

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

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

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.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 C.F.R. § 1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with reportable and targeted disabilities in the federal government.

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.
  - a. Cluster GS-1 to GS-10 (PWD) Answer: No
  - b. Cluster GS-11 to SES (PWD) Answer: Yes

This report presents results for both persons with disabilities (PWD) and persons with targeted disabilities (PWTD) calculated in two ways to assess against the specific numerical goals found in EEOC regulations to identify the presence of any triggers. A trigger is a trend, difference, variance, outlier, or anomaly that suggests the need for further inquiry into a particular policy, practice, procedure, or condition. Statistics are only a starting point for analysis, which considers statistics in the totality of the circumstances. First, this report shares results based on established crosswalks between General Schedule (GS) grades and the SEC's alternative pay plan SK grade levels. For the GS to SK levels, the grade levels, with corresponding numbering in the SK structure, are the same as in the General Schedule. Hence, an SK-11 is the same as a GS-11. The SEC's Senior Officer ranks are the SEC's highest level leadership, in the same manner as is the Senior Executive Service at other Agencies.

Second, this review presents cluster results based on locality adjusted salary, as specified in the revised regulations implementing Section 501 of the Rehabilitation Act, compared to the locality adjusted salary of a GS-11, step 1, in the Washington, DC area. For FY 2017, that salary was \$66,510.

The Agency did not identify an anomaly involving PWD in the SK-01 to SK-10 grade level cluster in the permanent workforce; 22.30% of permanent employees in this cluster were PWD compared to the 12% benchmark.

The Agency noted an anomaly involving PWD in the SK-11 to SO grade level cluster; 6.63% of employees in these higher grade levels were PWD compared to the 12% benchmark.

For employees with salaries below a GS-11, step 1, the Agency did not have a trigger involving PWD; 31.82% of employees in this cluster were PWD compared to the 12% benchmark.

For employees with locality adjusted salaries above a GS-11, step 1, the Agency noted a difference involving PWD; 7.03% of employees in this cluster were PWD compared to the 12% benchmark.

\* For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

a. Cluster GS-1 to GS-10 (PWTD)

Answer: No

b. Cluster GS-11 to SES (PWTD)

Answer: Yes

Applying the same comparisons to PWTD as described in section I.1, the SEC presents information on trigger identification among PWTD in the permanent workforce.

In the SK-01 to SK-10 grade level cluster in the permanent workforce, 8.78% of permanent employees in this cluster were PWTD compared to the 2% benchmark. The Agency noted a difference involving PWTD in the SK-11 to SO grade level cluster; 1.56% of permanent employees in this cluster were PWTD compared to the 2% benchmark.

For employees with salaries below locality adjusted GS-11 step 1, the Agency did not have a variance involving PWTD; 4.55% of employees in this cluster were PWTD compared to the 2% benchmark.

For employees with salaries above a GS-11, step 1, the Agency noted a difference involving PWTD; 1.78% of employees in this cluster were PWTD compared to the 2% benchmark. The Agency notes that the one area for PWTD in which a variance was found was a difference very small in magnitude. This difference was found not to be statistically significant.

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

Hiring goals for PWTD (i.e., 2% of the total workforce) are communicated to hiring managers during quarterly Office of Human Resources Steering Committee meetings. Additionally, metrics for disability hiring are published monthly and at the end of the year by the SEC's Office of the Chief Operating Officer. The overall percentage of employees who are PWTD is posted in the Diversity Dashboard sponsored by OMWI and the Diversity Council.

Relatedly, OHR has developed a 2018-2019 Recruitment Strategy, which describes the support and collaboration necessary from senior leadership, OEEO, and OMWI to recruit a diverse candidate base. The Recruitment Strategy includes the following goals, among others:

- Build a pipeline of qualified Schedule A applicants; and
- Improve Veteran recruitment efforts.

The Recruitment Strategy specifically denotes an objective to "Increase workforce representation for people with disabilities and people with targeted disabilities." Specific strategies and tasks in the plan for recruitment explain how this objective will be accomplished.

For specific hiring actions, OHR continues to address special hiring authorities, including Schedule A, in conversations with hiring managers to reinforce progress toward achieving numerical goals. A checklist is used by OHR Staffing Specialists when vacant positions are identified to ensure hiring managers understand all their options for filling positions, including using Schedule A and veterans' hiring authorities

for those applicants with a service-connected disability of 30% or greater. Beginning in April 2017, OEEEO led monthly meetings with a cross-functional working group comprised of representatives from OHR and OMWI, including those who support recruiting, to discuss the MD-715 and the Agency's progress related to equal employment opportunity, participation, and inclusion of employees and applicants for employment. For these monthly meetings, OEEEO provided up-to-date information from the Agency workforce data tables and highlighted areas for discussion, including goals and progress related to the participation and inclusion of PWD and PWTD. In FY 2017, OEEEO developed an automated reporting tool, the Equal Employment Opportunity – Analytic Tool (EEO-AT) that will improve the efficiency and accuracy of information shared with the working group in FY 2018 and going forward. In FY 2018, the material shared through these various channels will be updated to include the broader goal for PWD (i.e., 12% of the workforce) and to report separately on participation of PWD and PWTD for higher and lower level jobs. Information shared in the quarterly Office of Human Resources Steering Committee meetings and metrics in the monthly dashboard published by the Agency's Office of the Chief Operating Officer will also be updated to reflect the defined goals for PWD and PWTD.

## Section II: Model Disability Program

Pursuant to 29 C.F.R. § 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 & COMPETENT STAFFING FOR DISABILITY PROGRAM

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If "no", describe the agency's plan to improve the staffing for the upcoming year.

Answer: Yes

The Agency designates talent acquisition resources and FTE to Special Programs classification, recruitment, and staffing in support of the disability program

2. Identify all staff responsible for implementing the agency's disability employment program by the office, staff employment status, and responsible official.

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	12	0	0	Stephen Brown, Assistant Director, Office of Human Resources, brownst@sec.gov
Answering questions from the public about hiring authorities that take disability into account	12	0	0	Stephen Brown, Assistant Director, Office of Human Resources, brownst@sec.gov
Processing reasonable accommodation requests from applicants and employees	2	2	1	Dia Gonsalves, Disability Program Officer, Office of Human Resources, gonsalvesd@sec.gov

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Section 508 Compliance	1	0	0	Remi Pavlik-Simon, Policy and Administration Branch, Office of Information Technology PavlikSimonR@sec.gov
Architectural Barriers Act Compliance	0	0	3	Ray Ferrari, RA, LEED AP, Architect, FerrariR@sec.gov Jillian Bates, RA, LEED AP, Architect, Carla Hairston, Program Analyst
Special Emphasis Program for PWD and PWTD	2	0	0	Stephen Brown, Assistant Director, Office of Human Resources, brownst@sec.gov

3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If “yes”, describe the training(s) that disability program staff have received. If “no”, describe the training(s) planned for the upcoming year.

Answer: Yes

The two full-time employees who work on the disability program staff came to the Agency with significant experience in the federal government’s reasonable accommodation programs and the responsibilities inherent in responding to reasonable accommodation requests. They periodically attend training programs and review recent case law to stay apprised of the current developments in this area. Additionally, the Disability Program Manager and Disability Program Officer complete courses specific to recruiting, accommodating, hiring, and retaining PWD via OPM’s HR University and the SEC’s Learning Management System, LEAP, in addition to the general training received.

More generally, all of the SEC’s HR Specialists have completed training courses related to staffing and placement offered by the USDA Graduate School or OPM and through various other platforms. The Agency’s training and development office also offers learning options that include processing applications for PWD. The Agency will continue these practices in the future.

In the coming year, changes are planned in line with implementation of requirements and recommendations under Section 501 of the Rehabilitation Act, as amended. Those changes will require more focused and specific training on related policy and procedure post implementation for both HR Specialists and disability program staff.

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

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If “no”, describe the agency’s plan to ensure all aspects of the disability program have sufficient funding and other resources.

Answer: Yes

The Agency was resourced adequately during the reporting period to meet the needs to successfully implement the disability program.

### Section III: Program Deficiencies in the Disability Program

In Part G of its FY 2017 MD-715 report, the agency identified the following program deficiencies involving its disability program:

Program Deficiencies	Agency Comments
Are 90% of accommodation requests processed within the frame set forth in the agency procedures for reasonable accommodation?	(Please see Part H.)

### Section IV: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. § 1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency’s recruitment program plan for PWD and PWTD.

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

1. Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.

OHR has taken steps toward improving the participation of PWD and PWTD in applicant pools. As outlined in OHR’s 2018-2019 Recruitment Strategy, the SEC will begin to organically realize an increase in the overall representation of people with disabilities by using effective recruitment and outreach efforts that brand the Agency as an employer of choice.

The following provides detail on recruitment-related activity during FY 2017 to identify and encourage applications from potentially qualified PWD and PWTD.

The Agency attended the National Federation of the Blind Job Fair, Careers & the Disabled Magazine’s Career Expo, Corporate Gray Military Job Fair, and Hiring Our Heroes & the American Legion Job Fair. These events allowed the SEC to reach a key constituency and promote a variety of positions.

The SEC also hosted its second annual Informational and Networking Event for Individuals with Disabilities at SEC Headquarters. The event provided guests the opportunity to learn more about the SEC’s mission, hear about the Agency’s benefits and reasonable accommodations, and network with SEC hiring managers. The SEC hosted this event in an effort to continue building a pipeline of applicants for future vacancies and educate prospective applicants on the SEC recruitment, hiring, and RA processes. After this event, OHR shared contact information for attendees with hiring managers for their consideration.

The SEC created an internal resume database for applicants with disabilities that is accessible to hiring managers for all hiring actions.

The SEC plans to continue these efforts in FY 2018.

In FY 2018, OHR will continue to leverage the Disability Issues Advisory Committee for recruitment resources and assistance. Further, OHR will continue to retain and review applications from people with disabilities for future openings and will conduct targeted outreach to connect with qualified candidates by collaborating with community-based partners such as nonprofit organizations, national and local disability organizations, and federally funded state and local employment programs.

2. Pursuant to 29 C.F.R. § 1614.203(a)(3), describe the agency's use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce.

The Agency uses a variety of available resources that support hiring through Schedule A and other hiring authorities that take disability into account.

During FY 2017, the Special Programs Manager identified potential candidates from the Workforce Recruitment Program database for Schedule A hiring.

The Special Programs Manager sourced potential candidates for open positions from the OPM's Shared List of People with Disabilities.

The Special Programs Manager is registered to receive notifications and newsletters from the following groups and transmits information to OHR staff engaged in recruiting:

- EARN – Employer Assistance Resource Network: <http://askearn.org>.
- JAN – Job Accommodation Network <http://askjan.org>
- ODEP – Office of Disability Employment Policy, Department Of

Labor: <http://www.dol.gov/odep/>

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority and (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

The SEC's administrative regulations on its Veterans Employment Program provides instruction for hiring veterans with disabilities and was last updated in January 2017.

The Agency's administrative regulations are available upon request.

The following describes two procedures for processing applications under the Schedule A hiring authority for persons with disabilities, one used in response to a specific vacancy posting and the other for unsolicited Schedule A applications.

The Office of Human Resources processes Schedule A applications in response to a Job Opportunity Announcement (JOA).

Applicants, who wish to be considered for a specific vacancy under the Schedule A hiring authority, must submit the appropriate documentation when applying for a current open JOA. The SEC defers to the OPM-identified appropriate documentation. Applications are reviewed by HR Specialists to determine if the applicant is minimally qualified as identified in the JOA. If the applicant is minimally qualified, that individual is referred to the hiring manager on a separate certificate of eligible candidates. HR Specialists provide written guidance to hiring managers via email that explains how Schedule A applicants can be selected once the certificate has been issued.

The Office of Human Resources also processes unsolicited Schedule A applications.

Applicants who wish to be considered under the Schedule A hiring authority, outside the process for a specific vacancy posting, must submit the appropriate documentation as identified by OPM with their application. The Special Programs Manager will proactively contact the prospective applicant if the individual did not submit the required documentation. The application will not be processed until the appropriate documentation is received.

Resumes submitted directly to the Special Programs Manager are reviewed to determine the potential job series the applicant may be suitable for based on the knowledge, skills, and abilities identified on the applicant's resume. Building a pool of qualified candidates is important to the SEC; as such, the Agency has developed a Schedule A Resume Database.

The SEC process for hiring starts with a Staffing Action Request Form (SARF)

submitted by the hiring manager. When a SARF is received by OHR, the Special Programs Manager compiles a certificate of eligible candidates from the database per the job series and refers candidates to hiring managers. In some cases, the Special Programs Manager conducts a one-on-one consultation with the hiring manager to discuss the certificate of eligible candidates, as appropriate.

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If “yes”, describe the type(s) of training and frequency. If “no”, describe the agency’s plan to provide this training.

Answer: Yes

OHR has developed a 2018-2019 Recruitment Strategy which describes the Agency’s commitment to educating the SEC workforce on special programs for people with disabilities. In addition, OHR and DIAC co-sponsored a Disability Resources Showcase in which all SEC employees, including hiring managers, were invited to learn about several disability resources, including the Schedule A hiring authority. In FY 2017, new SEC managers participated in mandatory training as part of the LD 307 Fundamentals of Human Resource Management training. Specific sections in the Fundamentals of HR Management highlight special hiring authorities, including Schedule A, and requests for reasonable accommodation in the job application process. The Disability Program Officer presents this training content. The Disability Program Manager speaks at DIAC meetings/events on a regular and recurring basis on a variety of topics, including the hiring authorities that take disability into account.

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

Describe the agency’s efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

The SEC’s Special Programs Manager makes a concerted effort to establish and maintain contact with organizations that assist PWD in securing and maintaining employment. The Special Programs Manager updates the SEC’s list of affinity organizations to maintain contact and foster relationships for recruitment events and candidate sourcing.

The Special Programs Manager maintains an ongoing relationship with the SEC’s Disability Interests Advisory Committee and the Veterans Committee.

In addition to outreach and recruitment efforts conducted by OMWI and described elsewhere in this report, OHR took steps to ensure the SEC has a pipeline of talent in the disability and veteran communities by:

- Building relationships with over 10 professional organizations that handle disability and veteran affairs;
- Hosting onsite networking events for potential candidates;
- Attending several disability- and veteran-focused career fairs and events; and
- Strengthening partnerships with internal affinity groups in an effort to bring awareness to SEC personnel regarding disability and veteran hiring initiatives.

To improve its outreach to veterans, including those with disabilities, the SEC participated in two Vets on Wall Street events and is in the process of implementing an Operation Warfighter (OWF) internship program. The SEC also addressed



professional veteran-focused organizations and veterans' hiring events.

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

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If "yes", please describe the triggers below.
  - a. New Hires for Permanent Workforce (PWD)      Answer: Yes
  - b. New Hires for Permanent Workforce (PWTD)      Answer: Yes

Data from FY 2017 presented in Table B8 was reviewed for evidence of differences in hiring into the permanent workforce. From these data, the Agency did identify an anomaly in the participation rate for PWD among new hires in the permanent workforce. In FY 2017, the participation of PWD among permanent new hires was 5.30% as compared to the goal of 12%.

The Agency also noted a difference in the participation of PWTD among new hires. In FY 2017, the participation of PWTD among permanent new hires was 0.76% as compared to the goal of 2%.

The Agency notes that the hiring freeze, implemented early in FY 2017, impacted the efforts towards filling open positions and affected results toward increasing the participation of PWD and PWTD.

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below.
  - a. New Hires for MCO (PWD)      Answer: Yes
  - b. New Hires for MCO (PWTD)      Answer: No

FY 2017 data that underlie Tables B7 and B8 was reviewed for evidence of triggers in the hiring of permanent employees into MCO positions. Triggers did not exist in the Accountant, IT Management, Attorney, or Economist MCOs. No triggers were found in permanent new hires for PWTD. A difference was found for PWD in the Securities Compliance Examiner occupation.

To assess these differences, the percentage of PWD in the permanent new hires from Table B8 for each occupation was compared to the qualified applicant pool in the data from Table B7. As described above (see Part E, Section II.C.2, *supra*), the applicant flow data in Table B7 summarizes the phases of the hiring process through selection for vacancies that were posted and closed through USAJOBS during the fiscal year. The data in Table B7 and the qualified applicant pool data summarized here reflect the pool of applications deemed qualified for permanent and/or temporary vacancies announced through USAJOBS during FY 2017.

In contrast, Table B8 presents data on permanent new hires onboarded during the course of the fiscal year. Some newly-hired staff applied for a vacancy posted in a prior fiscal year. Differences may be observed in comparing the demographic statistics of the qualified applicant pool in Table B7 and that of new hires onboarded in Table B8. Triggers comparing the composition of PWD and PWTD in applicant flow versus new hire data should be interpreted with these difference in mind.

For Economists, the qualified applicant pool was 0.00% for PWD and PWTD.

*[Redacted to protect privacy]* No trigger was evident in these data. For Attorneys, the qualified applicant pool was 1.38% PWD, and the qualified

applicant pool for PWTD was 0.88%. [Redacted to protect privacy] PWD were 5.08% of newly-hired permanent attorneys, and PWTD were 1.69% of permanent new hires. No trigger was found in these data.

For Accountants, the qualified applicant pool for PWD was 0.71%, and PWD were 11.11% of permanent new hires. [Redacted to protect privacy] The qualified applicant pool was 0.00% for PWTD, and PWTD were 0.00% of permanent new hires. Again, no trigger is found in these data.

For IT Management, no applicant flow data were collected from postings during FY 2017; therefore, the qualified applicant pool was 0.00% PWD, and PWD were 12.5% of new hires. [Redacted to protect privacy] The qualified applicant pool was 0.00% PWTD, and none of the permanent new hires were PWTD. [Redacted to protect privacy] For Securities Compliance Examiners, a difference was identified for PWD. The qualified applicant pool was 3.13% PWD, and no permanent new hires were PWD. No anomaly was evident in new hires for Securities Compliance Examiners. The qualified applicant pool for PWTD was 0.00%, and none of permanent new hires were PWTD. [Redacted to protect privacy]

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified *internal* applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

a. Qualified Applicants for MCO (PWD) Answer: Yes

b. Qualified Applicants for MCO (PWTD) Answer: Yes

In the FY 2017 data presented in Table B9, differences were identified in the participation of PWD in the qualified internal applicants for competitive promotions as compared to the relevant applicant pool (RAP) within three of the SEC’s MCOs, i.e., Attorney, Accountant, and Securities Compliance Examiner.

The RAP was defined for each MCO based on the number of employees holding the same MCO series and in the SK-levels encumbered at the Agency between SK-11 and SK-16. Specifically, for Attorneys, the RAP included all employees in the 0905 series; for Accountants, the RAP included all employees in the 0510 series; for Securities Compliance Examiners, the RAP included all employees in the 1831 and the 0501, Financial Administration and Program series; and for the Information Technology Management occupation, the RAP included all employees in the 2210 series.

Differences were also identified for PWTD within the internal competitive promotion data for the MCOs Attorney, Accountant, and Securities Compliance Examiner.

No internal competitive promotions were processed for Economists or IT Management; therefore, no anomaly was found for PWD or PWTD in those occupations.

For Attorneys, the RAP for PWD was 4.39%, and PWD represented 2.53% of the qualified internal applicants. The RAP for PWTD was 1.38%, and PWTD were 0.00% of the qualified internal applicants for Attorneys. For Accountants, the RAP for PWD was 5.87%, and PWD were 0.00% of the qualified internal applicants. The RAP for PWTD was 1.11%, and PWD were 0.00% of the qualified internal applicants. For Securities Compliance Examiners, the RAP for PWD was 6.94%, and PWD

represented 2.56% of the qualified internal applicants. The RAP for PWD was 1.16%, and PWTD were 0.00% of the qualified internal applicants. For Economists, there were no internal vacancies posted. *[Redacted to protect privacy]*  
 For IT Management, there were no internal vacancies posted. *[Redacted to protect privacy]*

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.
- |                              |             |
|------------------------------|-------------|
| a. Promotions for MCO (PWD)  | Answer: Yes |
| b. Promotions for MCO (PWTD) | Answer: No  |

In the FY 2017 data presented in Table B9, a difference was observed when comparing participation of PWD among those selected for promotion with their participation among the qualified internal applicant pool (QAP) in the Securities Compliance Examiner occupation. The QAP for PWD was 2.56%, and 0.00% of those promoted were PWD. The QAP for PWTD was 0.00%, and 0.00% of those promoted were PWTD. *[Redacted to protect privacy]*  
 In the Attorney occupation, there were no differences among those selected for internal promotions. The QAP for PWD was 2.53%, and 8.33% of those selected for promotion were PWD. The QAP for PWTD was 0.00%, and PWTD were 0.00% of promotions. *[Redacted to protect privacy]*  
 In the Accountant occupation there were no triggers among internal promotions. The QAP was 0.00% for PWD and PWTD, which drove a result of 0.00% among internal promotions for PWD and PWTD. *[Redacted to protect privacy]*  
 In the Economist and IT Management occupations there were no internal promotions during FY 2017, so no triggers were identified.

## Section V: 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. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

### **A. ADVANCEMENT PROGRAM PLAN**

Describe the agency's plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

To promote equal employment opportunity, the Agency takes a number of steps to ensure that opportunities for advancement are open and available to all, including PWD and PWTD, in the workforce. Information about training and career development options is widely shared with the workforce. The following describes those efforts to promote opportunities for advancement.

- OHR implemented and maintains a new, user-friendly, interactive portal, AskHR, on the SEC's intranet, which provides employees with information about hiring,

compensation and benefits, employee development, performance management, and disability accommodations, among a number of other topics. In addition, all employees receive a daily communication, SEC Today, which highlights important information about events and opportunities for details, training, and SEC staff accomplishments.

- The Chief Human Capital Officer is an active member of the SEC Veterans Committee, which hosts a website that includes information concerning veterans' benefits, to include a link to the Feds Hire Vets website that highlights special hiring authorities for veterans.

- DIAC regularly communicates with its membership, which includes PWD and PWTD, about its own activities, other events, developmental opportunities, and circulates job postings and support available to the workforce. These more targeted communications help ensure that PWD and PWTD are aware of the available options and any processes for requesting participation or enrollment.

## B. CAREER DEVELOPMENT OPPORTUNITIES

1. Please describe the career development opportunities that the agency provides to its employees.

The SEC provides numerous opportunities for employees to acquire the skills and certifications needed to succeed in their technical positions and to progress in their careers. Classroom-style and e-Learning programs offer an extensive array of learning opportunities in technical areas (e.g., courses on Hedge Funds, Mutual Funds, and Credit Derivatives, etc.) as well as in leadership development to SEC senior leaders and non-supervisory staff alike.

The SEC's robust training program also offers seminars targeted to specific audiences, including Senior Officers, managers, and employees, covering relevant subject matter.

In FY 2017, OHR implemented enhancements to its Learning Management System, LEAP. Within this system's MyCareer@SEC module, employees can find information about career paths mapped to their current position, the responsibilities and occupational requirements of positions in that career path, and options for training and development that would enable them to progress toward their career goals. SECU established initial career paths based on prior projects to define competency requirements for a variety of occupations. In FY 2018, OHR and SECU will gather additional data to support the competency development of professional and leadership positions to enhance the value of the new LEAP career path options. Relatedly, in FY 2018, the Agency will solicit input and consider options for the design of a mentoring program that will support the career development of all employees, including PWD and PWTD, into and within leadership levels.

Among the many career development options for SEC employees, the Agency offered four career development programs in FY 2017: Women in Leadership, Excellence in Government Fellows Program, Aspiring Leaders, and Upward Mobility. Data about applicants and participants in these programs is presented in Table B12.

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

a. Applicants (PWD)

Answer: Yes

b. Selections (PWD)

Answer: Yes

From the FY 2017 data presented in Table B12, this report summarizes information on career development data in three groups: career development programs for employees in grades SK-05 to SK-12, career development for SK-13 to SK-14, and career development for SK-15 to SK-17.

The following summarizes comparisons between the participation of PWD and PWTD in first, the relevant applicant pool (RAP) and the applicants for career development programs and second, between the applicants for and selections/participants in career development programs for employees in these grade levels.

In the SK-05 to SK-12 programs, the Agency did find an outlier among PWD applicants for career development. The RAP was 15.18% PWD, and applications from PWD were 13.89%. The Agency also noted a difference among PWD participants; PWD were 7.14% of participants, and 13.89% of applicants.

In the SK-13 to SK-14 programs, the Agency did not have a trigger among applicants for career development. The RAP was 6.89% PWD, and applications from PWD were 10.34%. The Agency noted a difference among PWD participants. PWD were 1.72% of participants, and 10.34% of applicants.

In the SK-15 to SK-17 programs, there was an anomaly among applicants for career development. The RAP was 4.99% PWD, and applications from PWD were 0.00%. The Agency did not find a trigger among PWD participants. PWD were 0.00% of participants, and 0.00% of applicants.

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

- |    |                   |             |
|----|-------------------|-------------|
| a. | Applicants (PWTD) | Answer: Yes |
| b. | Selections (PWTD) | Answer: Yes |

Applying the same comparisons to PWTD as described in section IV.2.b, this report presents information on participation in career development programs among PWTD. In the SK-05 to SK-12 programs, the Agency did not find a trigger among PWTD applicants for career development. The RAP was 5.43% PWTD, and PWTD were 11.11% of applicants. The Agency did note an anomaly among PWTD participants. PWTD were 0.00% of participants, and 11.11% of applicants.

In the SK-13 to SK-14 programs, the Agency did not find a trigger among applicants. The RAP was 1.62% PWTD, and PWTD were 3.45% of applicants. The Agency did note a difference among PWTD participants. PWTD were 0.00% of participants, and 3.45% of applicants.

In the SK-15 to SK-17 group, the Agency did note a difference among applicants. The RAP was 1.35%, and 0.00% of applicants were PWTD. The Agency did not have an anomaly among PWTD participants. PWTD were 0.00% of participants and 0.00% of applicants.

## C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If "yes", please describe the trigger(s) in the text box.

a. Awards, Bonuses, & Incentives (PWD) Answer: Yes

b. Awards, Bonuses, & Incentives (PWTD) Answer: Yes

In the FY 2017 data reflected in Table B13, the Agency presents information on awards distributed to employees during the year as part of its Employee Recognition Program.

The inclusion rate for PWD was calculated by comparing the number and percent of employees with disabilities (PWD) who received at least one award in each applicable program element to the number and percent of employees without a disability (this category combines persons with no disability and those who did not identify as having a disability) who received at least one award in each applicable program element.

The inclusion rate for PWTD was calculated by comparing the number and percent of employees with targeted disabilities (PWTD) who received at least one award in each applicable program element to the number and percent of employees without a targeted disability (this category combines persons with no disability, those who did not identify as having a disability, and those with a disability that is not targeted) who received at least one award in each applicable program element.

For both PWD and PWTD, the Agency found anomalies in: time-off awards of 9 hours or more and cash awards of more than \$500. A difference was found for PWD in time-off awards of 9 hours or less but not for PWTD. No trigger was found for either PWD or PWTD in the distribution of cash awards of \$100 to \$500.

For time-off awards of 9 hours or less, the inclusion rate for PWD was 24.22%, and the inclusion rate for people with no disability was 27.43%, indicating an anomaly. The inclusion rate for PWTD was 29.63%, and the inclusion rate for people with no targeted disability was 27.15%.

For time-off awards of more than 9 hours, the inclusion rate for PWD was 27.33%, and the inclusion rate for people with no disability was 30.46%. The inclusion rate for PWTD was 25.93%, and the inclusion rate for people with no targeted disability was 30.32%.

For cash awards of more than \$500, the inclusion rate for PWD was 37.58%, and the inclusion rate for people with no disability was 46.13%. The inclusion rate for PWTD was 29.63%, and the inclusion rate for people with no targeted disability was 45.81%.

There was no trigger identified in cash awards of \$100 to \$500. The inclusion rate for PWD was 26.71%, and the inclusion rate for people with no disability was 21.38%.

The inclusion rate for PWTD was 34.57%, and the inclusion rate for people with no targeted disability was 21.52%.

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If "yes", please describe the trigger(s) in the text box.

a. Pay Increases (PWD) Answer: Yes

b. Pay Increases (PWTD) Answer: Yes

To address the question posed here, the following summarizes data from performance-based pay increases distributed under the Agency's Performance Management Program. Data summarized here include those personnel actions coded under nature of action (NOA) Code 891, Regular Performance Pay, in accordance with EEOC instruction for presenting this data. Performance-based awards at the SEC

are also recorded under NOA Codes 885 and 886 for performance rating based lump sum awards. In FY 2017, a significant proportion of the employee population received lump sum payments under NOA Code 885 and/or 886 rather than a pay increase under NOA Code 891.

The inclusion rate was calculated by comparing the number and percent of employees who received a performance-based pay increase (NOA 891) among PWD to the number and percent of employees with no disability (this group includes those who did not identify as having a disability).

For PWD, the Agency found a variance in these performance rating based pay increases. The inclusion rate for PWD was 72.98%, and for people without disabilities and those who did not self-identify with a disability, it was 74.96%.

The inclusion rate for PWTD was calculated by comparing the number and percent of PWTD who received a performance-based pay increase (NOA 891) to the number and percent of employees without a targeted disability (i.e., the combined total of persons with no disability, those who do not identify as having a disability, and those with a disability that is not targeted) who received such a performance-based pay increase.

For PWTD, the Agency found a trigger in performance rating based pay increases. In these performance rating based pay increases, the inclusion rate for PWTD was 74.07%, and for people without targeted disabilities (including those with no disability, those who did not self-identify as having a disability, and those with a disability that is not targeted), it was 74.84%.

The observed differences are small in magnitude and partially driven by recent hiring and onboarding of PWD and PWTD. *[Redacted to protect privacy]*

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

a. Other Types of Recognition (PWD) Answer: N/A

b. Other Types of Recognition (PWTD) Answer: N/A

The Agency instituted a Gift Card Recognition Program in late FY 2016. At the time this report was prepared, data for this program were not available to compare the demographic information of the recipients of this awards program. The Agency plans to conduct analysis of gift cards distributed under this program during FY 2018.

## D. PROMOTIONS

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.
  - a. SES
    - i. Qualified Internal Applicants (PWD) Answer: No
    - ii. Internal Selections (PWD) Answer: Yes
  - b. Grade GS-15
    - i. Qualified Internal Applicants (PWD) Answer: Yes
    - ii. Internal Selections (PWD) Answer: No
  - c. Grade GS-14
    - i. Qualified Internal Applicants (PWD) Answer: Yes
    - ii. Internal Selections (PWD) Answer: No
  - d. Grade GS-13
    - i. Qualified Internal Applicants (PWD) Answer: Yes
    - ii. Internal Selections (PWD) Answer: No

The SEC crosswalks the Agency’s SK alternative pay plan’s senior grade levels to the General Schedule according to the following equivalencies: SES = SO and EX; GS-15 = SK-15 and SK-17; GS-14 = SK-14 and SK-16; GS-13 = SK-13. Table B11 presents the relevant FY 2017 data to assess whether triggers exist with regard to promotions to senior grade levels.

At the SO level, the Agency noted a difference involving PWD among internal selections for promotions. The Relevant Applicant Pool (RAP), comprised of all employees at grade levels SK-14 and higher, was 5.81% and among qualified internal applicants, 5.88% were PWD. *[Redacted to protect privacy]*

At the SK-15 and SK-17 levels (GS-15 equivalent), the RAP, comprised of employees at grades SK-14, SK-15, and SK-16, was 5.80%, while the participation of PWD among qualified internal applicants was 1.56%. The Agency did not have a trigger involving internal selections for senior grade levels at the SK-15 and SK-17 levels; 4.76% of selections were PWD compared to their participation among qualified internal applicants at 1.56%.

At the SK-14 and SK-16 levels (GS-14 equivalent), the RAP, comprised of employees at grades SK-13, SK-14, and SK-15, was 6.36%, and the participation of PWD among qualified internal applicants was 2.88%. On the other hand, 6.25% of selections were PWD compared to 2.88% of qualified internal applicants.

At the SK-13 level (GS-13 equivalent), the Agency identified a difference involving PWD among qualified internal applicants. The RAP was 12.37%, and the participation of PWD among qualified internal applicants was 0.00%. The Agency did not have a trigger involving internal selections. *[Redacted to protect privacy]*



2. Does your agency have a trigger involving PWTB among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

a. SES

- i. Qualified Internal Applicants (PWTB)                      Answer: Yes
- ii. Internal Selections (PWTB)                                      Answer: No

b. Grade GS-15

- i. Qualified Internal Applicants (PWTB)                      Answer: Yes
- ii. Internal Selections (PWTB)                                      Answer: No

c. Grade GS-14

- i. Qualified Internal Applicants (PWTB)                      Answer: Yes
- ii. Internal Selections (PWTB)                                      Answer: No

d. Grade GS-13

- i. Qualified Internal Applicants (PWTB)                      Answer: Yes
- ii. Internal Selections (PWTB)                                      Answer: No

Applying the same comparisons to PWTB as described in section VI.4.a, the Agency presents information on trigger identification for PWTB in promotions to senior grade levels.

At the SO level, the Agency notes that the RAP was 1.37%, and the participation among qualified internal applicants of PWTB was 0.00%. No anomaly was found for the selections to SO positions; *[Redacted to protect privacy]*

At the SK-15 and SK-17 level (GS-15 equivalent), the Agency had an anomaly involving PWTB among qualified internal applicants. The RAP was 1.37%, and among the qualified internal applicants, none were PWTB. No trigger was found for the internal selections to grades SK-15 and SK-17; 0.00% of the qualified internal applicant pool was PWTB. *[Redacted to protect privacy]* At the SK-14 and SK-16 level (GS-14 equivalent), the Agency the RAP was 1.35% while 0.00% of the qualified internal applicants were PWTB *[Redacted to protect privacy]* no trigger was found in these data.

At the SK-13 level (GS-13 equivalent), the Agency had an anomaly involving PWTB among qualified internal applicants. The RAP was 4.47%, and the participation of PWTB among qualified internal applicants was 0.00%. The Agency did not have a trigger involving internal selections. *[Redacted to protect privacy]*

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

- |                             |             |
|-----------------------------|-------------|
| a. New Hires to SES (PWD)   | Answer: No  |
| b. New Hires to GS-15 (PWD) | Answer: Yes |
| c. New Hires to GS-14 (PWD) | Answer: No  |
| d. New Hires to GS-13 (PWD) | Answer: No  |

Applying the same grade equivalencies that were described in section VI.4.a, the Agency presents information on trigger identification for PWD new hires to senior grade levels based on reviewing data underlying Tables B7 and B8. As described above (see Part E, Section II.C.2 and Part J.III.3.a, supra), the qualified applicant pool from Table B7 summarizes data where the applicant self-identified with a disability and was deemed qualified for the position. Data in this pool describe vacancies for permanent and temporary positions with the SEC that were posted in USAJOBS with a closing date during the fiscal year. In contrast, Table B8 presents data on new hires onboarded during the course of the fiscal year; some of whom applied for a vacancy posted prior to the start of the fiscal year. Differences may be observed in the demographic statistics of those selected versus those onboarded as new hires. Triggers comparing the composition of PWD and PWTD in applicant flow versus new hire data should be interpreted with these difference in mind. At the SO level, the Agency did not have a trigger involving PWD among new hires. The qualified applicant pool was 0.00% PWD, and none of the [Redacted to protect privacy] newly hired SOs, four permanent and eight temporary new hires, were PWD. At the SK-15 and SK-17 levels, the qualified applicant pool was 2.65% PWD, however none of the [Redacted to protect privacy] new hires for SK-15 and SK-17 positions were PWD. There were no temporary hires in these grade levels. At the SK-14 and SK-16 levels, the qualified applicant pool was 4.34% while 7.14% [Redacted to protect privacy] of the [Redacted to protect privacy] permanent new hires to SK-14 and SK-16 positions were PWD. [Redacted to protect privacy] At the SK-13 level, the qualified applicant pool was 4.20% while 6.67% [Redacted to protect privacy] of the [Redacted to protect privacy] new hires to SK-13 positions were PWD. [Redacted to protect privacy]

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

- |                              |             |
|------------------------------|-------------|
| a. New Hires to SES (PWTD)   | Answer: No  |
| b. New Hires to GS-15 (PWTD) | Answer: Yes |
| c. New Hires to GS-14 (PWTD) | Answer: Yes |
| d. New Hires to GS-13 (PWTD) | Answer: Yes |

Applying the same grade equivalencies that were described in section VI.D.1 and Tables reviewed in section VI.D.3, the Agency presents information on trigger identification for PWTD new hires to senior grade levels.

At the SO level, the Agency did not have a trigger involving PWT D among new hires. The qualified applicant pool was 0.00%, and none of the [Redacted to protect privacy] new hires to SO positions were PWT D. [Redacted to protect privacy] At the SK-15 and SK-17 levels, the qualified applicant pool was 1.23%, however none of the [Redacted to protect privacy] permanent new hires to SK-15 and SK-17 positions were PWT D. There were no temporary hires in these grade levels. At the SK-14 and SK-16 levels, the qualified applicant pool was 2.90%, though none of the [Redacted to protect privacy] permanent new hires to SK-14 and SK-16 positions were PWT D. [Redacted to protect privacy] At the SK-13 level, the qualified applicant pool was 2.33% and 2.22% [Redacted to protect privacy] of the [Redacted to protect privacy] permanent new hires to SK-13 positions was PWT D. [Redacted to protect privacy] The Agency notes the small magnitude of the observed difference between the qualified applicant pool and new hires for the SK-13 level (0.11%).

5. Does your agency have a trigger involving PWD among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

a. Executives

- |  |             |
|--|-------------|
| i. Qualified Internal Applicants (PWD) | Answer: Yes |
| ii. Internal Selections (PWD)          | Answer: Yes |

b. Managers

- |  |             |
|--|-------------|
| i. Qualified Internal Applicants (PWD) | Answer: Yes |
| ii. Internal Selections (PWD)          | Answer: No  |

c. Supervisors

- |  |             |
|--|-------------|
| i. Qualified Internal Applicants (PWD) | Answer: Yes |
| ii. Internal Selections (PWD)          | Answer: No  |

The SEC cross-walked the Agency's alternative pay plan supervisory levels to the Executive, Manager, and Supervisor levels according to the following equivalencies: Executives = SO; Managers = SK-17 and the supervisory Administrative Law Judges in pay plan Administrative Law (AL); and Supervisors = employees or positions at SK-levels below SK-17 who hold supervisory status. FY 2017 data underlying Table B11 presents the data relevant for assessing whether triggers exist with regard to promotions to supervisory positions.

For executives, the Agency had a trigger involving internal selections. The RAP, comprised of permanent managers at the SK-17 level, was 5.85%, and the qualified internal applicants were 5.88% PWD. None of the internal selections for SO positions were PWD.

For managers, the RAP, comprised of permanent supervisors at the SK-13 through SK-15 levels, was 5.65%, but the qualified internal applicant pool was 1.92%. PWD were 10.00% of [Redacted to protect privacy] manager selections. Therefore, no trigger existed for manager selections.

For supervisors, the Agency had a trigger involving qualified internal applicants. The RAP, comprised of both supervisory and non-supervisory employees at the SK-12 through SK-14 levels, was 7.08% PWD, and the qualified internal applicants included no (0.00%) PWD. There was no anomaly identified for internal selections; none of the qualified internal applicants were PWD, and none were selected.

6. Does your agency have a trigger involving PWTD among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.
- a. Executives
    - i. Qualified Internal Applicants (PWTD)                      Answer: Yes
    - ii. Internal Selections (PWTD)                                      Answer: No
  - b. Managers
    - i. Qualified Internal Applicants (PWTD)                      Answer: Yes
    - ii. Internal Selections (PWTD)                                      Answer: No
  - c. Supervisors
    - i. Qualified Internal Applicants (PWTD)                      Answer: Yes
    - ii. Internal Selections (PWTD)                                      Answer: No

Applying the same grade equivalencies that were described in section VI.4.e, the Agency presents information on trigger identification for PWTD internal promotions to supervisory positions from data underlying Table B11.

For executives, the RAP was 1.27% PWTD though 0.00% of the qualified internal applicants were PWTD. The Agency did not identify an anomaly involving internal selections; no PWTD were among the qualified internal applicants for SO positions, and none were selected.

For managers, the RAP was 1.41% PWTD though 0.00% of the qualified internal applicants were PWTD. The Agency did not identify an anomaly involving internal selections; no PWTD were among the qualified internal applicants for manager positions, and none were selected.

For supervisors, the RAP was 1.63%, though 0.00% of the qualified internal applicants were PWTD. The Agency did not identify an anomaly involving internal selections; no PWTD were among the qualified internal applicants for supervisor positions, and none were selected.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.
- a. New Hires for Executives (PWD)                                      Answer: No
  - b. New Hires for Managers (PWD)                                      Answer: Yes
  - c. New Hires for Supervisors (PWD)                                      Answer: Yes

Applying the same grade equivalencies that were described in section VI.4.e, the Agency presents information on trigger identification for PWD new hires into supervisory positions. Data underlying Tables B7 and B8 are relevant for assessing whether differences exist with regard to applicants and new hires in supervisory positions for PWD (this question) and PWTD (see the following question). Anomalies were found in FY 2017 new hire data for PWD at the manager and supervisor levels. As described above (see Part E, Section II.C.2 and Part J.III.3.a, supra), the qualified applicant pool from Table B7 summarizes data where the applicant self-identified with a disability and was deemed qualified for the position. Data in this pool describe vacancies for permanent and temporary positions with the SEC that were posted in USAJOBS with a closing date during the fiscal year. In contrast, Table B8 presents data on new hires onboarded during the course of the fiscal year; some of whom applied for a vacancy posted prior to the start of the fiscal year. Differences may be observed in the demographic statistics of those selected versus those onboarded as new hires. Triggers comparing the composition of PWD and PWTD in applicant flow versus new hire data should be interpreted with these differences in mind. For executives, the qualified applicant pool was 0.00%, and none of the newly-hired permanent executives were PWD. No trigger was found. For managers, the qualified applicant pool was 0.75%, and none of the newly-hired permanent managers were PWD, providing evidence of a variance. For supervisors, the qualified applicant pool was 1.94%, and none of the newly-hired permanent supervisors were PWD. These data suggest the presence of a trigger.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.
- |                                     |             |
|-------------------------------------|-------------|
| a. New Hires for Executives (PWTD)  | Answer: No  |
| b. New Hires for Managers (PWTD)    | Answer: Yes |
| c. New Hires for Supervisors (PWTD) | Answer: No  |

Differences were found in FY 2017 new hire data for PWTD at the manager level. No PWTD were selected as new hires for executive or supervisory positions in FY 2017. For executives, no anomaly was found as the qualified applicant pool was 0.00%, and none of the newly-hired permanent executives were PWTD. For managers, the qualified applicant pool was 0.37% PWTD, though none of the newly-hired permanent managers were PWTD. For supervisors, the qualified applicant pool was 0.00% PWTD, and none of the newly-hired permanent supervisors were PWTD. Supervisor data do not suggest the presence of a trigger.

## 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 personal assistance services.

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If "no", please explain why the agency did not convert all eligible Schedule A employees.

Answer: Yes

The SEC maintains discretion on conversions to a career or career-conditional appointment among employees on Schedule A appointments. As a general practice, those Schedule A employees who were not converted voluntarily accepted a new Schedule A appointment within the Agency.

[Redacted to protect privacy] employees were converted to the competitive service under the Schedule A legal authority during FY 2017. [Redacted to protect privacy] of those employees were converted within two years of entering on duty with the SEC [Redacted to protect privacy] successfully converted to the competitive service during FY 2017 after serving multiple Schedule A appointments [Redacted to protect privacy] converted within two years of being placed into the most recent Schedule A appointment.

2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If "yes", describe the trigger below.

a. Voluntary Separations (PWD) Answer: Yes

b. Involuntary Separations (PWD) Answer: Yes

Table B14 provides FY 2017 data on voluntary and involuntary separation by disability. These data were used to calculate the inclusion rates. Inclusion rates were calculated as the number of PWD who separated among all PWD in the workforce, compared to the same proportion among persons with no disability (this category is combined with those who did not self-identify as having a disability).

For voluntary separations, the percentage of PWD exceeded that of persons without disabilities. The inclusion rate for PWD was 5.59%, and for people without disabilities, including those who did not self-identify, the inclusion rate was 4.47%.

For involuntary separations, the percentage of PWD exceeded that of persons without disabilities. The inclusion rate for PWD was 0.93%, and for people without disabilities, including those who did not self-identify, the inclusion rate was 0.07%.

3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If "yes", describe the trigger below.

a. Voluntary Separations (PWTD) Answer: Yes

b. Involuntary Separations (PWTD) Answer: Yes

Using data from Table B14 to calculate the inclusion rates for PWTD, the following was found in FY 2017 data. Inclusion rates were calculated as the number of PWTD who separated among all PWTD in the workforce, compared to that same proportion among persons with no disability (this group also includes those who did not self-identify as having a disability and those with a disability that is not targeted).

For voluntary separations, the percentage of PWTD exceeded that of persons without targeted disabilities. The inclusion rate for PWTD was 9.88%, and for people without targeted disabilities, it was 4.45%.

For involuntary separations, the percentage of PWTD exceeded that of persons without targeted disabilities. The inclusion rate for PWTD was 1.23%, and for people

without targeted disabilities, the inclusion rate was 0.11%.

4. If a trigger exists involving the separation rate of PWD and/or PWTB, please explain why they left the agency using exit interview results and other data sources.

The SEC invites all departing employees to complete an Exit Survey during their last pay period on SEC rolls. This survey asks exiting employees to self-identify if they have a disability and whether or not an accommodation was needed or provided. Among [Redacted to protect privacy] employees who completed the Exit Survey in FY 2016, [Redacted to protect privacy] self-identified as having a disability (5.49%). Among exiting employees who reported a disability in FY 2016, [Redacted to protect privacy] reported that they were provided reasonable accommodation. The Exit Survey continued in FY 2017. Through July 31 (Q3), [Redacted to protect privacy] departing employees completed the Exit Survey, and [Redacted to protect privacy] (5.71%) self-identified as having a disability. A smaller percentage of employees with disabilities completed the Exit Survey (5.71%) as compared to their participation among those who separated from the Agency (9.95%) and as compared to their total workforce participation at the end of the year (7.15%). Among exiting employees who reported a disability through Q3 of FY 2017, [Redacted to protect privacy] reported that they were provided reasonable accommodation. The small number and percentage of separating employees who self-identified with a disability and completed an Exit Survey limits the reliability of conclusions to be drawn from these data about the reasons why those employees left the Agency. In FY 2018, the Agency will compile information from the Exit Survey across years to support more general conclusions about why employees with disabilities left the SEC.

## B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

1. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

Information specific to the accessibility of Agency technology under Section 508 is not currently consolidated into one specific notice or resource. Such information can be gathered from a variety of sources.

Information about the SEC's Disability Program is posted on SEC.gov ([http://www.sec.gov/disability/sec\\_access.htm](http://www.sec.gov/disability/sec_access.htm) and [www.sec.gov/accessibility/sec-accommodation-procedures.pdf](http://www.sec.gov/accessibility/sec-accommodation-procedures.pdf)).

Every SEC vacancy announcement posted to USAJOBS includes information about obtaining accommodations, including alternative methods to apply. The name of SEC's Special Programs Manager serving as the Selective Placement Program Coordinator (SPPC) is posted on OPM's website at <http://www.opm.gov/policy-data-oversight/disability-employment/selective-placement-program-coordinator-directory/>. OHR has also built a separate page providing more in-depth information about hiring PWD (<https://www.sec.gov/ohr/sec-disability-program-page.html>). This page includes a link to an online form (<https://www.sec.gov/forms/ADA4Applicants>) for requesting accommodations in the technology-enabled job application process and information on alternate methods for contacting the Disability Program at the SEC.

The SEC posts information on how to file an EEO complaint at <https://www.sec.gov/eeoinfo/eeocomplaints.htm>.

In line with the Agency's plans for implementing the required and recommended elements of Section 501 of the Rehabilitation Act, the Agency will update the SEC website with applicable procedures under Section 508 related to technology accessibility.

These updates are intended to address the required notice explaining employees' and applicants' rights under Section 508 and the Architectural Barriers Act as well as other policy and procedural changes to support reasonable accommodation for employees and applicants for employment. Updates will include contact information and specific complaints processes for issues related to accessibility.

2. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

Information specific to the accessibility of facilities under the Architectural Barriers Act is not currently consolidated into one specific notice or resource. Such information can be gathered from a variety of sources.

Information about the SEC's Disability Program and accommodation procedures is posted on SEC.gov ([http://www.sec.gov/disability/sec\\_access.htm](http://www.sec.gov/disability/sec_access.htm) and [www.sec.gov/accessibility/sec-accommodation-procedures.pdf](http://www.sec.gov/accessibility/sec-accommodation-procedures.pdf)). These resources provide information on accessibility in workspace modifications and appropriate response to other requests, including requests to make the SEC program accessible to disabled members of the public.

The SEC posts information on how to file an EEO complaint at <https://www.sec.gov/eeoinfo/eeocomplaints.htm>.

In line with the Agency's plans for implementing the required and recommended elements of Section 501 of the Rehabilitation Act, the Agency will update the SEC website with applicable procedures under the Architectural Barriers Act related to the accessibility of facilities.

Such updates are intended to address the required notice explaining employees' and applicants' rights under Section 508 and the Architectural Barriers Act as well as other policy and procedural changes to support reasonable accommodation for employees and applicants for employment. Updates will include contact information and specific complaints processes for issues related to accessibility under both Section 508 of the Rehabilitation Act and the Architectural Barriers Act.

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

Regarding the accessibility of technology, the Agency developed a Technology Strategic Plan to cover the years 2018 – 2020. That plan was posted to the sec.gov website (<http://technologyplan.sec.gov/>). The plan's technology priorities include improvements to the information technology (IT) operational environment and technology delivery model to provide high levels of system and infrastructure reliability and availability. Some initiatives within the plan will help provide high-quality user support and best-in-class infrastructure that benefit PWD and PWTDD. These initiatives also support accessibility to SEC's technology for employees, applicants, and members of the public.

The Agency will conduct a review of plans for the IT operational environment found in the Technology Strategic Plan against the required and recommended elements for technology accessibility embedded in Section 508.



The Agency will also conduct a review assessing current policy and procedure related to accessibility of facilities as required by the Architectural Barriers Act during FY 2018.

## 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.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

The SEC has established a Reasonable Accommodation (RA) processing timeline of 20 business days from the day of request to fulfillment, absent extenuating circumstances. Excluding the provision of Adjustable Height Tables (AHTs), in FY 2017, 72% of initial requests for accommodation were processed within 20 business days.

SEC is currently engaged in a system design of an automated electronic case management system for processing reasonable accommodation requests as described in Part H of this report (*supra*).

In the meantime, tools and a more structured set of procedures were developed and used in FY 2017 for capturing data related to processing reasonable accommodation requests. From those data, the time frame for processing initial requests for reasonable accommodation during FY 2017 was 22.3 days. Requests for AHT were processed in 21.6 days. RA requests, excluding requests for AHT, were processed in 23 days.

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

The interactive portal, AskHR, on the Agency's intranet described above provides employees with information about reasonable accommodation and the processes for making requests. To support employees in making such a request, the Agency has made available a comprehensive resource guide, "Requesting Accommodations at SEC", for everyone involved in the accommodations process. It explains how persons with disabilities should request accommodations, how requests are processed, and, as applicable, how requestors may seek review of decisions where a request has been denied.

The SEC provides temporary accommodations to employees with short-term medical conditions even when the condition does not constitute a covered disability when supervisory officials and the Disability Program Office decide that it is appropriate to do so. In FY 2016, the Disability Program Office developed and issued a new policy and standard operating procedures to clarify the process and guidelines for the Temporary Medical Telework (TMT) program. In FY 2017, the SEC processed 117 TMT requests, processed 244 RA requests, of which 106 were requests for telework as a reasonable accommodation.

All new SEC managers participate in mandatory training regarding the reasonable accommodation process as part of the LD 307 Fundamentals of Human Resource Management training. Additionally, the SEC's New Employee Orientation includes a

presentation on the following programs and processes: Disability Accommodations, Reasonable Accommodation, Temporary Medical Telework, Telework, and Leave (i.e., annual/sick, advance leave, and FMLA, etc.). This information is also included in the New Employee Handbook and made available on the new AskHR portal. In FY 2017, the SEC designed business requirements to implement an electronic case management system that would allow employees to request reasonable accommodations personally and privately. During the requirements gathering phase for the new system, opportunities were identified that could strengthen the current manual tracking process, including tracking timeliness for processing RA requests, and meeting on a monthly basis with the Chief Human Capital Officer to review and discuss timeliness and processing of all reasonable accommodation cases. Going forward, the Agency will continue its efforts to implement the business requirements for the electronic case management system as further described in Part H of this report, supra. Further, the Agency's policy on reasonable accommodation is currently undergoing final review for approval following OHR's standard policy development procedures. During FY 2018, the Agency will review the electronic case management system's business requirements, the new policy, and related procedural changes that support reasonable accommodation for employees and applicants for employment. This review will address coverage of required and recommended elements defined under Section 501 of the Rehabilitation Act, as amended in 2017. Changes to reasonable accommodation procedures will likely necessitate updates to training, job aids, notices, and other information sources in FY 2019 and beyond.

#### **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.

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

The Disability Program Office recently updated the reasonable accommodation policy to include requests for PAS. The policy is in OHR's internal review process and will be sent to EEOC for final review thereafter. In the interim, the Agency entered into a contract to support employees needing PAS. The Agency currently has one employee using PAS. OHR proactively reached out to this employee and shared the recent EEOC regulations on PAS earlier in FY 2017. OHR is developing communications to share with employees and managers regarding the availability of PAS for those in need.

### **Section VII: EEO Complaint and Findings Data**

#### **A. EEO COMPLAINT DATA INVOLVING HARASSMENT**

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the government-wide average?

Answer: No

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Answer: Yes

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

The Agency did not have any findings of discrimination alleging harassment based on disability status.

## **B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION**

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?

Answer: No

2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?

Answer: Yes

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

The Agency did not have any findings of discrimination involving the failure to provide a reasonable accommodation.

## **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.

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Answer: No

2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?

Answer: Yes

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments.

<p><b>Trigger 1</b></p>	<p>There is a lower-than-expected participation rate of Persons with Targeted Disabilities in the total workforce and in promotions to higher level positions. The participation rate of PWTD in the SEC's workforce was less than 1% in FY 2014 based on the then-current Standard Form 256 (SF-256) Self Identification of Disability. Participation has increased based on the revised categories reflected in the new October 2016 version of the SF-256 to 1.84% in FY 2017.</p>	
<p><b>Barrier(s)</b></p>		
<p><b>Objective(s)</b></p>	<p>While the Agency has not identified specific policies, practices, or procedures that represent a "barrier that affects employment opportunity for PWD or PWTD", representatives of OEEO and OHR agreed to take action toward enhancing equal employment opportunity for persons with targeted disabilities in the following areas:</p> <ul style="list-style-type: none"> <li>• Policies and procedures specific to the recruitment, hiring, advancement, and retention of persons with disabilities (PWD) or persons with targeted disabilities (PWTD) that are aligned with the federal government-wide flexibilities and requirements for affirmative action;</li> <li>• Consistency and structure in the posting, screening, and interview processes for selection;</li> <li>• Awareness on the part of hiring managers and subject matter experts or others involved in recruitment and selection about the requirements for and flexibilities available under government-wide programs supporting PWD and the affirmative action plan for PWTD; and</li> <li>• Employment programs, especially reasonable accommodation and disability programs, supportive of PWD and PWTD.</li> </ul>	
	<p>In January 2017, the EEOC issued revised regulations under the federal government's obligation to engage in affirmative action for people with disabilities that modified Section 501 of the Rehabilitation Act of 1973. This revision addresses the hiring, retention, and career opportunity for persons with disabilities and those with targeted disabilities. OEEO had previously initiated this barrier analysis focused on persons with targeted disabilities. Going forward, as the Agency prepares for implementation of the revised regulation in FY 2018, OEEO will leverage or expand this prior work to include the population of persons with disabilities in the workforce. The objective of these efforts will be to continue to implement action plans developed to address PWTD and expand those plans in line with revised regulation. Additional action will focus on:</p> <ul style="list-style-type: none"> <li>• Analysis of quantitative data and employee perceptions among the population of PWD and PWTD;</li> <li>• Implementing the recommended and required actions under Section 501 of the Rehabilitation Act of 1973;</li> <li>• Implementing, as feasible, revisions to the workforce data tables presenting information on PWD and PWTD, as per instruction from EEOC; and</li> <li>• Reviewing and updating agreed-upon action plans to address the broader population of PWD and/or to cover Section 501 regulatory changes.</li> </ul>	
<p><b>Responsible Official(s)</b></p>	<p><b>Performance Standards Address the Plan? (Yes or No)</b></p>	
<p>Lacey Dingman, Chief Human Capital Officer, OHR</p>	<p>Yes</p>	
<p>Peter Henry, Acting Director, OEEO</p>	<p>Yes</p>	
<p><b>Barrier Analysis Process Completed? (Yes or No)</b></p>	<p><b>Barrier(s) Identified? (Yes or No)</b></p>	

<b>Barrier Analysis Process Completed? (Yes or No)</b>		<b>Barrier(s) Identified? (Yes or No)</b>		
Yes		No		
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>		
Workforce Data Tables	Yes	Analyzed applicable workforce demographic data from FY 2011 - FY 2015.		
Complaint Data (Trends)	Yes	Reviewed complaints filed by PWTD during FY2013-FY2016 for any trends		
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	Not applicable.		
Climate Assessment Survey (e.g., FEVS)	Yes	Reviewed Federal Employee Viewpoint Survey results from FY 2013 through FY 2015 to compare responses from persons with disabilities to those with no disability.		
Exit Interview Data	Yes	Reviewed Exit Survey data from FY 2016 and FY 2017 provided by persons with disabilities.		
Focus Groups	No			
Interviews	Yes	Interviewed subject matter experts in OHR and OMWI and subject matter experts in disabled student service offices at Gallaudet University and Rochester Institute of Technology.		
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Reviewed reports and regulations related to the employment of PWD and PWTD in the federal workforce offered by OPM, EEOC, DOL/ODEP, EARN, and other agencies and supporting organizations.		
Other (Please Describe)	Yes	Researched and reviewed the law and federally mandated hiring and promotions policies, practices, and procedures applicable to recruitment and retention of PWTD; reviewed the Agency's hiring and promotions policies, practices, and procedures applicable to people with disabilities, including PWTD; reviewed the efficiency and effectiveness of the SEC's reasonable accommodation program; and reviewed selection case files (hiring and promotions) for the second half of FY 2014 and the first half of FY 2015.		
<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>

02/28/2019	OEEEO will implement feasible changes to the workforce data tables providing information on PWD and PWTD in collaboration with a shared service provider.	Yes		
11/30/2017	OEEEO will conduct a Workplace Experience Survey of the Agency workforce to explore employee perceptions among the population of PWD and PWTD as well as those without disabilities on, among other topics, the recruitment, hiring, promotion, recognition, and retention of talent.	Yes		11/30/2017
01/31/2018	The Agency will establish a cross-functional working group with representatives from OEEEO and OHR to develop action plans and implement required and recommended activity under Section 501 of the Rehabilitation Act of 1973.	Yes		01/31/2018
<b>Fiscal Year</b>	<b>Accomplishments</b>			
2017	Representatives from OEEEO and OHR implemented a number of actions			
2016	OHR engaged in the following recruitment/outreach initiatives:			

4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

OEEEO considered launching a Workplace Experience survey in the summer of 2017. To avoid interfering with an OHR survey focused on career development of employees currently holding SK-15, SK-16, and SK-17 levels into higher level leadership ranks, the OEEEO Workplace Experience survey was rescheduled for October and early November of 2017.

5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

Representatives of OEEEO and OHR agreed to take action toward enhancing equal employment opportunity for PWTD and proposed 15 actions to address recommendations from the study of PWTD. As of September 30, 2017, 12 of those actions have been closed or completed, one was transitioned to an ongoing monitoring status, and two are under review pending some action or decision. The actions toward improvement related to:

- Embracing best practices suggested by OPM and EEOC on recruiting, hiring, retaining, and promoting PWD and PWTD;
- Adding structure to programs for the hiring, development, advancement, and retention of PWD and PWTD, including programs focused on training persons with no disability toward greater inclusion of PWTD;
- Issuing, communicating, and training those directly involved in the hiring or promotions process on the policy memorandum entitled: Requirements for Screening and Interviewing Job Candidates (PM-2016-001) to include the requirement of documenting decisions made at all phases of the selection process;
- Expanding and leveraging relations with external affinity groups and with DIAC to

support strategic relationships with professional organizations focused on individuals with disabilities;

- Proactively developing and implementing strategies with and through DIAC to retain employees who are PWTD;
- Developing communications and hosting events focused on PWTD to highlight successes from that population;
- Improving tracking and analysis of complaints and other relevant data for PWTD; and
- Formalizing the responsibilities of a Selective Placement Program Manager within OHR to focus on employment programs and initiatives for PWTD.

Because of the relatively small size of the PWTD population, small changes in workforce participation, year over year, can have large impacts on the observed rates of change. Nonetheless, the SEC notes the following indications of growth within this employee population over the five years ending in FY 2017:

- Over the five year period from FY 2013 through FY 2017, the permanent workforce of PWTD experienced net growth of 9 persons or 12.50%, which approximates the 13.08% net growth in the total permanent workforce over that same time period. The participation rate of permanent PWTD employees in the SEC's workforce remained virtually unchanged over this period (a decline of .01% points), and the participation rate of PWTD SK-11 and higher declined .15% points to 1.56%.
- Over the five year period from FY 2013 through FY 2017, the permanent workforce of PWD experienced net growth of 118 persons or 57.84%. The participation rate of permanent PWD employees in the SEC's workforce grew at a rate of 22.65% to 7.15%, and the participation rate of PWD SK-11 and higher increased 1.69% points (a growth rate of 19.96% or nearly 20%) to 6.63% over this five year period.

The SEC will continue to monitor the PWD and PWTD workforce participation for signs of continued or accelerated growth and consider effects of underreporting on these statistics. Please note, data from SF-256 collected prior to October 2016 were recharacterized against the definitions found in the revised form in order to estimate the five year trends. As such, the numbers of employees who are reported in this trend analysis as PWTD and/or PWD in prior years may underestimate the workforce due the addition of disability and targeted disability categories.

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

Triggers from the original study of PWTD, as reflected above, continue to require focused attention toward improvement. Starting in FY 2016 and through FY 2017, representatives of OEEO and OHR initiated and completed actions intended to address the recommendations to improve equal employment opportunity. These actions will continue into FY 2018.

In the interim, the EEOC issued revised guidance and regulation focused on PWD and PWTD in the federal workforce. Changes to regulation require and recommend additional affirmative action on the part of agencies regarding the recruitment, hiring, development, advancement, recognition, and retention of PWD and PWTD. The Agency will be implementing additional required and recommended actions during FY 2018 and beyond.