

**MD-715 – Part J**  
**Special Program 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 | No |
| b.Cluster GS-11 to SES (PWD)  | Answer | No |

\*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 |

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

OMWI distributes a quarterly workforce dashboard to all NCUA staff, and the dashboards are sent directly to the NCUA leadership under memo and posted on the agency's intranet. The dashboards clearly indicate the PWD/PWTD benchmarks against current NCUA workforce numbers.

**Section II: Model Disability Program**

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

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

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

Answer Yes

N/A

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Section 508 Compliance	0	0	1	Nickol Davenport, Website Admin/ Section 508 Coordinator, edavenport@ncua.gov
Processing reasonable accommodation requests from applicants and employees	1	1	0	Vanessa Jackson, HR Specialist Office of Human Resources vjackson@ncua.gov; JoAnn Cottman, Reasonable Accommodation Specialist, Office of Human Resources (resigned in Dec 2023)
Processing applications from PWD and PWTD	10	0	0	Jodi Johnson, Director Staffing and Classification, Office of Human Resources, jejohnson@ncua.gov; Lisa Bazemore, Lead HR Specialist, Office of Human Resources, mbazemore@ncua.gov; Lauren Portwood, HR Specialist, Office of Human Resources, LPortwood@ncua.gov; Michele Sullivan, HR Specialist, Office of Human Resources, masullivan@ncua.gov
Answering questions from the public about hiring authorities that take disability into account	11	0	0	Jodi Johnson, Director Staffing and Classification, Office of Human Resources, jejohnson@ncua.gov; Lisa Bazemore, Lead HR Specialist, Office of Human Resources, mbazemore@ncua.gov; Lauren Portwood, HR Specialist, Office of Human Resources, LPortwood@NCUA.GOV; Michele Sullivan, HR Specialist, Office of Human Resources, masullivan@ncua.gov
Architectural Barriers Act Compliance	0	0	1	Alejandro HolguinAlejandro Holguin, Facility Management Specialist, aholguin@ncua.gov
Special Emphasis Program for PWD and PWTD	0	0	1	Gladymar Rivera-Virella, EEO Specialist, Office of Minority and Women Inclusion, GVirella@ncua.gov

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

Answer Yes

OMWI attends yearly disability workshops at the Federal Dispute Resolution Conference and/or EEOC’s Examining Conflicts in Employment Laws (EXCEL) training conference. Additionally, human resources staff are provided on-the-job training regarding the sourcing, use, and processing of various hiring appointing authorities and their associated required documentation. New HR specialists are trained by senior specialists on the agency disability program and responsibilities. OMWI’s Disability Employment Program Manager keeps up to date through cyberFeds and other resources regarding disability issues.

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

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

Answer Yes

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

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

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

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

The NCUA participates in a number of activities to enhance outreach to individuals with disabilities. These efforts include: - Maintaining a "talent bank" of Schedule A applicants who apply for agency positions. - Participating in targeted outreach events for people with disabilities. - Expanding the NCUA's outreach through LinkedIn Recruiter and the USAJOBS Resume Mining tool to reach diverse applicants, including those with disabilities. - Offering the Workforce Recruitment Program Services as an additional resource for managers to source potential applicants to fill vacant positions, in addition to the regular competitive recruitment process. - Distributing NCUA vacancy announcements to a newly established email distribution list of potential applicants that have expressed interest in NCUA opportunities during recruitment and outreach events. - Posting a full-page ad in DiversAbility magazine sponsored by DiversityComm. - Leveraging the services of a vendor that distributes NCUA job postings to diverse populations, including PWD and PWTD.

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

The agency uses all available and appropriate hiring authorities to employ persons with disabilities. The NCUA's recruitment and outreach efforts included the following: - Using LinkedIn, a tool that allows the NCUA to expand outreach efforts to a more diverse pool of applicants, to include targeting and connecting with various disabled veterans' groups and communities in LinkedIn. - Distributing NCUA vacancy announcements to a variety of diverse organizations, colleges, and universities through the digital tool, Handshake. This outreach effort includes veterans' organizations and organizations focused on hiring individuals with disabilities. - Posting all NCUA vacancy announcements on targeted websites to ensure maximum distribution to a diverse audience, which includes individuals with disabilities. - Maintaining a talent bank of Schedule A applicants, which includes disabled veterans who apply for positions with the agency. - Using the USA Jobs Resume Mining database to search for highly qualified individuals with disabilities and/or veterans with a disability rating of 30 percent or more. - Distributing NCUA vacancy announcements to an email distribution list of potential applicants who have expressed interest in NCUA opportunities during recruitment and outreach events. - Leveraging social media channels established by the NCUA's Office of External Affairs and Communications to announce the NCUA's participation at diverse recruitment outreach events. Additionally, the Disability Employment Program Manager served as a Workforce Recruitment Program recruiter for the Department of Labor applicant database, interviewing potential Schedule A applicants from assigned colleges and universities. Lastly, the OMWI awarded a contract to expand NCUA postings to state-sponsored organizations, educational entities to widen the candidate pool of employees with disabilities.

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority; and, (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

The Selective Placement Manager uses a searchable Schedule A candidate database to assist hiring managers. Human Resources Staffing Specialists discuss the process and review the Schedule A database with managers for each recruitment during the strategic conversation pipeline step for recruitment/hiring. Managers are encouraged to consider all available candidates prior to posting the vacancy. Additionally, once vacancy announcements are posted, each specialist is responsible for confirming the eligibility of qualified Schedule A candidates prior to issuing certificates to the hiring managers. When Schedule A candidates apply to agency postings through a vacancy announcement, their resume package is reviewed to determine their qualifications and eligibility. Thereafter, qualified candidates are forwarded to the hiring official on a referral list for consideration. Once the candidate's application and supporting documentation are received, the coordinator will conduct a qualifications analysis of all materials submitted. After a careful review, candidates are notified of their status (qualified/not qualified). Qualified candidates are added to the agency's Schedule A database. Each HR Specialist is required to review the database prior to posting the vacancy announcement and refer qualified candidates to the hiring manager (at the hiring manager's request).

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If "yes", describe the type(s) of training and frequency. If "no", describe the agency's plan to provide this training.

Answer Yes

The agency has a supervisory orientation program, recently updated supervisory training, and a resource center for employees who are newly appointed into supervisory positions. The resource center provides an overview of training requirements as well as immediate access to external training, webinars, and job aids. A Schedule A job aid tool covers the hiring authority details and answers several commonly asked questions. In addition to the supervisory training and resource center, each HR Specialist is responsible for educating managers on the Schedule A hiring authority and process during the strategic conversation pipeline step of recruitment/hiring. The agency offers hiring managers Recruitment and Hiring Flexibilities training throughout the year. To include a 4-hour recruitment boot camp with a large focus on flexible hiring authorities for PWD and PWTD. Additionally, the OMWI manages the disability solutions desk mailbox for questions or concerns for any disability-related issue.

## **B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS**

Describe the agency's efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

The agency's recruitment strategy includes a strong focus on outreach to PWDs and PWTDs. In sourcing candidates, we utilized multiple resume databanks, such as the Department of Labor's Workforce Recruitment Program (WRP) and OPM's USAJOBS Agency Talent Portal, which has a direct sourcing search for PWDs/PWTDs. Additionally, the agency maintains a contract with CIRCO, which pushes our vacancy opportunities to third-party contacts, including, but not limited to, underserved populations and underrepresented demographics in our workforce, with a specific focus on PWDs and PWTDs nationwide. We attend multiple disability-focused career fairs both in person and virtually to maximize access. We have established partnerships with universities and colleges such as Gallaudet University and Rochester Institute of Technology - National Institute for the Deaf. The NCUA also participates in mock interviews with students at Gallaudet University to assist them in securing employment. The OMWI does advertise a one-page advertisement in DIVERSEability Magazine, one of the nation's most circulated disability magazines. The magazine has a readership of over 267,000 and a circulation of over 250,000. Current NCUA employees have the following programs available to assist and support to help provide reasonable accommodations. - Reasonable Accommodations Support Services: • American Sign Language (ASL) • Communications Access Realtime Translation (CART) • Virtual Remote interpretation (VRI) • Mobility Services • Specialized Computer Equipment • Ergonomic Assessments - Employee Assistance Program (EAP) - WorkLife4U Lastly, the agency had a robust training and development program described in Section A. ADVANCEMENT PROGRAM PLAN below.

**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 No
- b. New Hires for Permanent Workforce (PWTD) Answer No

Table B8, which displays data for all accessions (100-level nature of action codes), indicates that the NCUA hired 15 PWD out of 133 permanent hires (11.28 percent, which is 1 employee below the 12.00 percent target). It should be noted that the 15 PWDs noted here claimed the disability voluntarily. The actual percentage might exceed the 12 percent EEOC goal.

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 No
- b. New Hires for MCO (PWTD) Answer No

This section discusses permanent new hires into Mission Critical Occupational Series 0580: Credit Union Examiners (Table B7P). PWD: Inspection of the USA Staffing applicant flow data suggests that applicants with disabilities are underrepresented in hires (Table B7P); 135 external PWD out of 2,486 applicants were Qualified (5.43 percent) and only 2 PWD out of 88 applicants were selected (2.27 percent). However, inspection of HR data (not found in tables) suggests that PWD are well represented; 6 PWD out of 73 employees actually onboarded (8.22 Percent). PWTD: Inspection of the USA Staffing applicant flow data suggests that applicants with targeted disabilities are underrepresented in hires (Table B7); 51 PWTD out of 2,486 applicants were Qualified (2.05 percent) and 0 PWTD out of 88 applicants were selected (0.00 percent). However, inspection of HR data (not found in tables) suggests that PWTD are well represented; 2 PWTD out of 73 employees actually onboarded (2.74 Percent).

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

a. Qualified Applicants for MCO (PWD) Answer No

b. Qualified Applicants for MCO (PWTD) Answer No

N/A

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

a. Promotions for MCO (PWD) Answer No

b. Promotions for MCO (PWTD) Answer No

N/A

#### **Section IV: 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 NCUA's primary occupation is the Credit Union Examiner (CUE). Entry-level CUE positions are advertised and recruited as career ladder positions with promotion opportunities to a target level of CU-12. CUEs are provided extensive training to develop and reach the full performance level. Note: All CUE announcements are open to Schedule A candidates. The agency also advertises Leadership Development Programs, which are open to all employees at all levels. Briefings are provided to employees prior to the program's opening to ensure employees understand the development opportunities and the application process and have an opportunity to ask questions.

##### **B. CAREER DEVELOPMENT OPPORTUNITES**

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

NCUA's career development model deploys a two-pronged approach. It focuses, simultaneously, on the development of technical and leadership competencies. The technical aspect of this model is described in Section IV, A above. The leadership development component is described below. NCUA's leadership development efforts are guided by its leadership vision and leadership journey. The leadership vision describes employee leader development (which happens at all levels) across four key pillars: Inspiring Others, Demonstrating Emotional Intelligence, Driving Results, and Fostering Inclusion. The leadership journey describes growth as a function of seniority, identifying key competencies expected at various levels of responsibility. To formally support leadership development at all levels, the NCUA sponsors the following leadership development programs: Aspiring Leader Program: offered federal government-wide by the Graduate School's Center for Leadership and Management. NCUA CU 4-6 staff may apply for this two-month program designed to provide competency-based leadership training. Executive Leadership Program: offered federal government-wide by the Graduate School's Center for Leadership and Management. NCUA CU 11- 12 staff are eligible to apply for this program. While remaining in their position of record, participants complete a variety of activities including a developmental detail, formal training sessions, management book reviews and interviews, and a team project. Management Development Program: an 18-month developmental program for non-supervisors. The Program focuses on learning to lead others. Candidates are exposed to defining project scopes, delegating work, developing others, setting organizational goals, and understanding the broader agency mission. Excellence in Government Fellows: a 12-month program for supervisors/managers. Candidates are able to enhance their skills through a combination of coursework, action-learning projects, executive coaching, and government-wide networking. Fellows remain in their full-time jobs, meet every 6 weeks, and spend a total of 24 days in session. NCUA Executive Training Program: an 18-month program for senior level supervisors. This program prepares employees to transition from supervisory or managerial positions into senior leadership positions within the agency. New Leader Program (NLP) is offered federal government-wide by the Graduate School's Center for Leadership and Management. NCUA CU 7-10 staff may apply for this program designed to develop future leaders. NCUA nominates individuals using our internal competitive selection process; the Graduate School's Center for Leadership and Management has final approval authority. While remaining in their position of record, participants complete a variety of activities including a developmental detail, formal training sessions, management book reviews and interviews, and a team project. In addition to leadership training, NCUA has commissioned and is investing heavily in coaching. Executive Coaching Program: a 12-month program for the NCUA's executive staff. The program is designed to help managers become more highly effective leaders, reinforce leadership competencies, enhance performance, etc. In addition, the agency offers a series of training opportunities through its internal training catalog, external training organizations, agency shadowing assignments, and opportunities to participate in short-term detail assignments. The agency also provides career development opportunities through its agency-wide mentorship program. NOTE: These programs are not presented in Tables A/B12 & 20 because they are available for grade ranges and do not align with the tables. Group Coaching: Group coaching was recently piloted at NCUA and was widely successful. As a result, NCUA now offers group coaching to both supervisory and non-supervisory personnel.

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 (%)
Coaching Programs	30	30	8	8	1	1
Internship Programs	479	12	8	3	0	0
Detail Programs	N/A	N/A	N/A	N/A	N/A	N/A
Fellowship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Training Programs	18	11	2	1	0	0
Other Career Development Programs	25	11	4	2	2	1
Mentoring Programs	N/A	N/A	N/A	N/A	N/A	N/A

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

- a. Applicants (PWD) Answer Yes  
b. Selections (PWD) Answer Yes

For the Internship programs, there was an underrepresentation of PWD in the applications. For the training programs, the representation of PWD decreased from 11.11 percent of the applicants to 9.09 percent of the selections. This difference is approximately one-fifth of an employee.

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 Yes  
b. Selections (PWTD) Answer No

For the Pathways interns and the Training programs there were no applicants from PWTD.

### 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

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

- a. Pay Increases (PWD) Answer No  
b. Pay Increases (PWTD) Answer No

In the aggregate, there appears to be a trend of employees not reporting a disability. However, many employees have reached the maximum pay for their pay grade and are limited on the percentage of pay increase that they can receive based on their performance. If we exclude the 188 employees that have reached maximum pay limits, there are no statistically significant differences between the remaining 890 non-executive employees: 710 no disabilities (7.37%+/-0.15%), 77 employees who have not disclosed their disability status (6.82% +/- 0.46%), 78 PWD (7.55% +/- 0.53%), or the 25 PWTD (7.06% +/- 0.76%).

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

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

N/A



## D. PROMOTIONS

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. SES
  - i. Qualified Internal Applicants (PWD) Answer Yes
  - 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 Yes
- d. Grade GS-13
  - i. Qualified Internal Applicants (PWD) Answer No
  - ii. Internal Selections (PWD) Answer No

Data presented Summarizes Table B11 Representation of PWD Internal Merit Promotions at stages of the hiring process SES/SSP: 4/60 (6.67%) Applications; 0/27 (0.00%) Qualified; 0/2 (0.00%) Selected. CU-15: 20/213 (9.39%) Applications; 3/58 (5.17%) Qualified; 0/5 (0.00%) Selected. CU-14: 77/837 (9.20%) Applications; 18/299 (6.02%) Qualified; 0/10 (0.0%) Selected.

2. Does your agency have a trigger involving PWTB among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

Representation of PWTB Internal Merit Promotions at stages of the hiring process (Table B11) SES/SSP: 4/60 (6.67%) Applications; 0/27 (0.00%) Qualified; 0/2 (0.00%) Selected. CU-15: 11/213 (5.16%) Applications; 2/58 (3.45%) Qualified; 0/5 (0.00%) Selected. CU-14: 37/837 (4.42%) Applications; 7/299 (2.34%) Qualified; 0/10 (0.00%) Selected. CU-13: 23/535 (4.30%) Applications; 7/129 (5.43%) Qualified; 1/21 (4.76%) Selected.

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 Yes
- b. New Hires to GS-15 (PWD) Answer Yes
- c. New Hires to GS-14 (PWD) Answer Yes
- d. New Hires to GS-13 (PWD) Answer Yes

Representation of PWD New Hires at stages of the hiring process (from Table B15) SES/SSP: 6/106 (5.66%) Qualified; 0/1 (0.00%) Selected. CU-15: 12/241 (4.98%) Qualified; 0/4 (0.00%) Selected. CU-14: 46/1133 (4.06%) Qualified; 0/12 (0.00%) Selected. CU-13: 57/1235 (4.62%) Qualified; 0/7 (0.00%) Selected. It should be noted that each of these triggers is a fraction of a person.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB 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 (PWTB)   | Answer | Yes |
| b. New Hires to GS-15 (PWTB) | Answer | Yes |
| c. New Hires to GS-14 (PWTB) | Answer | Yes |
| d. New Hires to GS-13 (PWTB) | Answer | Yes |

Representation of PWTB New Hires at stages of the hiring process (from Table B15) SES/SSP: 3/106 (2.83%) Qualified; 0/1 (0.00%) Selected. CU-15: 4/241 (1.66%) Qualified; 0/4 (0.00%) Selected. CU-14: 17/1133 (1.50%) Qualified; 0/12 (0.00%) Selected. CU-13: 18/1235 (1.46%) Qualified; 0/7 (0.00%) Selected. It should be noted that each of these triggers is a fraction of a person.

5. 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 | Yes |
| ii. Internal Selections (PWTB)          | Answer | No  |
| b. Managers                             |        |     |
| i. Qualified Internal Applicants (PWTB) | Answer | Yes |
| ii. Internal Selections (PWTB)          | Answer | Yes |
| c. Supervisors                          |        |     |
| i. Qualified Internal Applicants (PWTB) | Answer | N/A |
| ii. Internal Selections (PWTB)          | Answer | N/A |

Representation of PWTB internal competitive promotions for management positions at stages of the hiring process (Table B19) Executives: 4/60 (6.67%) Applications; 0/27 (0.00%) Qualified; 0/2 (0.00%) Selected. Managers: 16/185 (8.65%) Applications; 3/59 (5.08%) Qualified; 0/6 (0.00%) Selected. Supervisors: N/A

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 | Yes |
| ii. Internal Selections (PWTB)          | Answer | No  |
| b. Managers                             |        |     |
| i. Qualified Internal Applicants (PWTB) | Answer | Yes |
| ii. Internal Selections (PWTB)          | Answer | Yes |
| c. Supervisors                          |        |     |
| i. Qualified Internal Applicants (PWTB) | Answer | N/A |
| ii. Internal Selections (PWTB)          | Answer | N/A |

Representation of PWTD internal competitive promotions for management positions at stages of the hiring process (Table B19) Executives: 4/60 (6.67%) Applications; 0/27 (0.00%) Qualified; 0/2 (0.00%) Selected. Managers: 16/185 (8.65%) Applications; 3/59 (5.08%) Qualified; 0/6 (0.00%) Selected. Supervisors: N/A

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for Executives (PWD) Answer Yes
- b. New Hires for Managers (PWD) Answer Yes
- c. New Hires for Supervisors (PWD) Answer No

Representation of PWD New Hires Supervisors at stages of the hiring process (Table B18) Executives: 9/200 (4.50%) Applications; 6/106 (5.66%) Qualified; 0/1 (0.00%) Selected. Managers: 32/441 (7.26%) Applications; 22/306 (7.19%) Qualified; 0/4 (0.00%) Selected. Supervisors: N/A It should be noted that each of these triggers is a fraction of a person.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

Representation of PWTD New Hires Supervisors at stages of the hiring process (Table B18) Executives: 3/106 (2.83%) Qualified; 0/1 (0.00%) Selected. Managers: 9/306 (2.94%) Qualified; 0/4 (0.00%) Selected. Supervisors: N/A It should be noted that each of these triggers is a fraction of a person.

## Section V: 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 CFR § 213.3102(u)(6)(i))? If "no", please explain why the agency did not convert all eligible Schedule A employees.

Answer Yes

N/A

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

- a. Voluntary Separations (PWD) Answer No
- b. Involuntary Separations (PWD) Answer No

N/A

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 Yes

Involuntary Separation Rates = [(RIFs + Removals) (Table B16) / prior year's end strength (Table B1)]; calculations only made for the permanent population. No Disability Group = 0.58 percent (0 RIFs + 5 Removals out of 866 employees) PWTD = 2.00 percent (0 RIFs + 1 Removal out of 50 employees). It should be noted that the difference between these groups is a fraction of a person.

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.

There was a single PWTD that was removed.

## **B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES**

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

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

The internet address on the NCUA'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 is <https://ncua.gov/accessibility> (Note: The NCUA's reasonable accommodation policy includes Section 508 for accommodation purposes, including filing a complaint, but the policy does not go into details regarding the Section 508 statute.)

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

The NCUA amended the Accessibility Statement on its public website at <https://ncua.gov/accessibility> to include notice of employees' and applicants' rights under the Architectural Barriers Act and included a description of how to file a complaint.

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

The NCUA Office of the Chief Financial Officer installed ADA door openers in its Central Office building garage and training center to improve physical accessibility. The Office of External Affairs and Communications' (OEAC) Section 508 Program team identifies and assists with the remediation of agency information technology. OEAC maintains a Section 508 Resource Center on the internal NCUA Central site for staff and contractors. The resource center offers training, guides, and best practice resources for creating accessible content. OEAC Section 508 Program team identifies and assists with the remediation of agency information technology. The office also works with content owners and creators to identify and remediate deficiencies. All new NCUA content is required to be accessible before it is posted on the public-facing websites. Accessibility language has been updated in the NCUA Style Guide.

## **C. REASONABLE ACCOMMODATION PROGRAM**

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

The timeframe for processing initial requests for reasonable accommodation averages 10-20 business days, absent extenuating circumstances. The time to process a request depends on the nature of the accommodation requested and the receipt of sufficient supporting information.

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 NCUA's Reasonable Accommodation (RA) program includes timely processing and approvals of accommodation requests. In CY 2023, a total of 30 reasonable accommodation cases were completed with an average processing time of 25 days. The RA Program Manager tracks by types of accommodations requested, testing accommodations, equipment needs, and full-time telework, as applicable. The NCUA conducts RA training for all new supervisors and plans to conduct four reasonable accommodation refresher training sessions for all supervisors before December 31, 2024. The NCUA's RA Specialist provides consultation services with managers, supervisors, and employees on the reasonable accommodation process and the laws governing reasonable accommodations. The NCUA is proactive regarding the needs of persons with disabilities.

## 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 NCUA Reasonable Accommodation Instruction was finalized on March 28, 2022, and made available to both agency personnel and the public. Guidance on PAS services is incorporated into the updated Instruction. To this date, there have been no requests for PAS services.

## Section VI: 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 No

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Answer No

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

N/A

### B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer 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

## Section VII: 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?

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

<b>Source of the Trigger:</b>	Workforce Data (if so identify the table)					
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B1					
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	There are triggers for individuals with disabilities and individuals with targeted disabilities in the areas of pathways interns, training, new hires and promotions to senior levels, new hires and promotions to management positions, and voluntary separations.					
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i> People with Disabilities					
<b>Barrier Analysis Process Completed?:</b>	N					
<b>Barrier(s) Identified?:</b>	N					
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b>  Low PWD/PWTD representation	<b>Description of Policy, Procedure, or Practice</b>  Although no specific policy, procedure or practice has been identified, barriers appear to be present in pathways interns, training, new hires and promotions to senior levels, new hires and promotions to management positions, and voluntary separations.				
<b>Objective(s) and Dates for EEO Plan</b>						
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>	
01/01/2023	10/01/2025	Yes			NCUA will conduct a barrier analysis on PWD and PWTD.	
<b>Responsible Official(s)</b>						
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>		
OMWI/EEO Director		Miguel A. Polanco		Yes		
OHR Director		Towanda Brooks		Yes		
<b>Planned Activities Toward Completion of Objective</b>						
<b>Target Date</b>	<b>Planned Activities</b>			<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>	<b>Completion Date</b>
10/01/2025	NCUA completes analysis of underrepresentation of PWD/PWTD			Yes		
10/01/2025	NCUA begins implementing changes			Yes		
<b>Report of Accomplishments</b>						
<b>Fiscal Year</b>	<b>Accomplishments</b>					
2023	The NCUA begins reviewing data, policy, procedures, and practices. Issued a barrier analysis survey to the workforce, including questions germane to the agency's PWD/PWTD population.					

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

The NCUA is on track with its implementation plan to mitigate or eliminate the impact of the identified perceived barriers. The review of the PE Certification Program and testing procedures is ongoing. An agency-wide survey of stakeholders was conducted, and the results identified perceived/potential barriers and the catalysts for those barriers. Using this information, the agency created a taskforce of Principal Examiners and Supervisory Examiners to develop training and resources for examiners and supervisors. The training and resources produced by the taskforce will better prepare examiners for the PE Certification Assessment and aim to mitigate barriers.

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

The NCUA used services from the OPM to evaluate the PE promotional process for adverse impact. The PE test is the process through which NCUA examiners obtains promotions. The results of this test and adverse impact relative to individuals with disabilities were being evaluated by agency leadership in its Talent Management Council (TMC). The NCUA worked closely with OPM on the NCUA Examiner Career Development and Principal Examiner Certification Program Preparation Project. The NCUA developed short-term and long-term strategies to address barriers identified within the survey. The short-term strategies put into place include a community of practice (discussion board) for Supervisory Examiners and examiners, enhanced PE Exam resources made available to examiners, and early exposure to examiners of the PE Certification Program and potential career progression opportunities with detailed briefings offered during their first 12 months of employment with the NCUA. Long-term strategies are being developed between the NCUA and OPM.

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.

The approach to address perceived and potential barriers is one of our continuous process improvement initiatives. The work of the PE/SE review is ongoing, and the training and resources produced by the review recommendations will be implemented, assessed for effectiveness, and modified as necessary. The agency is in the process of implementing its barrier mitigation plan. The NCUA will actively monitor assessment processes and outcomes to continue to mitigate any identified barriers.