

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

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 | Yes |
| b. Cluster GS-11 to SES (PWD)  | Answer | Yes |

The representation of PWD in the overall workforce is 1.75% (Table B4), and below the 12% benchmark goal at every grade level.

\*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 | Yes |
| b. Cluster GS-11 to SES (PWTD)  | Answer | Yes |

The representation of PWTD in the overall workforce is .39% (Table B4), and below the 2% benchmark goal at every grade level except for the Administrative Band Level 1 where it is 25%.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10					
Grades GS-11 to SES					

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

The Postal Service communicated the 12% PWD and 2% PWTD goals to all Officers, Area Vice Presidents, Area Human Resources Managers, all District HR staff, Reasonable Accommodation Committee members, Disability Program staff, District Disability Coordinators, and Diversity and Talent Acquisition staff in memorandum dated January 2018. This memorandum also included the revised obligations under section 501 of the Rehabilitation Act.

### 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 THE 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

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 reasonable accommodation requests from applicants and employees	4	0	0	Jason Morris Manager, HR jmorris@uspsoig.gov
Processing applications from PWD and PWTB	4	0	0	Erin Muru Manager, HR emuru@uspsoig.gov
Answering questions from the public about hiring authorities that take disability into account	4	0	0	Erin Muru Manager, HR emuru@uspsoig.gov
Section 508 Compliance	1	0	0	Tara Linne Director, Communications and Digital Reporting tlinne@uspsoig.gov
Architectural Barriers Act Compliance	1	0	0	John Prakash Director, Property Management jprakash@uspsoig.gov
Special Emphasis Program for PWD and PWTB	1	0	0	Trina King HR Director tking@uspsoig.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 that disability program staff have received. If “no”, describe the training planned for the upcoming year.

Answer Yes

All disability program staff, disability-related program staff (disability specialists, disability coordinators, reasonable accommodation committee members) have access to take and complete the following courses: HR: Reasonable Accommodation Committee (RAC) Course description: Educate RAC committees and USPS managers on the reasonable accommodation process and provide guidance on matters of reasonable accommodation that involve applicants and employees with disabilities in order to assist managers and supervisors in meeting our legal and regulatory responsibilities in accordance with the law. Providing Communication Accommodations Course Description: The United States Postal Service has a legal responsibility to ensure that employees and applicants who are deaf or hard of hearing have access to reasonable communication accommodations. Access to such accommodations helps to eliminate workplace barriers that keep such individuals from performing jobs they could otherwise do with some form of accommodation. This course is designed specifically for managers and supervisors who support staff who are deaf or hard of hearing. After completing this course, learners are able to: - Explain the agency’s legal responsibility and its importance to the business. - Recognize and handle requests for communication accommodations. - Engage in the interactive process. - Identify different types of communication accommodations available at USPS - Effectively use various types of

communication accommodations to ensure appropriate and safe working conditions for employees who are deaf/hard of hearing. - Describe the USPS process for establishing a communication plan for employees needing accommodations. - Define responsibilities of supervisors and managers with respect to communication accommodations. - Perform all tasks associated with defined procedures and tasks as well as reporting requirements.

**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

**Section III: Program Deficiencies In The Disability Program**

<b>Brief Description of Program Deficiency</b>	C.2.a.6. Do the agency’s training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR §1614.203(d)(2)]
<b>Brief Description of Program Deficiency</b>	C.3.b.6. Provide disability accommodations when such accommodations do not cause an undue hardship? [ see 29 CFR §1614.102(a)(8)]
<b>Brief Description of Program Deficiency</b>	D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.
<b>Brief Description of Program Deficiency</b>	D.4.b. Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR §1614.203(d)(1)(i)]
<b>Brief Description of Program Deficiency</b>	D.4.d. Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR §1614.203(d)(7)(ii)]

**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 APPLICATIONS WITH DISABILITIES**

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

USAJobs application collection is used as the method for identifying applicants with disabilities and applicants with targeted disabilities. Limited external hiring opportunities exist due to budget and complement controls. All new employees are provided PS Form 2489, Self-identification of a Physical or Mental Disability. New employees are advised that self-identification is voluntary, but are encouraged to complete this form. The Postal Service also uses PS Form 3666, Certification of Postal Service Employment of Individuals with Severe Disabilities. External applicants for employment and internal applicants for promotion or reassignment may request reasonable accommodation for any part of the application and selection process. All external job vacancy postings contain two statements: 1) This agency provides Reasonable Accommodations to applicants with disabilities. If you require

accommodations for any part of the application and/or hiring process, please call 703-248-2210. The decision on granting an accommodation request will be made on a case by case basis. 2) Reasonable Accommodation Policy: Federal agencies must provide reasonable accommodation to applicants with disabilities where appropriate. Applicants requiring reasonable accommodation for any part of the application and hiring process should contact the hiring agency directly. Determinations on requests for reasonable accommodation will be made on a case-by-case basis. A reasonable accommodation is any change to a job, the work environment, or the way things are usually done that enables an individual with a disability to apply for a job, perform job duties or receive equal access to job benefits. Under the Rehabilitation Act of 1973, federal agencies must provide reasonable accommodations when: • An applicant with a disability needs an accommodation to have an equal opportunity to apply for a job. • An employee with a disability needs an accommodation to perform the essential job duties or to gain access to the workplace. • An employee with a disability needs an accommodation to receive equal access to benefits, such as details, training, and office-sponsored events. You can request a reasonable accommodation at any time during the application or hiring process or while on the job. Requests are considered on a case-by-case basis." The USPS OIG has a Reasonable Accommodation Committee that reviews all requests for accommodation.

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

Since the USPS is created under Title 39, Schedule A hiring authority does not apply to USPS or USPS-OIG. The USPS OIG has policy to support noncompetitive appointment of VRA eligibles (for positions up to GS-11 equivalent), and 30% or more disabled veterans.

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 USPS, and therefore USPS OIG, does not use hiring authorities, such as Schedule A, that take disability into account to recruit PWD and PWTD, because it is not a Title 5 agency. The agency has policy to support noncompetitive appointment of VRA eligibles, and 30% or more disabled veterans. In these instances, the agency would review the VA documentation regarding the VA rating and determine if the individual met the 30% threshold. It would then provide the selecting official the opportunity to evaluate the candidate against the requirements of the position to ensure the individual meets the essential requirements prior to making a selection.

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

The hiring authorities are managed by the HR Staffing & Classification team and they have received training.

## **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 USPS OIG is planning to partner with the USPS on establishing such contacts for FY21. The Postal Service has continued to participate in career fairs and partner with organizations that focus on employment for individuals with disabilities and individuals with targeted disabilities including but not limited to: Rochester Institute of Technology/National Technical Institute for the Deaf, Gallaudet University, Recruit Military, Corporate Gray, Hiring our Heroes, National and Fort Campbell Regional Job Fair, Coast to Coast Career Fairs, Career Expo for People with Disabilities, Careers and the disAbled, disabled veterans, and other disability related employment organizations. The Postal Service utilizes resources for disability recruitment and accommodations such as: • AbilityJobs.com • Workforce Recruitment Program • The US Business Leadership Network (USBLN) • Career Opportunities for Students with Disabilities (COSD) • Disability.gov • Job Accommodation Network (JAN) • Employer Assistance and Resource

Network (EARN) • The American Association of People with Disabilities (AAPD) • Workforce Recruitment Program (WRP) – Office of Disability Employment (ODEP)

**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

The representation of PWD among the new hires in the permanent or career workforce was 1.15%, below the 12% benchmark goal. The representation of PWTD among the new hires in the permanent or career workforce was 0%, below the 2% benchmark goal and unchanged from FY18. (Table B8- New Hires for Type of Appointment by Disability)

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	0				
% of Qualified Applicants	0				
% of New Hires	0				

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for MCO (PWD) Answer N/A
- b. New Hires for MCO (PWTD) Answer N/A

There is data available however there is not sufficient data to draw any conclusions due to the low percentages of applicants who voluntarily identify their disability status. We plan to continue posting using USAJobs and requesting applicants to voluntarily disclose the information.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Qualified Applicants for MCO (PWD) Answer N/A
- b. Qualified Applicants for MCO (PWTD) Answer N/A

FY19 was the first year for posting all internal positions using USAJobs to collect applicant flow data. There is data available however there is not sufficient data to draw any conclusions due to the low percentages of applicants who voluntarily identify their disability status. We plan to continue posting using USAJobs and requesting applicants to voluntarily disclose the information.

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Promotions for MCO (PWD) Answer N/A
- b. Promotions for MCO (PWTD) Answer N/A

The majority of the positions in our mission critical occupation series are in our journey band career ladder and therefore the promotional opportunities are non-competitive. For FY19 we expanded the list of these occupation series based on the number of incumbents as recommended in the FY18 report.

## 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.

In FY19, all employees were encouraged to have individual development plans on file. In addition, in FY19, all positions were posted on USAJobs.gov, with a link to the announcements in the daily newsletter sent to all employees via email to ensure all employees had an opportunity to apply for advancement.

### B. CAREER DEVELOPMENT OPPORTUNITES

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

The USPS OIG promotes participation in career development and structured developmental programs, in addition to on-the-job development through detail assignment opportunities. All employees have an opportunity to work with their management to develop individual development plans to ensure they are taking training and exploring development opportunities to exist with the current position and promotional opportunities.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/ approval to participate.

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	0					
Fellowship Programs	0					
Mentoring Programs	0					
Coaching Programs	0					
Training Programs	0					

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Detail Programs	0					
Other Career Development Programs	0					

3. 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 the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWD) Answer N/A
- b. Selections (PWD) Answer N/A

Data is not collected or reported for USPS OIG career development programs. Our plan is to expand our National Leadership Development Program in FY20 to include all non-management employees in the agency as well as to add an application process. Generally all employees are required to have an Individual Development Plan.

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWTD) Answer N/A
- b. Selections (PWTD) Answer N/A

Data is not collected or reported for USPS OIG career development programs. Our plan is to expand our National Leadership Development Program in FY20 to include all non-management employees in the agency as well as to add an application process. Generally all employees are required to have an Individual Development Plan.

**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

The representation of PWD for Time Off Awards and Cash Awards at all values is less than the 12% benchmark goal The representation of PWTD for Time Off Awards and Cash Awards at all values is less than the 2% benchmark goal (Table B13)

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %

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

The representation of PWD for Quality Step Increases is 2%, less than the 12% benchmark goal. The representation of PWTD for Quality Step Increases is 0%, less than the 2% benchmark goal. (Table B13). Performance Based Pay Increases are not currently being tracked.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Performance Based Pay Increase	0	0.00	0.00	0.00	0.00

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

## 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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. SES

i. Qualified Internal Applicants (PWD)

Answer N/A

ii. Internal Selections (PWD)

Answer N/A

b. Grade GS-15

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer Yes

c. Grade GS-14

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer Yes

d. Grade GS-13

i. Qualified Internal Applicants (PWD)

Answer N/A

ii. Internal Selections (PWD)

Answer N/A

Table B11. The number of internal applicants with disabilities who applied at the GS-15 equivalent level was 5.26%, one was selected (11.11%), nearing the 12% target. . The number of applicants who applied at the GS-14 equivalent level was 4.42% and none were selected.

2. Does your agency have a trigger involving PWTD 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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. SES
  - i. Qualified Internal Applicants (PWTD) Answer N/A
  - ii. Internal Selections (PWTD) Answer N/A
- b. Grade GS-15
  - i. Qualified Internal Applicants (PWTD) Answer No
  - ii. Internal Selections (PWTD) Answer Yes
- c. Grade GS-14
  - i. Qualified Internal Applicants (PWTD) Answer No
  - ii. Internal Selections (PWTD) Answer Yes
- d. Grade GS-13
  - i. Qualified Internal Applicants (PWTD) Answer N/A
  - ii. Internal Selections (PWTD) Answer N/A

Table B11. The number of internal applicants with Targeted Disabilities who applied at the GS-15 equivalent level was 10.53%. This substantially exceeds the workforce percentage (.56%). The number of applicants who applied at the GS-14 equivalent level was .74% and is similar to the workforce representation. No PWTD was selected for an internal promotion.

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

Table B11. The number of internal applicants with disabilities who applied at the GS-15 equivalent level was 5.26%. This substantially exceeds the workforce percentage (1.5%). The number of applicants who applied at the GS-14 equivalent level was 4.42% and substantially exceeds the total workforce. Overall more research needs to be done however it appears applicants may be more willing to identify as disabled or having a targeted disability than employees. One PWD was selected for an internal promotion at the GS-15 equivalent level totaling 11.11% of selections at that level and approaching the target.

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires to SES (PWTD) Answer Yes
- 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	N/A

Table B15. None of the new hires were PWTD.

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

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

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	Yes

Table B19. PWD were selected for Executive (11.11%) and Manager (11.11%) positions and nearing the goal of 12%.

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

i. Qualified Internal Applicants (PWTD)	Answer	Yes
ii. Internal Selections (PWTD)	Answer	N/A

b. Managers

i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	No

c. Supervisors

i. Qualified Internal Applicants (PWTD)	Answer	Yes
ii. Internal Selections (PWTD)	Answer	Yes

Table B19. No PWTD applied for an Executive position. PWTD comprised 10.53% of applicants for Manager positions exceeding the 2% target. They also qualified (4.04%) at that level. PWTD comprised .74% of applicants for Supervisory positions, not achieving the 2% target. No PWTD were selected for Supervisory positions.

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for Executives (PWD) Answer Yes
- b. New Hires for Managers (PWD) Answer Yes
- c. New Hires for Supervisors (PWD) Answer Yes

Table B18. PWD comprised 6.67% of applicants for Executive positions and none were selected. PWD comprised 18.75% of applicants for Manager positions and none were selected. PWD comprised 7.79% of applicants for supervisory positions and none were selected.

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for Executives (PWTD) Answer Yes
- b. New Hires for Managers (PWTD) Answer Yes
- c. New Hires for Supervisors (PWTD) Answer Yes

Table B18. PWD comprised 0% of applicants for Executive positions. PWD comprised 12.5% of applicants for Manager positions, 13.33% of qualified applicants, and none were selected. PWD comprised 3.9% of applicants for supervisory positions and none were selected.

## Section VI: Plan to Improve Retention of Persons with Disabilities

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

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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 N/A

The USPS, and therefore USPS OIG, does not use hiring authorities, such as Schedule A, that take disability into account to recruit PWD and PWTD, because it is not a Title 5 agency.

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 No
- b. Involuntary Separations (PWD) Answer No

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
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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 | No  |

PWTD Separations is 1.01% of total separations while PWTD inclusion is .56%.

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
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4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

The total number of actual people accounted for in the separations percentage is 1 therefore there is not adequate data to draw any conclusions.

**B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES**

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

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.

<http://about.usps.com/who-we-are/legal/section-508/welcome.htm>

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.

<http://about.usps.com/who-we-are/legal/arch-barriers-act/welcome.htm>

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.

The agency is conducting an annual facility survey to determine which facilities require repair. We work with the USPS to resolve facilities related concerns. The USPS Facilities Organization has established a Facilities Accessibility Compliance Program to ensure that Postal facilities comply with applicable requirements of the Architectural Barriers Act of 1968 (ABA), effective June 2017. Facilities staff are available to assist Postal customers and Postal employees who are concerned that ABA standards have not been met. Persons with such concerns should contact the FAC Program Manager: Program Manager Facilities Accessibility Compliance 475 L’Enfant Plaza SW Washington, D.C. 20260-1862 Postal customers and Postal employees may also contact the US Access Board if they believe that applicable accessibility standards have not been met at a Postal facility. Information on the Access Board’s complaint process may be found at: <https://www.access-board.gov/aba-enforcement>.

**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 average initial response is to the requestor within 1 business day.

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 USPS OIG program is effective in its responsiveness to requests for accommodation usually providing a decision within 1 week of receipt of medical documentation.

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

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

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

In FY18 we published the USPS PAS policy on the usps.oig.gov external website. In addition, we added a section to the USPS OIG Reasonable Accommodation Standards of Practice to address concerns about PAS directly related to employees of the OIG. The practices are still in place for FY19 and beyond.

## **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 governmentwide 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 No

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.

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### **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 No

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.
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## 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 N/A

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
  4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.
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5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).
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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.
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