

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: No

PWD represent 14.29% in the GS1-10 cluster and 11.3% in the GS11-SES cluster, both on par with the 12% benchmark.

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

PWTD represent 4.7% of GS1-10 cluster and 2.63% of GS11-SES cluster, both on par with the 2% benchmark.

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

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Human Resources (HR) input:

BPA supports the Department of Energy's (DOE) hiring objectives and the EEOC's goals of hiring 12% for persons with disabilities and 2% for persons with targeted disabilities. BPA's Human Resources Service Center (HRSC) provides guidance to hiring managers on utilizing non-competitive hiring authorities, such as 30 Percent or More Disabled Veteran and Schedule A to fill vacant positions efficiently. BPA provides year-round training for managers and supervisors, covering hiring authorities and flexibilities and recruitment and outreach strategies. Additionally, BPA shares DOE training opportunities to reinforce best practices and ensure hiring managers and recruiters remain informed and equipped to meet the agency's hiring commitments.

Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training, and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.

A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If "no", describe the agency's plan to improve the staffing for the upcoming year.

Answer: Yes

2. Identify all staff responsible for implementing the agency's disability employment program by the office, staff employment status, and responsible official.

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Kaci Conner Human Resources Specialist klconner@bpa.gov
Processing reasonable accommodation requests from	1	0	0	Madeleine Goldfarb Human Resources Specialist

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applicants and employees				bmgoldfarb@bpa.gov
Section 508 Compliance	1	0	0	Jeanna Ramos Equal Employment Specialist jaramos@bpa.gov
Architectural Barriers Act Compliance	0	0	0	VACANT
Processing applications from PWD and PWTD	1	0	0	Dayna Romancito, Supervisory HR Specialist (Recruitment & Placement), dtromancito@bpa.gov

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

Answer: Yes

BPA has facilitated internal discussions and knowledge-sharing sessions to ensure disability program staff remain informed of agency policies, procedures, and updates related to the disability program.

Employees within HRSC Staffing completed the “A Roadmap to Success: Hiring, Retaining and Including People with Disabilities”, Veteran Employment Training, and participated in annual training offered by the Office of Civil Rights and Equal Employment Opportunity (CREEO).

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 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 agency uses the tools made available to it from the Department of Energy.

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.

BPA HRSC collaborates with hiring managers to ensure they are aware of Schedule A and 30 Percent or More Disabled Veteran hiring authorities. Hiring managers may request to use these authorities when seeking to fill positions. Once a candidate is identified, the hiring process is streamlined, allowing for direct appointment without the need for a competitive selection process. If a merit promotion vacancy allows for non-competitive hiring, HRSC may provide a separate list of Schedule A applicants. The hiring manager can then select from this list, provided the candidate meets all qualifications. Through close collaboration with hiring managers, BPA effectively utilizes these authorities to hire qualified persons with disabilities.

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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.

HRSC Staffing verifies an applicant's eligibility for appointment under Schedule A, Veteran's Recruitment Appointment (VRA), or 30 Percent or More Disabled Veteran hiring authority by reviewing the documentation provided to confirm disability or veteran status. Applicants who are veterans must upload a copy of their DD Form 214 (Member 4 copy) and a Veterans Administration (VA) disability letter to verify their eligibility.

Under BPA's merit promotion policy, HRSC Staffing tentatively refers veterans under their preference or eligibility claimed, even if complete documentation is not initially provided. If an applicant claims TP preference or eligibility under VRA and their DD Form 214 reflects the qualifying time period and/or campaign but lacks the character of service/nature of discharge (e.g., is not a member-4 copy), they will be tentatively referred with preference and/or eligibility. However, the correct DD Form 214 must be submitted before a tentative offer is made.

If an applicant claims disabled veteran status (CP, CPS), but submits documentation that does not confirm an overall service-connected disability rating (e.g., only one page of a multi-page letter showing a rating for a single condition), they will be tentatively referred with preference and/or eligibility. However, the full rating letter must be provided before a tentative offer is made. If a disabled veteran requests Schedule A consideration and submits a valid letter confirming a service-connected disability but does not provide a Schedule A letter, they will be tentatively referred as eligible. However, the Schedule A letter must be submitted before tentative offer is made.

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

In FY24, DOE's Human Capital Management (HCM) provided training to hiring managers on the use of hiring authorities that take disability into account. One key offering was the "Personnel Basics for Federal Managers: Targeted Hiring". This course uses real-life scenarios guide managers and supervisors through federal personnel law, hiring processes in the federal government, and the tools available to support Schedule A hiring within BPA. The training also covers the structure of federal hiring procedures, equipping managers with the knowledge needed to navigate the process efficiently. Additionally, all managers and supervisors are required to complete the annual "A Roadmap to Success: Hiring, Retaining and Including People with Disabilities" training. This course reinforces best practices and legal requirements for hiring individuals with disabilities.

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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 Agency maintained contact with the Association of State Administrators of Vocational Rehab, INCIGHT Oregon, Portland State University, Oregon State University and University of Oregon and Oregon and Washington Light House for the Blind.

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B. 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

BPA analyzed the actual representation of PWD and PWTD among new hires for a set of 7 occupations that had at least 120 permanent employees on board at the end of FY24 and hired at least 15 new employees in FY24 (BPA refers to these as "major occupational categories").

BPA’s Major Occupations were:

- 0343 Management and Program Analysis
- 0850 Electrical Engineering
- 1101 General Business and Industry
- 1130 Public Utilities Specialist Series
- 2210 Information Technology Management
- 2810 High Voltage Electrician*
- 5407 Electric Power Controlling*

(*Note: 2810 and 5407 are wage grade trades occupations)

Of the 185 new hires, 11.4% were PWD and 7.9% were PWTD. Examination of the major occupations reveals that three of the seven meet the EEOC target goal of 12% for PWD (0343 at 25.9%; 1101 at 18.8%; and 2210 at 18.6%). The other four did not meet the target goal for PWD.

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: No.

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Percent PWD and PWTD among Qualified Applicants (New Hire Applicant Flow Data; with a +/- 3 percentage point tolerance). Triggers were noted for five of the seven major occupations for PWD.

- 0343 9.9% PWD; 4.9% PWTD – No trigger
- 0850 4.5% PWD; 1.1% PWTD -- Trigger for PWD
- 1101 8.9% PWD; 6.7% PWTD – Trigger for PWD
- 1130 7.5% PWD; 5.0% PWTD – Trigger for PWD
- 2210 7.1% PWD; 3.5% PWTD – Trigger for PWD
- 2810 3.4% PWD; 2.1% PWTD – Trigger for PWD
- 5407 0.0% PWD; 0.0% PWTD – with 4 vacancy announcements and 4 new hires, data insufficiently robust

(*Note: 2810 and 5407 are wage grade trades occupations)

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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 |

The USAStaffing system classification of “internal competitive promotions” (ICP includes applicants outside the agency). Percent PWD and PWTD among Qualified ICP applicants are shown, below. Triggers were noted for PWD in four of the seven major occupations.

- 0343 10.4% PWD; 3.6% PWTD – Trigger for PWD, Rel App Pool was 15.9% PWD
- 0850 2.6% PWD; 1.0% PWTD – No triggers
- 1101 9.4% PWD; 5.1% PWTD – Trigger for PWD, Rel App Pool was 19.2% PWD
- 1130 9.4% PWD; 4.2% PWTD – No triggers
- 2210 11.8% PWD; 7.0% PWTD – Trigger for PWD, Rel App Pool was 17.7% PWD
- 2810 1.8% PWD; 0.9% PWTD – Trigger for PWD, Rel App Pool was 8.5% PWD
- **5407 0.9% PWD; 0.9% PWTD – No triggers**

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: No |

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BPA analyzed SF50 data on actual promotions (i.e., OPM NOA Code 702) rather than the USA Staffing Applicant Flow Data for two reasons: (1) USA Staffing ICP, as noted above, includes hiring actions that include individuals from outside the agency, therefore, it is not a valid measurement of within-agency promotions; and (2) more than 50% of the AFD lack information about disability status. OPM NOA Code 702 provides information about actual promotions within the agency. BPA computed the inclusion rate for promotions.

For example, there were 244 employees in these seven occupations who were promoted in FY24, representing 13.6% of all permanent employees on board at the end of FY24. The overall promotion rate for PWD was 15.6% and 11.4% for PWTD, on par with that for employees without a disability at BPA. There were no major occupations in which the PWD promotion rate lagged that of employees who did not report a disability (SF256 code (05)). Among PWTD, only one of the seven occupations—2210—had >10 PWTD employees (i.e., barely sufficient for robust analysis). None of the 12 PWTD in 2210 was promoted in FY24, which had the lowest promotion rate (4.3%) among the seven major occupations.

Section IV: 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.

1. ADVANCEMENT PROGRAM PLAN

Describe the agency's plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

BPA is committed to providing career development opportunities to all employees, including those with disabilities and targeted disabilities. HRSC Training manages a variety of training programs and advancement resources designed to support employees' professional growth and career development. In addition, reasonable accommodations are provided to ensure individuals with disabilities have equal access to career development opportunities.

2. CAREER DEVELOPMENT OPPORTUNITES

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

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1. Aspiring Manager Program

Aspiring Manager is a year-long cohort program consisting of virtual instructor-led workshops and supplemental work to help participants understand the role of a manager at BPA and in the federal government. The program helps participants make an informed decision about whether to pursue a management career at BPA.

2. Aspiring Manager Workshops

- Introduction to a Management Role at BPA
- Leadership Behaviors
- Powering Your Professional Growth for Aspiring Managers
- Preparing for a Management Role

3. New Manager Leadership Journey

The New Manager Leadership Journey program (NMLJ) prepares new managers and supervisors for the technical, interpersonal, and leadership skills they'll need to be successful managers at BPA. The Learning & Workforce Development team continues to offer curriculum for virtual delivery and added the following program elements:

- Added more just-in-time learning and a la carte training offerings via WebEx
- Utilized Percipio/Learning Nucleus platform for eLearning
- Provided a tracking system for managers to track training requirements and progress
- Promoted and supported the DOE *Let's Lead* curriculum

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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 (%)
Mentoring Programs						
Fellowship Programs	This information has been provided and will be analyzed and submitted for the FY2025 MD715.					
Other Career Development Programs						
Coaching Programs						
Training Programs						
Internship Programs						
Detail 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

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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 |

AFD for career development programs are not available.

3. 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 |

Time Off Awards: No differences between PWD versus all other BPA employees. The modal category for time off awards was 21-30 hours. Overall, 67.7% of employees with time-off awards had 21-30 hours which was comparable to the 69.0% of PWD in this category. PWTD were more likely to earn time-off awards in this category (77.8%) and slightly less likely in the 41+ hours category (12.5% vs. 17.9% of all BPA time-off awardees).

Cash Awards: More than 70% of employees—regardless of disability status—who received cash awards were in the \$5000 or more category.

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: Yes |
| d. Pay Increases (PWTD) | Answer: Yes |

Overall, 7.7% of BPA GS pay plan employees received a QSI in FY24, which is higher than the rate for PWD (4.5%) and for PWTD (4.4%).

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities?

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(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

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4. 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 |
| ii. Internal Selections (PWD) | Answer: No |
| b. Grade GS-15 | |
| i. Qualified Internal Applicants (PWD) | Answer: Yes |
| ii. Internal Selections (PWD) | Answer: Yes |
| c. Grade GS-14 | |
| i. Qualified Internal Applicants (PWD) | Answer: Yes |
| ii. Internal Selections (PWD) | Answer: Yes |
| d. Grade GS-13 | |
| i. Qualified Internal Applicants (PWD) | Answer: Yes |
| ii. Internal Selections (PWD) | Answer: No |

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USASTaffing data for internal competitive promotions (ICP) includes vacancy announcements open to other non-public candidate categories beyond employees specifically employed at BPA (e.g., other federal agencies, military spouses, and veterans, among others). As such these data have limited validity for understanding BPA's internal advancement processes. Additionally, "qualified" in the context of USASTaffing data refers to "minimally qualified," based on candidates' assertion rather than human capital assessment of candidate qualifications.

SES: no internal competitive promotions (ICP)

GS15:

Qualified applicants: 18.5% PWD - No triggers

Selections: 0.0% PWD - Trigger

GS14:

Qualified applicants: 11.4% PWD - Trigger – Rel App Pool was 11.9% PWD

Selections: 3.8% PWD - Trigger

GS13:

Qualified applicants: 9.2% PWD - Trigger – Rel App Pool was 14.9% PWD

Selections: 9.0% PWD - No trigger

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

ii. Internal Selections (PWTD) Answer: No

b. Grade GS-15

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

c. Grade GS-14

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

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d. Grade GS-13

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

SES: no internal competitive promotions (ICP)

GS15:

Qualified applicants: 6.2% PWTD - No trigger

Selections: 0.0% PWTD (14 selections – PWD trigger; insufficient data for PWTD assessment)

GS14:

Qualified applicants: 3.6% PWTD - No trigger

Selections: 1.2% PWTD - No trigger

GS13:

Qualified applicants: 4.7% PWTD - No trigger

Selections: 3.0% PWTD - No trigger

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

SES: Only 1 vacancy announcement and 1 selection – too little data to assess.

GS15: Only 1 vacancy announcement and 0 selections – too little data to assess.

GS14: Qualified applicants: 7.9% PWD – with 0 PWD among 5 selections – too little data to assert a trigger.

GS13: Qualified applicants: 7.5% PWD – with 7.7% PWD among selections, no trigger.

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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: N/A |
| d. New Hires to GS-13 (PWTD) | Answer: N/A |

SES: Only 1 vacancy announcement and 1 selection – too little data to assess.

GS15: Only 1 vacancy announcement and 0 selections – too little data to assess.

GS14: Qualified applicants: 2.1% PWD – with 0 PWTD among 5 selections – too little data to assert a trigger.

GS13: Qualified applicants: 4.0% PWTD – with 6.4% PTWD among selections, no trigger.

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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: Yes |
| ii. Internal Selections (PWD) | Answer: No |

c. Supervisors

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

Executives: no internal competitive promotions (ICP)

Managers:

Qualified applicants: 7.1% PWD – Trigger (Rel App Pool 11.3% PWD)

Selections: 4.6% PWD - No trigger

Supervisors:

Qualified applicants: 0.0% PWD – Trigger (Rel App Pool , 9.5% PWD)

Selections: 3 selections, insufficient data to assert a trigger.

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 |

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b. Managers

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

c. Supervisors

i. Qualified Internal Applicants (PWTD) Answer: Yes

ii. Internal Selections (PWTD) Answer: No

Executives: no internal competitive promotions (ICP)

Managers:

Qualified applicants: 1.9% PWTD - No trigger

Selections: 2.3% PWTD - No trigger

Supervisors:

Qualified applicants: 0.0% PWTD – Trigger (Note: 2 PWTD applied but these employees were not minimally qualified)

Selections: 3 selections, insufficient data to assert a trigger.

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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: No |
| b. New Hires for Managers (PWD) | Answer: No |
| c. New Hires for Supervisors (PWD) | Answer: No |

SES: No PWD selectees, no qualified PWD applicants – No trigger

Managers: No new hire selectees regardless of disability status - No evidence of a trigger

Supervisors: No new hire vacancy announcements

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 |

SES: No PWTD selectees, no qualified PWTD applicants – No trigger

Managers: No new hire selectees regardless of disability status - No evidence of a trigger

Supervisors: No new hire vacancy announcements

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.

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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: No

BPA had 18 Schedule A new hires in FY22. Of these 7 remained in Schedule A appointments, 10 converted to career conditional appointments, and one left BPA at some point prior to FY24.

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

Inclusion rates: Overall, 8.0% of separations were involuntary (removals) and 77.3% were voluntary (resignations and retirements). PWD rates were comparable (10.7% involuntary; 78.6% voluntary).

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

Inclusion rates: Overall, 8.0% of separations were involuntary (removals) and 77.3% were voluntary (resignations and retirements). PWTD involuntary rate was comparable (9.1%) but at 81.8%, PWTD were more slightly more likely than BPA employees in general to voluntarily separate. However, with a total number of 11 PWTD separations, this inclusion rate gap does not indicate a potential systemic issue.

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

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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.

BPA is currently in the process of updating our internal and public website to include detailed information regarding employees' and applicants' rights under Section 508 of the Rehabilitation Act, including instructions to file a complaint. Once the update is complete, the information will be made readily available, ensuring compliance with Section 508 accessibility standards and providing guidance on the process for filing complaints.

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.

BPA is currently in the process of updating our internal and public website to include detailed information regarding employees' and applicants' rights under the Architectural Barriers Act, including instructions to file a complaint. This update will align with the requirements of the Act.

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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.

BPA is committed to continuously improving the accessibility of both our facilities and technology. Over the next fiscal year, the agency plans to implement the following initiatives aimed at enhancing accessibility:

1. **Facility Accessibility:** As employees return to the office on a full-time basis, BPA will conduct a comprehensive accessibility audit of its physical facilities to identify any barriers that may impede access for individuals with disabilities. This review will focus on spaces and accommodations needed to support a smooth transition back to in-person work. Based on the findings, we will implement necessary modifications to ensure compliance with the Architectural Barriers Act and improve overall accessibility.
2. **Technology Accessibility:** BPA will review our technology systems, websites, and internal platforms to ensure compliance with Section 508 standards, ensuring all content is accessible to employees with disabilities.
3. **Training and Awareness:** BPA will facilitate trainings on Section 508 Compliance and the Architectural Barriers Act for employees, managers and supervisors. These trainings will focus on ensuring that both agency facilities and technology comply with accessibility standards, and will help ensure that all personnel understand their responsibilities related to these requirements.

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.)

As of FY24, the average time for processing requests was 22 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.

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In FY24, BPA took proactive steps to enhance the effectiveness of its Reasonable Accommodation (RA) Program. The RA Office delivered trainings to employees, managers and supervisors on disability and religious reasonable accommodations. The RA Office also participated in the Department of Energy's Disability Summit.

The RA Office continuously updates the RA SharePoint site, ensuring that relevant and accessible information is available to all employees. Feedback is used to make ongoing improvements. Additionally, the RA Office monitors accommodation requests to identify recurring trends or common challenges. This approach helps ensure the timely processing of requests while fostering ongoing improvements to the accommodation process.

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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.

In FY24, BPA continues to process individual requests for PAS in a timely basis. All RA trainings for managers and employees are inclusive of PAS information.
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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: 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.

N/A

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

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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.

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

Answer: No

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

Answer: N/A

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

On January 3, 2017, the EEOC issued a final rule to amend the regulations implementing Section 501 of the Rehabilitation Act of 1973 (Section 501). Federal agencies are required to set a goal of 12% representation of personas with disabilities in their workforce.

Trigger: In FY24, BPA's permanent workforce includes 10.84% individuals with disabilities.

We have not completed a comprehensive barrier analysis for this identified trigger in the current reporting period, as we are awaiting further guidance from the EEOC and the Department of Energy. This guidance is necessary to ensure that our approach aligns with the most current executive orders. Once the guidance is provided, we will assess how to proceed in accordance with their instructions.

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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