

Affirmative Action Plan

Part J - Special Program 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: Yes

The 12% target was met for the lower grades but not higher grades cluster. Among BPA permanent employees on board at the end of FY22: PWD were more highly represented in the lower grades cluster (21.26%) and less represented in the GS11-SES cluster (10.55%)

*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 2% target is met for both grade clusters. Among BPA permanent employees on board at the end of FY22: PWTD were more highly represented in the lower grades cluster (6.30%) and less represented in the GS11-SES cluster (2.60%)

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

The Office of Civil Rights (CREEO) educates managers and or recruiters about the barrier analysis process to reinforce parity goals for women, minorities, persons with disabilities and veterans.

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

EEO specialist is assigned to manage the Individuals with Disabilities program.

- 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	
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Madeleine Goldfarb Human Resources Specialist bmgoldfarb@bpa.gov
Processing reasonable accommodation requests from applicants and employees	1	0	0	Madeleine Goldfarb Human Resources Specialist bmgoldfarb@bpa.gov
Section 508 Compliance	0	0	0	vacant Equal Employment Specialist
Architectural Barriers Act Compliance	0	0	0	vacant Equal Employment Specialist
Special Emphasis Program for PWD and PWTB	1	0	0	Ernesto Jaquez Equal Employment Specialist ejaquez@bpa.gov
Processing applications from PWD and PWTB	1	0	0	Dayna Romancito, Supervisory HR Specialist (Recruitment & Placement), dtromancito@bpa.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

The Basic DEPM course covers: Roles and responsibilities of an (Effective) Disability Program Manager, Sections 501 and 508 of the Rehabilitation Act of 1973, The Reasonable Accommodation Process, EEOC Management Directive 715 (MD-715) Disability Data Collection, Why it’s Necessary Emergency Evacuation Planning, Recruiting: Interns, Vets & Schedule A and The Architectural Barriers Act (ABA).

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: 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 PWTDD.

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.

Targeted Recruitment – We have designed a process to identify/track candidates from a variety of events and map the outreach efforts to actual hires at BPA to determine our success rate (or lack thereof). This process is underway in our Recruitment & Placement workgroup within Human Capital Management.

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 PWTDD for positions in the permanent workforce

Information about the Schedule A Hiring Authority is available for managers on BPA’s internal Manager’s Resource page.

BPA EEO office will work with the Public Affairs Sounding Board team to create an external webpage on BPA Jobs website to promote Schedule A Hiring Authority once there is a Person’s with Targeted Disabilities Recruitment plan in place.

BPA’s Civil Rights/ EEO Office and BPA’s Disability Awareness Resource Group will incorporate the following measures for FY 2018 and beyond as suggested by the Equal Employment Opportunity Commission:

1. Collect and review applicant flow data to assess the recruitment of qualified individuals with targeted disabilities. NOTE: Applicant flow data is retrieved via USA Jobs website, but not in a timely manner due to technical/output issues
2. Conduct focus groups with employees and targeted disabilities to discuss their recruitment, hiring and career growth experiences with the agency.
3. Meet with disability organizations and universities’ Disabled Student Services offices to explore the perceptions of the agency within the disability community.
4. Evaluate the career advancement opportunities for employees with targeted disabilities to and through the mission critical occupations.
5. Review all occupations and identify series having occupational requirements that may preclude employment of People with Targeted Disabilities.
6. Conduct climate assessment (surveys) to obtain feedback from the workforce.
7. Resurvey the workforce to ensure accurate disability status information.
8. We will work with the Oregon State Department of Rehabilitation to apply best practices for empowering people with disabilities.

- 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.

Targeted Recruitment – BPA has designed an effective process to identify/track candidates from a variety of Events and map to actual hires at BPA to determine our success rate (or lack thereof) for those under Schedule A or other hiring authority. This process is underway in our Recruitment & Placement workgroup within HR. Our Recruitment Coordinator will be utilizing a program to monitor this activity beginning with second quarter of FY 2018. The Recruitment Coordinator will let the hiring officials know about these relevant individuals.

- 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

HCM offered training sessions in FY21 educating managers on the use of hiring authorities. Course Title: Personnel Basics for Federal Managers Hiring Target Audience: Managers and Supervisors Course Description: This class uses real-life examples to teach the nuts and bolts of federal personnel law and hiring in the federal environment. Managers learn tools and strategies needed to handle employee discipline and performance issues, ranging from informal counseling to formal discipline to removal actions with appeals to the Merit Systems Protection Board (MSPB). Managers will also learn the basic structure of federal hiring procedures that will help navigate the process more efficiently and quickly.

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.

BPA Disability Employment Program Manager Ernesto Jaquez continues to partner with Business Director Kathy West Evans, of Northwest Employment Coordinators of The Council of State Administrators of Vocational Rehabilitation (CSAVR) by sharing BPA vacancy announcements with Ms. West- Evans. She not only forwards the vacancy announcements to her Northwest Team but to all the CSAVR employment coordinators throughout the country. This is over 50 points of contacts where BPA vacancy announcements are circulated. CSAVR employment coordinators review the vacancy announcements and compare the job requirements with their clients’ resumes and job skills. The employment coordinators only refer those clients that they believe meet the minimum requirements for the BPA vacancy announcements, and whom they believe would be a good fit for a position. They also interview these clients to find out if they would be interested in applying for a vacancy and then go as far as assisting the clients navigating through the usajobs.gov application process. The employment coordinators also assist their clients with preparing their resume.

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: No

b. New Hires for Permanent Workforce (PWTD) Answer: No

Among the 282 new hires to BPA's permanent workforce, 9.93% were PWD and 1.42% were PWTD. These were both below the goals.

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: No
- b. New Hires for MCO (PWTD) Answer: Yes

Data for all five BPA major occupational series (i.e., 0850, 1101, 1130, 2210, 2810, and 5407) were combined to permit statistically appropriate analyses.

Among the 138 new hires to BPA's permanent workforce in the five major occupational series, 11.59% were PWD (meeting the goal) and 0.72% were PWTD (below the goal)

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

Data for all five BPA major occupational series (i.e., 0850, 1101, 1130, 2210, 2810, and 5407) were combined to permit statistically appropriate analyses.

According to the USA Staffing data, there were 1,681 external qualified applicants to vacancies associated with one of the five major occupational series, 4.51% were PWD (below the goal) and 2.57% were PWTD (above the goal).

Among the 808 internal qualified applicants for internal competitive promotions within the five major occupational series, 9.03% were PWD (below the goal) and 6.77% were PWTD (above the goal).

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

Data for all five BPA major occupational series (i.e., 0850, 1101, 1130, 2210, 2810, and 5407) were combined to permit statistically appropriate analyses.

BPA computed a selection ratio, which indicates the relative likelihood of a PWD or PWTD obtaining a promotion among those who were qualified and referred compared to the overall pool of internal qualified and referred internal applicants for promotions within the five major occupational series. Overall, 17.84% of qualified and referred internal applicants for internal competitive promotions in the five major occupational series were selected. In contrast, just 1.49% of PWD (a selection ratio of 0.08) and 0% of PWTD (a selection ratio of 0.00) who were qualified and referred were selected for promotions. In contrast, employees without disabilities who applied for internal competitive promotions were much more likely to be selected (selection ratio of 1.39).

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

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

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: No

b. Awards, Bonuses, & Incentives (PWTD) Answer: No

At BPA, 93.02% of permanent employees received at least one cash, time off, quality step increase, or performance-based pay increase in FY 2022. PWTD were more likely to receive at least one award (97.53%), while PWD were as likely as all BPA employees (92.70%) to receive at least one award.

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.

c. Pay Increases (PWD) Answer: No

d. Pay Increases (PWTD) Answer: No

There were 145 QSIs at BPA in FY 2022: 4.96% of BPAs permanent employees received a QSI in FY 2022. Among PWD, 4.44% received a QSI and 4.94% of PWTD received a QSI. Both of these inclusion rates are statistically similar to the overall 4.96% rate for BPA employees.

There were 16 performance-based pay increases, representing insufficient data for statistical analysis.

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.

- e. Other Types of Recognition (PWD) Answer: N/A
- f. Other Types of Recognition (PWTD) Answer: 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: N/A
 - ii. Internal Selections (PWD) Answer: N/A
- b. Grade GS-15
 - i. Qualified Internal Applicants (PWD) Answer: No
 - ii. Internal Selections (PWD) Answer: N/A
- c. Grade GS-14
 - i. Qualified Internal Applicants (PWD) Answer: Yes
 - ii. Internal Selections (PWD) Answer: N/A
- d. Grade GS-13
 - i. Qualified Internal Applicants (PWD) Answer: No
 - ii. Internal Selections (PWD) Answer: No

a. SES: There were no internal vacancies for SES positions at BPA.

b. GS-15: 17.65% of internal qualified applicants were PWD none were selected. Since there were only 2 internal selections, this is insufficient data to draw conclusions about a possible trigger for internal selection. However, if inclusion rates are used, whereas 33.3% of internal PWD applicants for promotions were deemed qualified, this was a lower rate than the 48.6% of all BPA applicants for GS-15 positions.

c. GS-14: 3.86% of internal qualified applicants were PWD (below the 12% target) none were selected among the 5 selections made, this is insufficient data to draw conclusions about a possible trigger for internal selection. Using inclusion rates: similar to the situation for the GS15 internal applicants, 44.4% of PWD internal applicants versus 67.2% of internal all BPA applicants for promotions to GS14 were deemed qualified. These lower qualification rates of PWD for those who apply to GS15 and GS14 positions suggest a need to examine career counseling and training opportunities provided to PWD at BPA.

d. GS-13: 30.99% of internal qualified applicants were PWD and three (15%) PWD were among the 20 selections made. Using inclusion rates: in contrast to the situation for the GS14 and GS15 internal applicants, PWD were as likely as all BPA internal applicants for competitive promotions to be qualified.

2. Does your agency have a trigger involving PWTB 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 (PWTB) Answer: N/A

ii. Internal Selections (PWTB) Answer: N/A

b. Grade GS-15

i. Qualified Internal Applicants (PWTB) Answer: No

ii. Internal Selections (PWTB) Answer: N/A

c. Grade GS-14

i. Qualified Internal Applicants (PWTB) Answer: No

ii. Internal Selections (PWTB) Answer: Yes

d. Grade GS-13

i. Qualified Internal Applicants (PWTB) Answer: No

ii. Internal Selections (PWTB) Answer: Yes

- a. SES: There were no internal vacancies for SES positions at BPA.
- b. GS-15: 11.76% of internal qualified applicants were PWTB none were selected. Since there were only 2 internal selections, this is insufficient data to draw conclusions about a possible trigger for internal selection. However, if inclusion rates are used, whereas 40.0% of internal PWTB applicants for promotions were deemed qualified, this was a lower rate than the 48.6% of all BPA applicants for GS-15 positions.
- c. GS-14: 1.45% of internal qualified applicants were PWTB (below the 12% target) none were selected among the 5 selections made, this is insufficient data to draw conclusions about a possible trigger for internal selection. Using inclusion rates: similar to the situation for the GS15 internal applicants, 30.0% of PWTB internal applicants versus 67.2% of internal all BPA applicants for promotions to GS14 were deemed qualified. These lower qualification rates of PWTB for those who apply to GS15 and GS14 positions suggest a need to examine career counseling and training opportunities provided to PWTB at BPA.
- d. GS-13: 16.96% of internal qualified applicants were PWTB and none were among the 20 selections made, suggesting a trigger for selection of internal PWTB applicants for promotion to GS13 positions. Using inclusion rates: in contrast to the situation for the GS14 and GS15 internal applicants, PWTB were as likely as all BPA internal applicants for competitive promotions to be qualified.

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: N/A
- b. New Hires to GS-15 (PWD) Answer: Yes
- c. New Hires to GS-14 (PWD) Answer: Yes
- d. New Hires to GS-13 (PWD) Answer: Yes

SES: There were two vacancy announcements, representing insufficient data for analysis. None of the nine applicants were PWD.

GS15: There were 4 PWD applicants, none of whom were deemed qualified, below the 12% goal. Overall there were 26 applicants, of whom 8 (30.8%) were qualified.

GS14: 8.57% of the 70 qualified external applicants were PWD, below the 12% goal.

GS13: 10.42% of the 470 qualified external applicants were PWD, below the 12% goal.

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

SES: There were two vacancy announcements, representing insufficient data for analysis. None of the nine applicants were PWTD.

GS15: There was 1 PWTD applicants, none of whom were deemed qualified, below the 2% goal. Overall, there were 26 applicants, of whom 8 (30.8%) were qualified.

GS14: 7.14% of the 70 qualified external applicants were PWTD, above the 2% goal.

GS13: 10.42% of the 470 qualified external applicants were PWTD, above the 2% goal.

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: N/A
- ii. Internal Selections (PWD) Answer: N/A

b. Managers

- i. Qualified Internal Applicants (PWD) Answer: N/A
- ii. Internal Selections (PWD) Answer: N/A

c. Supervisors

- i. Qualified Internal Applicants (PWD) Answer: N/A
- ii. Internal Selections (PWD) Answer: N/A

Insufficient data for appropriate statistical analysis.

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: N/A
- ii. Internal Selections (PWTD) Answer: N/A

b. Managers

- i. Qualified Internal Applicants (PWTD) Answer: N/A
- ii. Internal Selections (PWTD) Answer: N/A

c. Supervisors

- i. Qualified Internal Applicants (PWTD) Answer: N/A
- ii. Internal Selections (PWTD) Answer: N/A

Insufficient data for appropriate statistical analysis.

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: N/A
- b. New Hires for Managers (PWD) Answer: N/A
- c. New Hires for Supervisors (PWD) Answer: N/A

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: N/A
- b. New Hires for Managers (PWTD) Answer: N/A
- c. New Hires for Supervisors (PWTD) Answer: N/A

USA Staffing does not have the relevant independent variable to permit this analysis.

Section V: 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: N/A

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: Yes

a. Voluntary separations: A total of 227 BPA employees separated in FY 2022. Of these, 193 either resigned or retired (voluntary separations), representing 6.71% of BPA's FY 2022 permanent workforce. Among PWD, 18 retired or resigned in FY 2022, representing 5.81% of BPA's permanent PWD workforce. This rate of voluntary separation is comparable to that of the overall BPA workforce.

b. Involuntary separations: There was a relatively small number of Removals at BPA in FY 2022 (n=9). Among these, 3 were PWD. In total, 227 BPA employees separated in FY 2022, of which, 3.96% were involuntarily separated (i.e., removed). The 3 PWD who were removed represented 12.5% of PWD who were separated in FY 2022. This inclusion rate for involuntary separation is higher than the overall rate among BPA separations. Although the numbers are small, weak evidence of a trigger suggests a need to look more carefully at PWD separations from BPA.

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

a. Voluntary separations: A total of 227 BPA employees separated in FY 2022. Of these, 193 either resigned or retired (voluntary separations), representing 6.71% of BPA's FY 2022 permanent workforce. Among PWTD, 2 retired or resigned in FY 2022, representing 2.53% of BPA's permanent PWTD workforce. This rate of voluntary separation is lower than that of the overall BPA workforce.

b. Involuntary separations: There was a relatively small number of Removals at BPA in FY 2022 (n=9). Among these, 1 was a PWTD, which represented 33.3% of the three PWTD separations in FY 2022, which is higher than the 3.96% rate for all BPA separations in FY 2022, but illustrating the general statistical problem of drawing conclusions based on small numbers. No evidence of a trigger.

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.

<https://www.bpa.gov/about/careers/office-of-civil-rights-eeo>

- 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.bpa.gov/about/careers/office-of-civil-rights-eeo>

- 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.

Section 508 of the Rehabilitation Act (29 USC § 794d) requires that Federal agencies' electronic and information technology is accessible to people with disabilities, including employees and members of the public. Before onboarding the Learning & Workforce Development team's eLearning developers, very few eLearning courses at BPA were Section 508 compliant. During the eLearning course migration to Learning Nucleus, the Learning & Workforce Development team eDevelopers edited all courses under the team's purview to meet the Section 508 requirement. Further, all new courses developed by the Learning & Workforce Development eLearning Developers are Section 508 compliant.

Beyond compliance, the Learning & Workforce Development eLearning Developers have also worked with individuals using assistive technology to improve their eLearning experience. This effort has significantly improved all BPA employees' access to eLearning, in addition to finally meeting the Section 508 requirement.

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.

- 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 was 27 days excluding requests for COVID telework and the vaccine mandate.

- 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.

Over the past year we've provided manager training, created a database for monitoring the program, updated our website based on user feedback, and consolidated many of our files to one system for easy reference.

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.

BPA timely processes individual requests for PAS on an ad-hoc basis.

Section VI: 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: N/A

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: N/A

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.

BPA reported 10 formal EEO complaints in its FY 2022 462 report. Of these, one was a complainant that alleged harassment based on mental disability and one was a complainant that alleged harassment based on physical disability, representing 0.32% of BPAs 312 PWD employees (permanent and temporary). In comparison, 0.17% of all BPA employees (n=2,883 permanent and temporary) alleged harassment in five formal EEO complaints filed in FY 2022.

(Note: EEOC has advised that agencies use a 21.98% benchmark for comparisons as the government-wide average. Using the implied computational process. 1/1 of the BPA's EEO complaints filed by PWD alleging a mental basis cited harassment as an issue (100%) and 1/3 of the BPA's EEO complaints alleging a physical disability basis cited harassment as an issue (33.3%). While these rates are higher than the 21.98% rate, they are based on such small numbers that conclusions are not statistically appropriate.)

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 formal EEO complaints alleging failure to provide reasonable accommodation. With no RA-issue complaints, BPA's rate is lower than the government-wide average of 14.03% provided by EEOC for comparison purposes. le

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 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

N/A

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

N/A

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

N/A

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.

N/A