

## 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 No
- b. Cluster GS-11 to SES (PWD) Answer No

The percentage of PWD in the permanent workforce is above the 12 percent benchmark at the each of the grade level clusters.

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

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

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

The percentage of PWTD in the permanent workforce is above the 2 percent benchmark at each of the grade level clusters.

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	158	15	9.49	2	1.27

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

Goals, strategies and actions identified in the Disability Employment Program Strategic Plan were incorporated into the FDIC 2021-2023 Diversity, Equity, and Inclusion Strategic Plan (DEI Strategic Plan), finalized in February 2021. All employees received notice of the goals while promoting the use of the Workforce Recruitment Program. Employees from OMWI also presented diversity and disability data along with goals during new employee orientation sessions to all employees. Furthermore, OMWI identified the goals during the annual State of the Agency briefing and at Diversity and Inclusion Executive Advisory Council meetings which are both attended by Agency executives.

### 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	
Section 508 Compliance	1	0	0	Brook Aiken Section 508 Program Manager baiken@fdic.gov
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Roxana Flores Program Analyst (Selective Placement Coordinator), rflores@fdic.gov
Processing applications from PWD and PWTD	57	0	0	Human Resources Specialist Human Resources Branch
Processing reasonable accommodation requests from applicants and employees	2	0	0	Monica Flint Disability Program Manager (DPM) mflint@fdic.gov
Special Emphasis Program for PWD and PWTD	1	0	0	Monica Flint Disability Program Manager mflint@fdic.gov
Architectural Barriers Act Compliance	1	0	0	Gwenn Marley Chief, Space Planning Unit gmarley@fdic.gov

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

Answer Yes

DPM participated in multiple training sessions and webinars on accommodations related to the COVID-19 pandemic, mental health, neurodiversity, and Section 508 Standards. The Selective Placement Coordinator (SPC) attended “The ABCs of Schedule A Tips for Human Resource Professionals on Using Schedule A Appointing Authority” hosted by the EEOC.

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

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

Answer Yes

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

<b>Brief Description of Program Deficiency</b>	B.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]
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<b>Brief Description of Program Deficiency</b>	E.4.a.5. The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(4)]
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### 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.

The FDIC’s Corporate Recruitment Program enlists nearly 300 collateral-duty employees to engage over 600 schools. The Corporate Recruiters attend events on campus or online and build relationships with professors, deans, career center staff, key school contacts, and organized student groups, including those targeting veterans and persons with disabilities. In addition to fostering relationships with the schools, recruiters also participate in events organized by professional associations and other organizations that have outreach to persons from underrepresented groups, such as minorities, women, persons with disabilities, and/or veterans. The recruiters’ efforts help to market FDIC employment opportunities to a diverse group of applicants, including people with disabilities. In FY 2021, the FDIC participated in 14 virtual recruitment events targeting persons with disabilities, veterans, and veterans with disabilities. National and regional corporate outreach efforts included engagement with the following organizations: Equal Opportunity Publications (EOP); City Career Fair; Recruit Military; Corporate Gray; Bender Consulting Services, LLC; and campus recruitment included participation in virtual career fairs with Rochester Institute of Technology, as well as the American Public University System, which includes American Public University and Military University. In addition to using USAJOBS.gov to advertise employment opportunities, the Division of Administration’s Human Resources Branch (HRB) also sends a weekly list of all vacancy announcements to multiple sources that target persons with disabilities, to include Vocational Rehabilitation Agencies across the United States, the DC Department of Disability Services, Career Opportunities for Students with Disabilities, disABLEDPerson.com, Virginia Department for the Blind and Vision Impaired, and Corporate Advocacy Network for Disability Opportunities (CAN DO), an FDIC Employee Resource Group (ERG). We also advertised several jobs and distributed targeted email campaigns with the American GI Forum, Corporate Gray, Operation Warfighter, Recruit Military, and VetJobs. The Corporate Recruitment Program, in collaboration with OMWI and Corporate University, provides ongoing training to nearly 300 Corporate Recruiters. The training programs highlight the value of diversity, equity, and inclusion in the workplace, and provide best practices on recruiting people with disabilities, including disabled veterans. Additionally, in FY 2021, non-RMS/DCP Corporate Recruiters were instructed to take Diversity, Equity, and Inclusion (DEI) Training. The curriculum designed for recruiters includes modules that address unconscious bias and disability awareness. FDIC successfully used the Workforce Recruitment Program (WRP) to place one individual with disabilities in a 3-month internship, and five individuals with disabilities for internships greater than nine months.

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 FDIC utilizes Schedule A hiring authority 5 CFR 213.3102 (u) for people with intellectual disabilities, severe physical disabilities or psychiatric disabilities. All vacancy announcements state that the agency is an equal opportunity employer and

encourages candidates with disabilities to apply. FDIC vacancy announcements and job postings have been widely distributed to attendees of the 2020 CAREERS & the disABLED Magazine's Career Expo. Prospective applicants were provided with contact information for the SPC in order to follow up with job announcements that they wish to apply for and qualified applicants were encouraged to apply for the new entry-level examiner hiring program and Financial Management Scholars Program.

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.

Schedule A applicants are encouraged to contact the SPC to ensure that the required Schedule A letters are completed accurately before the applicants upload them to the USAjobs.gov database. Once the Human Resources Specialist receives their applications, they are reviewed for eligibility under Schedule A authority, 5 CFR 213.3102 (u), for people with intellectual disabilities, severe physical disabilities or psychiatric disabilities. Upon meeting the qualification standards for a particular position, the applicant's information is supplied to the hiring official with an explanation of how and when the individual may be appointed, if selected for the position.

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

Guidance on Schedule A and other special hiring authorities is provided to all managers on an ongoing basis during the recruitment and hiring process.

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

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

The DPM and SPC continue to network with organizations involved with PWD and PWTD such as the Virginia Department for the Blind and Vision Impaired, Virginia Department for Aging and Rehabilitative Services, District of Columbia Department of Disability Services, and Maryland State Department of Education, Division of Rehabilitation Services. Additionally, Corporate Recruiters build and maintain networks with organizations that assist persons with disabilities for job seeking purposes.

**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

The percentage of new hires of PWD within the permanent workforce was 10.1 percent and is below the 12 percent benchmark. The percentage of new hires of PWTD was 0.6 percent, which is below the 2 percent benchmark.

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

% of Total Applicants	2785	4.20	0.00	2.23	0.00
% of Qualified Applicants	2163	4.16	0.00	2.08	0.00
% of New Hires	69	1.45	0.00	1.45	0.00

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

Triggers exist for only PWD for 0110 and for only PWTD in the 0570 and 1101.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
0110 ECONOMIST	2	0.00	0.00
0570 FINANCIAL INSTITUTION EXAMINING	14	0.00	0.00
0905 ATTORNEY	39	0.00	0.00
1101 GENERAL BUSINESS AND INDUSTRY	14	7.14	7.14
2210 INFORMATION TECHNOLOGY SPECIALIST	0	0.00	0.00

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

- a. Qualified Applicants for MCO (PWD) Answer No
- b. Qualified Applicants for MCO (PWTD) Answer No

The FDIC has recently obtained more detailed data on applications and will work to match with eligible onboard employees for “Relevant Applicant Pool” in future MD-715 reporting.

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

Triggers exist for both PWD and PWTD for 0570.

## 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.

The DEI Strategic Plan identifies that the agency will recruit from a diverse, qualified group of potential applicants to secure a high-performing workforce drawn from the available talent pool in American society and will strengthen and broaden relationships with veterans' organizations and other institutions that serve people with disabilities and targeted disabilities. Goals and strategies in the updated plan are designed to increase the applicant pool of qualified individuals with disabilities, with key action items focusing on training selecting officials, interviewers, and Subject Matter Experts to ensure consistency in the hiring process for individuals with disabilities. Additionally, the FDIC provides guidance to managers and recruiters on trends in the advancement and retention of persons with disabilities and progress in implementing the FDIC and Division and Office diversity strategies targeted at persons with disabilities. Discussion of the DEI Strategic Plan is included in mandatory training for managers.

**B. CAREER DEVELOPMENT OPPORTUNITES**

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

The FDIC encourages employees with disabilities to participate in available formal mentoring, career development, leadership and management programs, detail opportunities, and tracks representation. Information about available programs is distributed FDIC-wide through a variety of methods. Additional reminders and notifications are sent to the Employee Resource Group (ERG) for people with disabilities, CAN DO, and the Veterans ERG.

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						
Fellowship Programs						
Mentoring Programs						
Coaching Programs						
Training Programs						
Detail Programs						
Other Career Development Programs						

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

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

EEOC instructed the FDIC that the definition of career development program/opportunities is the same in Part J as in other sections of the report, requiring competition to participate in training that would qualify employees for a promotion. The FDIC has no career development programs as defined in the instructions to MD-715 and as confirmed by EEOC. While the FDIC does not have career

development programs that, upon completion, necessarily “qualify a participant for a promotion,” all Financial Institution Examiners (Series 0570) are required to attend and complete four core training programs as a part of the commissioning process. The completion of the core training programs, and the commissioning process will not qualify a participant for a promotion but may enhance an Examiner’s promotion potential. Attendance in the core programs is required of all Examiners regardless of race, ethnicity, sex, or disability.

4. Do triggers exist for PWTB 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 (PWTB) Answer N/A
- b. Selections (PWTB) Answer N/A

Please see response to question 3 above.

**C. AWARDS**

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTB 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 (PWTB) Answer Yes

The inclusion rate for Awards for PWD and PWTB was lower than those with no disability across all Award categories except the Cash Award category of \$501-999 where PWTB was slightly higher than both PWD and those with no disability. Those with no disability had a higher inclusion rate than the total workforce percent receiving awards for all categories outside of \$501-999 category. Looking at Performance Based Pay Awards where PWTB had a higher inclusion rate than PWD but those with no disability had an inclusion rate higher than both groups. Alternatively, when compared with the total population, those PWTB did show representation above the threshold of two percent across all award categories. Awards to PWD and PWTB are included in the barrier analysis conducted by an outside consultant. The FDIC plans to use the results of this analysis to implement any necessary changes and conduct additional analysis as warranted.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	7	0.15	0.11	0.00	0.18
Time-Off Awards 1 - 10 Hours: Total Hours	52	0.58	0.86	0.00	0.74
Time-Off Awards 1 - 10 Hours: Average Hours	7	0.58	0.17	0.00	0.74
Time-Off Awards 11 - 20 hours: Awards Given	6	0.00	0.13	0.00	0.00
Time-Off Awards 11 - 20 Hours: Total Hours	89	0.00	1.92	0.00	0.00
Time-Off Awards 11 - 20 Hours: Average Hours	14	0.00	0.30	0.00	0.00
Time-Off Awards 21 - 30 hours: Awards Given	2	0.00	0.04	0.00	0.00
Time-Off Awards 21 - 30 Hours: Total Hours	49	0.00	1.06	0.00	0.00
Time-Off Awards 21 - 30 Hours: Average Hours	24	0.00	0.52	0.00	0.00

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 31 - 40 hours: Awards Given	2	0.29	0.00	0.00	0.37
Time-Off Awards 31 - 40 Hours: Total Hours	80	11.70	0.00	0.00	14.76
Time-Off Awards 31 - 40 Hours: Average Hours	40	5.85	0.00	0.00	7.38
Time-Off Awards 41 or more Hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	3042	46.78	56.90	52.11	45.39
Cash Awards: \$501 - \$999: Total Amount	2062664	32040.06	38530.66	36136.62	30966.79
Cash Awards: \$501 - \$999: Average Amount	678	100.00	14.62	488.03	-1.66
Cash Awards: \$1000 - \$1999: Awards Given	1226	20.47	22.87	19.72	20.66
Cash Awards: \$1000 - \$1999: Total Amount	1513281	24609.80	28325.42	22352.82	25201.11
Cash Awards: \$1000 - \$1999: Average Amount	1234	175.73	26.73	797.89	12.73
Cash Awards: \$2000 - \$2999: Awards Given	297	5.26	5.55	7.75	4.61
Cash Awards: \$2000 - \$2999: Total Amount	663668	11564.33	12428.59	16901.41	10166.05
Cash Awards: \$2000 - \$2999: Average Amount	2234	321.20	48.35	1535.92	2.95
Cash Awards: \$3000 - \$3999: Awards Given	49	0.58	0.97	0.70	0.55
Cash Awards: \$3000 - \$3999: Total Amount	154000	1790.94	3060.89	2112.68	1706.64
Cash Awards: \$3000 - \$3999: Average Amount	3142	447.66	68.02	2112.68	11.44
Cash Awards: \$4000 - \$4999: Awards Given	4	0.00	0.09	0.00	0.00
Cash Awards: \$4000 - \$4999: Total Amount	17000	0.00	367.09	0.00	0.00
Cash Awards: \$4000 - \$4999: Average Amount	4250	0.00	91.77	0.00	0.00
Cash Awards: \$5000 or more: Awards Given	4	0.00	0.09	0.00	0.00
Cash Awards: \$5000 or more: Total Amount	20000	0.00	431.87	0.00	0.00
Cash Awards: \$5000 or more: Average Amount	5000	0.00	107.97	0.00	0.00

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

a. Pay Increases (PWD)

Answer No



b. Pay Increases (PWTD)

Answer No

The FDIC does not have traditional grades/steps as found in the GS scale, and the FDIC does not award Quality Step Increases (QSIs). FDIC's performance-based pay system awards bonus shares and since individual employees had the opportunity to receive one or more bonus shares.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	0	0.00	0.00	0.00	0.00

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

a. Other Types of Recognition (PWD)

Answer N/A

b. Other Types of Recognition (PWTD)

Answer N/A

N/A

**D. PROMOTIONS**

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

a. SES

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer No

b. Grade GS-15

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer Yes

c. Grade GS-14

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer Yes

d. Grade GS-13

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer Yes

For senior grade levels the grade below was used as the Relevant Applicant Pool, although the pool could be broader for SES and will be further evaluated. This pool was higher in PWD and PWTD representation across the board, the largest difference in the applicant flow is the number of PWD or PWTD that actually applied and therefore could be rated as qualified, increasing the pool of qualified. This may be contingent on specific experience or education required for the application, and will be further reviewed. Note: The FDIC's Senior Executive Status (SES) positions are equivalent to Executive positions.

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 Yes

ii. Internal Selections (PWTD) Answer Yes

For senior grade levels the grade below was used as the Relevant Applicant Pool, although the pool could be broader for SES and will be further reviewed. This pool was higher in PWD and PWTD representation across the board, the largest gap in the applicant flow is the number of PWD or PWTD that actually applied and therefore could be rated as qualified, increasing the pool of qualified. This may be contingent on educational or experiential criteria and is further narrowed by the smaller population of PWTD in the workforce. Therefore, a more granular review is required to determine the specific cause.

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 No

c. New Hires to GS-14 (PWD) Answer No

d. New Hires to GS-13 (PWD) Answer No

There were only three total hires for SES and a small pool of referred candidates, 12 referred from a pool of 119 qualified (of which five were PWD). Due to the small number of individuals an Agency-wide trigger was not identified. Note: The FDIC’s Senior Executive Status (SES) positions are equivalent to Executive positions.

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 No

b. New Hires to GS-15 (PWTD)	Answer	No
c. New Hires to GS-14 (PWTD)	Answer	Yes
d. New Hires to GS-13 (PWTD)	Answer	Yes

There were no PWTD applicants to SES, and no PTWD hires for grades CG-13 or CG-14, although there were eight referrals to CG-13 and 24 referrals to CG-14. Due to the small number of individuals an Agency-wide trigger was not identified. Note: The FDIC's Senior Executive Status (SES) positions are equivalent to Executive positions.

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	No
ii. Internal Selections (PWD)	Answer	No

b. Managers

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

c. Supervisors

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

There were 24 applications but only eight referrals for PWD for Manager positions, with no selections – all selections (n=17) were made from those with no disability. We are working to refine our data for Relevant Applicant Pools for the MD 715 to have improved comparison data analysis. Note: The FDIC's Senior Executive Status (SES) positions are equivalent to Executive positions.

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	No
ii. Internal Selections (PWTD)	Answer	Yes

b. Managers

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

c. Supervisors

i. Qualified Internal Applicants (PWTD)	Answer	No
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ii. Internal Selections (PWTD)

Answer Yes

For Executive positions, there were eight PWTD applications, three referrals, no selections; for Managers there were nine PWTD applications, and four referrals, no selections; and for supervisors there were 21 applications, seven referrals and no selections. We are working to refine our data for Relevant Applicant Pools for the MD 715 to have improved comparison data analysis. Note: The FDIC's Senior Executive Status (SES) positions are equivalent to Executive positions.

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 No

c. New Hires for Supervisors (PWD)

Answer Yes

For Executive positions, there were three PWD applications and Qualified with no referrals. There were no PWD applications for Manager, but also limited applications from other groups as well. For Supervisors, there were 14 applications with 13 qualified but no referrals of PWD qualified applicants. Note: The FDIC's Senior Executive Status (SES) positions are equivalent to Executive 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 No

b. New Hires for Managers (PWTD)

Answer No

c. New Hires for Supervisors (PWTD)

Answer Yes

There were no PWTD applicants for Executive or Manager positions. There were six PWTD applicants for supervisory positions which were qualified but were not referred. Note: The FDIC's Senior Executive Status (SES) positions are equivalent to Executive positions.

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

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

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer Yes

The HR Service Center will regularly review reports identifying individuals hired under Schedule A, 5 CFR 213.3102(u) and coordinate with the servicing HR Offices to more closely monitor conversion actions and ensure conversions are accomplished in a timely manner after completion of 2 or more years of satisfactory service.

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

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	6	0.28	0.08
Permanent Workforce: Resignation	210	2.49	3.72
Permanent Workforce: Retirement	282	5.66	4.67
Permanent Workforce: Other Separations	55	1.38	0.87
Permanent Workforce: Total Separations	553	9.81	9.34

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

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

The inclusion rate for PWTD (1.34 percent) compared with those with no disability (0.217 percent) for involuntary separations may point to a trigger, although not statistically significant due to the small numbers.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	6	0.00	0.10
Permanent Workforce: Resignation	210	2.74	3.59
Permanent Workforce: Retirement	282	6.16	4.76
Permanent Workforce: Other Separations	55	2.74	0.89
Permanent Workforce: Total Separations	553	11.64	9.34

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.

N/A

**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.

Section 508 Statement: <https://www.fdic.gov/about/diversity/fdicaccessibilitystatement.html>

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.

Architectural Barriers Act Statement: <https://www.fdic.gov/about/diversity/fdicaccessibilitystatement.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 FDIC Section 508 Program continued its advancement during FY2021 across the Corporation. The conformance levels of FDIC Intranet pages increased three percent - from 91 percent to 94 percent, and the conformance level of the FDIC's external Internet pages remained above 90 percent. The 508 team received a 10% increase in IT application testing requests and a 20% increase in document compliance remediation requests. The Section 508 team's website was rebranded, and additional document compliance subject matter experts were added within the Division of Depositor and Consumer Protection (DCP) and Division of Risk Management Supervision (RMS) organizations. The Section 508 team implemented the "Mission Accessible" awareness campaign, training over 120 employees and contractors. The Section 508 Service Now portal was implemented in FY21, directing all Section 508 workflows through a central location. Three American Sign Language classes were hosted by the 508 team and new trainings were introducing including "Accessibility for Adobe Experience Manager, and "Section 508 Awareness". Virtual office hours began in FY21 allowing employees and contractors the ability to quickly receive Section 508 assistance. The Section 508 team continues to strengthen and enhance the needs of IT Accessibility for the FDIC.

### C. REASONABLE ACCOMMODATION PROGRAM

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

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

The complexity of reasonable accommodations requests rose because of the continuation of mandatory telework and an unidentified return to office date, the DPM focused on providing clear information and next steps to employees and deciding officials which resulted in a more efficient process. The average number of days for an employee to receive a final decision for reasonable accommodation requests, once all pertinent documentation was received, fell from 14 days in FY 2020 to 11 days in FY 2021.

2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

The DPM received 81 reasonable accommodation requests during FY 2021, and 70 of those accommodation requests received a decision during the fiscal year. There were 68 (97%) final decisions issued that fell within the time frame set forth in FDIC procedures or received a comparable interim accommodation prior to the issuance of the final decision. The two (3%) requests that did not meet the established time frame and an interim accommodation could not be issued involved specialized equipment that required additional consideration from other Divisions and Offices as well as the employee. During FY 2021, the DPM included response time frames and recommendations for interim accommodations when corresponding with managers and deciding officials to continue to hold decision-makers accountable and increasing the percentage of final decisions issued within policy by one percent over FY 2020. Additionally, the DPM and OWMI began the process to create standard operating procedures to evaluate requests for reasonable accommodations due to the Executive Order on Requiring Coronavirus Disease 2019 Vaccination for Federal Employees.

### 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 FDIC issued a PAS policy memo in March 2019 that outlined the proper procedures for employees with targeted disabilities for requesting and processing a PAS. The Agency issued the policy memo in conjunction with the issuance of the finalized updated reasonable accommodation directive. The FDIC did not receive any PAS requests in FY 2021. Once PAS requests are received, the effectiveness of the program will be evaluated.

## 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 Yes

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

N/A

### B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer 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

## Section VIII: Identification and Removal of Barriers

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

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

Answer No

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

Answer N/A

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



<b>Source of the Trigger:</b>		Workforce Data (if so identify the table)			
<b>Specific Workforce Data Table:</b>		Workforce Data Table - B13			
<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?		The FDIC identified a trigger for PWD and PWTD regarding cash awards, which continued into FY 2021			
<b>STATEMENT OF BARRIER GROUPS:</b>		<i>Barrier Group</i> People with Disabilities People with Targeted Disabilities			
<b>Barrier Analysis Process Completed?:</b>		N			
<b>Barrier(s) Identified?:</b>		N			
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.		<b>Barrier Name</b>		<b>Description of Policy, Procedure, or Practice</b>	
		Barrier(s) not yet identified		Barrier(s) not yet identified	
<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>
10/01/2019	09/30/2022	Yes			Begin review of other sources of information to gain additional insights relative to trigger identified and then begin to measure impact of implemented strategies.
<b>Responsible Official(s)</b>					
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>	
Assistant Director, Corporate Human Resources Performance & Compensation , DOA		Nancy Green		No	
Program Analyst, OMWI		Karen Rigby		Yes	
Disability Program Manager, OMWI		Monica Flint		Yes	

<b>Planned Activities Toward Completion of Objective</b>				
<b>Target Date</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>	<b>Completion Date</b>
09/30/2020	Begin review of other sources of data to gain additional insights relative to trigger identified.	Yes		09/30/2020
12/31/2022	Use analysis results to develop and implement strategies to remove barriers and conduct additional analysis as warranted.	Yes		
09/30/2023	Begin to measure impact of implemented strategies.	Yes		
<b>Report of Accomplishments</b>				
<b>Fiscal Year</b>	<b>Accomplishment</b>			
2020	As planned, additional analysis commenced in FY 2020 and is expected to be completed in FY 2021			
2021	As planned, additional analysis commenced in FY 2020 and was completed in FY 2021.			

<b>Source of the Trigger:</b>		Workforce Data (if so identify the table)			
<b>Specific Workforce Data Table:</b>		Workforce Data Table - B8			
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>		The FDIC identified a trigger for PWD and PWTD among new hires in the permanent workforce. While there was significant improvement in the hires of PWD in FY 2020 compared to past years, it is still below the 12% benchmark. Additionally, the percentage of new hires who were PWTD declined from FY 2019. There were also triggers among new hires to the GS-15 and GS-13 equivalent grade levels.			
Provide a brief narrative describing the condition at issue.					
How was the condition recognized as a potential barrier?					
<b>STATEMENT OF BARRIER GROUPS:</b>		<i>Barrier Group</i>			
		People with Disabilities			
		People with Targeted Disabilities			
<b>Barrier Analysis Process Completed?:</b>		N			
<b>Barrier(s) Identified?:</b>		N			
<b>STATEMENT OF IDENTIFIED BARRIER:</b>		<b>Barrier Name</b>		<b>Description of Policy, Procedure, or Practice</b>	
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.		Barrier not yet identified		Barrier not yet identified	
<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>
10/01/2019	09/30/2023	Yes			Implement 2021-2023 DEI Strategic Plan Goal: Talent Acquisition: 2.1(a)(b), Career Development: 2.2, and Training Plan: 4.3.
<b>Responsible Official(s)</b>					
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>	
Assistant Director, HR Service Center, DOA		Cathy Grossman		No	
Disability Program Manager, OMWI		Monica Flint		Yes	
Roxana Flores, Program Analyst (Selective Placement Coordinator), DOA		Roxana Flores		No	
Chief, Staffing Policy, Recruiting and Corporate Employee Program Operations, DOA		Alyssa Asonye		No	
Program Analyst, OMWI		Karen Rigby		Yes	

<b>Planned Activities Toward Completion of Objective</b>				
<b>Target Date</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>	<b>Completion Date</b>
09/30/2020	Begin review of other sources of data to gain additional insights relative to trigger identified.	Yes		09/30/2020
12/31/2022	Use analysis results to develop and implement strategies to remove barriers and conduct additional analysis as warranted.	Yes		
09/30/2023	Begin to measure impact of implemented strategies	Yes		
<b>Report of Accomplishments</b>				
<b>Fiscal Year</b>	<b>Accomplishment</b>			
2020	As planned, additional analysis commenced in FY 2020 and is expected to be completed in FY 2021			
2021	Complete Phase I of barrier analysis			

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

The FDIC has not identified any barriers that affect employment opportunities for PWD and/or PWTD, but will review results of analysis initiated in FY 2020 and take action as appropriate.

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

The FDIC has not identified any barriers that affect employment opportunities for PWD and/or PWTD, but will review results of analysis initiated in FY 2020 and take action as appropriate.

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 FDIC has not identified any barriers that affect employment opportunities for PWD and/or PWTD, but will review results of analysis initiated in FY 2020 and take action as appropriate.