

## 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

Based on a review of demographic data, the NRC has not achieved the required Section 501 workforce goals. The EEO office determined that triggers exist using the benchmark of 12% for PWD by grade level cluster in the permanent workforce. This determination is supported by the information uncovered and described in the following paragraph: There were no separate GG information/data workforce tables. Workforce Table B4 (GS Permanent) does not reflect information/data for GS employees (GS-1 to GS15) (all categories reflect 0s). See MD-715 Part E3 - Workforce Analysis, pertaining to information/data on NRC occupational groups, which includes ES, EG, GG-06 to GG-15, and other grades, and Workforce Data Table B6P - "Mission-Critical Occupations. See also, MD-715 Part E3, Section 2 - Analysis of Participation Rates for Women, Minorities, and Individuals with Disabilities in NRC Standard Occupations, and Workforce Data Table B4 (AD Permanent) (covering AD 13 and 14 levels), which reflects the total AD Workforce consisted of 30 employees. Within the AD group 29 employees self-identified as no disability (96.67 percent), and 1 employee self-identified as PWD (3.33 percent). Within the SES group 101 employees self-identified as no disability (91.82 percent), 1 employee did not self-identify their status (0.91 percent), 8 employees self-identified as PWD (7.27 percent), and 1 employee self-identified as PWTD (0.91 percent). Workforce Table B7 - Senior Grade Levels - Distribution by Disability (Participation Rate), reflects that there were 1,656 employees in the total senior grades. Within the senior grades group 1,461 employees self-identified as no disability (88.22 percent), 68 employees did not self-identify their status (4.11 percent), 127 employees self-identified as PWD (7.67 percent), and 21 employees self-identified as PWTD (1.27 percent). Workforce Data Table B8 - Management Positions (Participation Rate), does not reflect information/data for the Managers group. NRC is making meaningful progress towards reaching the Section 501 goals.

\*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

Based on a review of demographic data, the NRC has not achieved the required Section 501 workforce goals. The EEO office determined that triggers exist using the benchmark of 2% for PWTD by grade level cluster in the permanent workforce. The response to question 1 is incorporated and adopted, herein. NRC is making meaningful progress towards reaching the Section 501 goals.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	0	0	0.00	0	0.00
Grades GS-11 to SES	140	9	6.43	1	0.71

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

The NRC’s policies, regulations, and procedures regarding employment of PWDs are in Management Directive and Handbook 10.13, Part V, “The NRC Program for Employment of Persons with Disabilities.” The numerical goals are communicated to hiring managers and recruiters through the following communication forums: (1) Annual EEO training for managers and supervisors; (2) Lunch and Learns; (3) NRC's Disability Program Strategic Project Plan (FY 2019-FY 2024); (4) The Agency's Disability Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities, and (5) Semi-Annual EEO and Human Capital Briefings. During the 2021 EEO briefing, information was presented to the Agency Heads, senior officials and management, all employees, stakeholders and the public at large, regarding Section 501 regulatory changes, new requirements, numerical goals, NRC efforts, etc. During fiscal year (FY) 2021, NRC participated in a number of career events that included conveyance of NRC’s hiring authority related to PWD and PWTD. [see MD-715, Part E.3 - Workforce Analysis, Section 4 - Recruitment, Subsection 4.4 - FY 2021 Recruitment and Advertisement Activities (Pp 25-26).

## 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

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	1	0	0	Kimberly.English@nrc.gov
Architectural Barriers Act Compliance	1	0	0	Alan De Leon, Sr. Project Manager, Office of Administration
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Kimberly.English@nrc.gov

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Special Emphasis Program for PWD and PWTB	1	0	0	Dorothea Washington, Special Emphasis Program Manager, Office of Small Business and Civil Rights,
Processing reasonable accommodation requests from applicants and employees	1	0	0	Anne Silk, Human Resources Specialist (Reasonable Accommodation), Policy, Labor, & Employee Relations Branch, ADHROP, OCHCO
Section 508 Compliance	1	0	0	John Beatty, Section 508 Coordinator, Office of the Chief Information Officer,

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

In 2021, the OCHCO Disability program staff participated in a training session by DOJ on Service Animals and Section 501 (2/18/21) and a Job Accommodation Network (JAN) session on Service & Emotional Support Animals (4/13/21).

**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

In 2021, the OCHCO Disability program staff participated in various Federal Exchange on Employment and Disability (FEED) and EEOC training sessions; with a plan to do the same in 2022.

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

<b>Brief Description of Program Deficiency</b>	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.		
<b>Objective</b>	To comply with section 501 requirements.		
<b>Target Date</b>	Sep 30, 2022		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Oct 1, 2021		Process requests, approvals, and notifications to affected applicants and employees as set forth in the RAP and required by 29 CFR 1614.203(d) (3).
	Oct 1, 2021		To develop an effective and accurate electronic data collection system for the tracking of reasonable accommodation claims.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]		
<b>Objective</b>	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]		
<b>Target Date</b>	Sep 30, 2021		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	D.4.d. Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR §1614.203(d)(7)(ii)]
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<b>Objective</b>	The OCHCO will make statistical tables, demographics, and applicant flow data available quarterly; increase representation of PWTD in senior grade levels; achieve 12 % PWD and 2 % PWD disability goals; assure awareness of NRC hiring authority equivalent to Schedule A and increase use of these hiring authorities; create awareness of reasonable accommodations procedures and personal assistance services; assurance that disability barriers and/or practices are not the reason for leaving agency.			
<b>Target Date</b>	Sep 30, 2022			
<b>Completion Date</b>				
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>	
	Feb 27, 2018	September 30, 2021	Provide RAP training to managers, supervisors, and employees.	
	Oct 1, 2018		Evaluate ongoing hiring managers on their support of EEO and Diversity efforts including helping to meet disability goals in their annual performance appraisal.	
	Oct 1, 2018		Provide ongoing training to the disability program staff sufficient to increase their knowledge and skills regarding disability hiring programs; answer disability related questions; provide job applicants with necessary reasonable accommodations; accept, validate, and forward applications for appointment under hiring authorities that take disability into account to the relevant hiring official and; oversee any other disability related hiring program.	
	Oct 1, 2018		Address inconsistencies and provide MD-715 related workforce tables, demographics, and applicant flow information/data.	
	Oct 1, 2018		Provide ongoing training to all hiring managers and supervisors on the use of NRC hiring authority equivalent to Schedule A and other disability hiring authorities. One method will be to include a segment on disability hiring authorities in the annual mandatory EEO and Diversity & Inclusion Training for Supervisors and Managers.	
	Oct 1, 2018		Include a segment on disability hiring authorities in the annual mandatory EEO and Diversity & Inclusion Training for Supervisors and Managers; and encourage and support fiscal year hiring efforts that take disability into account (i.e., new hires; promotions, solicitations of interest, rotations, and assignments).	
	Oct 1, 2018		Conduct a focus group in FY 2022, with NRC employees, to Identify whether policies, procedures, or practices for the reason PWD and PWTD terminate their employment with the agency and to Identify challenges and barriers for people with disabilities when applying and interviewing for jobs at the NRC, receiving training and developmental opportunities, and applying for and being selected for promotions/new opportunities.	
	Oct 1, 2018		Increase the number of PWD/PWTD hired, promoted, and reassigned (i.e., rotations, details, reassignments).	
	Oct 1, 2018		Conduct a barrier analysis to determine whether any policies, procedures, or practices are causing PWD and PWTD to leave the agency and have barriers in the recruitment and/or selection processes for new hires, promotions, training and career development, advancement, distribution of awards and retention.	
	Sep 30, 2019		Conduct outreach and recruitment efforts for PWTD in the senior grade levels.	
	Sep 30, 2019		September 30, 2021	Published the Disability Program Strategic Project Plan for FY 2019 – FY 2024 and posted on the agency’s public Web site. Plan implementation ongoing.
	Sep 30, 2019			Use a service provider to administer PAS to disability status applicants and employees.
	Sep 30, 2019		September 30, 2021	Published the Disability Program Strategic Project Plan for FY 2019 – FY 2024 and posted on the agency’s public Web site. Plan implementation ongoing.
	Sep 30, 2019		September 30, 2021	Post RAP on agency’s public Web site.

	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019		Establish and maintain contacts with organizations that specialize in the employment of individuals with disabilities and use program resources that identify applicants eligible to be appointed under NRC hiring authorities that take disabilities into account.
	Sep 30, 2019		Conduct outreach and recruitment efforts for PWTB in the senior grade levels.
	Sep 30, 2019		Establish and maintain contacts with organizations that specialize in the employment of individuals with disabilities and use program resources that identify applicants eligible to be appointed under NRC hiring authorities that take disabilities into account.
	Sep 30, 2019		Use a service provider to administer PAS to disability status applicants and employees.
	Sep 30, 2020		Conduct a focus group in FY 2020, with NRC employees, to Identify challenges and barriers for people with disabilities when applying and interviewing for jobs at the NRC, receiving training and developmental opportunities, and applying for and being selected for promotions/new opportunities.
	<u>Fiscal Year</u>	<u>Accomplishment</u>	
<b>Accomplishments</b>	2021	In 2021, the EEO office/ADEM, OCHCO, and OGC conducted four EEO and Diversity & Inclusion training courses for managers and supervisors, which covered disability regulations and requirements including the NRC procedures and processes, and manager/supervisor responsibilities related to reasonable accommodations.	
	2021	NRC staff referred one resume from the Workforce Recruitment Program (WRP) data base for consideration for a Human Resources Specialist position. NRC staff participated in the City Career Fair 21st Annual Diversity Day Virtual Video fair and subsequently referred two Schedule A eligible resumes for an Administrative Assistant position and a Regulations Assistant position. In addition to the three resumes referred above, we referred another 15 resumes from our internal Schedule A database to HR Specialists for various jobs.	
	2021	NRC Disability program staff continued to implement the Disability Affirmative Action Plan. Promoted the use of our Schedule A equivalent hiring authority by providing training for supervisors on special hiring authorities and forwarding resumes of eligible applicants to hiring managers.	
	2020	As of 09/30/21, the NRC had partnered with the Department of Defense Operation Warfighter (OWF) Program, which provides Federal internship opportunities in a supportive work setting to recovering service members. The NRC brought on one OWF intern from November 2020 through April 2021 and referred one OWF participant who was seeking a full-time job in Information Technology to a hiring manager. The NRC also partnered with the Department of Labor's Workforce Recruitment Program (WRP) by accessing their resume database to search for candidates for Administrative Assistant, Information Technology, and Temporary Summer Student positions. The NRC partnered with the Wounded Warrior Project (WWP) and, NRC participated in recruiting events and/or posted job vacancies on job boards with Equal Opportunity Publications (EOP), Ability Corps/Ability Magazine, Maryland Workforce Exchange job board, Maryland Department of Rehabilitative Services, and GettingHired.com.	
	2021	See additional accomplishments captured in MD-715 Part J, "Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities."	
	2021	See additional agencywide accomplishments captured in MD-715 Part E3, "Workforce Analysis."	

<b>Brief Description of Program Deficiency</b>	E.4.a.5. The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(4)]		
<b>Objective</b>	To generate the information/data needed to prepare the annual MD-715 report and monitor EEO activities throughout the year.		
<b>Target Date</b>	Sep 30, 2023		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Oct 1, 2021		To develop an effective and accurate electronic data collection system for the tracking of reasonable accommodation claims.
	Oct 1, 2021		OCHCO recognizes our internal procedures may limit cert-specific data which is required for the MD-715. We have recently started reviewing our applicant processes and data collection practices.
	Oct 1, 2021		Resource limitations significantly impact the speed with which required EEOC files are prepared. But OCHCO\HCAB has increased staffing by 30% in the last 12 months. The increased staffing does not immediately address resource limitations. But tasking additional team members will improve efficiency and response rates of future submissions.
	Oct 1, 2021		This year's Status and Dynamics files were submitted shortly after the EEOC Template became available. However, EEOC's reports did not yield totals that NRC expected. Working with EEOC tech staff, NRC learned a subsequent version of the template was released. NRC resubmitted our data; however, this did not resolve all discrepancies. NRC and EEOC tech representatives continued to exchange suggestions; however, these exchanges are time-consuming and prevent NRC from meeting EEOC deadlines.
	Oct 1, 2021		Perhaps NRC can request more-accessible tech support from EEOC. A dedicated technical contact would be very helpful to verify our initial submissions are correctly prepared and may help prevent multiple resubmissions.
	Oct 1, 2021		OCHCO & SBCR have agreed to a series of After-Action meetings to identify issues encountered in recent MD-715 filings; methods to resolve/prevent similar impediments in future filings; improved planning/communications that task/target appropriate team members; timelines for FY22.
	Oct 1, 2021		OCHCO has initiated regular meetings with our applicant software vendor to further investigate data-collection limitations and explore recommended strategies for obtaining and reporting EEOC required data. NRC will request contacts from Agencies that successfully harvest necessary data. OCHCO hopes to learn practices/procedures of Agencies that successfully curate MD-715 data.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

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

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

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

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

In FY 2021, the agency participated in a variety of recruitment outreach events to increase the number of qualified PWD and PWTD within the major occupations. The NRC engaged in extensive recruitment outreach, which is identified in MD-715 Part E3 - Workforce Analysis, Section 4 - Recruitment (Pp. 24-26).

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 NRC uses all available and appropriate hiring authorities to recruit and hire PWD and PWTD including a special hiring authority that takes disability into account (similar to the Schedule A hiring authority) to hire PWTD; and non- competitive selection of PWDs. During FY 2021, the NRC engaged in extensive recruitment outreach. See MD-715 Part E3 - Workforce Analysis, Section 4 – Recruitment (Pp. 24-26).

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.

In accordance with NRC’s established special hiring authority (Schedule A equivalent), the following steps are being taken: 1) The hiring manager alerts the servicing Human Resources (HR) Specialist of the job opening and explains what competencies the ideal candidate should possess; 2) The HR Specialist consults with the Disability Program Manager (DPM) regarding resources available to the hiring manager with potential special hiring authority applicants; 3) If available, the hiring manager reviews the resumes of the applicants, conducts interviews, and makes a selection. If there are no candidates available or the hiring manager is not satisfied with any of the special hiring authority applicants presented for consideration, they retain the option to use other methods to fill the vacancy; 4) If a selection decision is made, the servicing HR Specialist extends the offer of employment on behalf of the agency; and, 5) Once the offer has been accepted, a start date is established to bring the candidate on board.

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

Information and materials are available to hiring managers online. During FY 2021, the OCHCO and Office of General Counselor (OGC) in coordination with the EEO office provided training to 100+ hiring managers on the use of hiring authorities that take disability into account and how to use and access resumes of qualifying individuals as part of the agency’s mandatory annual (and refresher) EEO and Diversity Management Training for Managers and Supervisors, which was conducted four times during FY 2021. In addition to the mandatory training for managers and supervisors, OCHCO conducted training for other NRC supervisors on the use of hiring authorities, reasonable accommodation program and areas of overlap such as worker’s compensation, Family Medical Leave Act, telework, ergonomics, accessibility, information technology, and modifications of the physical environment.

**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.

See MD-715 Part E3 - Workforce Analysis, Section 4 - Recruitment (Pp. 24-26).

**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 |

See answer provided in this document under Section I - Efforts to Reach Regulatory Goals.

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

See answer provided in Section I - Efforts to Reach Regulatory Goals. For more details, see MD-715 Part E3 - NRC Workforce Analysis, Section 8 - Applicants and New Hires for NRC Mission-Critical Occupations, Pp. 28-34. See also Workforce Table B6P - Mission Critical Occupations, and Table B3 - Occupational Categories - Distribution by Disability (Participation Rate).

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

See answer provided in Section I - Efforts to Reach Regulatory Goals. For more details, see MD-715 Part E3 - Workforce Analysis, Section 9 - Internal Competitive Promotions for NRC Mission-Critical Occupations, Pp. 34-41. See also Workforce Table B6P - Mission Critical Occupations, Table B3 - Occupational Categories-Distribution by Disability (Participation Rate)”, and Table B7 - Senior Grade Levels (Participation Rate)”.

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

See answer provided in Section I - Efforts to Reach Regulatory Goals. For more details, see MD-715 Part E3 - Workforce Analysis, Section 9 - Internal Competitive Promotions for NRC Mission-Critical Occupations, Pp. 34-41. See also Workforce Table B6P - Mission Critical Occupations, Table B3 - Occupational Categories-Distribution by Disability (Participation Rate), and Table B7 - Senior Grade Levels (Participation Rate).

## 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.

To better ensure the agency’s mission and the employees’ career goals are achieved, the NRC offers professional mentoring, assistance with preparation of an Individual Development Plan (IDP), and continuing education for technical, professional, and leadership courses through an instructor-led virtual platform and online self-study. The NRC continues to offer foundational leadership and professional development training through the Leadership Academy. This program offers PWD a variety of instructor-led leadership and interpersonal skills courses. Through these courses such as Leadership Orientation, Emotional Intelligence, and Building Your Leadership Potential Through Effective Communication, staff can assess their leadership potential, improve their interpersonal relationship skills, and begin learning about the OPM Leadership Competencies that are critical for successful career advancement. In FY 2021, the agency engaged in a number of other initiatives designed to ensure PWD and PWTD were provided sufficient advancement opportunities [see MD-715, Part E3 - Workforce Analysis, Section 10 - Hiring and Recruitment: Focus- Noncompetitive Hiring, Rotations, Details, Assignments, Advancements, and Other Selections. Pp. 41]. In addition to instructor-led training, PWD and PWTD have access to online courses, books, audiotapes, and videos in the NRC’s Talent Management System (TMS). Through the TMS online learning resources, PWD and PWTD serving in administrative and corporate positions can acquire the foundational skills needed to successfully perform at higher levels and be more competitive when seeking new opportunities. The NRC also offers PWD and PWTD two-self-paced programs to develop leadership skills at different levels. The Aspiring Leaders Certificate Program (ALCP) for employees at grades GG 13 -15 is a non-competitive leadership development program designed to develop future supervisors. The Leader at All Levels Certificate Program (LCP) provides employees (GG 7-12) the opportunity to acquire and strengthen the fundamental leadership competencies that support self-awareness and self-management. These programs support development of the OPM leadership competencies, offering instructor-led and online courses at the employee’s own pace. In FY 2021, OCHCO continued to provide three instructor-led courses - Strategies for Managing Your Career, Writing Your Resume, and Winning Interview Strategies - to specifically provide employees tools and strategies for navigating key career development activities such as choosing a career path or preparing for and participating in interviews.

### B. CAREER DEVELOPMENT OPPORTUNITES

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

The NRC launched two initiatives to help PWD and PWTD advance their careers and professional development. The Guide to Career Enhancement SharePoint site provides tools and resources to help staff assess their skills, reflect on personal priorities, and prepare for future job opportunities. The Career Mentoring Program is a self-service program for employees who are motivated to develop their careers and/or specific skills, and mentors who want to share their knowledge and experience. These new initiatives, in combination with other learning and training resources, reflect NRC’s strategic choice to help PWD and PWTD develop their skills and grow in their careers. The NRC also launched an internal resource called NRC Open Opportunities, where employees can apply to participate in projects, workgroups, etc. These opportunities look for employees who can contribute their existing skills and develop new ones. The program facilitates collaboration and knowledge sharing across the agency and allows more opportunities for PWD and PWTD to work in other areas to demonstrate their skills and abilities, as well as grow their network. [see also MD-715 Part E3 - Workforce Analysis, Section 11 - Training and Development Opportunities Pp. 42-45]

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
Training Programs	0	0	0	0	0	0
Fellowship Programs	0	0	0	0	0	0
Detail Programs	0	0	0	0	0	0
Mentoring Programs	0	0	0	0	0	0
Other Career Development Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	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 Yes
- b. Selections (PWD) Answer Yes

The EEO office is unable to conduct a full analysis, due to lack of, or limited information/data. Workforce Data Table B7 provides no data for the SES level. There were 6 career development program slots available to GG-15 employees. There was a total of 288 eligible applicants of whom, 263 employees self-identified as no disability (91.32 percent), 8 employees did not self-identify their status (2.78 percent), 17 employees’ self-identified as PWD (5.90 percent), and 2 employees self-identified as PWTD (0.69 percent). Three applicants with no disability (100.00 percent) were determined qualified for the program. The agency selected 1 employee with no disability into the program. There were 3 career development program slots available to GG-14 employees. There was a total of 123 eligible applicants of whom, 105 employees self-identified as no disability (85.37 percent), 6 employees did not self-identify their status (4.88 percent), 12 employees’ self-identified as PWD (9.76 percent), and 1 employee self-identified as PWTD (0.81 percent). Four applicants with no disability (100.00 percent) were determined qualified and selected to participate in the program. There were 0 slots identified at the GG-13 level. The workforce tables did not include a career training program for NRC mission critical occupations.

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 Yes

The EEO office is unable to conduct a full analysis, due to lack of, or limited information/data. Workforce Data Table B7 provides no data for the SES level. There were 6 career development program slots available to GG-15 employees. There was a total of 288 eligible applicants of whom, 263 employees self-identified as no disability (91.32 percent), 8 employees did not self-identify their status (2.78 percent), 17 employees’ self-identified as PWD (5.90 percent), and 2 employees self-identified as PWTD (0.69 percent). 3 applicants with no disability (100.00 percent) were determined qualified for the program. The agency selected 1 employee with no disability to in the program. There were 3 career development program slots available to GG-14 employees. There were 123 eligible applicants of whom, 105 employees self-identified as no disability (85.37 percent), 6 employees did not self-identify their status (4.88 percent), 12 employees’ self-identified as PWD (9.76 percent), and 1 employee self-identified as PWTD (0.81 percent). Four applicants with no disability (100.00 percent) were determined qualified and selected to participate in the program. There were 0 slots identified at the GG-13 level. The workforce tables did not include a career training program for NRC mission critical occupations.

**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 Yes

b. Awards, Bonuses, & Incentives (PWTD) Answer Yes

The EEO office identified a trigger based on the disparities identified when comparing the time-off awards made to PWD and PWTD with employees who self-identified as not having a disability related to: Time-off awards for 1-10 hours, 11-20 hours and PWD related to time off awards for 21-30 hours and 31-40 hours. See MD-715 Part E3 - Workforce Analysis, Section 12 - Retention Efforts, Including Salary Distribution and Time Off and Cash Awards (Pp. 45-56), Subsections 12.3 - Employee Incentives, 12.4 - Employee Recognition and Awards, 12.5 - Time-Off Awards (1-10 Hours), and 12.6 - Time-Off Awards (11-20 Hours). The EEO office also identified a trigger based on the disparities identified when comparing the cash awards made to PWD and PWTD for \$500 or under, \$501-\$999, \$1,000-\$1,999, \$2,000-\$2,999, \$3,000-\$3,999, \$4,000-\$4,999, and \$5,000 or more. See MD-715 Part E3 - Workforce Analysis, Section 12 - Retention Efforts, Including Salary Distribution and Time Off and Cash Awards (Pp. 45-57).

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	684	23.64	25.76	28.95	22.53
Time-Off Awards 1 - 10 Hours: Total Hours	5215	174.55	196.60	226.32	163.74
Time-Off Awards 1 - 10 Hours: Average Hours	7	3.18	0.29	18.42	0.00
Time-Off Awards 11 - 20 hours: Awards Given	105	2.27	4.03	0.00	2.75
Time-Off Awards 11 - 20 Hours: Total Hours	1728	41.82	66.28	0.00	50.55
Time-Off Awards 11 - 20 Hours: Average Hours	16	8.18	0.67	0.00	9.89
Time-Off Awards 21 - 30 hours: Awards Given	3	0.00	0.13	0.00	0.00
Time-Off Awards 21 - 30 Hours: Total Hours	72	0.00	3.02	0.00	0.00
Time-Off Awards 21 - 30 Hours: Average Hours	24	0.00	1.01	0.00	0.00
Time-Off Awards 31 - 40 hours: Awards Given	2	0.00	0.04	0.00	0.00
Time-Off Awards 31 - 40 Hours: Total Hours	74	0.00	1.51	0.00	0.00
Time-Off Awards 31 - 40 Hours: Average Hours	37	0.00	1.51	0.00	0.00
Time-Off Awards 41 or more Hours: Awards Given	5	0.00	0.21	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	219	0.00	9.19	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	43	0.00	1.80	0.00	0.00
<b>Cash Awards</b>	<b>Total (#)</b>	<b>Reportable Disability %</b>	<b>Without Reportable Disability %</b>	<b>Targeted Disability %</b>	<b>Without Targeted Disability %</b>
Cash Awards: \$501 - \$999: Awards Given	1286	43.18	47.82	55.26	40.66
Cash Awards: \$501 - \$999: Total Amount	933436	31160.45	34699.83	40628.95	29183.52

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Average Amount	725	327.73	30.41	1934.21	-7.69
Cash Awards: \$1000 - \$1999: Awards Given	1711	61.36	63.63	65.79	60.44
Cash Awards: \$1000 - \$1999: Total Amount	2155770	77915.00	80096.14	84763.16	76485.16
Cash Awards: \$1000 - \$1999: Average Amount	1259	576.82	52.77	3389.47	-10.44
Cash Awards: \$2000 - \$2999: Awards Given	740	26.36	27.39	21.05	27.47
Cash Awards: \$2000 - \$2999: Total Amount	1863340	65582.73	69017.20	51673.68	68486.81
Cash Awards: \$2000 - \$2999: Average Amount	2518	1130.45	105.66	6457.89	18.13
Cash Awards: \$3000 - \$3999: Awards Given	789	22.73	29.74	28.95	21.43
Cash Awards: \$3000 - \$3999: Total Amount	2744261	79792.27	103512.54	99384.21	75701.65
Cash Awards: \$3000 - \$3999: Average Amount	3478	1595.45	145.97	9034.21	42.31
Cash Awards: \$4000 - \$4999: Awards Given	452	12.27	17.53	10.53	12.64
Cash Awards: \$4000 - \$4999: Total Amount	1961865	52345.91	76187.12	45836.84	53704.95
Cash Awards: \$4000 - \$4999: Average Amount	4340	1938.64	182.26	11457.89	-48.90
Cash Awards: \$5000 or more: Awards Given	324	10.45	12.33	5.26	11.54
Cash Awards: \$5000 or more: Total Amount	3477305	109853.64	133449.75	62118.42	119820.33
Cash Awards: \$5000 or more: Average Amount	10732	4775.91	453.90	31057.89	-711.54

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

The EEO office identified a trigger based on the disparities identified when comparing the quality step increase made to PWD and PWTD with employees who self-identified as not having a disability. See MD-715 Part E3 - Workforce Analysis, Section 12 - Retention Efforts, Including Salary Distribution and Time Off and Cash Awards (Pp. 45-57), Subsection 12.17 - Quality Step Increases Awarded. (Pp. 57).

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 No

b. Other Types of Recognition (PWTD) Answer No

## 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 Yes

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 Yes

ii. Internal Selections (PWD) Answer Yes

The EEO office is unable to provide a workforce analysis on promotions for the following senior grade levels: senior executive services, supervisors, and managers, due to unavailability of workforce statistical information/data. Information for other senior grade levels (GG-15, GG-14, and GG-13) is captioned in MD-715 Part 3, Section 9 - Subsections 9.2, 9.3, and 9.4. (Pp. 34-35).

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 Yes

ii. Internal Selections (PWTD) Answer Yes

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 No
- ii. Internal Selections (PWTD) Answer No

For more information see Table B7 (Participation Rate) and MD-715 Part E3 - Workforce Analysis, Pp. 34-36.

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

See MD-715 Part E3 - Workforce Analysis.

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

See MD-715 Part E3 - Workforce Analysis.

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 Yes
  - ii. Internal Selections (PWD) Answer Yes
- b. Managers
  - i. Qualified Internal Applicants (PWD) Answer Yes
  - ii. Internal Selections (PWD) Answer Yes
- c. Supervisors

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

See MD-715 Part E3 - Workforce Analysis.

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

b. Managers

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

c. Supervisors

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

For more information see Workforce Table B7, and MD-715 Part E3 - Workforce Analysis.

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 Yes

For more information see Table B7 Senior Grade Levels (Participation Rate), and MD-715 Part E3.

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 Yes

For more information see Table B7 Senior Grade Levels (Participation Rate), and MD-715 Part E3

## 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 N/A

There were no employees who fell under the identified category.

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

See MD-715 Part E3 - Workforce Analysis, Section 13 - Separations.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	2	0.44	0.04
Permanent Workforce: Resignation	20	0.88	0.69
Permanent Workforce: Retirement	113	2.63	4.11
Permanent Workforce: Other Separations	48	1.75	1.69
Permanent Workforce: Total Separations	183	5.70	6.53

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 Yes

b. Involuntary Separations (PWTD) Answer No

See MD-715 Part E3 - Workforce Analysis, Section 13 - Separations.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	2	0.00	0.07
Permanent Workforce: Resignation	20	0.00	0.72
Permanent Workforce: Retirement	113	0.00	4.04
Permanent Workforce: Other Separations	48	2.63	1.68
Permanent Workforce: Total Separations	183	2.63	6.51

4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

The NRC has identified concerns raised by departing employees in exit interview surveys. As a result, MD-715 Part H and Part I plans have been instituted, and the EEO office and OCHCO will be coordinating efforts to address separation concerns and put in place change strategies during FY 2022.

## 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 NRC is committed to making every possible effort to ensure that all information on its internal Web site is accessible. External link to public Web site for NRC site accessibility: <https://www.nrc.gov/site-help/access.html>, which includes a link on "How to File a Complaint". The EEO office conducts NRC's Internal Disability Compliance Program, which implements the provisions of 10 CFR Part 4, Subpart E, "Enforcement of Nondiscrimination on the Basis of Disability in Programs or Activities Conducted by the U.S. Nuclear Regulatory Commission".

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 EEO office conducts NRC's Disability Program, which implements the provisions of 10 CFR Part 4, Subpart E, "Enforcement of Nondiscrimination on the Basis of Disability in Programs or Activities Conducted by the U.S. Nuclear Regulatory Commission," which includes compliance with the Architectural Barriers Act and a description of how to file a complaint. Public Web site link to NRC's Disability Program: <https://www.nrc.gov/about-nrc/civil-rights/occp/compliance-pgrm/disability.html>.

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 EEO office conducted a review of NRC's 2021 Building Accessibility Report. All renovations were designed to meet current Americans with Disabilities Act Accessibility Guidelines (ADAAG) and Architectural Barriers Act Accessibility (ABAAS) standards. The renovations and planned renovations are described in the following bullets: • Sixth floor (09/2021-01/2022) new NRC offices have office spaces, workstations, conference rooms, kitchens, wellness room, and private phone rooms that meet ABAAS standards. • Designs for the 1st and 12th floors are complete, and funding allocated and sent to GSA, who administers the construction phase, plans to award the contract in the first quarter of calendar 2022. • NRC initiated the design process for the 11th floor (11/2021) and anticipates completion by Fall 2022. • "Wave" button devices at the OWFN and Two White Flint North (TWFN) Buildings: NRC installed new touchless "wave" disability door opener devices on all the restroom entrances and all the disability door operator locations at the TWFN building. NRC is in the process of installing new "wave" disability door opener devices in all the restrooms and disability door operator locations at OWFN. • NRC through GSA renewed the lease in Arlington, Texas. As part of the lease renewal, NRC reduced the total square office footage, but all the space designs followed the ABAAS standards.

## 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.)

Within five (5) business days of receipt of the reasonable accommodation (RA) request, the Reasonable Accommodation

Coordinator (RAC) or designee reviews the request and keeps the requestor and supervisor apprised of the status, the need for any additional information, or any other delays as the nature of the request demands. The NRC process RA requests and provides accommodations, when appropriate, in as short a time frame as reasonably possible. Interim accommodations may be approved as a temporary provisional measure for cases that present extenuating circumstances. The NRC’s Reasonable Accommodation Procedures (RAP) contain a section entitled “Reasonable Accommodation Timeline,” which identifies specific actions and the associated timelines.

- 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 FY 2021, the EEO office monitored the policies, procedures, and practices related to NRC’s reasonable accommodation program. The EEO office determined that not all RA requests and approvals were timely processed. According to OCHCO, “Due to the significant increase in requests for home and office accommodations, especially for telework accommodations since the agency re-entered the workplace in November 2021 and the continuing evolution of COVID-19 guidance from CDC and its impact on employees with disabilities, the agency is experiencing longer than the usual processing times than stated in our procedures. We are also experiencing delays due the additional time it may take for an employee to get an appointment to obtain supporting medical documentation and for the agency’s contracted physician to conduct medical reviews that assist the agency in making a determination regarding a request. The agency is exploring an automated system that will make the process more efficient and effective.” In FY 2021, four sessions were given of the mandatory EEO and Diversity Management Training for Managers and Supervisors, which included information on the agency’s reasonable accommodation program, procedures, and processes.

**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 NRC included its Personal Assistant Services (PAS) procedures in the EEOC approved RAP. Requests for PAS are made in the same manner as all other requests for reasonable accommodations outlined in Section I of the RAP. The agency determined that PAS services would be paid through use of an agency purchase card. All procurements will comply with established EEOC guidance. To date, the NRC has not received any requests for PAS.

**Section VII: EEO Complaint and Findings Data**

**A. EEO COMPLAINT DATA INVOLVING HARASSMENT**

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

Answer No

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

Answer No

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

N/A
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**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 Yes

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
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**Section VIII: Identification and Removal of Barriers**

*Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.*

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Answer Yes

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

Answer Yes

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

<b>Source of the Trigger:</b>	Other				
<b>Specific Workforce Data Table:</b>	See MD-715, Executive Summary				
<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?	See MD-715, Executive Summary: MD-715 Part E.2. Essential Elements A-F, Part E3, Workforce Analysis, Md-715 Part E.4. Accomplishments, and MD-715 Part E.5. Planned Activities.				
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i>				
<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>		<b>Description of Policy, Procedure, or Practice</b>		
<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>
<b>Responsible Official(s)</b>					
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>	
<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>Report of Accomplishments</b>					
<b>Fiscal Year</b>	<b>Accomplishment</b>				

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

The NRC’s FY 2019 – FY 2024 Disability Program Strategic Project Plan for FY 2019 – FY 2024, identifies 5 target areas: recruitment, hiring, retention, development and career progression, and cultural change. All target areas include a goal along with corresponding action items. NRC planned to conduct a focus group, with employees, in FY 2020 to identify challenges and barriers for people with disabilities when applying and interviewing for jobs, receiving training and developmental opportunities, and

applying for and being selected for promotions/new opportunities. However, due to the COVID-19 pandemic, this effort has been delayed until later during FY 2022/FY 2023. OCHCO determined that OMB clearance is required to interview or survey/provide questions to people who are not employed by the NRC. Therefore, this activity is not being pursued. The EEO Advisory Committee for Employees with Disabilities (ACED) conducted a lunch-time forum on May 24, entitled, "Powered by Diversity –Hiring and Advancing Employees with Disabilities." The EEO office co-sponsored this event, where the Affirmative Employment and Diversity Management Program Manager, discussed NRC's Disability Affirmative Action Plan, and how the EEO office is assisting in agencywide efforts to achieve cultural diversity inclusion to advance affirmative action and equal employment opportunities for employees and applicants with disabilities. It was also emphasized to participants how the MD-715 Report/Plans provide assessments of the agency's organizational performance and how this information/data is used to build on the agency's strengths and address its weaknesses to improve agencywide performance outcomes. The EEO office plans to conduct similar presentations to influence decision-making at the office level to promote diversity in recruitment outreach, hiring, employee engagement, upward mobility, advancement, and retention of individuals with disabilities.

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

The EEOC advised, via letter dated September 30, 2019, that the NRC's RAP, as amended, are in compliance with EEOC regulations. The NRC posted the amended RAP on the internal and external websites, per notification in the EEOC's letter. During 2021, the NRC continued to implement the updated procedures by ensuring manager and supervisor awareness to promote compliance with regulations and requirements and by posting the RAP on the internal/external websites. Additionally, the NRC's Anti-Harassment Policy and Procedures for Preventing and Eliminating Harassing Conduct in the Workplace was updated to include pregnancy, gender expression, gender identity, and genetic information (e.g., some cases include disability).

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 NRC is making meaningful progress towards achieving the employment benchmark goals (12 percent for PWD and 2 percent PWTD) for employment of individuals with disabilities. The EEO office continues to monitor and assist offices in their efforts to increase recruitment outreach, hiring, training and development, career advancement, incentives, and retention of individuals with disabilities.