NATIONAL SECURITY AGENCY
CENTRAL SECURITY SERVICE

FY2021
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) or for Cluster GS-11 to SES (PWD).

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 Office of Recruitment, Hiring, Staffing and Placement presents and reviews the goals for the approaching fiscal year, as part of the annual recruitment kick-off meeting that occurs in the 4th quarter of the fiscal year. NSA identified six critical focus areas essential for building diversity and fostering inclusion. The goals are also included on the weekly report to the Director NSA and listed on the online hiring pipeline dashboard. Agency leaders receive a quarterly update on recruitment for progress made toward 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 Disability/Diversity Program Manager is the dedicated staffing resource for FY2021.

The Agency employs:

- One full-time and two collateral duty Disability/Diversity Program Managers to process applications and to answer questions from the public about hiring authorities that take disability into account.
- Two full-time employees and ten collateral duty employees in Installations and Logistics to oversee compliance to the Architectural Barriers Act.
- One Special Emphasis Program Manager to support the special emphasis program for people with disabilities and people with targeted disabilities.
- Three full time employees and one collateral duty employee to process reasonable accommodation requests in addition to one full-time employee fulfilling the role as a collateral duty.
- Two full-time, two part-time and one collateral duty employees to oversee compliance with Section 508.

The Agency has provided sufficient training to disability program staff to assist in their responsibilities during the reporting period, including the following activities:

- Each Reasonable Accommodation Manager received at least 20 hours of continuing education in the past year, including coursework through Certified Disability Management Specialist (CDMS.org), which

focuses on disability management in the workplace. Additional training through National Employment Law Institute, focusing on specific issues regarding legal aspects of workplace accommodations for individuals with disabilities was provided. Reasonable Accommodations Managers also completed specific training to maintain their certifications and licensure in the nursing, employee assistance, and social work fields.

- The interpreters completed courses and activities as part of the Job Quality Standard (JQS) to gain and enhance extra-linguistic knowledge of the environments in which they interpret. The courses offered through the National Cryptologic University (NCU) are standard issue computer-based modules incorporated into an interpreting centric curriculum. The Office of Reasonable Accommodations & Accessibility also provided a quarterly in-house training session for the sign language team, in addition to the leadership, customer services, and career development trainings that the interpreters attend individually through the NCU.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Section III: Program Deficiencies In The Disability Program

Deficiencies in the disability program are addressed along with the steps taken to improve on these deficiencies in sections IV-VIII below.

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 PWTD.

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

NSA uses the Department of Labor's Workforce Recruitment Program (WRP) database to source candidates for the annual Disability Hiring Invitational. Everyone, including those with a disability, must apply online at www.IntelligenceCareers.gov. In FY2021, the Disability/Diversity Program Managers participated in numerous disability-focused recruitment events including:

- Career Invitational for People with Disabilities
- Career Expo at Gallaudet University in Washington, D.C.,
- Equal Opportunities Publications (EOPs) STEM Career Fair,
- Careers & the DisABLED Virtual Career Expo,
- NTRD Career Fair

NSA was also awarded the "Public Sector Employer of the Year" for 2021 by the magazine, CAREERS & the disABLED for hiring efforts to the disabled community.

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 Agency closely tracks all external events by category to ensure inclusion of groups with differing abilities.

The NSA uses the Schedule A Hiring Authority in an indirect capacity, to source, recruit, and hire underrepresented talent into the permanent workforce. Through involvement with the Workforce Recruitment Program and the Careers and the disabled Expo, the Agency displays our culture of diversity inclusion. Once a year, External Recruitment and Hiring hosts a Spring Career Invitational to include people with a disability. Candidates are sourced from these programs/events and invited to interview at a full-day event. Success in reaching our Targeted and Non-Targeted Disability hiring goals can be attributed directly to this event. The External Recruitment and Hiring division also leverages our Employee Resource Groups at the grass-root 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 of Academic Enhancement (CAE) schools through the utilization of the Campus Ambassador Program. Through these recruitment strategies, the Agency continues to meet its hiring goals in FY2021, for attracting 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 unlike most other agencies. 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 External Recruitment, Hiring Recruiters, and Staffing Leads. Applicants who meet minimum qualifications and are determined to be a qualified applicant are forwarded to the appropriate Hiring Managers.

The Agency released a new, fully accessible Disability Awareness training. Course completion is mandatory for all and must be completed once every three years.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

The Agency has already made contacts with professionals associated with the Maryland Rehabilitation Services as well as with the National Federation for the Blind of Maryland and National Technical Institute for the Deaf.

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). Reportable data is not defined for feeder jobs by work role 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 Affirmative Action Plan Council (AAPC) engaged in affirmative actions to improve advancement for employees with disabilities in the last year. The Career Guidance Center (CGC) implemented a Career Empowerment Group for employees with disabilities. The group met once a week for 8 weeks to discuss essential topics to furthering careers such as exploring career options, creating targeted internal staffing resumes, and interviewing techniques. The format was developed in partnership with the People with Disabilities Employee Resource Group (PWD ERG). The PWD ERG solicited Agency volunteers to review promotion packages written by employees with disabilities prior to submission for the FY2021 promotion process. The reviews were an effort to provide strategic feedback on effectively communicating accomplishments and tying them to larger Agency initiatives and goals. New braille equipment was purchased by Capabilities/Cybersecurity to establish corporate braille printing services because of a study conducted by Rochester Institute of Technology. Employees from Capabilities/Cybersecurity and the Office of Reasonable Accommodations and Accessibility were trained in software and hardware over a 3-day period in December 2021. Feedback received from braille customers resulted in successful embossing of new types of braille projects such as flyers and business cards.

B. CAREER DEVELOPMENT OPPORTUNITIES

The Career Guidance Center (CGC) and the PWD ERG are collaborating to apply the lessons learned from the Career Empowerment Group held in fall of 2021 in creating a series of career development briefings for Employee Resource Group members. The efforts are aimed at fostering a closer collaboration between the CGC and PWD ERG. A working group collaborated with Human Resources to add a prompt into HR notifications sent when an employee is hired into a new position, to encourage them to communicate with their new supervisor about their approved reasonable accommodations. In addition, the notification prompts managers hired into new positions to speak with their employees about their reasonable accommodations.

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

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

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-14 and GS-13. There are no triggers for Internal PWD Selections at the SES level or Grade GS-14.

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

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 level.

Triggers exist for Internal PWTD Selections at Grades GS-15, GS-14, and GS-13.

Fails to meet 4/5th rule: GG-15, GG14, and GG13.

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

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 a 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. The notice explaining employees and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint was posted on the external and internal Agency webpages in 2020. Employees and applicants' rights under the Architectural Barrier Act, including a description of how to file a complaint, is provided via direct link from the Diversity, Equality & Inclusion Accommodations & Accessibility webpage of the NSA.gov website.

NSA's National Cryptologic University (NCU) in partnership with the Diversity, Equality & Inclusion group and the Chief Information Officer (CIO's) Information Communication Technology and Accessibility Team released the ALLY1007: Accessibility with MS Office and PDFs course, which teaches how to make emails, documents, spreadsheets, and presentations accessible.

A working group analyzed information gaps pertaining to disability topics and created content to input into already established workforce and manager's resources. Another working group is collaborating with Occupational Health, Environmental & Safety Services (OHESS) Emergency Management Team to better communicate information on PWD preparedness in emergencies via webpage content and mass messages to the workforce. An additional working group is collaborating with Capabilities to test platforms and evaluate hand held technology for hand held speech-to-text solutions.

The Installations & Logistics (I&L) organization has a 10-year plan to continually review and survey the buildings and exteriors to identify areas where NSA can provide improved accessibility. Existing program elements are under evaluation to determine opportunities for improvement. Due to travel restrictions, nationwide inspections were on hold for FY2021, however full inspection of two local sites was completed in addition to mini-audits in the local Maryland area. The team is on track to reinstitute onsite inspections for FY2022. 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 DEI. The primary cafeteria upgrade design was completed and design renovations kicked-off this year. This includes a full infrastructure renovation; the cafeteria will meet the latest ABA requirements to ensure accessibility to be completed in FY2022.

NSA has been the model Intelligence Community component in providing Information and Communications Technology (ICT) to its workforce. In 2020-2021, the NSA's ICT Accessibility Team drove key initiatives and programs to establish accessibility as a core value and requirement in development, deployment, and acquisition.

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 accommodations process provides guidance on how to request a workplace accommodation. The process from request to implementation takes approximately 7-21 days.

Disability awareness training has been developed for coworkers, managers, recruiters, and hiring managers and is mandatory every 3 years. There is also sensitivity training available upon request as a workplace accommodation. Trends are monitored and adjustments made in the accommodations implementation process when a high frequency of requests for particular accommodations, implementation time, accommodations equipment requested, security requirements and limitations, location of disabled employees, and total number of accommodations requests is identified.

ASL Interpreting statistics are reviewed on a quarterly basis to identify trends and implement solutions as needed. The statistics are forwarded to the Diversity, Equality & Inclusion Senior Leadership level.

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.

During FY2021, Well-Being Services (WBS) assumed management of Personal Assistance Services (PAS). This new alignment with other employee assistance, work/life and health/education programs supports continued program efficiency. The objective of PAS is to provide safe, timely assistance with basic activities of daily living such as toileting, assistance with removing or putting on clothing, and eating during duty hours to NSA civilians and applicant personnel with targeted disabilities.

The Agency posts procedures for requesting PAS on both external and internal websites for the benefit of applicants and employees.

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. The government-wide average for formal complaints filed by people with disabilities for harassment is 20.82% and for failure to accommodate is 14.02%.

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 implemented 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.