

## 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 percentage of PWD in the GS-1 to GS-10 cluster is 0.0%. The percentage of PWD in the GS-11 to SES cluster is 6.64%.

\*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 No

The percentage of PWTD in the GS-1 to GS-10 cluster is 0%. The percentage of PWTD in the GS-11 to SES cluster is 1.71%.

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 ODNI communicates numerical goals to hiring managers and/or recruiters using: (1) recruitment strategic plans with specific goals; (2) briefings to senior leadership and component heads; and (3) during EEO, diversity, and inclusion discussions.

### 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

ODNI plans to further increase the staff that delivers disability services to the workforce in FY 2021. ODNI expanded its Recruitment Staff in FY 2020, with a focus on recruiting minority applicants and applicants with disabilities.

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	
Section 508 Compliance	1	0	0	Erik K. Deputy Chief Information Officer ericmk@dni.gov
Architectural Barriers Act Compliance	1	0	0	Melanie H. Deputy Director - Facilities melanimh@nctc.gov
Processing applications from PWD and PWTD	0	0	1	Damarah R. Chief, HR Operations damamr@dni.gov
Processing reasonable accommodation requests from applicants and employees	3	0	0	Faith P. Disability Program Manager faith.portillo@dni.gov
Special Emphasis Program for PWD and PWTD	0	0	1	Damarah R. Chief, HR Operations damamr@dni.gov
Answering questions from the public about hiring authorities that take disability into account	0	0	3	Daphne M. Chief, HR Recruitment daphne.martinez@dni.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

The RA Program Director attended the EEOC Disability Program Manager course in addition to educational initiatives hosted by the National Employment Law Institute. COVID-19 pandemic curtailed plans to provide sufficient training to disability program staff. ODNI is working to identify and improve training opportunities for responsible officials, including EEOC offered courses on the MD- 715, Special Emphasis Programs, and Disability Program Manager Basics.

**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

In FY 2020, ODNI made facility updates that improved access for persons with disabilities. Notably, touchless door entries were installed at ODNI facilities and most sensitive compartmented information facility doors were also refitted with ADA compliant touchless pads to automatically open doors.

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

<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)]
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<b>Brief Description of Program Deficiency</b>	D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]		
<b>Objective</b>	Conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities.		
<b>Target Date</b>	Sep 30, 2023		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2023		Implement exit surveying of departing ODNI cadre officers to include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2020	ODNI initiated Entry on Duty (EOD) surveys, to gather information about recruitment and hiring experiences from newly on-boarded officers. Information from the EOD assessment is collected to improve to recruitment and hiring processes.	

### 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.

The ODNI partners with IC elements, institutions of higher education, and national level organizations focused on increasing employment opportunities for PWD and PWTD. Initiatives by the IC HC to expand recruiting to non- traditional partners with higher demographic representation of PWD and PWTD will increase the opportunities to expose qualified candidates to the mission of the ODNI. Continued collaborations and partnerships with wounded warrior programs and targeted engagement at national level conferences, and the Federal Exchange on Employment & Disability provide insight into innovative approaches to recruiting PWD and PWTD to various mission areas within the ODNI.

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

ODNI does not execute a hiring process that includes a hiring authority that permits non-competitive appointment of qualified persons with disabilities. ODNI is committed to increasing the percentage of PWD/PWTD by focusing on the recruitment and

retention of employees with disabilities and hiring them through the regular excepted service hiring process at ODNI.

- 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.

N/A

- 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 N/A

N/A

**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.

In addition to the partnerships and collaborations mentioned above, the ODNI maintains alliances with the Access Board, the Job Accommodation Network, and equal opportunity publications such as Careers and the disABLED. To continue strengthening partnerships with organizations that assist PWD and PWTD secure and maintain employment, the ODNI will include targeted recruitment initiatives, aligned to the ODNI Recruitment Strategy.

**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

In FY 2020, the percentage of PWD among the new hires in the permanent workforce was 1.77%. For PWTD, it was 0% new hires.

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

- 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 Yes
- b. New Hires for MCO (PWTD) Answer Yes

The percentage of PWD among the new hires for any mission-critical occupations is 2.17%. The percentage of PWTD among the new hires for any mission-critical occupations is 0%.

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

N/A

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

Due to the COVID-19 pandemic, HRM delayed the promotion season by three months, from July 2020 to October 2020, resulting in no data for FY 2020.

## 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.

ODNI's Competitive Learning Opportunity Program (CLOP) is an annual leadership and professional development program available to ODNI permanent cadre employees only. This annual program is comprised of competitive and non-competitive leadership development programs for GS-12 up to SNIS (SES) permanent cadre employees. Additionally, employees are encouraged to seek a wide variety of internal and external training and professional development opportunities as part of their leadership (skills) development. Further, selection officials for promotions are indoctrinated with precepts to ensure factors such as disability, race, or sex are eliminated from the decision making process. In FY 2020, ODNI continued to use internal websites, workforce messages, and discussions with components to conduct outreach and awareness. Managers received consistent messaging

via senior leadership group meetings about the use of reasonable accommodations and workplace flexibilities to ensure every employee received an equal opportunity to advance, particularly important due to the impact of the pandemic.

**B. CAREER DEVELOPMENT OPPORTUNITIES**

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

ODNI offers detail assignments (external and internal), mentoring (circles and one-on-one), competitive learning opportunities (programs at institutions of higher education, military colleges, and think tanks), career development programs, foreign language training, scholarships to pursue studies in critical mission areas, and subject specific training (external and internal).

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	N/A	N/A	N/A	N/A	N/A	N/A
Fellowship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Coaching Programs	N/A	N/A	N/A	N/A	N/A	N/A
Training Programs	N/A	N/A	N/A	N/A	N/A	N/A
Mentoring Programs	N/A	N/A	N/A	N/A	N/A	N/A
Detail Programs	N/A	N/A	N/A	N/A	N/A	N/A
Other Career Development Programs	N/A	N/A	N/A	N/A	N/A	N/A

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

Overall, the pandemic limited opportunities for all ODNI officers to participate in career development and mentoring programs in FY 2020. While many employees worked from home and leveraged online training opportunities, ODNI could not adequately track activity in this area.

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

Overall, the pandemic limited opportunities for all ODNI officers to participate in career development and mentoring programs in FY 2020. While many employees worked from home and leveraged online training opportunities, ODNI could not adequately track activity in this area.

**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 inclusion rate was not available at the time of the report, however, PWD and PTWD received Cash Awards for categories covering \$3000-\$5000+ at rates less than their onboard representation. Additionally, PWD/PTWD received Total Time-Off Awards for 11-20 hours, and for categories covering 31-40+ at rates lower than their onboard representation.

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 No
- b. Pay Increases (PWTD) Answer Yes

No quality step increases were awarded to PWTD.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
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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

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 N/A

ii. Internal Selections (PWD)	Answer	N/A
c. Grade GS-14		
i. Qualified Internal Applicants (PWD)	Answer	N/A
ii. Internal Selections (PWD)	Answer	N/A
d. Grade GS-13		
i. Qualified Internal Applicants (PWD)	Answer	N/A
ii. Internal Selections (PWD)	Answer	N/A

Due to the COVID-19 pandemic, HRM delayed the promotion season by three months, from July 2020 to October 2020, resulting in no available data for FY 2020. Promotion panels were held early in FY 2021.

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. 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 (PWTB)	Answer	N/A
ii. Internal Selections (PWTB)	Answer	N/A
b. Grade GS-15		
i. Qualified Internal Applicants (PWTB)	Answer	N/A
ii. Internal Selections (PWTB)	Answer	N/A
c. Grade GS-14		
i. Qualified Internal Applicants (PWTB)	Answer	N/A
ii. Internal Selections (PWTB)	Answer	N/A
d. Grade GS-13		
i. Qualified Internal Applicants (PWTB)	Answer	N/A
ii. Internal Selections (PWTB)	Answer	N/A

Due to the COVID-19 pandemic, HRM delayed the promotion season by three months, from July 2020 to October 2020, resulting in no available data for FY 2020. Promotion panels were held early in FY 2021.

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	N/A

- c. New Hires to GS-14 (PWD) Answer N/A
- d. New Hires to GS-13 (PWD) Answer N/A

N/A

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 N/A
- b. New Hires to GS-15 (PWTD) Answer N/A
- c. New Hires to GS-14 (PWTD) Answer N/A
- d. New Hires to GS-13 (PWTD) Answer N/A

N/A

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 N/A
  - ii. Internal Selections (PWD) Answer N/A
- b. Managers
  - i. Qualified Internal Applicants (PWD) Answer N/A
  - ii. Internal Selections (PWD) Answer N/A
- c. Supervisors
  - i. Qualified Internal Applicants (PWD) Answer N/A
  - ii. Internal Selections (PWD) Answer N/A

Due to the COVID-19 pandemic, HRM delayed the promotion season by three months, from July 2020 to October 2020, resulting in no available data for FY 2020.

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 N/A

ii. Internal Selections (PWTD)	Answer	N/A
b. Managers		
i. Qualified Internal Applicants (PWTD)	Answer	N/A
ii. Internal Selections (PWTD)	Answer	N/A
c. Supervisors		
i. Qualified Internal Applicants (PWTD)	Answer	N/A
ii. Internal Selections (PWTD)	Answer	N/A

Due to the COVID-19 pandemic, HRM delayed the promotion season by three months, from July 2020 to October 2020, resulting in no available data for FY 2020.

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 | No  |
| b. New Hires for Managers (PWD)    | Answer | Yes |
| c. New Hires for Supervisors (PWD) | Answer | No  |

Data on external selections for PWD for new hires to executive positions represented 10% of selections FY 2020. External selections for PWD for new hires to supervisory positions represented 12.5% of the selections. 0% of new hire managerial selections were PWDs.

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 | N/A |

Data on qualified applicants involving PWTD for new hires to supervisory positions stayed the same for FY 2020. No new hires were PWTD.

## 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

N/A

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

N/A

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 No
- b. Involuntary Separations (PWTD) Answer No

N/A

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.

N/A

**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.

The ODNI is developing a notice specific to employees' and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

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.

The ODNI is developing a notice specific to explaining employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

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 ODNI is currently updating its internal policies on personal electronic devices which includes medical devices, service animals, and reciprocity with other IC elements. ODNI added touchless and ADA compliant automatic door opening to the entrances of ODNI facilities and to most work areas. During the pandemic, officers were given the opportunity to have a flexible workplace agreement, allowing them to do unclassified work from home. ODNI recently issued a revised Telework Policy for all ODNI officers in FY 2021, which allows unclassified work to be performed from alternate work locations. ODNI put stand-up desks in many cubicles and offices. In addition, ODNI employed UCC - a camera and headset combination to officers' desktops, to allow for more accessible VTC options. In FY 2021, ODNI launched U-View, an UNCLASSIFIED/FOUO network that officers can use both while teleworking from home and working in the office, enabling stronger collaboration between officers teleworking and those in the office. In addition, U-View has closed captioning capabilities.

**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 ODNI processes initial requests for reasonable accommodations within fifteen days of request and/or receipt of necessary medical documentation. In FY 2020, ODNI provided 51 sign language interpreters to support events, meetings and conferences. Additionally, we provided closed captioning services for five events.

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 ODNI demonstrated effectiveness of policies, procedures, and practices by processing requests and fulfillment of reasonable accommodations in a timely manner, and by providing, prompt guidance to managers and supervisors, and monitoring accommodation requests for trends. The ODNI is currently in the process of updating its internal policies on reasonable accommodation.

**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.

There were no requests for PAS in FY 2020.

**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.

N/A

## 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.

N/A

## 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

<b>Source of the Trigger:</b>	Workforce Data (if so identify the table)					
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B1					
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	The FY 2020 data review revealed triggers for the following areas: • PWD and PWTD by grade level cluster in the permanent workforce • PWD and/or PWTD among the new hires in the permanent workforce, mission critical occupations, supervisory positions, • PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives • PWTD for quality step increases or performance-based pay increases					
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i>					
<b>Barrier Analysis Process Completed?:</b>	N					
<b>Barrier(s) Identified?:</b>	N					
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b>		<b>Description of Policy, Procedure, or Practice</b>			
<b>Objective(s) and Dates for EEO Plan</b>						
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>	
<b>Responsible Official(s)</b>						
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>		
Chief, Human Resource Management		Jennifer M.		Yes		
<b>Planned Activities Toward Completion of Objective</b>						
<b>Target Date</b>	<b>Planned Activities</b>			<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>	<b>Completion Date</b>
09/30/2021	HRM will identify and determine strategies to increase recruitment of PWD/PWTD, including partnerships with other IC elements to target recruiting opportunities for PWD/PWTD.			Yes		
09/30/2021	HRM will work with EMRO, Ombuds, and EEO-ICD to identify training for managers and supervisors and consider written materials addressing unconscious bias that can be put on the ODNI website and sent to all managers.			Yes		

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	HRM will identify and determine strategies to mitigate any unconscious biases in the awards processes for PWD/PWTD, including a review of practices across other IC elements.	Yes		
09/30/2021	HRM will monitor applicant data of PWD/PWTD in mission critical occupations and senior grades to identify trends	Yes		
Report of Accomplishments				
Fiscal Year	Accomplishment			
2020	ODNI continued to ensure that officers serving on Awards panels signed precepts acknowledging panel processes. ODNI had at least one (and in most cases two) HR Officers sitting in on Awards panels to ensure procedures were followed.			

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

The COVID-19 pandemic curtailed many recruitment efforts, however by the end of FY 2020, the recruitment team had begun participating in more virtual recruitment events. As part of its efforts to improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities, the ODNI is actively working with the U.S. Department of Labor's Workforce Recruitment Program for College Students with Disabilities (WRP). ODNI is seeking to leverage this program to recruit highly motivated college students and recent graduates with disabilities. Additionally, reduced staffing due to the pandemic impacted ODNI's capacity to conduct barrier analyses. ODNI continually strives to provide opportunities for America's combat-wounded military members. Using semi-annual career fairs, veterans learn about unique internship opportunities that may provide a match between their skills and mission requirements. Unfortunately, this year we did not receive any applicants under the program. As such, we have evaluated the challenges for participation in the program and identified the lengthy security process as a potential obstacle for participation.

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

A review of data shows that new hires for management positions (supervisors, managers, and executives) increased in FY 2020 for PWD, and there was no change for PWTD. ODNI's efforts to increase overall hiring for PWD/PWTD were slowed by the COVID-19 pandemic and we will be reviewing our efforts following through on planned activities throughout FY 2021.

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.

ODNI did not have sufficient time to adequately implement and evaluate planned activities. ODNI will be reviewing activities at the end of FY 2021 and making any adjustments.