

## 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

(U) The percentage of PWD in the GS-1 to GS-10 cluster is 0.00%. The percentage of PWD in the GS-11 to SES/SNIS cluster is 7.76%, which falls below 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 Yes
- b. Cluster GS-11 to SES (PWTD) Answer No

(U) The percentage of PWTD in the GS-1 to GS-10 cluster is 0.00%.

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

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

(U) ODNI Human Resources Management manages hiring and recruitment without numerical goals, in compliance with Executive Orders 14151, Ending Radical and Wasteful Government DEI Programs and Preferencing, and 14173, Ending Illegal Discrimination and Restoring Merit-Based Opportunity. See Office of the Attorney General Memorandum, Subject: Implementation of Executive Orders 14151 and 14173, Eliminating Unlawful DEI Programs in Federal Operations (21 March 2025).

### 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

(U) ODNI maintained a full staff of Disability Program Managers to support the workforce in FY 2024.

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 |  |
| Special Emphasis Program for PWD and PWTB  | 0                                   | 0         | 1               | Melanie H.<br>Disability Program Manager             |
| Processing applications from PWD and PWTB  | 0                                   | 0         | 1               | Melanie H.<br>Chief, Workforce Benefits and Services |
| Answering questions from the public about hiring authorities that take disability into account | 0                                   | 0         | 3               | Daphne M.<br>Chief, HR Recruitment                   |
| Processing reasonable accommodation requests from applicants and employees                     | 3                                   | 0         | 0               | Reba C.<br>Disability Program Manager                |
| Section 508 Compliance   | 1                                   | 0         | 0               | Eric K.<br>Deputy CIO                                |
| Architectural Barriers Act Compliance  | 1                                   | 0         | 0               | Diana J.<br>Deputy Director, Facilities              |

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

(U) The Reasonable Accommodation, Disability Program Managers, attended the ODNI/EEOC Training – RA Process, Best Practices, Case Law Updates and Microsoft (MS) Document Accessibility Course. All new team members will attend the EEOC Disability Program Manager and Special Emphasis Program Manager courses, in addition to other EEOC offerings on the MD-715 basic, barrier analysis, disability program management, and refresher training. ODNI will also explore initiatives hosted by the National Employment Law Institute (NELI) covering the ADA and FMLA.

**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

### 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.

(U) In FY 2024, ODNI identified steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies, as well as steps that are designed to increase the number of PWD or PWTD. (U) Further, in FY 2023, ODNI launched a new ODNI internal system, called POP 2.0. This new system in conjunction with existing HR systems fully captures applicant flow data. The respective data management and data science capabilities of the system provides the ability to use this data to identify job applicants with disabilities, including individuals with targeted disabilities. (U) ODNI continues partnership with Wounded Warrior programs (and targeted engagement at Wounded Warrior national conferences) and the Federal Exchange on Employment & Disability provide opportunities for expanded recruitment among candidates with disabilities and with targeted disabilities, as well as insight into innovative approaches to recruiting PWD and PWTD to ODNI’s mission areas. ODNI is also establishing relationships with organizations that specialize in assisting individuals with disabilities in securing and maintaining employment, such as America Job Centers, State Vocational Rehabilitation Agencies, the Veterans’ Vocational Rehabilitation and Employment Program, and Employment Program, Centers for Independent Living, and Employment Network service providers. ODNI also continues to maintain alliances with the Access Board, the Job Accommodation Network, and equal opportunity publications, such as Careers and the disabled, to promote awareness of ODNI’s mission and opportunities.

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

(U) ODNI’s hiring process does not include a hiring authority permitting non-competitive appointment of qualified persons with disabilities. ODNI is committed to increasing the percentage of PWD and PWTD by focusing on the recruitment and retention of employees with disabilities and hiring them through the regular excepted service hiring process.

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 – see answer to #2, above

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

Schedule A hiring authorities do not apply to ODNI.

**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.

(U) ODNI HRM coordinates all ODNI recruitment activities in order to achieve resource efficiencies and unity of message, including contacts with organizations that assist in recruiting PWD and PWTD.

**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

(U) In FY 2024, the percentage of PWD among new hires in the permanent workforce was 3.87% while PWTD was 0.65%.

| New Hires                 | Total<br>(#) | 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 N/A
- b. New Hires for MCO (PWTD) Answer N/A

(U) Qualified applicant pool data is not currently available in HRM’s data holdings.

| New Hires to Mission-Critical Occupations | Total<br>(#) | Reportable Disability | Targetable Disability |
|---|--------------|-----------------------|-----------------------|
|   |              | New Hires (%)         | 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 No
- b. Qualified Applicants for MCO (PWTD) Answer Yes

(U) In FY 2023 for the Mission Management MCO, there was a trigger such that the representation of qualified internal applicants who were PWD (0.00 percent) was below their representation in the relevant applicant pool (10.18 percent). There was also a trigger such that the representation of qualified internal applicants who were PWTD (0.00 percent) was below their representation in the relevant applicant pool (2.18 percent).

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 No
- b. Promotions for MCO (PWTD) Answer No

(U) No triggers found.

## 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.

(U) Following the implementation of recommendations from the FY 2022 Barrier Analysis, COO sponsored an updated Barrier Analysis in 2023 to identify successes and areas still needing improvement for ODNI applicants and personnel with disabilities and with targeted disabilities. Two of the identified barriers from the 2022 report were: (1) lack of an existing comprehensive recruitment plan, and (2) lack of applicant flow data. ODNI initiatives address these issues, for example, ODNI Recruitment Strategy, which included specific language and direction for the recruitment of PWD and PWTD and captures and analyzes the applicant flow data of PWD and PWTD in mission-critical occupations and senior grades, among other efforts. (U) ODNI launched a self-ID campaign in early 2024 to encourage increased self-identification of disability status, using lessons learned from other agencies and the private sector. Improved data of ODNI PWD and PWTD will be used, in part to help inform ODNI’s strategies, approach and resource requirements needed to recruit and retain PWD and PWTD. (U) ODNI also attempted to ensure all personnel were aware of available disability and accessibility resources. OEEO, COO, and COO/HRM’s RA Program conducts continuous outreach to ODNI’s Directorates, Components, and Offices (DCOs) and often appears at component all-hands meetings to provide updates and answer questions. (U) Further, as described in greater detail above, ODNI has also undertaken training and other programs to facilitate promotion of employees with disabilities and with targeted disabilities to senior grade levels; coordination with other organizations and IC elements regarding recruiting efforts and best practices; unconscious bias training as it relates to PWD and PWTD for ODNI personnel in hiring and promotion roles; and disability-related training for managers and employees. (U) Managers receive consistent messaging via senior leadership meetings about the use of RAs and workplace flexibilities to ensure every employee receives an equal opportunity to advance. Additionally, COO/HRM’s new Supervisor & Manager Training Course includes modules on unconscious bias, empathy training, and detailed knowledge of supervisory and management responsibilities as they relate to the employment of PWD and PWTD. (U) With respect to hiring and promotion, ODNI employees who serve on hiring panels and promotion boards are required to sign formal precepts, which affirm that discriminatory factors, such as disability, race, or sex, are not part of the decision-making process.

### B. CAREER DEVELOPMENT OPPORTUNITES

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

(U) Competitive Learning Opportunity Program (CLOP) is a suite of annual professional development activities available to all permanent employees at ODNI. All employees are encouraged to formalize an Individual Development Plan with their supervisors, including a mix of internal and external training experiences as part of their professional development goals. (U) 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) to all employees. (U) ODNI continues to improve its tracking of participation in career development opportunities for PWD and PWTD.

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           |
| Coaching Programs                 | N/A                | N/A           | N/A            | N/A           | N/A            | N/A           |
| Fellowship Programs               | *                  | *             | 13.8%          | 0.0%          | 3.5%           | 6.7%          |
| Mentoring Programs                | *                  | *             | 6.9%           | 6.9%          | 2.0%           | 2.0%          |
| Training Programs                 | N/A                | N/A           | N/A            | N/A           | N/A            | N/A           |
| Detail Programs                   | *                  | *             | 8.7%           | 3.33%         | 4.35%          | 6.67%         |
| Other Career Development Programs | *                  | *             | 4.5%           | 4.5%          | 1.5%           | 1.5%          |

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

(U) ODNI does not track selections for career development based on disability.

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

(U) ODNI does not track selections for career development based on disability.

**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 No
- b. Awards, Bonuses, & Incentives (PWTD) Answer No

(U) ODNI does not track awards based on disability.

| 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 No

(U) Inclusion rates are not predictive measures for QSI pay increases, which for the most part are tied to individual’s position tenure in the agency. ODNI does not track performance based QSIs based on disability.

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

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 No
  - ii. Internal Selections (PWD) Answer No
- b. Grade GS-15
  - i. Qualified Internal Applicants (PWD) Answer No
  - ii. Internal Selections (PWD) Answer No
- c. Grade GS-14
  - i. Qualified Internal Applicants (PWD) Answer No
  - ii. Internal Selections (PWD) Answer No
- d. Grade GS-13

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

(U) Note: During FY 2024, for promotions above the GS-12 level, ODNI utilized a promotion process of “promotion in person” rather than “promotion in position,” and the relevant applicant pool consists of those who have petitioned for promotion. Agency-wide, 6.2% of promoted officers were identified as having a disability, while 69% of promoted officers did not identify as either having or not having a disability, and 24.8% identified as not having a disability. Accordingly, OEEEO concludes that the inclusion rate (the rate of representation of persons identifying as having a disability) is not a predictive measure of the availability of persons with disabilities. Moreover, separate promotion data is not maintained for PWTD. (U) In FY 2024, 7.7% of those who petitioned for promotion from the GS-15 to SNIS grade level who identified as having a disability were eligible for promotion; 0% were promoted. Agency-wide, 6.2% of promoted officers were identified as having a disability. Here again, the inclusion rate is not predictive. (U) In FY 2024, 7.7% of those who petitioned for promotion from the GS-14 to the GS-15 grade level who identified as having a disability were eligible for promotion; 7.7% were promoted. (U) In FY 2024, 15% of those who petitioned for promotion from the GS-13 to GS-14 grade level who identified as having a disability were eligible for promotion; 15% were promoted. (U) In FY 2024, 5.1% of those who petitioned for promotion from the GS-12 to GS-13 grade level who identified as having a disability were eligible for promotion; 5.1% were promoted.

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 No
- ii. Internal Selections (PWTD) Answer No

b. Grade GS-15

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

c. Grade GS-14

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

d. Grade GS-13

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

(U) Note: During FY 2024, for promotions above the GS-12 level, ODNI utilized a promotion process of “promotion in person” rather than “promotion in position,” and the relevant applicant pool consists of those who have petitioned for promotion. Agency-wide, 6.2% of promoted officers were identified as having a disability, while 69% of promoted officers did not identify as either having or not having a disability, and 24.8% identified as not having a disability. Accordingly, OEEEO concludes that the inclusion rate (the rate of representation of persons identifying as having a disability) is not a predictive measure of the availability of persons with disabilities. Moreover, separate promotion data is not maintained for PWTD.

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

(U) “Qualified applicant pool” data is not currently available in HRM’s data holdings.

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

(U) Qualified applicant pool data is not currently available in HRM’s data holdings.

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 No
  - ii. Internal Selections (PWD) Answer No
- b. Managers
  - i. Qualified Internal Applicants (PWD) Answer No
  - ii. Internal Selections (PWD) Answer No
- c. Supervisors
  - i. Qualified Internal Applicants (PWD) Answer No
  - ii. Internal Selections (PWD) Answer No

a. (U) Executives (U) (U) Note: During FY 2024, for promotions above the GS-12 level, ODNI utilized a promotion process of “promotion in person” rather than “promotion in position.” The relevant applicant pool consists of those who have petitioned for promotion. Agency-wide, 6.2% of promoted officers were identified as having a disability, while 69% of promoted officers did not identify as either having or not having a disability, and 24.8% identified as not having a disability. Accordingly, OEEEO concludes that the inclusion rate (the rate of representation of persons identifying as having a disability) is not a predictive measure of the

availability of persons with disabilities. b. (U) Managers (U) See above: ODNI uses a system of “promotion in person” in which the promotion selection requires self-nomination for promotion. c. (U) Supervisors (U) (U) See above: ODNI uses a system of “promotion in person” in which the promotion selection requires self-nomination for promotion.

6. Does your agency have a trigger involving PWTDD 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 (PWTDD) Answer No

ii. Internal Selections (PWTDD) Answer No

b. Managers

i. Qualified Internal Applicants (PWTDD) Answer No

ii. Internal Selections (PWTDD) Answer No

c. Supervisors

i. Qualified Internal Applicants (PWTDD) Answer No

ii. Internal Selections (PWTDD) Answer No

a. (U) Executives (U) See above: ODNI uses a system of “promotion in person” in which the promotion selection requires self-nomination for promotion. b. (U) Managers (U) See above: ODNI uses a system of “promotion in person”; selection is among those who self-nominate for promotion. In addition, ODNI does not track the promotion of PWTDD separately from those who identify as having a disability c. (U) Supervisors (U) See above: ODNI uses a system of “promotion in person”; selection is among those who self-nominate for promotion. In addition, ODNI does not track the promotion of PWTDD separately from those who identify as having a disability.

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 N/A

b. New Hires for Managers (PWD) Answer N/A

c. New Hires for Supervisors (PWD) Answer N/A

(U) Qualified applicant pool data is not currently available in HRM’s data holdings.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTDD 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 (PWTDD) Answer N/A

b. New Hires for Managers (PWTDD) Answer N/A

c. New Hires for Supervisors (PWTDD) Answer N/A

(U) Qualified applicant pool data is not currently available in HRM's data holdings.

## 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

- 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

Schedule A authorities do not apply to ODNI.

- 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 % |
|-------------|---------|---------------------------|-----------------------------------|
|-------------|---------|---------------------------|-----------------------------------|

- 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

(U) "Qualified applicant pool" data is not currently available in HRM's data holdings.

| Separations | Total # | Targeted Disabilities % | Without Targeted Disabilities % |
|-------------|---------|-------------------------|---------------------------------|
|-------------|---------|-------------------------|---------------------------------|

- 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.

(U) Website: <https://www.dni.gov/index.php/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.

(U) ODNI's information on the Architectural Barriers Act and contact information can be found on ODNI's public website at: [https://www.dni.gov/index.php/accessibility#:~:text=Architectural%20Barriers%20Act%20of%201968&text=The%20Architectural%20Barriers%20Act%20\(ABA,](https://www.dni.gov/index.php/accessibility#:~:text=Architectural%20Barriers%20Act%20of%201968&text=The%20Architectural%20Barriers%20Act%20(ABA,)

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.

(U) ODNI's EEO action plan aimed to improve accessibility of agency facilities and/or technology by ensuring the following: (1) minimum specifications for common accessibility concerns; (2) adherence to accessibility; (3) consistent procedures that are in compliance with ODNI and IC policies; and (4) increased supervisor and management engagement at the DCO level: 1. Minimum Specifications for Common Accessibility Concerns: · Ensure consistency with standards found in: o Americans with Disabilities Act of 1990 o Section 508 of the Rehabilitation Act of 1973 o Architectural Barriers Act (ABA) Standards of 1968 · Establish a working group to develop minimum specifications to address common physical access concerns. o Incorporate an Accessibility question into Entry on Duty (EOD) surveys to ensure awareness of common accessibility concerns. o Use exit survey data to ensure awareness of common accessibility concerns. o Encourage use of senior leader communication opportunities to identify persistent concerns. 2. Adherence to Accessibility: o Establish an annual Accessibility assessment process co-led by Facilities and Logistics and the Reasonable Accommodations office. o Establish annual review of websites and workforce communications on Accessibility o Require considering ADA compliance as part of initiating any facility modification. 3. Consistent Procedures that are in compliance with ODNI and IC Policies: o Easily accessible information on currently approved devices and how to seek approval for assistive technology and medical devices, and appeal procedures if denied. o Assess ODNI Supervisor and Manager course post-survey data to determine if supervisors and managers are leaving with an increased awareness of available accessibility resources, services, and processes. o Assess ODNI EOD course post-survey data to determine if newly onboarded employees are leaving with an increased awareness of available accessibility resources, services, and processes. 4. Increased Supervisor and Management Engagement at the Directorate, Center, and Office (DCO) Level: o Ensure DCOs offer Reasonable Accommodation program information and training to their workforces at least annually, including: the benefits of self-reporting in ODNI Human Resource Management tool any disability or targeted disability, Reasonable Accommodation process and resources, actions that can be undertaken to improve the work environment without a formal Reasonable Accommodation (for e.g., obtaining screen shields, Varideks, wall extenders) and when it may be advisable to do so. o Incorporate a Reasonable Accommodation question into DCO onboarding checklist to ensure employees and managers remember to account for these considerations upon accession of each employee to a new DCO. The checklist should include information on how to request an assessment for conference and SCIF door modifications, and language Chiefs of Staff can use to explain to employees the considerations that factor into an assessment (including, e.g., the paths of egress and distance of travel). o Develop and publish a Reasonable Accommodations managers/supervisors guide that is disseminated at managers/supervisors training, through workforce communications, and posted to the Reasonable Accommodations website. o Incorporate an accessibility question in DCO-level exit surveys. o Establish an ODNI working group to review and update ODNI policies, processes, and communications materials for classified and unclassified websites related to medical devices consistent with the plan and the IC policy currently in coordination. o Develop a one-pager information sheet and communications plan to share with employees on how disability data is stored and used at ODNI for confidentiality purposes.

### 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.)

(U) In FY 2024, the average time frame for processing initial requests for ODNI was 1.5 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.

(U//FOUO) In FY 2024, COO/HRM/RA verified that 100% of RA initial requests that required a determination met the timeline requirement. (U) ODNI also attempts to ensure all personnel are aware of available disability and accessibility resources. ODNI offices conduct continuous outreach to ODNI’s DCOs and often appear at component all-hands meetings to provide updates and answer questions. New ODNI employees also receive information at the Entry on Duty Orientation.

**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.

(U//FOUO) There were no requests for PAS in FY 2024. RA provides PAS training upon request for supervisors and managers.

**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.

(U) N/A. ODNI had no findings of discrimination in the last fiscal year.

## 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.

N/A

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

N/A

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.

N/A