

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

*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

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-11 to SES	174	19	10.92	5	2.87
Grades GS-1 to GS-10	0	0	0.00	0	0.00

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

Offices and Divisions provide hiring goals to HRB, in turn Talent Sourcing Team (TST) communicates the type of positions office and divisions plan to recruit.

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

- 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

- 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
Processing reasonable accommodation requests from applicants and employees	1	0	0	Michelle Curry Reasonable Accommodations Program Manager michcurry@fdic.gov
Answering questions from the public about hiring authorities that take disability into account	0	0	1	Roxana Flores Program Analyst (Selective Placement Coordinator), rflores@fdic.gov
Special Emphasis Program for PWD and PWTB	1	0	0	Jessica Hill Disability Program Manager jehill@fdic.gov
Processing applications from PWD and PWTB	0	0	1	Paula Molloy Assistant Director, Staffing, Classifications and Processing Operations pmolloy@fdic.gov
Architectural Barriers Act Compliance	0	0	1	Gwenn Marley Chief, Space Planning Unit gmarley@fdic.gov

- 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

Yes, the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period. Here are the two trainings: EEOC Disability Program Manager Training – This course outlines the roles and responsibilities of the Disability Program Manager and identifies some of the challenges faced. The main objective of a Disability Program Manager is to help agency management meet its affirmative employment responsibilities to ensure employment opportunities for persons with disabilities. FDIC Reasonable Accommodations Training – This online training provides supervisors and managers the tools needed to understand FDIC processes and policies regarding reasonable accommodations. This course is designed to provide supervisors with the tools and resources they need to effectively address reasonable accommodation requests from employees.

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

Brief Description of Program Deficiency	C.2.a.6. Do the agency’s training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR §1614.203(d)(2)]		
Objective	Update current training materials to include examples of disability-based harassment.		
Target Date	Dec 31, 2024		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	

Brief Description of Program Deficiency	E.4.a.5. The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(4)]		
Objective	Migrate from SharePoint to ServiceNow, an internal, automated data collection system. The Reasonable Accommodation Program currently uses SharePoint while FDIC is in the process of building an automated system as required by EEOC.		
Target Date	Sep 30, 2024		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
Accomplishments	<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.

The FDIC’s Talent Sourcing Team targeted list of collegiate campuses currently includes 202 schools (80.8% of the schools on the FDIC’s key school list) These school have that had programs and/or services for persons with disabilities; and 46 (over 18%) of these schools were recognized for outstanding programs and/or services for persons with disabilities. The agency assigned each school two dedicated recruiters who will establish networks and identify opportunities to connect with qualified PWD. In addition, the FDIC utilizes the Workforce Recruitment Program (WRP) to recruit qualified post-secondary students and recent graduates with disabilities. Trained WRP recruiters conduct informational interviews with interested candidates from colleges and universities across the country to provide federal career advice and enter candidate feedback in a searchable database on the WRP website.

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 C.F.R. 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 for all merit promotion recruitments external to the FDIC.

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.

See comments above, individuals are appointed to temporary, term, or permanent positions under the Schedule A hiring authority when there is a bona fide vacant 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

The HRB provides guidance on Schedule A and other special hiring authorities to all managers on an ongoing basis. This information may be provided during the recruitment consultation process and during HR client training sessions.

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 FDIC partnered with affinity groups and organizations that focus on veterans, women, Black, Asian, Hispanic, and individuals with disabilities through the Corporate Outreach Program to encourage potential candidates to apply and to increase awareness of the FDIC as an employer of choice. Nineteen of the 43 Corporate Outreach events targeted individuals with disabilities – this represents approximately 44% of the events. On a bi-weekly basis, the Talent Sourcing Team provides a notification of vacancy announcements for FDIC positions to multiple sources that target PWD, including Vocational Rehabilitation Agencies for several 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 ERG.

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

PWD new hires was 6.15% and PWTD new hires was 0.16%.

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

There is a lower-than-expected participation rate for PWD in the Economist, Financial Institution Examining, and Attorney occupational series. There is a lower-less than-expected participation rate for PWTD in the Attorney and Financial Institution Examining occupational series.

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

- 4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission- critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
 - a. Promotions for MCO (PWD) Answer No
 - b. Promotions for MCO (PWTD) Answer Yes

Based on the qualified applicant pool benchmark, a trigger exists for PWTD among our General Business MCO positions.

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 FDIC uses multiple methods to provide opportunities for advancement for employees with disabilities as well as those with targeted disabilities. Agency employees can participate in career development plans, use the FDIC’s Professional Learning Account (PLA) funds, the mentoring program, and participate in the external leadership programs. These programs are listed on the internal FDIC website, shared through Global Messenger to all employees and through division and office level communications.

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 participation. Information about available programs is distributed FDIC-wide through a variety of methods. Additional reminders and notifications are sent to the Veterans ERG and CAN DO, an ERG for people with disabilities. The specific leadership and management programs are Leadership Excellence Acceleration Program (LEAP) for non-supervisory CG12-CG15 grade levels, Leadership Connect (LC) for all CG-CM grade levels, Aspiring Leader Program (ALP) for CG4-CG6 grade levels, New Leader Program (NLP) for CG7-CG10 grade levels, Executive Leadership Program (ELP) for CG11-CG13 grade levels, and Executive Potential Program (EPP) for CG14-CM grade levels.

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

The EEOC instructed the FDIC that the definition of career development program/opportunities is the same in Part J, 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 the 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.

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 N/A
- b. Selections (PWTD) 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 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

Time Off Awards for 11-20 and 21-30 hours is lower-than-expected for PWD. For all categories, Time Off Awards for PWTD are lower-than-expected. Cash Awards of \$2,000-\$2,999 did not meet the target for both PWD and PWTD. Additionally, for Cash Awards from the \$3,000- through \$5,000 and more categories, PWTD had no participation. Lastly, for Cash Awards \$4,000-through \$5,000 and more categories, PWD did not meet the target and/or had no participation.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	55	0.87	0.97	0.72	0.91
Time-Off Awards 1 - 10 Hours: Total Hours	379	6.40	6.58	5.76	6.56
Time-Off Awards 1 - 10 Hours: Average Hours	6	1.02	0.12	5.76	-0.18
Time-Off Awards 11 - 20 hours: Awards Given	9	0.00	0.16	0.00	0.00
Time-Off Awards 11 - 20 Hours: Total Hours	142	0.00	2.60	0.00	0.00
Time-Off Awards 11 - 20 Hours: Average Hours	15	0.00	0.31	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	48	0.00	0.99	0.00	0.00
Time-Off Awards 21 - 30 Hours: Average Hours	24	0.00	0.49	0.00	0.00
Time-Off Awards 31 - 40 hours: Awards Given	12	0.58	0.14	0.00	0.73
Time-Off Awards 31 - 40 Hours: Total Hours	497	23.26	6.29	0.00	29.14
Time-Off Awards 31 - 40 Hours: Average Hours	41	5.81	0.89	0.00	7.29
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	3361	54.51	59.47	51.08	55.37
Cash Awards: \$501 - \$999: Total Amount	2286060	37800.00	40338.43	36149.64	38217.85
Cash Awards: \$501 - \$999: Average Amount	680	100.73	13.98	508.63	-2.55
Cash Awards: \$1000 - \$1999: Awards Given	1585	32.27	26.96	25.18	34.06
Cash Awards: \$1000 - \$1999: Total Amount	1992148	41015.41	33852.34	32482.01	43175.96

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$1000 - \$1999: Average Amount	1256	184.74	25.87	928.06	-3.46
Cash Awards: \$2000 - \$2999: Awards Given	380	6.10	6.80	4.32	6.56
Cash Awards: \$2000 - \$2999: Total Amount	826700	13110.47	14821.69	9136.69	14116.58
Cash Awards: \$2000 - \$2999: Average Amount	2175	312.06	44.90	1522.30	5.65
Cash Awards: \$3000 - \$3999: Awards Given	73	1.60	1.24	0.72	1.82
Cash Awards: \$3000 - \$3999: Total Amount	230950	5087.21	3915.69	2158.27	5828.78
Cash Awards: \$3000 - \$3999: Average Amount	3163	462.35	65.24	2158.27	32.97
Cash Awards: \$4000 - \$4999: Awards Given	20	0.00	0.41	0.00	0.00
Cash Awards: \$4000 - \$4999: Total Amount	82000	0.00	1690.37	0.00	0.00
Cash Awards: \$4000 - \$4999: Average Amount	4100	0.00	84.52	0.00	0.00
Cash Awards: \$5000 or more: Awards Given	26	0.44	0.47	0.00	0.55
Cash Awards: \$5000 or more: Total Amount	130000	2180.23	2370.65	0.00	2732.24
Cash Awards: \$5000 or more: Average Amount	5000	726.74	103.07	0.00	910.75

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

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

N/A: The FDIC does not have traditional grades/steps as found in the GS scale, and the FDIC does not award Quality Step Increases (QSIs). The FDIC’s performance-based pay system awards bonus shares and since individual employees have the opportunity to receive one or more bonus shares, table B-9 counts the number of shares awarded, not the individuals who received bonus shares.

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

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

N/A

D. PROMOTIONS

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and

the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. SES

i. Qualified Internal Applicants (PWD)	Answer	No
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ii. Internal Selections (PWD)	Answer	No
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b. Grade GS-15

i. Qualified Internal Applicants (PWD)	Answer	No
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ii. Internal Selections (PWD)	Answer	No
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c. Grade GS-14

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

i. Qualified Internal Applicants (PWD)	Answer	No
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ii. Internal Selections (PWD)	Answer	No
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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	No
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ii. Internal Selections (PWTD)	Answer	No
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b. Grade GS-15

i. Qualified Internal Applicants (PWTD)	Answer	No
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ii. Internal Selections (PWTD)	Answer	No
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c. Grade GS-14

i. Qualified Internal Applicants (PWTD)	Answer	No
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ii. Internal Selections (PWTD)	Answer	No
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d. Grade GS-13

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

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	No

Based on applicant pool data received from Monster, CG-14 new hires are below the goal for PWTD.
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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	No

c. Supervisors

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

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	No
b. Managers		
i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	No
c. Supervisors		
i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	No

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

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 | No |

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

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

For reporting purposes, resignations and retirements are counted as voluntary separations. Reductions in force, removal, and other separations are counted as involuntary.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	13	0.55	0.16
Permanent Workforce: Resignation	188	2.06	3.17
Permanent Workforce: Retirement	161	3.58	2.47
Permanent Workforce: Other Separations	51	0.96	0.81
Permanent Workforce: Total Separations	413	7.15	6.61

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

For reporting purposes, resignations and retirements are counted as voluntary separations. Reductions in force, removal, and other separations are counted as involuntary. The data shows that PWTD has a higher separation rate in retirement than the FDIC total of employees separating within the permanent workforce.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	13	0.68	0.20
Permanent Workforce: Resignation	188	3.42	3.03
Permanent Workforce: Retirement	161	4.79	2.55
Permanent Workforce: Other Separations	51	0.68	0.83
Permanent Workforce: Total Separations	413	9.59	6.60

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 FDIC reviewed Exit Survey data for persons who identified as having a disability. During 2023, eight respondents self-identified as PWD. The agency is cautious not to draw strong conclusions from a small sample of respondents. These data reveal a less positive experience of the FDIC’s “work or organizational culture”, particularly as it relates to relationships with colleagues and their immediate supervisor. PWD respondents reported lower satisfaction with the item on the Exit Survey that reads “Tools, equipment, and resource support”. A review of employee commentary on the Exit Survey notes some employee concerns over requests for reasonable accommodation that may help to explain lower satisfaction related to “tools, equipment, and resource support.”.

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.

<https://www.fdic.gov/accessibility/> Complaints alleging violations of Section 508 must be initiated within 180 calendar days of the alleged violation with the Office of Minority and Women Inclusion (OMWI). Contact Eric Atilano at eatilano@fdic.gov or (703)562-6073. Complaints alleging violations of Section 508 connected to employment must contact an FDIC EEO Counselor within 45 calendar days of the alleged violation. Contact FDIC EEO Counselor Donald Ballard by mail at the Federal Deposit Insurance Corporation, Office of Minority and Women Inclusion, 3501 Fairfax Drive, Room E-2076, Arlington, VA 22226; by telephone at (703) 562-6082; or by email at DoBallard@fdic.gov

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.

<https://www.fdic.gov/accessibility/>

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.

In FY 2023 the FDIC completed the accessibility upgrade to the Student Resident Center (SRC). Those upgrades included the following: A. Floor/deck raised to height of threshold B. Ramp up to new raised floor/deck C. Railing at ramp/raised deck D. ADA pad/button and door operator E. New or replaced door with swing in direction of egress F. New panic hardware G. New exit signs H. Install addition ceiling lighting I. ADA area of refuge J. Communications phone for refuge area K. Demo overhead bulkhead to maintain required clearance L. Installation of new carpet and base inside SRC space M. Wall mounted devices raised to code compliant height above new floor/deck N. Raise existing electrical closet door/frame/create elevated threshold O. Relocated existing storage room doors

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 average time for processing requests during FY 2023 was fifteen (15) days.

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 an effort to create more effective practices, the Reasonable Accommodation Program conducted training for managers and supervisors at headquarters and in the regions, as well as timely processing requests and providing approved accommodations. Finally, we monitored and provided data on trends in types of accommodations.

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 has policies in place to process requests for PAS, timely provide services and monitor the requests. We conduct PAS training as part of reasonable accommodation training for supervisors and managers. We did not receive any PAS requests for FY 2023; therefore, there is no data pertaining to PAS for FY 2023.

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.

There were no findings.

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 No

- 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.

There were no findings.

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 No

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

Source of the Trigger:		Workforce Data (if so identify the table)			
Specific Workforce Data Table:		Workforce Data Table - B13			
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: 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			
STATEMENT OF BARRIER GROUPS:		<i>Barrier Group</i> People with Disabilities People with Targeted Disabilities			
Barrier Analysis Process Completed?:		N			
Barrier(s) Identified?:		N			
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.		Barrier Name		Description of Policy, Procedure, or Practice	
		Barrier(s) not yet identified		Barrier(s) not yet identified	
Objective(s) and Dates for EEO Plan					
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
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.
Responsible Official(s)					
Title		Name		Standards Address The Plan?	
Assistant Director, Corporate Human Resources Performance & Compensation , DOA		Nancy Green		No	
Program Analyst, OMWI		Karen Rigby		Yes	
Disability Program Manager, OMWI		Monica Flint		Yes	

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
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		
Report of Accomplishments				
Fiscal Year	Accomplishment			
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.			

Source of the Trigger:		Workforce Data (if so identify the table)			
Specific Workforce Data Table:		Workforce Data Table - B8			
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:		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?					
STATEMENT OF BARRIER GROUPS:		<i>Barrier Group</i>			
		People with Disabilities			
		People with Targeted Disabilities			
Barrier Analysis Process Completed?:		N			
Barrier(s) Identified?:		N			
STATEMENT OF IDENTIFIED BARRIER:		Barrier Name		Description of Policy, Procedure, or Practice	
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	
Objective(s) and Dates for EEO Plan					
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
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.
Responsible Official(s)					
Title		Name		Standards Address The Plan?	
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	

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
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		
Report of Accomplishments				
Fiscal Year	Accomplishment			
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.

Not Applicable

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

Not Applicable

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.

Not Applicable