

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

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

### Section I: Efforts to Reach Regulatory Goals

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

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

- a. Cluster GS-1 to GS-10 (PWD) Answer Yes
- b. Cluster GS-11 to SES (PWD) Answer Yes

The representation rate for AMS employees in the GS-1 to GS-10 cluster at the end of FY 2018 was 9.54%, 2.46% below the Federal goal. The majority of PWD were employed at the GS-09 grade level. The representation rate for AMS employees in the GS-11 to SES cluster at the end of FY 2018 was 8.85%, 4.93% below the Federal goal. The majority of PWD were employed at the GS-12 grade level.

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

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

- a. Cluster GS-1 to GS-10 (PWTD) Answer No
- b. Cluster GS-11 to SES (PWTD) Answer No

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical Goal	--	12%		2%	
Grades GS-1 to GS-10	1422	135	9.49	31	2.18
Grades GS-11 to SES	1300	115	8.85	36	2.77

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

AMS conducts internal compliance reviews of specific Agency Programs as a means of evaluating the Agency's effectiveness in fulfilling its civil rights obligations. AMS Civil Rights Program provides monthly statistical tables relating to hires, promotions, separations, and workforce representation of PWD and PWTD to each of its Agency Programs' Deputy Administrator and to the Agency Administrator with the numerical goals listed.

## 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

- 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

See below.

- 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	1	0	0	Amber Kiel, HR Specialist, APHIS, MRPBS Recruitment & Placement Amber.m.kiel@aphis.usda.
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Carmen Humphrey, Deputy Director/EEO Specialist AMS Civil Rights Program Carmen.Humphrey@ams.u
Processing reasonable accommodation requests from applicants and employees	1	0	0	Carmen Humphrey, Deputy Director/EEO Specialist AMS Civil Rights Program Carmen.Humphrey@ams.u
Section 508 Compliance	0	0	1	Irene Omade, Program Analyst APHIS, MRPBS, MRP Information Technology Services m.irene.omade@ams.usda.
Architectural Barriers Act Compliance	1	0	0	Mr. Fidel Delgado, Engineering Branch Facilities Management Division, Offices of Operations Fidel.Delgado@dm.usda.go

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 PWTD	0	0	1	Jeana Harbison, General Attorney/Disability Employment Program Manager Fair Trade Practices, P&SP Jeana.m.Harbison@ams.us

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

Answer Yes

The Disability Employment Program Manager received Disability Program Manager training in FY 2018.

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

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

Answer Yes

The Disability Employment Program Manager received Disability Program Manager training in FY 2018.

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

<b>Brief Description of Program Deficiency</b>	C.2.c.1. Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR §1614.203(d)(5)(v)] If “yes”, please provide the internet address in the comments column.		
<b>Objective</b>	The Agency does not make a distinction between reasonable accommodation and disability reasonable accommodation, both are included within the AMS’ RA program. AMS will utilize the MRP Directive: MRP 4300.2, Reasonable Accommodations Program, for AMS and APHIS RA and PAS requests. MRP 4300.2 is currently being updated and awaiting final clearances in agreement with the USDA Departmental Regulation 4300-008, Reasonable Accommodation and Personal Assistance Services.		
<b>Target Date</b>	Sep 30, 2019		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019		APHIS to continue to clear MRP 4300.2, Reasonable Accommodations Program for distribution and website posting.
	Sep 30, 2019		AMS to forward updated MRP 4300.2, Reasonable Accommodations Program to AMS employees via The AMS Voice and post on the AMS website.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2018	<ul style="list-style-type: none"> <li>Utilizing MRP Directive, MRP 4300.2, Reasonable Accommodations Program, for AMS (and APHIS) RA requests. This eliminates the FY 2017, Part H, Deficiency. The directive is posted at <a href="http://www.ams.usda.gov/AMSV1.0/amsissuances">http://www.ams.usda.gov/AMSV1.0/amsissuances</a>. Once cleared, and have already been cleared through EEOC, the updated procedures for RA and PAS will be posted on this same website.</li> <li>In FY 2018 due to the new USDA telework policy-DR 4080-811-002 Telework Program, dated January 4, 2018, AMS processed and completed over 110 reasonable accommodation requests (temporary and ongoing) compared to 20 employee requests in FY 2017. The accommodations provided included the Agency providing employees equipment, leave, and telework. Equipment examples include: verbal to text software, updated software for enlarged text for laptop computers, adjustable-height desks and desk tops, visual/screen additions for computers, and ergonomic keyboards and chairs.</li> <li>Provided RA procedures during separate RA Training sessions, presented by OGC, for employees and supervisors on November 29, 2017 via live presentations and webinar, and in October 2018 via YouTube.</li> <li>Tracked Agency RA trends, problems, and managerial issues, which were used to develop internal tools and templates for AMS employees and supervisors (below).</li> <li>Developed a RA Process handout, which covers a more detailed overview of the RA process, with steps defined for: 1) what an accommodation can and cannot do for the employee; 2) medical documentation submission; 3) the interactive discussion; 4) decisions being provided in writing; and 5) requests for reassignment, the accommodation of last resort. The tools have simplified and assisted AMS employees and staff through the RA process</li> </ul>	

### 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

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

AMS provides outreach for recruitment efforts to recruit, hire, and retain individuals with disabilities, including individual with

targeted disabilities. In FY 2018, the Veteran Employment Program Manager and the Disability Employment Manager attended various career and job fairs specifically for veterans and people with disabilities, such as Operation War Fighter and the Gallaudet University Internship and Career Fair.

- 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

Schedule A applicants forward their resumes to the Agency’s Selective Placement Program Manager (SPPM), APHIS Human Resources for review. The SPPM maintains a file of the resumes and refers the Schedule A applicants for consideration, when an appropriate AMS vacancy becomes available.

- 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.

If a Schedule A applicant applies to an announcement, an HR Staffing Specialist/Assistant reviews the PWD’s application to determine qualifications and eligibility. If the applicant is deemed qualified and eligible by means of Schedule A, the individual is forwarded to the selecting official by a non-competitive list (certificate). If the Schedule A applicant is selected, the servicing HR specialist provides guidance to the selecting official on the Schedule A appointment process.

- 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 No

The agency did not provide special hiring authorities training to hiring managers during FY 2018. AMS plans to conduct this training during FY 2018.

**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.

AMS entered into a four year Memorandum of Understanding (MOU) with Gallaudet University in December 2016. The MOU allows AMS to establish an ongoing exchange of training information and material, post internship and job vacancies on Gallaudet University’s webpage to provide interested students of employment opportunities at AMS; participate in Gallaudet’s Career Internship and Job Fairs throughout the year and promote AMS as an equal opportunity employer of choice. The MOU will also help Gallaudet fulfill its own goal of increasing the number of individuals who are deaf and hard of hearing within the federal government; provide short-term developmental internships for qualified students; and collaborate with AMS in the development of appropriate messages tailored to the deaf community. On October 6, 2017, AMS’ Disability Employment Program Manager and an Equal Employment Opportunity (EEO) Specialist attended the Gallaudet University Internship and Career Fair where there were over 50 organizations represented. The fair was held at the Career Center for their annual Fall 2017 Internship and Job Fair. There were over 100 students in attendance and about 30 stopped by to learn more about AMS and collected agency informational brochures and one-pagers. AMS staff members along with the Disability Program Manager were scheduled to attend the Spring Career Fair at Gallaudet in March, 2018, but it was cancelled due to inclement weather.

**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

PWD represented 6.90% of the new hires, 5.10% below the Federal Goal. PWTD represented 1.15% of the new hires, 0.85% below the Federal Goal.

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

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission- critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

Per APHIS, MRPBS, HRD, Table B7, which captures applications and hires by disability, it does not sort by series but groups all series together. Out of the 4,713 applications received for permanent positions, 245 were selected. Eleven or 4.49% of the selectees were PWD and 0.82% were PWTD as compared to 73.47% PWOTD.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	
0301MISCELLANE ADMINISTRATION AND PROGRAM	305	0.00	0.00	0.00	0.00
1102CONTRACTIN	59	0.00	0.00	0.00	0.00
1146AGRICULTUR MARKETIN SPECIALIST	124 7	0.00	0.00	0.00	0.00
1147AGRICULTUR MARKET REPORTER	121	0.00	0.00	0.00	0.00
1980AGRICULTUR COMMODITY GRADER	197 8	0.00	0.00	0.00	0.00
1981AGRICULTUR COMMODITY AID	8	0.00	0.00	0.00	0.00

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

The mission critical occupations within AMS are 0301 – Miscellaneous Administration and Program; 1102 – contracting; 1146 – Agricultural Marketing Specialist; 1147 – Agricultural Market Reporting; 1980 – Agricultural Commodity Grading; and 1981 – Agricultural Commodity Aid. In series 1147, the difference between the Relevant Applicant Pool and the qualified Internal Applications is -8.70% for PWD. For PWTD, the difference between the Relevant Applicant Pool and the Qualified Internal Applications is -1.35%. In series 1180, the difference between the Relevant Applicant Pool and the Qualified Internal Applications is -1.84% for PWD. For PWTD, the difference between the Relevant Applicant Pool and the Qualified Internal Applications is -0.19%..

- 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 Yes
  - b. Promotions for MCO (PWTD) Answer Yes

Out of the 59 qualified applicants for series 1102 – Contracting, five PWD/PWTD were qualified, but none were selected. Out of the 506 qualified applicants for series 1146 - Agricultural Marketing Specialist, 56 PWD/PWTD were qualified. Twenty-one individuals were selected; 4.76% were PWTD compared to 47.62% of PWOTD. Out of the 86 qualified applicants for series 1147 – Agricultural Market Reporting, there were four PWD/PWTD qualified, of the individuals selected; none were PWD/PWTD. Out of the 582 qualified applicants for series 1980 – Agricultural Commodity Grading, 38 PWD/PWTD were qualified. Seventy-one individuals were selected; 2.82% were PWD, none were PWTD as compared to 71.83% PWOTD.

## 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.

AMS explores promotion and advancement opportunities for employees with reported and targeted disabilities. The Leadership, Education and Development (LEAD) program is a yearlong training program focused on developing managerial core competencies and targeted leadership skills of mid-level AMS employees. The program is designed to help provide a leadership pipeline and talent pool aligned with AMS’ strategic and human capital goals. To promote diversity, inclusion, and equity in the program, the Selection committee consisted of Deputy Administrators and Staff Directors or their designee’s. The participation rate for PWD is 7.69% in the LEAD Program. AMS’ mentoring program began during Fall of 2018 and lasts through Fall of 2019. The AMS mentoring program is an informal and voluntary program. In the AMS Mentoring program the protégé submits an application which asks specific questions to aid in the selection of a mentor that will be paired with the protégé for a specific period of time. The protégé and mentor decide together when to meet, how often, and the issues or subjects they will work on/talk about (both sign the AMS Mentoring Agreement based on the agreed commitment). The mentoring program helps employees develop leadership skills as well as help employees to learn, grow, and improve their skills. AMS’ mentoring program consists of 207 mentors and protégés. The participation rate for PWD is 15.46% and 3.38% for PWTD.

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

AMS established the LEAD Program, a leadership development program focused on developing managerial core competencies and targeted leadership skill of mid-level AMS employees. This program is designed to help provide a leadership pipeline and talent pool aligned with AMS’ strategic and human capital goals. AMS established the New and Emerging Professionals (NEP) working group, which includes employees from all AMS Program areas. The NEP working group develops networks identifying developmental activities to guide and support new employees to grow and advance within AMS. Employees are required to develop Individual Development Plans (IDP) which allow for training, details and leadership opportunities. AMS managers review, discuss, and assist employees with their IDPs before approvals.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	0	0	0	0	0	0
Fellowship Programs	0	0	0	0	0	0
Mentoring Programs	0	207	0	32	0	7
Coaching Programs	0	0	0	0	0	0
Training Programs	0	0	0	0	0	0
Detail Programs	0	0	0	0	0	0
Other Career Development Programs	0	39	0	3	0	0

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

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

This information is not available from AMS. RSNOD data on applicants and selectees for career development programs is collected and recorded at APHIS/CTOD; however, the “Relevant Applicant Pool” (all employees in the next lower pay grade and in all series that qualify them for the position announcement ) is not available.

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

This information is not available from AMS. RSNOD data on applicants and selectees for career development programs is collected and recorded at APHIS/CTOD; however, the “Relevant Applicant Pool” (all employees in the next lower pay grade and in all series that qualify them for the position announcement ) is not available.



**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

N/A

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards: 1-9 hours : Total Time-Off Awards Given	19	31.58	57.89	0.00	31.58
Time-Off Awards: 9+ hours : Total Time-Off Awards Given	201	8.46	87.56	3.48	4.98

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$100 - \$500: Total Cash Awards Given	160	13.13	86.88	4.38	8.75
Cash Awards: \$501+: Total Cash Awards Given	1308	8.72	91.28	2.37	6.35

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

a. Pay Increases (PWD) Answer No

b. Pay Increases (PWTD) Answer Yes

The quality step increase inclusion rate for PWTD is zero percent, below the 0.90% rate for PWOTD.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Quality Step Increases (QSI): Total QSIs Awarded	24	16.67	83.33	0.00	16.67
Performance Based Pay Increase	0	0.00	0.00	0.00	0.00

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

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

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

The Agency does not have other types of employee recognition programs.

**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 Yes
- ii. Internal Selections (PWD) Answer Yes

c. Grade GS-14

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

d. Grade GS-13

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

There were no SES selections for mission critical occupations. For GS-15, out of the 246 Qualified Applicants, 5 individuals were selected. None were PWD. The difference between the Relevant Applicant Pool and Qualified Internal Applicants is PWD is -3.42%. For GS-14, out of the 313 Qualified Applicants, 12 individuals were selected. PWD represented 8.33% as compared to 58.33% of PWOTD. For GS-13, out of the 157 Qualified Applicants, 7 individuals were selected, none were PWD or PWTD.

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 Yes
- ii. Internal Selections (PWTD) Answer Yes

c. Grade GS-14

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

d. Grade GS-13

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

There were no SES selections for mission critical occupations. For GS-15, out of the 246 Qualified Applicants, 5 individuals were selected. None were or PWTD. The difference between the Relevant Applicant Pool and Selectees is -4.35%. For GS-14, out of the 313 Qualified Applicants, 12 individuals were selected, none were PWTD. The difference between the Relevant Applicant Pool and

Selectees is -2.58%. For GS-13, out of the 157 Qualified Applicants, 7 individuals were selected, none were PWD or PWTD. The difference between the Relevant Applicant Pool and Selectees is -4.35%.

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

AMS is not able to obtain or calculate this data. The instruction in this section of Part J require the preparer to use the Qualified Applicant Pool as the benchmark. The applicant flow data in the National Finance Center (NFC) had not been coordinated with the hiring data for FY 2018. The vendor will need to import this data, but the tool is not available.

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

AMS is not able to obtain or calculate this data. The instruction in this section of Part J require the preparer to use the Qualified Applicant Pool as the benchmark. The applicant flow data in the National Finance Center (NFC) had not been coordinated with the hiring data for FY 2018. The vendor will need to import this data, but the tool is not available.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

c. Supervisors

- i. Qualified Internal Applicants (PWD) Answer N/A
- ii. Internal Selections (PWD) Answer N/A

Currently, there are no workforce tables or reports that breakdown supervisory positions into executive, managers, and supervisors, where there is Relevant Applicant Pool or Qualified Internal Applicants benchmark data to calculate whether there are triggers for PWD or PWTB.

6. Does your agency have a trigger involving PWTB 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 (PWTB) Answer N/A
- ii. Internal Selections (PWTB) Answer N/A

b. Managers

- i. Qualified Internal Applicants (PWTB) Answer N/A
- ii. Internal Selections (PWTB) Answer N/A

c. Supervisors

- i. Qualified Internal Applicants (PWTB) Answer N/A
- ii. Internal Selections (PWTB) Answer N/A

Currently, there are no workforce tables or reports that breakdown supervisory positions into executive, managers, and supervisors, where there is Relevant Applicant Pool or Qualified Internal Applicants benchmark data to calculate whether there are triggers for PWD or PWTB.

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

Currently, there are no workforce tables or reports that breakdown supervisory positions into executive, managers, and supervisors, where there is Relevant Applicant Pool or Qualified Internal Applicants benchmark data to calculate whether there are triggers for PWD or PWTB.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB 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 (PWTB) Answer N/A
- b. New Hires for Managers (PWTB) Answer N/A
- c. New Hires for Supervisors (PWTB) Answer N/A

Currently, there are no workforce tables or reports that breakdown supervisory positions into executive, managers, and supervisors, where there is Relevant Applicant Pool or Qualified Internal Applicants benchmark data to calculate whether there are triggers for PWD or PWTD.

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

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

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer Yes

AMS has converted two Schedule A Employees during FY 2018.

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

a. Voluntary Separations (PWD) Answer No

b. Involuntary Separations (PWD) Answer No

N/A

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permenant Workforce	2731	9.19	90.81
Total Separations	243	9.47	90.53
Voluntary Separations	221	9.50	90.50
Involuntary Separations	22	9.09	90.91

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

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permenant Workforce	2731	2.42	97.58
Total Separations	243	3.29	96.71
Voluntary Separations	221	3.62	96.38
Involuntary Separations	22	0.00	100.00

- 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.

No triggers exist for separations.

**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.

AMS has a link at the bottom of each of its webpages title “Accessibility” which links to: <https://www.ams.usda.gov/about-ams/accessibility> . The webpage explains Agency document accessibility and 508 compliances. There is also information on how to contact AMS if the visitor is experiencing issues accessing information or would like to send comments. Also, at the bottom of each of the AMS webpages is a “Nondiscrimination” link that leads a visitor to information on how to file a complaint. AMS and Rural Development hosted a 508 Compliance Webinar to ensure all employees understand the need for 508 compliance and to ensure they take the necessary steps to make their documents compliant. This training featured subject matter experts, instructional videos and offered several one pagers.

- 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.

AMS continues to work on updating its “Accessibility” web page. <https://www.ams.usda.gov/about-ams/accessibility> to include information on the Architectural Barriers Act (ABA). Should the public contact the agency, the AMS Affirmative Employment Division would forward all visitors/employees to the United States Access Board (USAB) website: <https://www.access-board.gov/aba-enforcement>. Visitors/employees can view the ABA, file complaint and view standards for accessible designs.

- 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.

AMS continues to work in accordance with the Section 508 standards for electronic and information technology as outlined by [www.section508.gov](http://www.section508.gov). AMS will continue to work on updating its “Accessibility” web page to include information regarding the Architectural Barriers Act.

**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.)

Average is from 7-30 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.

In responding to reasonable accommodation requests, the Civil Rights Program follows the current USDA reasonable accommodation procedures, USDA Departmental Regulation 4300-002 Reasonable Accommodation Procedures and MRP Directive 4300.2 Reasonable Accommodations Programs, which have been in place since 2002. This ensures that AMS employees and applicants with disabilities are provided with equal employment opportunities. With the upcoming reorganization of the AMS and Animal Plant, Health Inspection Service (APHIS) Civil Rights Programs’ plan to be merged into mission area Marketing and Regulatory Program (MRP), AMS has worked closely with APHIS to determine duplications of efforts for these internal procedures. The AMS RA and PAS directives, policies and procedures have been identified as a duplication of procedures. AMS met with APHIS to discuss using the MRP procedures for submissions for both AMS and APHIS RA and PAS services requests for both AMS and APHIS. The written procedures, which are currently being updated, can be found within the directive entitled: MRP 4300.2 Reasonable Accommodations Programs. The procedures are currently being updated. After comments from EEOC, the directive is currently waiting for final clearances for the USDA Departmental Regulation 4300-008, Reasonable Accommodation and Personal Assistance Services. AMS continues to post the MRP 4300.2 Reasonable Accommodations Program procedures, dated March 2011, on its agency webpage at: <http://www.ams.usda.gov/AMSV1.0/amsissuances>. When the updated draft is cleared, it will be posted at this same website address. In FY 2018, due to the new USDA telework policy – DR 4080-811-002 Telework Program, dated January 4, 2018, AMS processed and completed over 110 reasonable accommodation requests (temporary and ongoing) compared to 20 employee requests in FY 2017. The accommodations provided included the Agency providing employees equipment, leave, and telework. Equipment examples include; verbal to text software, updated software for enlarged text for laptop computers, adjustable-height desk and desk tops, visual/screen additions for computers, and ergonomic keyboards and chairs. In FY 2018, AMS completed Reasonable Accommodation Training for AMS employees and supervisors. The agency arranged for the training to be provided by Office of the General Counsel staff via webinar, with links to the recorded webinar inserted in the AMS voice employee newsletter. AMS established internal tools for employees, supervisors, and managers to simplify the RA process. The agency developed an RA Process handout, which covers a more detailed overview of the RA process, with steps defined for; 1) what an accommodation can and cannot do for the employee; 2) medical documentation submission; 3) the interactive discussion; 4) decisions being provided in writing; and 5) requests for reassignment, the accommodation of last resort.

**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.

The PAS procedures have been reviewed by EEOC and are currently awaiting final clearances for the USDA Departmental Regulation 4300-008, Reasonable Accommodation and Personal Assistance Services.

**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.

AMS had no findings of discrimination in FY 2018.

**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.

AMS had no findings of discrimination in FY 2018.

**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

<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>The permanent workforce participation rate for PWD in AMS for FY 2018 is 9.19%, below the 12% Federal High goal.</p>
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p>

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

AMS has completed and submitted the recommended changes that EEOC suggested regarding Reasonable Accommodations and Personal Assistance procedures. AMS is waiting for EEOC approval.



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