to separate NSA's initial decision authority for the provisioning of accommodations services from the actual provisioning of the services. The office provides a core baseline for the anticipated increased resources needed to address the growing demand for services. Employees with reasonable accommodations were leveraged in the organizational redesign.

NSA closely monitors and analyzes trends to understand the efficacy of our Reasonable Accommodations (RA) program, make adjustments to address gaps, engages the workforce to increase awareness, and seeks feedback from those who participate in the RA program.

Every six months, the Office of Reasonable Accommodations & Accessibility (ORAA) sends a notification to employees who have a reasonable accommodation decision on file with the office. The message is a reminder to employees to contact ORAA should they need a modification to their accommodation. The RA process provides guidance on how to request workplace accommodations and is documented fully on internal and external webpages. The process from request to implementation takes approximately 7-30 days.

Trends are monitored and adjustments are made in the RA implementation process when the team identifies a high frequency of requests or when specific high-frequency trends are identified for particular accommodations, implementation time, accommodation equipment, security requirements/limitations, or location of employees with disabilities.

Sign language interpreting statistics are reviewed on a quarterly basis to identify trends and implement solutions as needed. The statistics are also reviewed by EEOA leadership.

Captioning metrics are reviewed monthly, and are also sent to EEOA leadership for review.

The administrative services contract continues to address the gap in administrative assistance services for employees with disabilities. The contract enables a wider range of performance of essential job functions by assisting employees with disabilities with such work-related tasks as note-taking, physically assisting with office equipment, and lifting and moving work-related items.

Fully accessible training that provides an overview of, and increases the awareness and understanding of, reasonable accommodations and accessibility in the workplace was developed for all employees. The training is mandatory, and must be completed once every three years. ORAA staff fulfill requests for tailored training on various disability topics on an ad-hoc basis.

In CY24, ORAA released an internal article highlighting the Agency's Personal Assistance Services Program — what it is, how much it's grown, and featuring an employee benefitting from the program.

ORAA continues to monitor feedback mechanisms to better understand customers' experiences and make adjustments as necessary.

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

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

In Q1 of FY24, NSA transitioned management of the Personal Assistance Services (PAS) Program from the Office of Reasonable Accommodations & Accessibility to the newly created Office of Reasonable Accommodation Services.



PAS intake forms are required for those inquiring to use the service. Intake forms are reviewed to ensure accommodations are within PAS scope and new customers receive service agreements, which outline all approved requests. All PAS customer service agreements are re-evaluated bi-annually to ensure accommodations are true to current needs.

## **Section VI: 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 that resulted in a finding of discrimination or a settlement agreement.

### **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.

During the last fiscal year, no complaints alleging failure to provide a reasonable accommodation resulted in a finding of discrimination or a settlement agreement.

## **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.*

NSA 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.

NSA previously identified that promotion rates for PWD were lower in all grades when compared to employees without disabilities. Consistent with 29 C.F.R. § 1614.203(d)(1)(iii), final recommendations were made to eliminate the identified barriers.

As of the FY24 submission of this report, all of the recommendations have been implemented. However, there has been insufficient time to indicate their impact. NSA follows industry standard practices for statistical analyses and does not analyze trends or impacts until five years



have elapsed since implementation.