

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 No |

The participation rate of PWDs in the GS-1 to GS-10 cluster is 4%, as compared to the federal goal of 12%.

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

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

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

The participation rate of PWTDs in the GS-1 to GS-10 cluster is 1%, as compared to the federal goal of 2%. The participation rate of PWTDs in the GS-11 to SES cluster is 1%, as compared to the federal goal of 2%.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%			

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

The FTC has a DPM dedicated to implementing a model disability program. The DPM is responsible for: (1) Implementing the FTC’s reasonable accommodation procedures consistent with reasonable accommodation policy, governing laws and regulations, executive orders, and EEOC directives. (2) Providing guidance and delivering training to employees and management officials concerning the agency’s reasonable accommodation procedures and disability hiring matters, and serving as a resource for information on disability issues that affect the agency. (3) Establishing effective tracking systems to monitor the processing of reasonable accommodation requests and affirmative employment initiatives for individuals with disabilities to include complying with all reporting and record retention requirements. (4) Regularly reviewing and analyzing the FTC’s reasonable accommodation process and progress in the recruitment and retention of individuals with disabilities. (5) Regularly reviewing agency procedures to ensure that vacancy announcements and hiring and promotion procedures include information describing how applicants may submit reasonable accommodation requests. (6) Managing the FTC’s reasonable accommodation procedures to include providing necessary guidance and technical assistance to managers, supervisors, employees, and applicants regarding requests for reasonable accommodation, and consulting with other agency offices and officials as necessary. (7) Assisting FTC management officials in evaluating accommodations that have been provided to ensure their continued effectiveness. (8) Requesting and reviewing medical information if an impairment or need for accommodation is not obvious to include having medical information reviewed by an external Medical Review Official (MRO) of the agency’s choosing and at the agency’s request and expense. (9) Serving as the deciding official for reasonable accommodation requests from applicants. (10) Participating in annual training relating to disability laws and regulations, to include training related to the provision of reasonable accommodation.

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	
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Adam Mahan, Disability Program Manager
Processing reasonable accommodation requests from applicants and employees	1	0	0	Adam Mahan, Disability Program Manager
Special Emphasis Program for PWD and PWTD	1	0	0	Cindee Smith, Acting Disability Program Manager
Processing applications from PWD and PWTD	2	0	0	HR Benefits Specialists, Human Capital Management Office
Section 508 Compliance	1	0	0	Paralegal, TBeierschmitt@f
Architectural Barriers Act Compliance	2	0	0	Jack Sheckells, Space Management Specialist JSheckells@ftc.gov AScott@ftc.gov

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The DPM is currently conducting a Schedule A Barrier Analysis to identify barriers to employment for PWD and PWTD's at the FTC. During FY 22, a plan will be implemented to address barriers identified and ultimately increase employment opportunities for PWD and PWTD's at the FTC. The FTC also uses authorities such as Veterans' Recruitment Appointments (VRA), Appointment of 30% or More Disabled Veterans, and Veterans Employment Opportunities (VEOA) Appointments for hiring veterans with disabilities as ways to address 3gities cTraing vetneedayshiA Bducg au vetemplnsuDisththeit curruitmen a ScVetretain a Schdiv ide

b. New Hires for Permanent Workforce (PWTD)

Answer Yes

Among the FY 21 new hires in the permanent workforce, there was one new hire that self-identified as a PWD. There were no new hires that self-identified as a PWTD.

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

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

a. New Hires for MCO (PWD)

Answer Yes

b. New Hires for MCO (PWTD)

Answer Yes

In terms of new hires, there were no new hires for Law Clerks who self-identified as PWD or PWTD. No newly hired General Attorneys identified as a PWD or a PWTD.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%

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

a. Qualified Applicants for MCO (PWD)

Answer N/A

b. Qualified Applicants for MCO (PWTD)

Answer N/A

N/A

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

a. Promotions for MCO (PWD)

Answer N/A

b. Promotions for MCO (PWTD)

Answer N/A

N/A

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.

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)			

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$4000 - \$4999: Total Amount	1145189	120211.58	111732.13	104462.50	123401.27
Cash Awards: \$4000 - \$4999: Average Amount	4370	4451.58	494.36	26112.50	64.56
Cash Awards: \$5000 or more: Awards Given	259	13.68	26.83	12.50	13.92
Cash Awards: \$5000 or more: Total Amount	2054624	128132.63	211115.67	90000.00	135855.70
Cash Awards: \$5000 or more: Average Amount	7932	9855.79	887.03	45000.00	2737.97

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

- a. Pay Increases (PWD) Answer Yes
- b. Pay Increases (PWTD) Answer Yes

In FY 21, triggers exist for PWD and PWTD involving performance-based pay increases.

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

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

N/A

D. PROMOTIONS

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

- a. SES
 - i. Qualified Internal Applicants (PWD) Answer N/A
 - ii. Internal Selections (PWD) Answer N/A
- b. Grade GS-15
 - i. Qualified Internal Applicants (PWD) Answer N/A
 - ii. Internal Selections (PWD) Answer N/A
- c. Grade GS-14
 - i. Qualified Internal Applicants (PWD) Answer Yes

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

In FY 21, triggers exist for PWD involving qualified grade levels 13 and 15 internal applicants and selectees for promotions.

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	Yes
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

In FY 21, triggers exist for PWTB involving qualified internal applicants and selectees for promotions to the senior grade levels.

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

Yes, there are low representation rates of PWDs in each category of senior grade levels.

- 4.



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

There is a lower than expected participation rate for PWTD in the Executive ranks.

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 Yes
 - c. New Hires for Supervisors (PWD) Answer Yes

There is a lower than expected participation rate for PWD among the selectees for new hires to supervisory positions.

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

There is a lower than expected participation rate for PWTD among the selectees for new hires to supervisory positions.

Section VI: Plan to Improve Retention of Persons with Disabilities



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In an effort to meet the requirements outlined in 29 C.F.R. § 1614.203(d) (5), the EEOVI in partnership with OGC, and HCMO, estaA0 0 cm /Artifact << /ti6143 246.9 1 S 0.6 w 5728u 39.3 662.4 1 S 0.6 w 39 454.11s5TJ ET B6.9 1 Sic.sct << /ti6143 246.9 la.sPa

Answer Yes

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

Source of the Trigger:	Workforce Data (if so identify the table)				
Specific Workforce Data Table:	Workforce Data Table - B1				
<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	The lower than expected participation rates of persons with disabilities and persons with targeted disabilities in the agency's total workforce, as compared to the goals of 12% and 2% respectively.				
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p>				
Barrier Analysis Process Completed?:	Y				
Barrier(s) Identified?:	Y				
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>Barrier Name</p>	<p>Description of Policy, Procedure, or Practice</p>			
	Trigger 1	Managers require additional training both in regards to recruiting individuals with disabilities and creating an inclusive work environment for differently abled individuals. The FTC must use more aggressive avenues to add qualified individuals with disabilities to the FTC's various employment pipelines (e.g., through internships, and partn WmD 10 >> BDC q n 36 756 m 5767			

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	Provide Schedule A training to new managers during the Supervisory Development Program training in FY 21	Yes	09/30/2022	
09/30/2021	Resurvey FTC population after educational memorandum is issued to outline the purpose of collecting the data	Yes	09/30/2022	
09/30/2021	Train not just managers, but also employees on topics to include disability awareness and inclusion, the reasonable accommodation process, etc.	Yes	09/30/2022	
09/30/2021	Maintain existing partnerships with disability rights groups, disability groups at colleges and universities, and other federal agencies to enhance employment opportunity pipelines at the FTC for qualified applicants with disabilities. Create and foster new partnerships with disability rights groups, disability groups at colleges and universities, and other federal agencies to build employment opportunity pipelines at the FTC for qualified applicants with disabilities.	Yes	09/30/2022	
Report of Accomplishments				
Fiscal Year	Accomplishment			
2020	Seasoned managers were trained Q3			
2020	During FY 21, information regarding the Schedule A hiring authority for job applicants with disabilities and reasonable accommodation was provided to new managers via the new manager training program, and to seasoned managers who were due to participate in the FTC’s annual management training program. The annual program for season managers is a means to provide managers a refresher many topics, including Schedule A and other EEO and non-EEO topics.			
2021	Resurvey of the FTC population will be conducted FY 22 or FY 23.			

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

For Activity 3, employees have not yet received training beyond 1:1 counseling during meetings with the DPM; however, employee training will be offered in FY 21 and beyond.

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

During FY 21, training on Schedule A hiring authority regarding job applicants with disabilities and training on the reasonable accommodation process was provided to managers. Additional sessions will be provided in FY 22 and beyond, and employees will be offered disability related trainings and encouraged to ensure accuracy of their self-identification data.

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.

Continue to offer training to both managers and employees and increase/enhance outreach efforts to attract qualified talent with disabilities for mission critical needs.