



NATIONAL SECURITY AGENCY  
CENTRAL SECURITY SERVICE

# FY2022 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 4<sup>th</sup> 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 not designated sufficient qualified personnel to implement its disability program during the reporting period. Additional Reasonable Accommodations Manager positions are needed to efficiently process increasing numbers of reasonable accommodations requests.

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.
- One full-time employee and eleven collateral duty employees in Installations and Logistics to oversee compliance to the Architectural Barriers Act.
- One full-time and six collateral duty Special Emphasis Program Managers 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.
- Four full-time, four part-time and one collateral duty employee 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 (RAM) 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. RAMS obtained additional training through 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 Sign Language Interpreters completed courses and activities as part of the Job Quality Standard 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 attended individually through the NCU. Agency Captioners completed required training to maintain their professional certifications.

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

Additional funding and other resources are required for sign language interpreters (staff and contractor), CART/captioning and personal assistance services (PAS). The Office of Reasonable Accommodations and Accessibility partners with Installations & Logistics, 508 Compliance support, and the Disability/Diversity Recruitment Program Manager for external recruitment to support employees and applicants. NSA is consistently able to procure funding, as needed, for the disability program – challenges exist primarily in filling key positions.

## 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 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](http://www.IntelligenceCareers.gov). In FY2022, 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. In August 2022, NSA won the DOD Award for Achievements in employing individuals with disabilities.

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-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 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 FY2022, for hiring applicants who self-identify as a Person with a Disability or a Person with a Targeted Disability. In 2022, NSA's hiring included 14% PWD and 3% PWTD, exceeding the federal representation goals of 12% PWD and 2% PWTD.

NSA's external hiring is under the authorization of the DoD 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.

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 IV: 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 advertises various leadership and training opportunities to the entire workforce annually via Agency-wide messages, blog posts, and multi-vision advertisements. The PWD ERG invites program directors to attend monthly meetings to advertise specific leadership, training, and mentorship opportunities to the membership.

The Job Enrichment Board (JEB), accessible to all employees, is a resource to obtain information on short-term, special project, volunteer, shadowing, and detail opportunities to enhance career growth. The JEB matches qualified candidates with available opportunities posted online via the Agency intranet.

Upcoming FY23 implementation of the Scalequality tool, to identify gender-coded and ability-based words in vacancy ads, will ensure language that might discourage qualified candidates from applying for positions is avoided in vacancy ads. To use the tool, a hiring manager inputs draft vacancy text into Scalequality and receives feedback with gender and ability-coded words highlighted and identified.

In FY2022, to support the Affirmative Action Plan efforts and to ensure career readiness of persons with disabilities, the agency engaged in proactive efforts to increase advancement opportunities. To assist supervisors with assessing employees' job performance with and without reasonable accommodations a draft guidance document was written, based on EEOC standards, for future release to the workforce in partnership with Human Resources.

The PWD ERG solicited Agency volunteers to review promotion packages written by employees with disabilities prior to submission for the FY2022 promotion process. The reviews were an effort to provide strategic feedback on effectively communicating accomplishments and tying them to larger Agency initiatives and goals. The Career Guidance Center, in partnership with the Persons with Disabilities Employee Resource Group, facilitated a career empowerment group focused on the needs of individual employees with disabilities.

Human Resources collaborated with the Office of Reasonable Accommodations and Accessibility to include a statement regarding reasonable accommodations in all internal staffing vacancy announcements. With the goal of attracting the greatest number of qualified candidates, the statement invites employees who possess the right skills and knowledge for a vacancy but who have concerns regarding potential accommodations needed to perform the essential job functions to contact the Office of Reasonable Accommodations and Accessibility. The purpose of the statement is to ensure employees with a disability do not opt out of applying for positions due to perceived requirements without first exploring whether effective reasonable accommodations are available. Efforts are underway to identify further affirmative activities for implementation in the future.

### B. CAREER DEVELOPMENT OPPORTUNITIES

The Agency annually hosts formal and informal career development opportunities for employees. NSA's Mentoring and Shadowing Resource Center promotes and facilitates a variety of enterprise-wide mentoring activities. The newly created Director's Skills Enrichment Program is open to all employee via application process. The purpose is to develop diverse and effective prospective leaders in the workforce through experiential opportunities focused on skills development and mission exposure as well as mentoring and networking.

The Career Guidance Center (CGC) is the primary resource to help all employees who want 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. The CGC has been fostering a close collaboration with the PWD ERG to capitalize on the success of Career Empowerment Group sessions held in 2021/2022. A Career Advisor in the CGC attends PWD employee resource group meetings to solicit input on CGC services and to personally invite members to events and inform about upcoming career development opportunities. The CGC also presented employees in the Deaf/Hard of Hearing Subcommittee with information on determining future career paths and goals, mentoring, networking, and informational interviewing.

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. Triggers exist for Qualified Internal PWD Applicants at Grade GS-15.

There are no triggers for Qualified 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 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 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

Not applicable. NSA's external hiring is under the authorization of the DoD 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 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.*

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

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



The Installations & Logistics (I&L) 10-year plan includes continual review, building and exterior surveys to identify potential accessibility improvements. I&L surveyed two major buildings at headquarters and one remote command site (three locations) in CY2022. Planning is underway for FY23 sites 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 DEIA. In FY22, I&L included experiential input from PWD ERG members on new facility features. Feedback is implemented to improve usability of the features beyond minimum compliance. Employees can report concerns to I&L and track how they are being handled via notification system. I&L 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. NSA began a full infrastructure renovation of the Agency's primary cafeteria in FY2020. Completed in FY2022, the cafeteria meets the latest ABA requirements to ensure accessibility.

The Enterprise Accessibility Council (EAC) was chartered in November 2021 and has developed 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 I&L and 508 Compliance groups. In FY2022, the Council released an article to advertise the availability and process to request braille printing as a service. The group is pursuing on-going projects that will progress accessibility efforts in the areas of parking, mission and meeting tools, and procedures for occupant and personnel notifications.

NSA hosted the 4th IT Accessibility Symposium (Oct 2021) with hundreds of virtual participants focusing on the accessibility of electronic and information technology. The Accessibility Symposium included informational seminars, inspirational stories, a chance to ask questions, and an opportunity to hear about the progress the IC is making towards accessibility.

In FY2022, NSA was integral to the development of the current IC Accessibility Program Maturity Model, an IT accessibility self-assessment tool for the IC to assess level of maturity. The agency self-assessed as "Emergent" with processes that are functional and promising, with a formal IT accessibility program office with a full-time PM position established, and policy standards developed. The NSA 508 Compliance Group hosted Accessibility 101 sessions, and recorded Accessibility tutorials for enterprise awareness and education on IT accessibility, to include agency-wide articles on IT accessibility. Finally, NSA 508 Compliance Group has consistently made improvements in the auditing and rating of IT accessibility products and applications by twice releasing and utilizing an updated IT accessibility scoresheet in FY22, encompassing additional WCAG and Trusted Tester standards for increased clarity of IT accessibility requirements and usability functions in line with agency Policy 6-38. NSA has been the model intelligence Community component in providing Information and Communications Technology 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.

In collaboration with Occupational Health and Well-Being's (OHWB) Emergency Management Team, a working group drafted and finalized a guidance tool to better equip the workforce with information on evacuation procedures for individuals with disabilities impacting mobility. The working group is collaborating with OHWB Emergency Management Team to better communicate information on PWD preparedness in emergencies via webpage content and mass messages to the workforce.

NSA operationalized feedback derived from an Office of the Director of National Intelligence survey regarding hearing device usage. Within 3 months of receiving feedback, Security implemented substantive changes to provide greater clarity regarding technical restrictions and the approval process for medical devices.

In addition, a working group completed the foundational work necessary to begin a pilot for speech-to-text accessibility solutions. The working group is collaborating with Capabilities to test platforms and evaluate handheld technology for handheld speech-to-text solutions.

### 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 Agency's policy regarding reasonable accommodations was updated in FY2022 with an anticipated release to the workforce in FY2023. ASL interpreting statistics are reviewed on a quarterly basis to identify trends and implement solutions as needed. The statistics are forwarded to the Diversity, Equity, Inclusion and Accessibility Senior Leadership level.

The reasonable accommodations 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 7-21 days. Trends are monitored and adjustments are 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.

In FY2022, a gap in administrative services for employees with disabilities was addressed when a new administrative services contract was established. The new contract enabled a wider range of performance of essential job functions by assisting employees with tasks such as note taking, lifting and moving work-related items, physically assisting with office equipment and other work-related task assistance. Remote captioning services via IP and desktop capabilities were developed to provide remote CART/captioning for employees with disabilities.

Disability Awareness Training has been developed for coworkers, managers, recruiters, and hiring managers and is mandatory every 3 years. Staff in the Office of Reasonable Accommodations and Accessibility fulfill requests for tailored training on various disability topics on an ad-hoc basis. In FY2022, a working group added information about the Job Accommodations Network to the internal website that houses reasonable accommodations information to expand the resources available to the workforce regarding the interactive process and potential accommodations solutions. The Office of Reasonable Accommodations and Accessibility also overhauled feedback mechanisms to elicit more frequent, timely, and detailed feedback.

### 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.*

Well-Being Services continued management of Personal Assistance Services (PAS) in FY2022. Well-Being Services and the Office of Reasonable Accommodations and Accessibility partner closely to best meet applicants' and employees' service requirements and ensure that care is supportive and timely. The PAS program standard operating procedures are available at: [https://media.defense.gov/2021/Sep/26/2002861847/-1/-1/0/WORKPLACE\\_CARE\\_SOP.PDF](https://media.defense.gov/2021/Sep/26/2002861847/-1/-1/0/WORKPLACE_CARE_SOP.PDF).

## 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 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.

There were no findings of discrimination or settlement agreements involving the failure to provide a reasonable accommodation during the last fiscal year.

## 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.*

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.

In 2018, the agency completed a full barrier analysis. Promotion rates for persons with disabilities were lower in all grades when compared to employees without a disability. Final recommendations were made to eliminate the identified barriers.

As of the end of FY2022, 12 of 17 recommendations were completed. Promotion rates for PWD were higher than for employees with no disability at grades 7 and 9 in 2022. PWTD was higher than no disability at grade 11. Activities remain in progress with continuous monitoring of the impact.