# 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

reporting period? If "n resolve them in the up	-		o describe t	the shortfall(s) and the command's plans to mitigate or
	Yes	X	No	

1. Has the command designated sufficient qualified personnel to implement its disability program during the

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

			# of FTE Sta mployment		
Disability Program Task	Office/Division Responsible (EEO/HR/IT/Facilities)	Full Time <sup>A</sup>	Part Time <sup>B</sup>	Collateral <sup>C</sup> Duty	Primary Point of Contact (Name, Title)
Processing RA requests from applicants and employees with disabilities	Code 10E EEO, D&I	5			Katie Arnold Disability Program Manager
Section 508 Compliance	Code 104, IT				Kendall Smith Chief Information Officer
Architectural Barriers Act Compliance	Code 102, Facilities				Bill Logsdon Facilities Manager
Special Emphasis Program for PWD and PWTD	Code 10E, EEO, D&I				Lauren Sikes Program Manager
PWD Champion <sup>D</sup>					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.

Yes

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 <u>relevant</u> 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.

X

DPM was vacant for several years, then filled twice in FY21. New DPM onboarded in Sep 2021. DPM has
obtained appropriate access to NEAT and will work on current RA cases as well as attend training. DPM
plans to conduct trainings on policies and processes, to meet with HR personnel to increase recruitment.

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 X	No					
•	sonnel, a	sure each of the following aspects of the disability nd other resources. If any are insufficiently funded, olve them in the upcoming fiscal year.				
Processing RA requests from applicants and employees with disabilities						
Special Emphasis Program for IWD and IWTD						

### 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		No	X
OPM Shared List of People with Disabilities ("Bender List")	Yes		No	$\Box$ X
Wounded Warrior Program	Yes	X	No	
Job Fairs dedicated to PWD/PWTD	Yes	X	No	
Schools primarily enrolling PWD/PWTD	Yes		No	$\mathbf{x}$
Other schools with programs dedicated to PWD/PWTD	Yes		No	X
State Vocational Rehabilitation Offices	Yes		No	X
Other (describe below)	Yes		No	X

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 <u>permanent</u> 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 adverting a position.
3. How many Schedule A(u) employees were hired to <u>permanent</u> positions during the reporting cycle? 6
4. Describe your command's use of programs to recruit PWD and PWTD for $\underline{\text{temporary}}$ positions (e.g. internships):
No temporary positions were filled during FY21 with the exception of Student Trainees.
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.
As part of the Wounded Warrior/Schedule A program, resumes collected are reviewed by a HR specialist to determine if the individual is eligible for either direct hiring authority, based on that the Specialist will forward the individual's resume and relevant documents (no medical documentation is included) to the selecting official for consideration. The hiring official is only informed that these individuals have a direct hiring authority and may be selected without further competition.
6. Has the command provided training to all <a href="https://www.nines.com">hiring managers</a> 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 X No
Number of hiring managers trained:  A SME in Hiring/Staffing/Classification provides training in the mandatory supervisory training, PROPEL, all supervisors have 3 months to complete this training. Additionally, supervisors must complete specific training every 3 years, including Hiring Talent TWMS training which reviews hiring authorities.
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 lever. 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.

	eriod, did th npetitive se	e command rvice after t	d convert a two years o	II of the e of satisfac	ctory service (5	e A(u) employees with CFR 213.3102(u)(6)(i))? ployees.	
	Yes		No	X	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:
<ul> <li>B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES</li> <li>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.</li> <li>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.</li> </ul>
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.
<ul> <li>C. REASONABLE ACCOMMODATION PROGRAM</li> <li>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.</li> <li>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 Sand (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.</li> </ul>
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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.

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.

NSWC PCD has hired a new DPM. Currently 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 bee	n requeste	ed.				
Section VI: EEO Co	omplain	t and Fil	ndings Da	ita			
A. EEO COMPLAINT	DATA IN	VOLVING	THE FAILU	RE TO AC	COMMODAT	Έ	
1. Did failure to accomm	modate fa	ıll within th	ne top three	issues all	eged in the cor	nmand's EEO	counseling
activity during the last	fiscal year	· ?					
	Yes		No	X			
2. Did failure to accommunity during the last fiscal ye		ıll within th	ne top three	issues all	eged in the cor	mmand's form	ial complaints
	Yes		No	X			
3. In cases alleging the agency or a settlement		-			ition, did any ro	esult in a findi	ng against the
	Yes		No	X	N/A		
4. If the command had accommodation during		_			_	•	e an
	Yes		No		N/A	X	

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

1. Did disability status for the last fiscal year?	all within 1	the top three	bases all	leged in the c	ommand's	EEO counseling activity during	
	Yes	X	No				
2. Did disability status fa last fiscal year?	ll within t	he top three	bases alle	eged in the co	ommand's	formal complaints during the	
	Yes		No	X			
3. In cases alleging discrisettlement agreement d			-	ntus, did any r	result in a f	finding against the agency or a	
	Yes		No	X	N/A		
4. If the command had o		_		nation based	on disabilit	ty status during the last fiscal	
	Yes		No		N/A	X	
Section VII: Identif Element D of MD-715 re procedure, or practice m	quires age	encies to cond	duct a ba	rrier analysis		igger suggests that a policy,	
1. Has the command ide employment opportunit	ntified an	y barriers (po	licies, pro				
2. Has the command est	Yes ablished a	X plan to corre	No ect the ba	□ arrier(s) invol	ving PWD	and/or PWTD?	
	Yes	X	No		N/A		
	lanned ac	tivities, and, v	where ap	plicable, acco	omplishme	ed barrier(s), objective(s), ents. Create additional tables a	S

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 DPM, AEPM and HR Official(s)		IR						
Target Date		Planned Activities				Sufficient Staffing & Funding	Modified Date	Completion Date	
1/1/2022		set up meetings with Hiring Official, send quarterly emails to update SF 256						9/30/2022	
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		
1/1/2022		Conduct deeper/aggressive analysis, review exit interview responses					9/30/2022		
Fiscal Accomplish						ents			
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).

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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.