

**2018 – 2019**

**DISABILITY EMPLOYMENT PROGRAM  
STRATEGIC PLAN**





# 2018 – 2019

## DISABILITY EMPLOYMENT PROGRAM STRATEGIC PLAN

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# VISION

The Federal Deposit Insurance Corporation (FDIC) will be a model employer of persons with disabilities, persons with targeted disabilities, and disabled veterans, and ensure they are included in all areas of the FDIC workforce.

# INTRODUCTION

The FDIC is committed to ensuring equal opportunity in the employment of all persons, including persons with disabilities, persons with targeted disabilities, and disabled veterans. This Disability Employment Program Strategic Plan (Plan) details specific strategies to address the recruitment, employment, development, advancement, and inclusion of persons with disabilities. Additionally, the Plan addresses the goals of Executive Order (EO) 13548, *Increasing Federal Employment of Individuals with Disabilities*, dated July 26, 2010, which seeks to increase federal employment of persons with disabilities through compliance with EO 13163, dated July 26, 2000, titled *Increasing the Opportunity for Individuals with Disabilities to be Employed in the Federal Government*. EO 13163 was issued to promote the hiring of persons with disabilities and support the goals articulated in Section 501 of the Rehabilitation Act of 1973, as amended (federal hiring of persons with disabilities).

The goals, strategies, and actions presented in this Plan align with the FDIC's Diversity and Inclusion (D&I) Strategic Plan, the FDIC's annual *Federal Agency Annual Equal Employment Opportunity Program Status Report* to the U.S. Equal Employment Opportunity Commission (EEOC) pursuant to Management Directive 715 (MD-715), and the FDIC's annual *Disabled Veterans Affirmative Action Program (DVAAP)* report/plan to the U.S. Office of Personnel Management (OPM).

In January 2017, the EEOC released regulations identifying new government-wide goals of 12 percent for persons with disabilities and 2 percent for persons with targeted disabilities, effective January 2018. These goals are for the overall workforce, as well as for employees who have salaries less than the salary at the GS-11, step 1 level in the Washington, DC locality and employees who have salaries equal to or greater than GS-11, step 1 in the Washington, DC locality. The FDIC has adopted these goals and has begun tracking progress against the goals. To adhere to the EEOC regulations on "Affirmative Action for People with Disabilities in Federal Employment," the FDIC has completed the EEOC's required "Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities," and will use the Plan in continuous efforts to include persons with disabilities, persons with targeted disabilities, and disabled veterans in its workforce. The Plan also provides for critical support to divisions and offices, fosters collaboration and coordination of acceptance, accommodation and accessibility, and encourages relationships with organizations that support the employment of persons with disabilities.

The FDIC's Diversity & Inclusion (D&I) Executive Advisory Council (EAC) will oversee and monitor the implementation of this Plan and will draw upon the in-house expertise of the Office of Minority and Women Inclusion (OMWI) and Division of Administration (DOA) to promote leadership engagement in the Plan. As advisor to FDIC leadership on issues related to diversity and inclusion, OMWI will provide analytics and reports on disability employment progress and increase organizational awareness and engagement about disability employment and inclusion throughout the agency on an ongoing basis. As advisor to FDIC leadership on issues related to human resources, DOA will provide guidance on disability recruitment and the use of special appointing authorities to employ persons with disabilities. DOA will also make recommendations regarding FDIC policies and procedures that may assist in increasing the employment of persons with disabilities.

## DEFINITIONS

**Disabled Veteran** – A person who has served on active duty in the armed forces, has been separated therefrom under honorable conditions, and has established the present existence of a service-connected disability or is receiving compensation, disability retirement benefits, or pension because of a public statute administered by the Department of Veterans Affairs or a military department.

**Individual/Person with a Disability** – A person with a physical or mental impairment that substantially limits one or more major life activities (such as walking, talking, seeing, hearing, or learning), has a record of such impairment, or is regarded as having an impairment unless the impairment is both transitory and minor.

**Personal Assistance Service** – Assistance with performing activities of daily living for a person with a targeted disability who would typically perform these activities if he or she did not have a disability, and that is not otherwise required as a reasonable accommodation, including for example, assistance with removing and putting on clothing, eating, and using the restroom.

**Reasonable Accommodation** – Any change in the work environment (or in the way things are usually done) to help a person with a disability apply for a job, perform the duties of a job, or enjoy the benefits and privileges of employment.

**Self-Identification of Disability** – The voluntary completion and submission of information from OPM's Standard Form 256 (SF 256) identifying that a person has a disability, either by hard copy of the SF 256 to the servicing Human Resource Branch (HRB) personnel in DOA, or electronically through the MyEPP system using the appropriate code from the SF 256.

**Targeted Disability** – Specific disabilities targeted for emphasis in affirmative action planning, and include: developmental disability; traumatic brain injury; deafness; blindness; missing extremities; partial paralysis; complete paralysis; epilepsy; intellectual disabilities; psychiatric disabilities; dwarfism; and significant disfigurement.

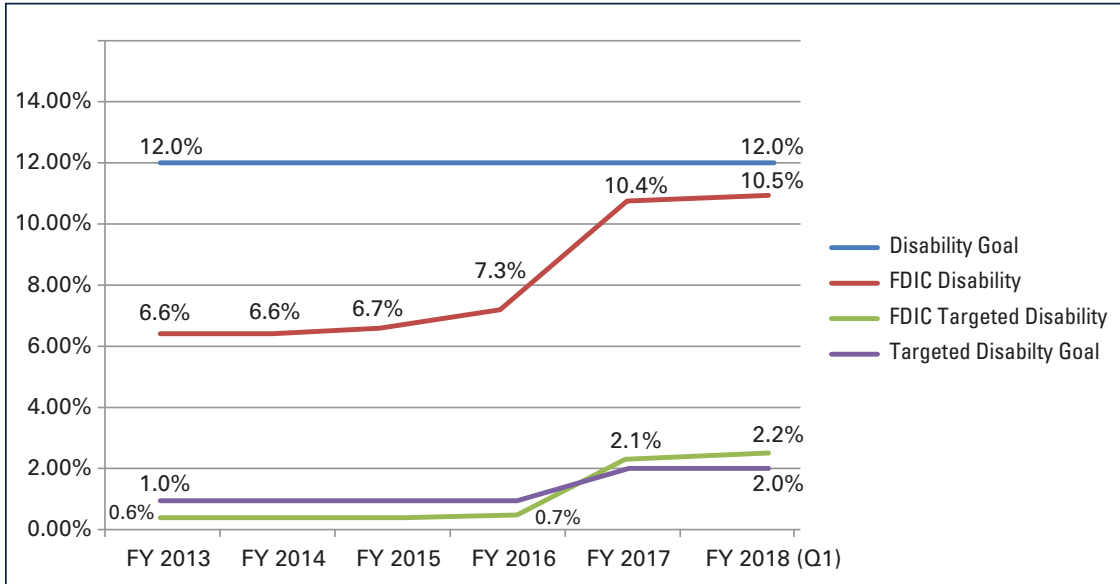
# EMPLOYEES WITH DISABILITIES IN THE WORKFORCE

The FDIC has a longstanding commitment to the employment of persons with disabilities, persons with targeted disabilities, and disabled veterans. Each year, the FDIC conducts a workforce analysis to assess the participation and inclusion of those individuals via its MD-715 report, DVAAP report/plan, and other assessments of the FDIC workforce. These workforce analyses inform FDIC leadership on progress and permit the development and implementation of additional strategies to eliminate barriers and increase employment opportunities.

When evaluating data produced from FDIC reporting systems, the FY 2017 workforce representation of FDIC employees who self-identify as having disabilities is 10.4%, an increase from 7.3% in FY 2016. The representation of employees with targeted disabilities increased from 0.6% in FY 2016 to 2.1% in FY 2017, which is above the prescribed EEOC goal for persons with targeted disabilities of 2.0 percent.

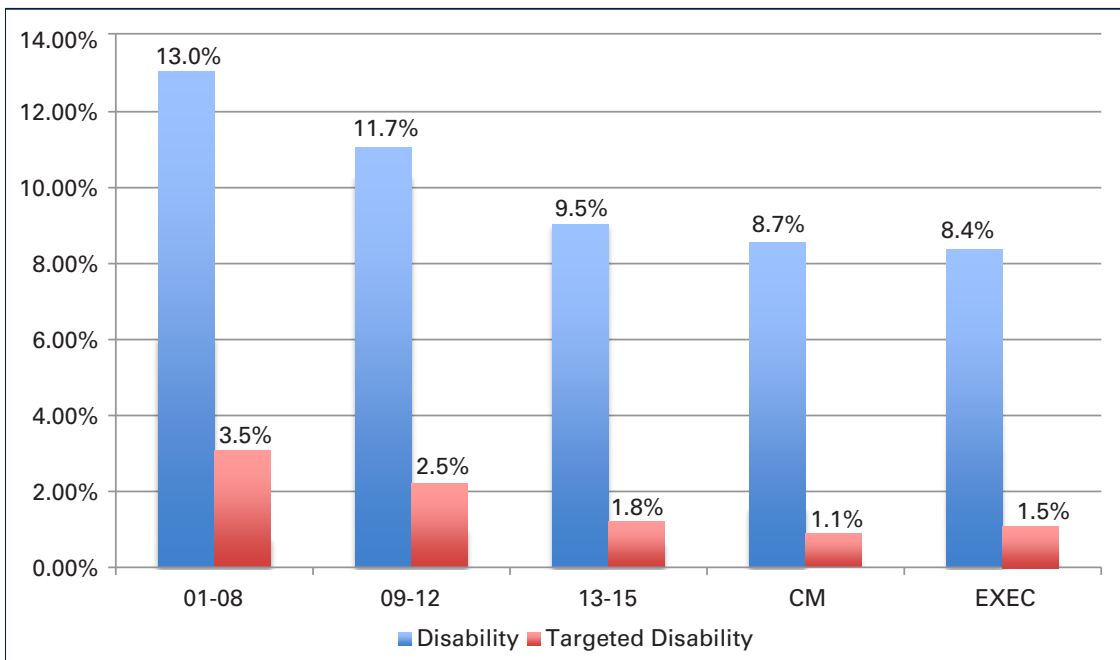
Chart 1 below on *FDIC Trend and Comparison by Disability* provides a five-year and current look at the FDIC's workforce representation of all employees identified as having a disability or targeted disability. There has been an upward trend in the representation of persons with disabilities over time, and a positive change for persons with targeted disabilities. This change can be partly attributed to modifications in data tracking and additional outreach to employees to self-identify. In FY 2017, The National Finance Center began enabling self-service for employees to update their disability self-identification, and the FDIC verified that outdated disability codes were updated in personnel systems to match the correlating data in the most recent SF 256. In addition, in September 2017 and March 2018, all FDIC employees received a notification requesting them to update their disability self-identification. Based on the bi-annual resurveys and electronic self-service, employees are reminded to update their disability self-identification more frequently which has allowed the FDIC to more accurately calculate its disability data.

**Chart 1: FDIC Trend and Comparison by Disability**



As of the end of 2017, the *FDIC Grade Distribution by Disability* (Chart 2) shows that the largest percentage of persons with disabilities and targeted disabilities is in the CG-01 to CG-08 grade levels.

**Chart 2: FDIC Grade Distribution by Disability<sup>2</sup>**



<sup>1</sup> FDIC personnel action data from the Corporate Human Resources Information System (CHRIS)

<sup>2</sup> FDIC personnel action data from CHRIS



# OBJECTIVES, STRATEGIES AND ACTIONS

## **GOAL 1**      **Build a diverse, high-performing workforce that reflects all segments of society, including persons with disabilities.**

**Strategy 1.1**      Demonstrate leadership commitment to the recruitment, employment, and advancement of persons with disabilities.

### **Actions**

- a. Communicate to all managers, supervisors, and Human Resources staff regarding the FDIC's hiring goals and commitment to the employment of persons with disabilities.
- b. Communicate to all employees about the Reasonable Accommodation procedures and Personal Assistance Services policy.
- c. Integrate disability employment initiatives with the FDIC's Diversity and Inclusion Strategic Plan.
- d. Host a roundtable discussion with other financial regulatory agencies to consider best practices in government for recruiting, hiring, advancement, retention, and inclusion of persons with disabilities.
- e. The FDIC Disability Program Manager will continue to participate in federal-wide best practices working groups focused on disability employment and inclusion.
- f. Stakeholders in Corporate University, DOA, and OMWI will meet quarterly to review progress.

## Strategy 1.2

Increase the applicant pool of qualified persons with disabilities.

### Actions

- a. Continue using the Workforce Recruitment Program (WRP) for hiring college students and recent graduates for internships and permanent employment.
- b. Establish a procedure to use the OPM Shared List of People with Disabilities.
- c. Enhance recruitment activities to develop closer relationships with colleges and universities with a high enrollment of students with disabilities.
- d. Use FDIC Corporate Recruitment staff to coordinate with State Vocational Rehabilitation Agencies (SVRAs) and build relationships with local and national organizations facilitating employment of persons with disabilities.
- e. Continue using special appointing authorities that consider persons with disabilities, such as Schedule A (5 CFR 213.3102(u), Disabled Veterans, and Pathways.
- f. Consider creating a process for accepting and referring unsolicited resumes for current and future vacancies from candidates eligible under Schedule A, 5 CFR 213.3102(u).
- g. Explore options for obtaining applications outside of the usual competitive hiring processes from candidates eligible for hiring under Schedule A, 5 CFR 213.3102(u), to invite the candidates to scheduled Corporate Employee Program (CEP) hiring events.
- h. Encourage employees with disabilities to participate in outreach and recruitment activities, particularly alumni of schools with a high enrollment of persons with disabilities.
- i. Evaluate the effectiveness of the reasonable accommodation program in the recruitment and hiring processes by creating and utilizing a feedback form.

### **Strategy 1.3**

Enhance the Corporate Recruitment Program by improving and/or expanding existing communication and marketing efforts to ensure that persons with disabilities receive real-time information about FDIC hiring events, job vacancies, webinars, and other employment-related communications and information.

#### **Actions**

- a. Make information about disability resources available externally at [fdic.gov](http://fdic.gov) and internally at FDICnet, to include employment opportunities, reasonable accommodation procedures, and the hiring process for applicants with disabilities.
- b. Create information materials on the FDIC Disability Employment Program, including information about special appointing authorities, to disseminate to potential applicants and post externally at [fdic.gov](http://fdic.gov).

### **Strategy 1.4**

Provide reasonable accommodations to qualified employees and applicants with disabilities, as required by applicable laws and regulations.

#### **Actions**

- a. Provide training opportunities for managers and supervisors on reasonable accommodation procedures.
- b. Provide training opportunities and/or information for employees or applicants on how to request a reasonable accommodation.
- c. Provide effective and timely reasonable accommodations to qualified individuals with disabilities, in accordance with applicable laws and regulations.
- d. Update the Reasonable Accommodation Request Information System (RARIS) to allow for employees and managers to submit electronic reasonable accommodation requests and to improve reasonable accommodation data.
- e. Encourage employees requesting reasonable accommodations to update their disability self-identification by providing instructions to employees when they submit requests for accommodation.

**Strategy 1.5**

Identify and eliminate barriers to the employment and advancement of qualified persons with disabilities at all levels and in all occupations.

**Actions**

- a. Bi-annually solicit voluntary self-identification of disability data to allow employees to update their status.
- b. Create promotional materials for distribution to Regional, Area, and Field Offices to encourage self-identification.
- c. Conduct an annual trend analysis and barrier analysis specific to the employment and advancement of persons with disabilities.
- d. Develop and provide guidance to managers and recruiters on trends in the recruiting, hiring, advancement, retention of persons with disabilities, and progress in implementing the FDIC and Division and Office diversity strategies targeted at persons with disabilities.

## **GOAL 2**

## **Cultivate a work environment that is inclusive of persons with disabilities.**

### **Strategy 2.1**

Leverage the talents of the FDIC workforce and empower diverse perspectives throughout the organization through career/ leadership development.

### **Actions**

- a. Encourage employees with disabilities to participate in available formal mentoring, career development, leadership, and management development programs and track representations.
- b. Ensure all announcements to employees about career development programs include instructions for requesting reasonable accommodations.
- c. Increase utilization of “Lunch and Learn” sessions and guest speakers to increase awareness and competency with respect to working with persons with disabilities.
- d. Engage the Employee Resource Group for persons with disabilities, Corporate Advocacy Network for Disability Opportunities (CAN DO), to promote advancement and training opportunities.

## **GOAL 3 Facilitate stakeholder relations through effective leadership and accountability.**

**Strategy 3.1** Strengthen relations with stakeholders, to include disability affinity groups, professional organizations, and educational Institutions serving persons with disabilities.

- Actions**
- a. Continue partnerships with Computer/Electronic Accommodations Program (CAP) and Job Accommodation Network (JAN) to support accommodating employees with disabilities.
  - b. Establish partnerships and affiliations with Disability Serving Institutions, professional organizations, stakeholders with disabilities, and other disability affinity groups to promote career opportunities and internships with the FDIC, as well as market the FDIC as an employer of choice to the Disability community.
  - c. Reach out to Disability affinity groups and professional organizations through participation at national training conferences and university/college career fairs aimed at providing FDIC career and employment information to the Disability community.

**Strategy 3.2** Enhance FDIC leaders' knowledge and skills to effectively lead a diverse workforce that includes persons with disabilities.

- Actions**
- a. Use computer-based training to increase the FDIC training portfolio for Diversity and Inclusion topics regarding special appointing authorities for veterans and persons with disabilities and inclusion of these individuals in the workforce.
  - b. Add a segment on disability awareness and competency in leadership training to managers and supervisors.
  - c. Provide senior leaders (D&I EAC, WE Steering Committee, etc.) an analysis of the satisfaction of employees with disabilities with the work environment based on the annual Federal Employee Viewpoint Survey (FEVS) results.
  - d. Develop and provide managers and supervisors with a disability "toolkit" of available resources, guidance, and other useful information.

# MONITORING AND EVALUATING

In FY 2014, the FDIC added disability data to its existing D&I Analytics Dashboard, giving the agency access to relevant workforce data on a quarterly basis. The dashboard provides current workforce data, as well as four-year historical trend data. OMWI will create a matrix for tracking the implementation of the plan's action, and will continue to monitor and evaluate hires, promotions, and separations of persons with disabilities. While this is a two-year plan, OMWI will report to the D&I EAC at midpoint regarding the plan's implementation and the results of agency efforts to increase the representation of persons with disabilities, persons with targeted disabilities, and disabled veterans, and determine if any changes are necessary.

Effective Date: This Plan becomes effective upon signature of the FDIC Chairman.





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