

The EEOC MD-715 PART J: The Special program plan for the recruitment, hiring, advancement, and retention of Individuals with Disabilities:

To capture agencies affirmative action plan for Individuals With Disabilities (IWD) and Individuals with Targeted Disabilities (IWTd), EEOC Regulations (29 C.F.R. 1614.203(e)) and MD-715 require agencies to describe how their plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All NAVSEA WFCs, regardless of size, must complete this Part of the MD-715.

EEOC FORM 715-02 PART J

The Special Program Plan for Recruitment, Hiring, Advancement, and Retention of Individual (or Persons) 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 achieving participation goals for persons with reportable disabilities (12%) and targeted disabilities (2%) in the agency.

Describe how the command has communicated the numerical goals to the hiring managers and recruiters:

The Deputy Director and HR Director receive the numerical goals and communicate these goals to hiring managers and recruiters at recurring meetings to include staff meetings, CO monthly meetings, Leadership Forum, and Corporate Operations staff meetings.

Section II: Model Disability Program

Pursuant to the regulations implementing Section 501 of the Rehabilitation Act of 1973 (29 CFR §1614.203), 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 command designated sufficient qualified personnel to implement its disability program during the reporting period? If “no”, use the text box to describe the shortfall(s) and the command’s plans to mitigate or resolve them in the upcoming fiscal year.

Yes No

2. Identify all command staff responsible for implementing the command’s disability employment program by the office, staff employment status, and point of contact:

Disability Program Task	Office/Division Responsible (EEO/HR/IT/Facilities)	# of FTE Staff by Employment Status			Primary Point of Contact (Name, Title)
		Full Time ^A	Part Time ^B	Collateral ^C Duty	
Processing RA requests from applicants and employees with disabilities	Code 10E EEO, D&I				Katie Arnold
Section 508 Compliance	Code 104, IT				David Hawes
Architectural Barriers Act Compliance	Code 102, Facilities				Gregory Brotherton
Special Emphasis Program for PWD and PWTB	Code 10E, EEO, D&I				Lauren Sikes
PWD Champion ^D					Meena Farzanfar

- A. Employees (1) whose primary duty is performance of this function and (2) who work 80 hours per Pay Period (PP)
- B. Employees (1) whose primary duty is performance of this function and (2) who work less than 80 hours/PP
- C. Employees who perform this function, but not as their primary duty.
- D. A senior leader (a member of the Senior Executive Service (SES), or a GS-15 if a command does not have an SES) who serves as a representative of their major command in recommending and implementing changes that remove discriminatory barriers to EEO for individuals with disabilities (IWD), and improve the hiring, retention and advancement for IWD, both at the major command and at the DON level.

3. Has the command provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If “yes”, describe the relevant training that disability program staff have received within the past 2 years. If “no”, describe all shortfalls and the command's plan to resolve them in the upcoming fiscal year.

Yes No

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

Has the command provided sufficient funding and other resources to successfully implement the disability program during the reporting period?

Yes No

Describe the steps that the command has taken to ensure each of the following aspects of the disability program have sufficient funding, trained personnel, and other resources. If any are insufficiently funded, describe the shortfalls and the command's plan to resolve them in the upcoming fiscal year.

Processing RA requests from applicants and employees with disabilities	RA processing has been funded and had a very successful year with the proper trained personnel running the program.
Special Emphasis Program for IWD and IWTD	Program in place and monthly meeting are established and the program is very successful.

Section III: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 CFR 1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of Persons with Disabilities. The questions below are designed to identify outcomes of the agency’s recruitment program plan for PWD and PWTD, such as whether the agency has a numerical hiring goal, and whether the agency uses the Schedule A(u) hiring authority or other hiring authorities that take disability into account, during this reporting period.

A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

1. Which of the following programs/resources does the command use to identify job applicants with disabilities, including Individuals with Targeted Disabilities:

Workforce Recruitment Program	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
OPM Shared List of People with Disabilities ("Bender List")	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Wounded Warrior Program	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Job Fairs dedicated to PWD/PWTD	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Schools primarily enrolling PWD/PWTD	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Other schools with programs dedicated to PWD/PWTD	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
State Vocational Rehabilitation Offices	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Other (describe below)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

2. Pursuant to 29 C.F.R. 1614.203(a)(3), describe your command's use of Schedule A(u) to recruit PWD and PWTD for positions in the permanent workforce:

NSWC PCD maintains a Schedule A and Wounded Warrior program, that allows managers to review experienced personal that meet the qualifications for the hiring authority and the position, prior to advertising a position.

3. How many Schedule A(u) employees were hired to permanent positions during the reporting cycle?

4. Describe your command's use of programs to recruit PWD and PWTD for temporary positions (e.g. internships):

5. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A(u)), explain how the command (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.

6. Has the command provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A(u))? Identify the number of hiring managers trained, type(s) of training, and frequency provided. If "no", describe the command's plan to provide the training to all hiring managers.

Yes No

Number of hiring managers trained:

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

NSWC PCD establishes and maintain contacts with local Disability organizations with recurring interaction throughout the year.

Section IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities

29 C.F.R §1614.203(d)(1)(iii) requires agencies to provide sufficient opportunities for employees with disabilities to advance within the agency. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, and similar programs that address hiring and 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 command’s plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

DHAs used for PWD/PWTD either hire at the development level, or at a full performance level. If hired at the development level, the employee has the opportunity to meet the position’s growth steps and gain promotions to the full performance level. If hired at the full performance level, the employee has opportunities to apply for other positions within the command using the knowledge, skills, and abilities they have garnered in their current position without prejudice.

B. CAREER DEVELOPMENT OPPORTUNITIES

Please describe the career development opportunities that the command provides to its employees, including PWD and PWTD.

NSWC PCD provides Reassignment Opportunities or Job Announcements to all members of the command via internal all hands emails notifying employees of positions open for consideration of application, either resumes or other formats identified.

Section V: Plan to Improve Retention of Persons with Disabilities

To be a model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In the sections below, 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 personal assistance services.

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Yes No N/A

Conversion is at the discretion of each manager.

2. Does the command use exit surveys or exit interviews to determine why PWD and/or PWTD separate?

Yes No

If "yes", please indicate reasons identified in the surveys that the PWD/PWTD left the command:

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 1614.203(d)(4), federal agencies are required to inform job applicants and employees of their accessibility rights under Section 508 of the Rehabilitation Act and the Architectural Barriers Act, and explain how to file complaints under those laws. In addition, agencies are also required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Describe any programs, policies, or practices that the command has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of command facilities and/or technology.

NSWC PCD utilizes the DoD CAP program to assist and improve accessibility. The DDEEO also attends recurring staff meetings with facilities and technology. The DPM also meets regularly with facilities and technology.

C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 CFR 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. How many reasonable accommodation requests have taken more than 30 days to process? Include (1) all requests processed during the reporting cycle, including those initiated in the previous cycle, that took more than 30 days to process and (2) all requests that have not yet been processed, but are more than 30 days past their request date. Do not include previously-approved requests associated with repetitive accommodations, such as Interpreter services.

6

2. What was the greatest number of days it took to process a reasonable accommodation request during the FY? If the longest request has yet been processed, calculate days from the request date to the present.

60

3. Describe the effectiveness of the policies, procedures, or practices to implement the command'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 the requests for trends.

We currently have a very smooth flowing RA requests are processed timely and providing approved accommodations. Briefs on RA trends have been shared to CO/TD and leadership. All Hands information has been released to the command regarding RA requests and process.

D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

Pursuant to 29 C.F.R. 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, timely providing approved personal assistance services, conducting training for managers and supervisors, and monitoring the requests for trends.

N/A, no PAS requests have been requested.

Section VI: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING THE FAILURE TO ACCOMMODATE

1. Did failure to accommodate fall within the top three issues alleged in the command's EEO counseling activity during the last fiscal year?

Yes No

2. Did failure to accommodate fall within the top three issues alleged in the command's formal complaints during the last fiscal year?

Yes No

3. In cases alleging the failure to provide reasonable accommodation, did any result in a finding against the agency or a settlement agreement during the last fiscal year?

Yes No N/A

4. If the command had one or more findings of discrimination involving the failure to provide an accommodation during the last fiscal year, please describe the corrective measures taken.

Yes No N/A

B. EEO COMPLAINT DATA INVOLVING DISCRIMINATION BASED ON DISABILITY STATUS (EXCLUDING FAILURE TO ACCOMMODATE)

1. Did disability status fall within the top three bases alleged in the command’s EEO counseling activity during the last fiscal year?

Yes No

2. Did disability status fall within the top three bases alleged in the command’s formal complaints during the last fiscal year?

Yes No

3. In cases alleging discrimination based on disability status, did any result in a finding against the agency or a settlement agreement during the last fiscal year?

Yes No N/A

4. If the command had one or more findings of discrimination based on disability status during the last fiscal year, please describe the corrective measures taken.

Yes No N/A

Section VII: 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 command identified any barriers (policies, procedures, and/or practices) that affect the employment opportunities of PWD and/or PWTD?

Yes No

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

Yes No 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. Create additional tables as necessary to describe each trigger and their related planned activities.

Trigger #1	IWD and IWTD have a low participation rate which is below the federally mandated 12% and 2% benchmarks.
Barrier(s)	Underutilization of Schedule A and employees' lack of knowledge on updating SF 256.
Objective(s)	To promote/train hiring officials on Schedule A, send quarterly notices on SF 256

Responsible Official(s)	DPM, AEPM and HR			
Target Date	Planned Activities	Sufficient Staffing & Funding	Modified Date	Completion Date
1/1/2023	Set up meetings with Hiring Official, send quarterly emails to update SF 256			9/30/2023
Trigger #2	High voluntary separation rates of IWTD.			
Barrier(s)	Further analysis is needed to determine if barrier exists.			
Objective(s)	To increase retention.			
Responsible Official(s)	DPM, AEPM and HR			
Target Date	Planned Activities	Sufficient Staffing & Funding	Modified Date	Completion Date
1/1/2023	Conduct deeper/aggressive analysis, review exit interview responses			9/30/2023
Fiscal Year	Accomplishments			

4. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the command intends to improve the plan for the next fiscal year.

Yes No N/A

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

5. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the command intends to improve the plan for the next fiscal year.