

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

<b>SECTION I: EFFORTS TO REACH REGULATORY GOALS .....</b>	<b>2</b>
<b>SECTION II: MODEL DISABILITY PROGRAM .....</b>	<b>3</b>
A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR DISABILITY PROGRAM .....	3
B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM .....	4
<b>SECTION III: PROGRAM DEFICIENCIES IN THE DISABILITY PROGRAM .....</b>	<b>4</b>
<b>SECTION IV: PLAN TO RECRUIT AND HIRE INDIVIDUALS WITH DISABILITIES .....</b>	<b>5</b>
A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES .....	5
B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS .....	7
C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING) .....	7
<b>SECTION V: PLAN TO ENSURE ADVANCEMENT OPPORTUNITIES FOR EMPLOYEES WITH DISABILITIES .....</b>	<b>8</b>
A. ADVANCEMENT PROGRAM PLAN .....	9
B. CAREER DEVELOPMENT OPPORTUNITIES .....	9
C. AWARDS .....	10
D. PROMOTIONS .....	11
<b>SECTION VI: PLAN TO IMPROVE RETENTION OF PERSONS WITH DISABILITIES .....</b>	<b>14</b>
A. VOLUNTARY AND INVOLUNTARY SEPARATIONS .....	15
B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES .....	15
C. REASONABLE ACCOMMODATION PROGRAM .....	16
D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE .....	17
<b>SECTION VII: EEO COMPLAINT AND FINDINGS DATA .....</b>	<b>18</b>
A. EEO COMPLAINT DATA INVOLVING HARASSMENT .....	18
B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION .....	18
<b>SECTION VIII: IDENTIFICATION AND REMOVAL OF BARRIERS .....</b>	<b>18</b>

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

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

### Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 C.F.R. § 1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with reportable and targeted disabilities in the federal government.

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.
  - a. Cluster GS-1 to GS-10 (PWD) Answer: Yes
  - b. Cluster GS-11 to SES (PWD) Answer: Yes

Compared to the goal of 12%, the Agency's number of PWD within GS-1 to GS-10 equivalent positions (FP 9 to FP 5) is 8% and for GS-11 to SES (FP 4 to SES) is 6.2%. Note that these numbers only include individuals who have identified as having a disability through OPM's SF-256 form.

\* 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

Compared to the goal of 2%, the Agency's number of PWTD within GS-1 to GS-10 (FP 9 to FP 5) is .4% and for GS-11 to SES (FP 4 to SES) is .29%. Note that these numbers only include individuals who have identified as having a targeted disability through OPM's SF-256 form.

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

The Office of Civil Rights and Diversity has met with the Acting Chief Compliance Officer, the Acting Director and Acting Deputy Director of the Office of Human Resources, as well as senior leaders from a variety of other offices to inform them of the Agency's responsibility to work towards these hiring goals and comply with the affirmative employment mandates of Section 501 of the Rehabilitation Act. The

Agency has already adopted the 2% hiring goal for individuals with targeted disabilities in its formal policy manual and is planning to edit our formal policies to include the 12% hiring goal. We are also planning to develop trainings for those involved in the hiring process on these hiring goals and to incorporate information on the goals into our existing trainings for supervisors, new employees, and existing employees.

## Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

### A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR DISABILITY PROGRAM

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

Answer: No

No. Though the Agency has sufficient staffing in all other categories listed below and has designated a new Section 508 Program Coordinator during FY17, the 508 Program Coordinator has assumed those duties as a collateral duty. During FY18, funding will be requested to establish a Section 508 Program, and to designate a full time 508 Program Coordinator to integrate Section 508 compliance into agency policy and procedures. Note also that though we currently have sufficient staffing for the responsibilities of processing applications from PWD and PWTD and answering questions from the public about hiring authorities that take disability into account, the Agency plans to eliminate that position, so the Agency must ensure that those responsibilities continue to be filled.

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	0	2	0	Enrique Colon, Diversity Recruiter, Office of Human Resources, <a href="mailto:ecolon@peacecorps.gov">ecolon@peacecorps.gov</a>
Answering questions from the public about hiring authorities that take <u>disability into account</u>	0	2	0	Enrique Colon, Diversity Recruiter, Office of Human Resources, <a href="mailto:ecolon@peacecorps.gov">ecolon@peacecorps.gov</a>
Processing reasonable accommodation requests from applicants and employees	2	0	0	Sarah Pauly, Disability Program Manager, Office of Civil Rights and Diversity, <a href="mailto:spauly@peacecorps.gov">spauly@peacecorps.gov</a> ; Jenese Portee, Office of Civil Rights and Diversity, <a href="mailto:jportee@peacecorps.gov">jportee@peacecorps.gov</a> .

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Section 508 Compliance	0	0	1	Rachel Gardell, Acting Director, Enterprise Business Software Services, Office of the Chief Information Officer, accessibility@peacecorps.gov
Architectural Barriers Act Compliance	0	2	0	Jason Swift, Supervisory Facility Operations Specialist, Facilities Management Division, facilities@peacecorps.gov
Special Emphasis Program for PWD and PWTD	1	0	0	Sarah Pauly, Disability Program Manager, Office of Civil Rights and Diversity, spauly@peacecorps.gov

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

Answer: Yes

Yes. Trainings received during FY17 include:

- Equal Employment Opportunity Commission Disability Program Manager Training
- Department of Homeland Security Trusted Tester Training for Section 508 testers
- Deque Section 508 trainings were purchased for a number of staff
- General Services Administration training on how to establish a 508 program within a federal agency
  - Department of Agriculture’s Target Center training on how to make Microsoft Office products accessible under Section 508

**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: No

No. Though there was sufficient funding and resources for all other aspects of the program, there was not sufficient funding for the Section 508 program. The Agency’s Office of the Chief Information Officer reports that funding and program requests are in development for FY19 planning.

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

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

Program Deficiencies	Agency Comments
<p>Are managers and supervisors evaluated on their commitment to agency EEO policies and principles, including their efforts to: ensure the provision of requested disability accommodations to qualified individuals with disabilities when such accommodations do not cause an undue hardship?</p>	<p>The Agency is reviewing its performance evaluation standards to address this criteria.</p>

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

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

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

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

In FY17 the Agency’s Office of Civil Rights and Diversity (OCD) and Office of Human Resource Management (HRM) partnered on multiple initiatives to increase the hiring of individuals with disabilities to include the disabled Veteran community. Both offices regularly partner to attend recruitment events specifically geared towards reaching out to the disability community. HRM has built several relationships and informal partnerships with Gallaudet University and other disability-friendly universities and organizations nationally and has successfully hired people with targeted and non-targeted disabilities including disabled veterans for staff positions and internships in FY17. HRM has made the promotion of our disability hiring program throughout the Agency a continued priority and initiative in FY17 and future.

For FY17 Peace Corps utilized the following strategies to recruit, employ, retain and advance Schedule A candidates and disabled Veterans with an added emphasis on Veterans with a compensable service connected disability of 30% or more in adherence to 5 CFR 720, Subpart C:

- Educated and promoted to management, hiring officials, staffing analysts, and leadership the benefits of utilizing disability and Veterans programs such as, Bender Consulting, Operation Warfighter (OWF), Wounded Warrior (WWP), Non-Paid Work Experience (NWE), Workforce Recruitment Program (WRP), as well as other programs.
- Attended various Transition Assistance Program (TAP) and university career (Gallaudet, Bowie St.) sessions and events on monthly and quarterly basis in local areas to inform and educate transitioning military professionals and Veterans with disabilities about Peace Corps job opportunities and to provide information sessions regarding the Peace Corps mission as well as to provide education and guidance on Federal resume writing and navigating the hiring process.
- Collaborated throughout the year with Veterans Affairs and the DC Department of

Human Resources to increase employment awareness of the agencies career opportunities by working with representatives from the Veterans Education Outreach program (VEOP) and DC disability employment counselors.

- Promoted the hiring of Schedule A and disabled Veterans (10 point) from our resume bank and worked with our HRM Staffing & Classification team to consistently be proactive in considering those eligible for non-competitive employment (NCE).
- Utilized Peace Corps Veteran and disability employee resource groups as a platform to discuss career training and advancement opportunities as well as utilizing the groups' wide circle of influence and network to circulate information in regard to employment at Peace Corps.

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.

Peace Corps currently uses the following hiring flexibilities to recruit PWD and PWTD for domestic and overseas positions:

- Schedule A Non-Competitive Appointment Equivalent
- Veterans' Recruitment Appointment (VRA) and 30% or More Disabled Veteran rule
- Temporary Appointment: Peace Corps may hire Veterans & Schedule A candidates under a temporary limited appointment for a specific period of time (usually 12 months or less). Once on board, temporary employees may apply for internal vacancy announcements.
- Operation Warfighter Program (OWP): a temporary assignment/internship program that provides training opportunities. There is no cost and no risk because assignment can be terminated at any time. The average length of an assignment is 3-5 months.
- Non-paid Work Experience Program (NPWEP): Veterans in this program are eligible to obtain training and practical job experience consistent with their vocational rehabilitation goals. The Veterans Administration pays participants a stipend and length of service is up to 18 months. There is no cost and no risk because assignment can be terminated at any time.
- Veterans Administration Work Study Program: Federal Work-Study provides part-time jobs for undergraduate and graduate veteran students with financial need, allowing them to earn money to help pay education expenses.

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.

(1) All documentation received to support Schedule A eligibility is reviewed and adjudicated by the Staffing Team in the Office of Human Resources Management and in compliance with Schedule A, 5 CFR 213.3102(u) and 5 CFR 213.3102(11).

(2) Qualified Schedule A candidates who apply electronically for external vacancies via USAJOBS will be given first preference along with internal candidates and submitted to Hiring Officials on a separate and identifiable certificate for consideration. The direct contact manual process remains the same as Schedule A eligible qualified candidate applications will continue to be presented by Human Resources representatives to the relevant Hiring Officials with an explanation of how and when the individual may be appointed.

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

All new supervisors receive training which includes information in regard to the benefits of hiring PWD and Veterans and the available hiring flexibilities and special authorities to do so (as well as how to use them). Additionally, the Diversity Recruitment Specialists in the office of HRM act as consultants/advisors to our internal clients and use this platform to also promote the hiring of persons with disabilities and the available hiring flexibilities and special authorities available on a continuous basis.

## **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.

HRM has made the promotion of the Agency’s affirmative employment program for PWD a continued priority and initiative for FY18 and beyond. To do so, the Agency has undertaken several initiatives to build relationships with organizations that assist PWD in securing and maintaining employment at the Peace Corps.

The Diversity Recruitment Specialists in the office of HRM are responsible for managing and building meaningful relationships with organizations that assist PWD, including PWTD, and utilizing those partnerships to increase recruitment and hiring of individuals with disabilities. HRM has built an informal partnership with Gallaudet University and other disability-friendly universities and organizations nationally, leading to the successful hiring of people with targeted and non-targeted disabilities. HRM partners with OCRD to attend recruitment events and educational workshops to strengthen the Agency’s disability hiring initiatives and will continue to partner to increase the hiring of individuals with disabilities to include the disabled Veteran community.

To help ensure that the Agency retains employees who need accommodations, OCRD partners with the Center for Computer and Electronic Accommodations to provide needs assessments, consultations, and free assistive devices to employees with disabilities. OCRD has also established a relationship with the Department of Agriculture’s Target Center, which has provided training for our Agency on creating accessible documents and has provided ergonomic assessments of employees who need them due to a disability. Furthermore, because Returned Peace Corps Volunteers constitute a significant portion of the Agency’s employee-applicant pipeline, the Agency has entered into a letter of intended commitment with Mobility International USA, to ensure that our Volunteer Corps is as inclusive as possible of PWD, and has also established a “Peace Corps Prep” program with Gallaudet University.

## **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

Among the permanent new hires in the workforce, triggers exist for PWD (8.33%) which falls below the benchmark of 12%, and for PWTD (.69%) which falls below the benchmark of 2%.

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.
  - a. New Hires for MCO (PWD)      Answer: Yes
  - b. New Hires for MCO (PWTD)      Answer: Yes

Yes. For occupation series code 0301, PWTD constituted 2.26% of the qualified applicant pool, but none of the selections; PWD constituted 4.76% of the qualified applicant pool, but only 1.69% of the selections. For occupation series code, 0341 PWTD constituted 1.68% of the qualified applicant pool but none of the selections.

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified *internal* applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.
  - a. Qualified Applicants for MCO (PWD)      Answer: No
  - b. Qualified Applicants for MCO (PWTD)      Answer: No

Unknown. Data distinguishing internal from external applicants is not available. The Agency will work to ensure this data is available for future reports.

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

Unknown. Data regarding the qualified applicant pool for competitive promotions is not available. The Agency will work to ensure this data is available for future reports.

## 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.

The Agency's Disability Program Manager will collaborate with Agency stakeholders, including the Office of Staff Learning and Development (OSLD), the Chief Diversity Officer, HRM, and the Agency's Disability and Veterans employee resource groups to ensure that PWD have sufficient opportunities for advancement. Specifically, the Agency will:

- Ensure that the Agency's infrastructure is accessible to PWD and PWTD by continuing to promote technology, information, and processes that facilitate the provision of reasonable accommodations and personal assistance services as well as conformance with accessibility standards under both Section 508 of the Rehabilitation Act and the Architectural Barriers Act;
- Address attitudinal barriers through programming and educational initiatives that break down stereotypes and stigmas surrounding both visible and invisible disabilities;
- Ensure that PWD and PWTD have access to promotion opportunities and training resources by strengthening the relationship between OSLD and the Agency's Disability and Veterans employee resource groups;
- Ensure that the Agency's disability-related hiring authorities are utilized for all grade levels and for promotions as appropriate.

## B. CAREER DEVELOPMENT OPPORTUNITIES

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

Career Development Opportunities are managed by the Agency's Office of Staff Learning and Development (OSLD). Such opportunities include a variety of learning opportunities such as career development and consultations, coaching, mentoring, and access to online and in-person training opportunities. OSLD echoes the Peace Corps' commitment to actively recruit, support, and retain a diverse workforce and Volunteer corps and build an inclusive culture that encourages collaboration, flexibility, and fairness through a variety of offerings aimed to increase staff awareness on the importance of diversity and inclusion, including practices that promote the inclusion of PWD and PWTD, such as trainings on inclusive habits. To ensure the inclusion of PWD in career development opportunities, OSLD ensures that reasonable accommodations are provided for all of its programs, by, for example, including contact information for reasonable accommodation requests in its event invitations and promotional materials and by partnering with the Office of Civil Rights and Diversity in hosting Agency-wide educational events and courses on accessibility under Section 508 of the Rehabilitation Act and on reasonable accommodations. Additionally, OSLD staff has played a key role in establishing and running the Section 508 taskforce for the Agency.

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

a. Applicants (PWD)

Answer: No

b. Selections (PWD)

Answer: No

Unknown. Data is not available. Per instructions above, the EEOC has stated that the Agency is not required to report on this data until the FY18 report.

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

a. Applicants (PWTD)

Answer: No

b. Selections (PWTD)

Answer: No

Unknown. Data is not available. Per instructions above, the EEOC has stated that the Agency is not required to report on this data until the FY18 report.

### 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, &amp; Incentives (PWD)

Answer: Yes

b. Awards, Bonuses, &amp; Incentives (PWTD)

Answer: No

Yes. For PWD, there is a trigger for time off awards and cash awards, and quality step increases; compared to the inclusion rate of 7.09%, PWD had 3.9% of time off awards 1-9 hours, 6.13% of time off awards 9+ hours, 5.71% percent of cash awards \$100-\$500, 5.4% percent of cash awards \$501+, and 6.06% of quality step increases.

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: No

Yes. Compared to the inclusion rate of .39%, PWTD had 0% of the quality step increases. Compared to the inclusion rate of 7.09%, PWD had 6.06% of quality step increases. Data is not available on performance based pay increases. It is not clear, however, whether this is a statistically significant difference.

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

Unknown. Data is not available for this year's report. The Agency will work to ensure this data is available for future reports.

## D. PROMOTIONS

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

a. SES

i. Qualified Internal Applicants (PWD) Answer: No

ii. Internal Selections (PWD) Answer: 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

Unknown. Data is not available for this year's report. The Agency will work to ensure this data is available for future reports.

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.

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 |

Unknown. Data is not available for this year's report. The Agency will work to ensure this data is available for future reports.
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3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

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

Unknown. Data is not available for this year's report. The Agency will work to ensure this data is available for future reports.
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4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

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

Unknown. Data is not available for this year's report. The Agency will work to ensure this data is available for future reports.

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

a. Executives

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

Unknown. Data is not available for this year's report. The Agency will work to ensure this data is available for future reports.

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

a. Executives

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

b. Managers

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

c. Supervisors

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

Unknown. Data is not available for this year's report. The Agency will work to ensure this data is available for future reports.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.

a. New Hires for Executives (PWD) Answer: No

b. New Hires for Managers (PWD) Answer: No

c. New Hires for Supervisors (PWD) Answer: No

Unknown. Data is not available for this year's report. The Agency will work to ensure this data is available for future reports.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.

a. New Hires for Executives (PWTD) Answer: No

b. New Hires for Managers (PWTD) Answer: No

c. New Hires for Supervisors (PWTD) Answer: No

Unknown. Data is not available for this year's report. The Agency will work to ensure this data is available for future reports.

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

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

## A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer: N/A

N/A- As an excepted service Agency, we are not part of the competitive service, and thus cannot convert employees into the competitive service.

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: Yes

Yes. PWD consisted of 40% of involuntary separations, whereas PWD consist of 7.09% of the Agency. However, only 5 total involuntary separations occurred in FY17, so it is not clear whether this trigger reflects a statistically significant pattern or not.

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

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 PWD who were involuntarily separated left the Agency due to performance and/or conduct issues.

## B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

<https://www.peacecorps.gov/about/accessibility-statement/>

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.

<https://www.peacecorps.gov/about/accessibility-statement/>

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 has convened a Section 508 taskforce that took strategic steps during FY17 to improve the accessibility of technology and will continue to do so during FY18. Steps taken during FY17 include appointing the Agency's first Section 508 program coordinator, conducting a variety of trainings on 508 accessibility, and training the Agency's first accessibility testers. In FY18, the Agency will further develop formal policies and procedures to promote 508 accessibility and will launch a Section 508 accessibility resource center.

To improve the accessibility of Agency facilities, the Agency plans to move to a new location during 2019 and has developed a list of key accessibility features for the building to ensure that it not only meets, but exceeds applicable accessibility requirements.

## 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.)

Unknown. Though all accommodation requests are processed as quickly as possible, records were not available to track this data point. The Agency will work to develop a system to ensure it can provide this data point for the FY18 report.

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 Agency's reasonable accommodation process is effective in that it: 1) promotes efficiency for PWD by flexibly applying the medical documentation requirement and allowing decision-makers discretion to waive that requirement where they feel the accommodation requested is easy to provide and has minimal impact upon operations; 2) has moved towards a system of developing standard practices and inter-office workflows for commonly requested accommodations, such as sit/stand workstations, sign language interpretation, assistive technology, and parking privileges; 3) has taken proactive steps to ensure that accommodation needs can be filled as quickly as possible by pre-screening and pre-purchasing assistive technology; 4) ensures that all new employees are provided with information on reasonable accommodations and that all employees receive training on reasonable accommodations once at least every two years; and 6) provides a centralized funding source for the most common accommodation requests.

The effectiveness of the reasonable accommodation process can be improved by: 1) updating the procedures to ensure they comply with all requirements under Section 501 of the Rehabilitation Act; 2) ensuring that a centralized funding source exists for any accommodation request not already provided with one; 3) increasing the effectiveness and frequency of trainings related to reasonable accommodations; and 4) developing a system to ensure that the number of days it takes to process each request is tracked.

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

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

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

Though Agency has not yet received a request for PAS, it has engaged in a variety of steps to implement the PAS requirement. The Agency will continue to monitor the effectiveness of these practices, policies and procedures. The steps the Agency has taken are:

- To ensure that PWTDD are aware of their right to PAS, the Agency has included a statement on PAS in its public-facing website's accessibility statement;
- The Agency's Office of Civil Rights and Diversity has created a one-page document on PAS that provides guidance to both employees and supervisors. This document will be posted on the Agency's internal-facing website.
- The Agency has educated senior leaders about the new requirement to provide PAS.
- The Agency has drafted PAS procedures and they are currently pending internal review with the Agency.

## Section VII: EEO Complaint and Findings Data

### A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer: N/A

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: N/A

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- No complaints were filed alleging harassment based on disability status.

### B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer: N/A

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: N/A

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- no complaints were filed alleging failure to provide reasonable accommodations.

## 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: Yes

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

Answer: Yes

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

<b>Trigger 1</b>	<p><u>AWARDS</u>: Compared to the inclusion rate of 7.09%, PWD had 3.9% of time off awards 1-9 hours, 6.13% of time off awards 9+ hours, 5.71% percent of cash awards \$100-\$500, 5.4% percent of cash awards \$501+, and 6.06% of quality step increases. Compared to the inclusion rate of .39%, PWTD had 0% of the quality step increases.</p>			
<b>Barrier(s)</b>	<p>Lack of educational resources regarding what all employees can do to ensure that the Agency is a place where PWD and PWTD can excel, including how to address attitudinal and infrastructural barriers.</p>			
<b>Objective(s)</b>	<p>Develop and promote educational resources to promote steps that all employees can take to ensure that the Agency is a place where PWD and PWTD can excel, including how to address attitudinal and infrastructural barriers.</p>			
<b>Responsible Official(s)</b>		<b>Performance Standards Address the Plan? (Yes or No)</b>		
Laara Manler, Director, Office of Civil Rights and Diversity		Yes		
<b>Barrier Analysis Process Completed? (Yes or No)</b>		<b>Barrier(s) Identified? (Yes or No)</b>		
Yes		Yes		
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>		
Workforce Data Tables	Yes			
Complaint Data (Trends)	Yes			
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	No			
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	Yes	Review of existing Agency resources on disability inclusion.		
<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>

09/30/2018	Develop and promulgate a one-page document for employees with disabilities that informs them of the resources available to them. The document will include information on reasonable accommodations, the Agency's Assistance Monitor Program, the employee resource group for PWD, information on career development and mentorship opportunities, and information on how to file a discrimination complaint if needed.	Yes		
09/30/2018	Develop and promulgate a one-page document and an in-person training on inclusive practices for PWD for people who may supervise or work with employees with disabilities. The materials will include information designed to address attitudinal barriers and stereotypes that PWD may face in the workplace, information on the Agency's affirmative hiring goals for PWD and steps that individuals can take to help the Agency to meet them, as well as information on infrastructure in place to ensure that reasonable accommodations and access can be provided.	Yes		
<b>Fiscal Year</b>	<b>Accomplishments</b>			

<b>Trigger 2</b>	<u>SEPARATIONS</u> : PWD consisted of 40% of involuntary separations, whereas PWD consist of 7.09% of the Agency. However, only 5 total involuntary separations occurred in FY17, so it is not clear whether this trigger reflects a statistically significant pattern or not.		
<b>Barrier(s)</b>	Lack of educational resources regarding what all employees can do to ensure that the Agency is a place where PWD and PWTD can excel, including how to address attitudinal and infrastructural barriers.		
<b>Objective(s)</b>	Develop and promote educational resources to promote steps that all employees can take to ensure that the Agency is a place where PWD and PWTD can excel, including how to address attitudinal and infrastructural barriers.		
<b>Responsible Official(s)</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>		
Laara Manler, Director, Office of Civil Rights and Diversity	Yes		
<b>Barrier Analysis Process Completed? (Yes or No)</b>	<b>Barrier(s) Identified? (Yes or No)</b>		
Yes	Yes		

<b>Sources of Data</b>		<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>		
Workforce Data Tables		Yes			
Complaint Data (Trends)		Yes			
Grievance Data (Trends)		No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)		No			
Climate Assessment Survey (e.g., FEVS)		No			
Exit Interview Data		No			
Focus Groups		No			
Interviews		No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)		No			
Other (Please Describe)		Yes	Reviewed Agency resources on disability inclusion.		
<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>	
09/30/2018	Develop and promulgate a one-page document for employees with disabilities that informs them of the resources available to them. The document will include information on reasonable accommodations, the Agency's Assistance Monitor Program, the employee resource group for PWD, information on career development and mentorship opportunities, and information on how to file a discrimination complaint if needed.	Yes			
09/30/2018	Develop and promulgate a one-page document and an in-person training on inclusive practices for PWD for people who may supervise or work with employees with disabilities. The materials will include information designed to address attitudinal barriers and stereotypes that PWD may face in the workplace, information on the Agency's affirmative hiring goals for PWD and steps that individuals can take to help the Agency to meet them, as well as information on infrastructure in place to ensure that reasonable accommodations and access can be provided.	Yes			

09/30/2018	Follow-up with the Agency's Human Resources Office to determine if there is any pattern that could contribute to the disparate rate of involuntary separation of employees with disabilities, and if such a pattern is found, create a plan to address it.	Yes		
<b>Fiscal Year</b>	<b>Accomplishments</b>			

<b>Trigger 3</b>	<p>REPRESENTATION AND HIRES:</p> <ul style="list-style-type: none"> <li>• Compared to the goal of 12%, the Agency's number of PWD within GS-1 to GS-10 equivalent positions (FP 9 to FP 5) is 8% and for GS-11 to SES (FP 4 to SES) is 6.2%. Compared to the goal of 2%, the Agency's number of PWTDD within GS-1 to GS-10 (FP 9 to FP 5) is .4% and for GS-11 to SES (FP 4 to SES) is .29%.</li> <li>• Among the permanent new hires in the workforce, triggers exist for PWD (8.33%) which falls below the benchmark of 12%, and for PWTDD (.69%) which falls below the benchmark of 2%.</li> <li>• For occupation series code 0301, PWTDD constituted 2.26% of the qualified applicant pool, but none of the selections; PWD constituted 4.76% of the qualified applicant pool, but only 1.69% of the selections. For occupation series code, 0341 PWTDD constituted 1.68% of the qualified applicant pool but none of the selections.</li> </ul>
<b>Barrier(s)</b>	Lack of information available on the Agency's public-facing and internal-facing websites on the processes for Schedule A Equivalent and other disability-related hiring authorities.
	Widespread use of the non-competitive hiring process for Returned Peace Corps Volunteers, which consistently represent the majority of the Agency's employees: though no data is available on the number of Peace Corps Volunteers with disabilities, due to the intensive medical clearance process that all Volunteers must go through before serving, it is hypothesized that individuals with disabilities are underrepresented in the Volunteer Corps compared to their prevalence in the US population. When Returned Peace Corps Volunteers regularly constitute over 50% of Peace Corps employees and the Agency regularly makes use of the non-competitive hiring process for Returned Peace Corps Volunteers to fill positions, the underrepresentation of PWD in the Volunteer Corps will lead to an underrepresentation of employees with disabilities in the Agency's workforce.
	Lack of educational resources regarding what all employees can do to ensure that the Agency is a place where PWD and PWTDD can excel, including how to address attitudinal and infrastructural barriers.
	Lack of knowledge of the Agency's new affirmative employment responsibilities and goals for PWD and how to help to meet them.
	Lack of applicants and hires under the Schedule A equivalent process: the Agency received only 19 applications for its Schedule A equivalent process and made no hires under it during FY17.
	Lack of clarity on funding sources for some reasonable accommodations for both employees and Volunteers
<b>Objective(s)</b>	Remove barriers to meet the federal goals of ensuring that the agency has at least 12% PWD and 2% of PWTDD employed throughout both higher and lower grade levels.

<b>Responsible Official(s)</b>		<b>Performance Standards Address the Plan? (Yes or No)</b>		
Laara Manler, Director, Office of Civil Rights and Diversity		Yes		
<b>Barrier Analysis Process Completed? (Yes or No)</b>		<b>Barrier(s) Identified? (Yes or No)</b>		
Yes		Yes		
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>		
Workforce Data Tables	Yes			
Complaint Data (Trends)	Yes			
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	No			
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	Yes	Analysis of responses provided by stakeholder offices, analysis of materials available on internal and external websites on disability-related hiring authorities and disability inclusion, analysis of existing policies and practices regarding reasonable accommodations for both Volunteers and employees.		
<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
09/30/2018	Develop and promulgate a one-page document for employees with disabilities that informs them of the resources available to them. The document will include information on reasonable accommodations, the Agency's Assistance Monitor Program, the employee resource group for PWD, information on career development and mentorship opportunities, and information on how to file a discrimination complaint if needed.	Yes		

09/30/2018	Develop and promulgate a one-page document and an in-person training on inclusive practices for PWD for people who may supervise or work with employees with disabilities. The materials will include information designed to address attitudinal barriers and stereotypes that PWD may face in the workplace, information on the Agency's affirmative hiring goals for PWD and steps that individuals can take to help the Agency to meet them, as well as information on infrastructure in place to ensure that reasonable accommodations and access can be provided.	Yes		
09/30/2018	Post information prominently on the Agency's external and internal facing websites on the Schedule A equivalent and other disability-related hiring authorities. The information should include both information on how to apply and details on what happens to the application after it is submitted. On the internal-facing website, it should provide information on what someone involved in the hiring process should do if they are interested in hiring someone through a disability-related non-competitive authority.	Yes		
09/30/2019	Establish a formal partnership with a disability-employment organization, such as a local rehabilitation center, to increase the number of qualified applicants with disabilities.	Yes		
09/30/2018	Research the feasibility of developing a system to align the Agency's non-competitive hiring process for Returned Peace Corps Volunteers with other non-competitive disability-related hiring authorities to ensure that whenever a position is filled non-competitively, that it considers individuals applying under non-competitive disability related authorities.	Yes		
09/30/2019	Establish a centralized funding source for accommodations for both employees that do not already have one, and for Volunteers.	Yes		
09/30/2019	Create and achieve internal approval of a disability inclusion strategy for the Volunteer Corps.	Yes		
<b>Fiscal Year</b>	<b>Accomplishments</b>			

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

N/A. Will provide information in FY18 report.

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

N/A. Will provide information in FY18 report.

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. Will provide information in FY18 report.