

## Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

### Section I: Efforts to Reach Regulatory Goals

*EEOC regulations (29 CFR §1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with targeted disabilities in the federal government.*

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

- |                                |            |
|--------------------------------|------------|
| a. Cluster GS-1 to GS-10 (PWD) | Answer No  |
| b. Cluster GS-11 to SES (PWD)  | Answer Yes |

Persons with a disability make up 7.70% of FHFA's permanent workforce, or 47 employees. The Agency does not utilize the GS pay scale, but at the EL-1 to EL-10 grade-levels, 17.14% of this group, or six employees report having disabilities. At the EL-11 and above grade level, 7.13% or 41 employees report having disabilities. This percentage is below the EEOC's 12% threshold.

\*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 Yes |

Persons with a targeted disability make up 0.98% of FHFA's total permanent workforce, or six employees. Persons with targeted disabilities in the EL-1 to EL-10 grade-level cluster consist of two employees or 5.71% of this group. The remaining four employees who report targeted disabilities are at the EL-11 and above grade-level cluster and make up 0.70% of this group, which is below the EEOC's threshold of 2%.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10					
Grades GS-11 to SES					

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

The Office of Equal Opportunity and Fairness (OEOF) communicated this information to FHFA Executives and Agency leadership during the MD 715 Briefing. In addition, the Office of Human Resources Management is aware of these goals.

## Section II: Model Disability Program

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

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

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

Answer Yes

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	0	0	1	Janice Obeido, Senior Human Resources Specialist, Office of Human Resources Management (OHRM)
Answering questions from the public about hiring authorities that take disability into account	0	0	1	Janice Obeido, Senior Human Resources Specialist, OHRM
Processing reasonable accommodation requests from applicants and employees	0	0	1	Joyce Wilson, Senior Human Resources Specialist, OHRM
Special Emphasis Program for PWD and PWTD	1	0	0	Gwen Jones, Program Analyst, Office of Minority and Minority (OMWI)
Section 508 Compliance	1	0	0	James Myers, Senior Information Technology Specialist, Office of Technology and Information Management (OTIM)
Architectural Barriers Act Compliance	0	0	1	DeWayne Perry, Lead Facilities Operations Specialist, Office of Facilities Operations Management (OFOM)

- 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

FHFA currently has several employees supporting various aspects of the Agency's disability program. These employees completed training in the areas of reasonable accommodation and program staff members attended the Federal Dispute Resolution (FDR) and the EEOC's Examining Conflicts in Employment Laws (EXCEL) training conferences. Additionally, OTIM's Senior Information Technology Specialist who supports the Agency's 508 Compliance Program, coordinates with offices to ensure that their materials meet 508 standards. FHFA maintains several online training modules for managers and employees 24/7 that focus on managing individuals with disabilities. The topics include but are not limited to: the ADA: An Overview for Managers, Reasonable Accommodation for the Federal Workplace, Handling Behavioral Health: Legal Considerations and Clinical Overview, and Disability Accommodation in 60 Minutes. In October 2020, OMWI sponsored an open-enrollment/non-competitive virtual training in American Sign Language. 27 participants from across the Agency attended the webinar series.

## B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If "no", describe the agency's plan to ensure all aspects of the disability program have sufficient funding and other resources.

Answer Yes

## Section III: Program Deficiencies In The Disability Program

## Section IV: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency's recruitment program plan for PWD and PWTD

### A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

1. Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.

FHFA continues to maintain an open register of disabled veteran applicants who are 30 percent or more disabled. This register is shared with hiring managers when they are seeking to fill position vacancies. OHRM informs managers and supervisors of the various appointment options available for employing disabled veterans, including the Veterans Recruitment Act (VRA) appointments, temporary appointments, Schedule A appointments, and non-competitive appointments. FHFA has identified several organizations that may provide candidates with disabilities, including individuals with targeted disabilities. Some of the partnerships and organizations we work with include: • Navy Wounded Warrior-Safe Harbor: We have been sharing job vacancies with the transition coordinator at Navy Wounded Warrior-Safe Harbor at Walter Reed National Military Medical Center in Bethesda, MD. The intention is for this partnership to assist us in finding veterans with disabilities who are experienced in FHFA career fields. • Office of the Assistant Secretary for Veterans' Employment and Training (OASVET): FHFA continues to share vacancies with our contact at OASVET and discuss ways we can partner together to make their customers – disabled veterans – aware of the opportunities at FHFA. • DC Department of Employment Services (DOES): Our Agency connected with this organization through a DAV Military Recruit Job Fair in Landover, MD and will continue to share job opportunities with them. • FHFA's FEORP Plan states that FHFA will target five professional conferences aimed at recruiting minorities, women or persons with disabilities and explore the possibility of sponsoring portions of the conference to increase brand awareness. FHFA also shares specific demographic compositions with each office once a year. The data is broken down by series, grade, veterans preference, disability, race, national origin, and gender. This information is shared for the purpose of educating the hiring managers on the areas where their team may be lacking in diverse representation. As the Agency matures, it will continue to employ initiatives that educate and encourage managers to use the flexibilities in place for hiring PWD and PWTD. Each business unit within FHFA is assigned an HR Account Manager to help leadership execute human resource related actions. The Account Managers educate managers on hiring flexibilities and the benefits of using these flexibilities for the applicant and the Agency. As a result, all hiring managers are educated on the appropriate use of hiring flexibilities for hiring PWD and PWTD. In FY 2020, FHFA hired an additional Account Manager. This will allow each Account Manager to spend more time with each of the offices they service assisting with their hiring needs. FHFA also implemented a new applicant tracking system. As OHRM staff become more proficient in using the system, the

Agency will be able to more efficiently and effectively monitor the Agency's Schedule A program. The system allows us to provide employment information with applicants requesting consideration under the Schedule A hiring authority, as well as, share resumes with the hiring managers. FHFA updated its exit interview process based on EEOC guidance to include questions regarding the Agency's efforts to support employees with disabilities. FHFA will continue to review the responses provided and employ those that are feasible to improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities.

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.

FHFA uses the Schedule A hiring authority to hire competitive and non-competitive employees, including interns. FHFA's applicant tracking system is intended to assist the Agency with monitoring its Schedule A Program and will enable FHFA to share employment information with applicants requesting to be considered under the Schedule A hiring authority, as well as share resumes with the hiring managers.

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.

A Human Resources specialist verifies the applicant is a person with a disability from the documentation provided and verifies that the applicable disability or disabilities fall within one of the following categories: intellectual disability, severe physical disability, or psychiatric disability. The Agency refers qualified Schedule A applicants to the hiring managers via the selection certificate once they apply to a specific vacancy announcement. In addition, the Agency may refer applicants who have not applied to a specific job announcement and they will be notified of the status of their application accordingly.

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

OHRM educates the hiring managers regarding the Schedule A hiring flexibilities at the onset of the recruitment process. FHFA assigns each business unit within FHFA an HR Account Manager to help execute human resource related actions. The Account Managers educate managers on hiring flexibilities and the benefits of using these flexibilities for the applicant and the Agency. As a result, all hiring managers are educated on the appropriate use of hiring flexibilities for hiring people with disabilities (Schedule A). In FY 2020, FHFA hired an additional Account Manager. This allows each Account Manager to spend more time with each of the offices they service assisting with their hiring needs. Also, in honor of National Employment Disability Awareness Month, FHFA hosted a panel discussion on October 6, 2020 entitled "Increasing Access and Opportunity: FHFA Resources to Help You Hire and Retain Talent." Panelists included a Policy Advisor from the Department of Labor and members from FHFA. Employees and managers learned about resources such as the Schedule A Hiring Authority, the Reasonable Accommodations Program, Veterans Preference, and Personal Assistance Services. In addition, furthering FHFA's effort to increase employee engagement, the Agency sponsored American Sign Language Classes. These classes reached maximum capacity and employees from across the Agency provided positive feedback regarding their experience.

## **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.

OMWI and OHRM staff members collaborated on ways the Agency can best advance the recruitment and hiring of diverse talent, including individuals with disabilities. The offices developed a recruitment and outreach plan, which included the following events that focused on individuals with disabilities, including disabled veterans: • The Equal Opportunity Publications – Careers & disABLED Career Expo, Washington, DC – November 22, 2019 • Recruit Military All Veterans Career Fair, Washington, DC –

Originally scheduled for March 12, 2020, rescheduled to November 12, 2020 due to COVID-19.

**C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)**

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If “yes”, please describe the triggers below.

- a. New Hires for Permanent Workforce (PWD) Answer Yes
- b. New Hires for Permanent Workforce (PWTD) Answer Yes

FHFA’s data show that the Agency hired 57 permanent employees in FY 2020. Of those, 8.77% or 5 employees report having a disability. This is below the EEOC’s 12% goal. Among new hires, 1.75% or 1 employee report having a targeted disability. This is below the EEOC’s benchmark of 2% for persons with targeted disabilities.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	1695	4.60	0.00	2.65	0.00
% of Qualified Applicants	691	2.75	0.00	0.00	0.00
% of New Hires	4	0.00	0.00	0.00	0.00

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission- critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for MCO (PWD) Answer Yes
- b. New Hires for MCO (PWTD) Answer Yes

FHFA’s applicant flow data for FY 2020 shows that persons who self-identified as having a disability comprised 4.60% of qualified applicants in the MCO applicant pool. Those who self-identified as having a targeted disability made up 2.65% of this pool. Regarding selection rates, none of the applicants in this pool were selected for specific vacancies. Among qualified applicants in the new hires category: in the 0343 series 7.91% were PWDs (3 of the 11 were PWTDs), in the 0570 series 1.61% were PWDs (all were PWTDs), and in the 0301 and 1160 series there were no qualified PWD or PWTD applicants.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	
0301 MISCELLANEOUS ADMINISTRATION AND PROGRAM	0	0.00	0.00	0.00	0.00
0343 MANAGEMENT AND PROGRAM ANALYSIS	0	0.00	0.00	0.00	0.00

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	
0570FINANCIAL INSTITUTION EXAMINING	0	0.00	0.00	0.00	0.00
1160FINANCIAL ANALYSIS	0	0.00	0.00	0.00	0.00

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 Yes

FY 2020 applicant flow data for internal applicants of MCOs show that 7.50% of qualified applicants report having a disability. Of the total internal applicant pool, 3.41% reported having a targeted disability. Among qualified applicants with disabilities in the internal category: in the 0301 series 7.50% were PWDs (15 of the 33 were PWTD), in the 0343 series 5.63% were PWDs (2 of the 4 were PWTDs), in the 0570 series 3.41% were PWDs (8 of the 11 were PWTDs). There were no qualified persons with disabilities in the 1160 series. Regarding selection rates for these MCO categories, no PWD or PWTDs were selected.

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

The collected applicant flow data for qualified applicants promoted to MCOs show that 16.32% of qualified Agency employees were promoted to MCOs. Of this group, no qualified PWD or PWTD employees were promoted.

## Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

### A. ADVANCEMENT PROGRAM PLAN

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

FHFA advertises training opportunities to all employees, including employees with disabilities, and encourages employees at all levels within the organization to enhance their knowledge through formal training, job rotation, details, and self-development opportunities. The Agency also provides funding, which allows employees to attend external training, conferences, certification courses, and management and leadership development training. All FHFA managers are encouraged to use developmental assignments or detailees from within the Agency as a tool for resourcing special projects. Doing so provides opportunities for employees to gain experience in other areas of the organization. In addition, FHFA encourages all employees to maintain a

competency-based Individual Development Plan (IDP). The IDP allows employees to identify competencies or technical skills to be gained/enhanced, and also enables the Agency to track progress made towards closing Agency-identified competency gaps. The Agency has a reasonable accommodations (RA) and Personal Assistance Services (PAS) coordinator who is responsible for ensuring that RA and PAS requests are processed and approved (as appropriate) in a timely manner. FHFA's Reasonable Accommodation and Personal Assistance Services Policy (FHFA Policy 106) provides RA and PAS to qualified employees and job applicants with disabilities, including disabled veterans, in a prompt, fair, and cost-effective manner. Accommodations are made to ensure that the Agency maintains an equitable work environment where we can retain our talent. Accommodations may include the purchase of specialized equipment and/or services, facility modifications, adjustments to work schedules and/or job duties. The Agency provides training to managers and employees about FHFA's RA and PAS policy, procedures, and processes via on-line training and individual briefings. Guidance is also provided to managers and employees through the employee relations process. New employees also receive information about how to initiate a request for an accommodation at the New Employee Orientation session. The Agency's Section 508 coordinator works closely with FHFA's webmaster to support the communication of external and internal information to audiences in accordance with Section 508 regulations.

**B. CAREER DEVELOPMENT OPPORTUNITES**

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

FHFA provides career and professional development opportunities to all FHFA employees, regardless of grade and/or occupational series. Prior to mandatory telework status due to the COVID-19 pandemic, employees had the ability to access a blended approach to learning, including attending on-site/instructor-led training courses and online learning (self-study and virtual webinars). Since March 2020, employees had the opportunity to participate in online learning or technology-enabled learning events. Employees can also request approval to attend externally offered courses by public training vendors, associations, and academic institutions. Some programs offered to employees target specific populations based on grade level, such as: • Excellence in Government Fellows Program (for EL-13 and above); • Treasury Executive Institute Leadership Courses/Coaching (for EL-14 and above); and • Supervisory/Managerial Training Courses: for all FHFA supervisors, managers, executives. FHFA's multi-faceted learning approach encourages employees at all levels within the organization to enhance their knowledge through a variety of modalities - formal in-house and external training, job rotations, details, one-on-one coaching, and self-development opportunities (videos, podcasts, online articles and resources to read and download as needed). These opportunities/programs include topics related to leadership development, Contracting Officers Representative training, professional skills training, and training relating to FHFA's mission critical positions in accounting, economics, financial analysis, and bank examination. In addition, at the beginning of each performance-rating year, all employees are encouraged to complete an Individual Development Plan (IDP). Beginning in FY21, these IDPs can be documented in our learning management system to enhance planning, monitoring, and reporting. IDPs provide tailored approaches and they identify opportunities for all employees to pursue development and training designed to hone their technical skills to effectively perform their jobs and enhance their careers. The Agency allocates funding to enable all employees to attend external training events, conferences, certification courses, and management and leadership development training with their manager's approval. Additionally, FHFA has an internal examiner commission program called the Housing Finance Examiner (HFE) Commission Program. The goal of the program is to equip FHFA examiners with a uniform set of technical and professional skills to conduct safety and soundness examinations of Fannie Mae, Freddie Mac, and the Federal Home Loan Bank System. There is no application process for the HFE program because individuals who are hired into an examiner position are automatically enrolled in the HFE program. Individuals who are not in examiner positions may attend classes, but they are no longer allowed to participate in the HFE program, for on the job training purposes, based on changes made in 2019. To ensure maximum agency-wide exposure, learning and development opportunities are advertised through multiple channels, including: FHFA's weekly newsletter, targeted emails, intranet sites, and monthly Learning Liaison group meetings with Agency training representatives from each FHFA division/office.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/ approval to participate.

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	115	11	1.74	0	1.74	0
Detail Programs	0	0	0	0	0	0

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Other Career Development Programs	0	0	0	0	0	0
Fellowship Programs	10	2	0	0	0	0
Mentoring Programs	0	0	0	0	0	0
Coaching Programs	7	7	0	0	0	0
Training Programs	0	0	0	0	0	0

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 No
- b. Selections (PWD) Answer Yes

There is a potential trigger in the Internship Program among applicants with disabilities. PWDs make up a small percent (1.74%) of applicants compared to those without a disability (98.26%). The PWDs in this group were qualified applicants but none were selected.

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 No
- b. Selections (PWTD) Answer Yes

The applicants listed in question three (1.74%) are also qualified PWTDs, and none of them were selected.

**C. AWARDS**

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

- a. Awards, Bonuses, & Incentives (PWD) Answer Yes
- b. Awards, Bonuses, & Incentives (PWTD) Answer Yes

Using the inclusion rate, triggers were identified for the following awards: 1) Time Off awards (1-10 hours) - there were no PWD or PWTD recipients compared with persons without a disability (PWOD) who had an inclusion rate of 2.31%. 2) Time Off awards (11-20h) - 2.13% of PWD were recipients compared with 4.26% of PWOD, and no PWTD received the award. 3) Time Off awards (21-30h) – did not include PWTD recipients compared with 5.15% of PWOD. 4) Cash awards (\$500 and under) - PWTD had an inclusion rate of 16.67% compared with PWOD who had an inclusion rate of 20.78%. 5) Cash awards (\$501-999) - PWD had an inclusion rate of 29.79% compared with 41.56% of PWOD. 6) Cash awards (\$1000-1999) – did not include PWTD recipients compared with 1.42% of PWOD.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %



Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
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2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If “yes”, please describe the trigger(s) in the text box.

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

N/A

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

- a. Other Types of Recognition (PWD) Answer No
- b. Other Types of Recognition (PWTD) Answer No

N/A

**D. PROMOTIONS**

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. SES
  - i. Qualified Internal Applicants (PWD) Answer No
  - ii. Internal Selections (PWD) Answer Yes
- 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 No
  - ii. Internal Selections (PWD) Answer Yes

Triggers are identified for PWDs at the EL-14 and EL-15 grade levels. Among PWDs at the EL-14 grade level, 44.44% were

qualified applicants versus 70.28% among PWODs. At the EL-15 grade level, 43.75% were qualified applicants versus 61.67% among PWODs. However, there was not a trigger at the EL-13 grade level for qualified applicants with disabilities. Qualified PWODs were not selected to positions at any of the four grade levels.

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 Yes
- ii. Internal Selections (PWTD) Answer Yes

b. Grade GS-15

- i. Qualified Internal Applicants (PWTD) Answer Yes
- ii. Internal Selections (PWTD) Answer Yes

c. Grade GS-14

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

d. Grade GS-13

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

The following triggers were identified among PWTDs: LL pay plan – 57.14% were qualified applicants compared to 61.32% among qualified PWODs; EL-15 – 20% PWTDs were qualified compared to 61.67% among qualified PWODs; EL-14 – 36.36% PWTDs were qualified applicants compared to 70.28% among qualified PWODs. In these three grade level areas PWTD’s were not selected. While there was no trigger for qualified PWTDs at the EL-13 grade level, no applicants were selected at this grade level.

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 Yes
- 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

A trigger was identified for PWD applicants at the LL pay plan level for new hires. Among PWDs, 50% were qualified applicants compared with 72.73% for PWODs.

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 Yes
- c. New Hires to GS-14 (PWTD) Answer No
- d. New Hires to GS-13 (PWTD) Answer No

A trigger was identified for PWTDS at the EL-15 grade level. Among those applicants, 27.27% qualified compared with 39.64% among PWODs.

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 Yes
- b. Managers
  - i. Qualified Internal Applicants (PWD) Answer Yes
  - ii. Internal Selections (PWD) Answer Yes
- c. Supervisors
  - i. Qualified Internal Applicants (PWD) Answer No
  - ii. Internal Selections (PWD) Answer No

At the manager level (EL-15), a trigger is identified. Among PWD applicants, 45.45% were qualified compared with 62.16% among PWODs. At both the executive and manger levels, none of the qualified PWD were selected for positions.

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 Yes
  - ii. Internal Selections (PWTD) Answer Yes
- b. Managers
  - i. Qualified Internal Applicants (PWTD) Answer Yes
  - ii. Internal Selections (PWTD) Answer Yes
- c. Supervisors

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

Regarding PWTD applicants at both the executive and the manager levels, triggers are identified. At the executive level, 57.14% were qualified versus 61.32% of PWODs, and at the manager level 16.67% were qualified versus 62.16% of PWODs.

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

Triggers are identified for executive and manager level vacancies because none of the selected applicants were PWDs.

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 | Yes |
| b. New Hires for Managers (PWTD)    | Answer | Yes |
| c. New Hires for Supervisors (PWTD) | Answer | No  |

Triggers were identified for executive and manager level vacancies because none of the selected applicants identified as PWTDs.

## Section VI: Plan to Improve Retention of Persons with Disabilities

To be model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace assistance services.

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer No

In FY 2020, FHFA did not have any Schedule A employees eligible for conversion into the competitive service.

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 |

N/A

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
-------------	---------	---------------------------	-----------------------------------

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

N/A

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
-------------	---------	-------------------------	---------------------------------

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.fhfa.gov/AboutUs/Policies/Pages/Accessibility.aspx>

2. Please provide the internet address on the agency’s public website for its notice explaining employees’ and applicants’ rights under the Architectural Barriers Act, including a description of how to file a complaint.

<https://www.fhfa.gov/AboutUs/Policies/Pages/%E2%80%8BReasonable-Accommodation.aspx>

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.

FHFA employs a full-time 508 compliance specialist. This employee works with the Office of Equal Opportunity and Fairness, the Office of Minority and Women Inclusion, the Office of General Counsel, and the Office of Congressional Affairs and Communications to ensure that all of the Agency’s publicly posted documents are accessible. The Office of Facilities Operations Management is installing accessible automatic door controls on the new entrance doors to the 5th floor expansion space in the NE Quadrant. Further, the FHFA reasonable accommodation and PAS coordinator assists employees and applicants with accessibility issues in accordance with the FHFA Reasonable Accommodation and PAS Policy and Procedures. The coordinator can also assist visitors requiring sign language interpreting services.

**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.)

In 2019, the average time frame for processing was 15 days. However, in 2020, due to COVID-19 related delays, the average time frame for processing was 28 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.

The Agency’s Reasonable Accommodation and Personal Assistance Services Policy and Procedures addresses handling delays in processing and delivery of accommodations. The coordinator will notify the employee or applicant of the reason for a delay, and to the extent possible, keep the employee or applicant informed of the date when the Agency expects to complete the process. Additionally, FHFA will work with managers and supervisors to make sure that they understand the policy and procedures, and also review accommodations to ensure that they are effective.

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

*Pursuant to 29 CFR §1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.*

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

The Agency has updated the reasonable accommodation policy to include PAS. We have not received any requests for PAS, however, the updated policy should assist in avoiding delays in processing and delivery of services. Additionally, FHFA will work with managers and supervisors to make sure that they understand the policy and procedures when requests are received, and also review PAS to ensure that they are effective.

**Section VII: EEO Complaint and Findings Data**

**A. EEO COMPLAINT DATA INVOLVING HARASSMENT**

- 1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the government-wide 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 Yes

- 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.

Answer NA

**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 Yes

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.

NA

## Section VIII: Identification and Removal of Barriers

*Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.*

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

Answer No

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

Answer No

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

<b>Source of the Trigger:</b>	Other					
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B4					
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	Recruitment and Hiring Persons with disabilities make up 7.70% of FHFA’s permanent workforce. Although there were qualified internal and external applicants, none of the selections made to mission critical occupations, EL-15 and above, or manager positions included persons who identified as having a disability.					
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i> People with Disabilities					
<b>Barrier Analysis Process Completed?:</b>	N					
<b>Barrier(s) Identified?:</b>	N					
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b>		<b>Description of Policy, Procedure, or Practice</b>			
	No Barrier Identified		N/A			
<b>Objective(s) and Dates for EEO Plan</b>						
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>	
01/01/2017	12/31/2021	Yes	12/21/2022		Conduct a barrier analysis for each trigger and determine whether there are specific barriers. Then develop recommendations and action plans to address any barriers.	
<b>Responsible Official(s)</b>						
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>		
OHRM Director		Andrew Wasilisin		Yes		
OEOF Director		Debra Chew		Yes		
<b>Planned Activities Toward Completion of Objective</b>						
<b>Target Date</b>	<b>Planned Activities</b>			<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>	<b>Completion Date</b>
12/31/2022	Conduct a barrier analysis for each trigger and determine whether there are specific barriers. Then develop recommendations and action plans to address any barriers.			Yes		



<b>Report of Accomplishments</b>	
<b>Fiscal Year</b>	<b>Accomplishment</b>

<b>Source of the Trigger:</b>	Other					
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B8					
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	Career Development, there was a very small percent of applicants to the Agency's Internship Program. Even though these individuals were qualified, none were selected. This pattern is seen in hiring to other positions within the Agency. There may be a potential barrier in the Agency's selection procedures for persons with disabilities.					
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i> People with Disabilities					
<b>Barrier Analysis Process Completed?:</b>	N					
<b>Barrier(s) Identified?:</b>	N					
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b>		<b>Description of Policy, Procedure, or Practice</b>			
<b>Objective(s) and Dates for EEO Plan</b>						
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>	
04/01/2022	12/31/2022	Yes			Conduct a barrier analysis for each trigger and determine whether there are specific barriers. Then develop recommendations and action plans to address any barriers.	
<b>Responsible Official(s)</b>						
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>		
OHRM Director		Andrew Wasilisin		Yes		
OEOF Director		Debra Chew		Yes		
<b>Planned Activities Toward Completion of Objective</b>						
<b>Target Date</b>	<b>Planned Activities</b>			<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>	<b>Completion Date</b>
09/30/2021	Conduct a barrier analysis for each trigger and determine whether there are specific barriers. Then develop recommendations and action plans to address any barriers.			Yes		

<b>Report of Accomplishments</b>	
<b>Fiscal Year</b>	<b>Accomplishment</b>

<b>Source of the Trigger:</b>	Other					
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B13					
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	Awards by percentage, PWD received less than those without a disability in time off awards. There's also a potential barrier to PWTD when it comes to employees who received cash awards up to \$1,999. This data warrants further investigation. Of note, the data shows that voluntary separations of persons with disabilities are far less (based on inclusion rates) than those who report not having disabilities.					
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i> People with Disabilities					
<b>Barrier Analysis Process Completed?:</b>	N					
<b>Barrier(s) Identified?:</b>	N					
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b>		<b>Description of Policy, Procedure, or Practice</b>			
<b>Objective(s) and Dates for EEO Plan</b>						
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>	
04/01/2021	12/31/2022	Yes			Conduct a barrier analysis for each trigger and determine whether there are specific barriers. Then develop recommendations and action plans to address any barriers.	
<b>Responsible Official(s)</b>						
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>		
OHRM Director		Andy Wasilisin		Yes		
OEOF Director		Debra Chew		Yes		
<b>Planned Activities Toward Completion of Objective</b>						
<b>Target Date</b>	<b>Planned Activities</b>			<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>	<b>Completion Date</b>
12/31/2022	Conduct a barrier analysis for each trigger and determine whether there are specific barriers. Then develop recommendations and action plans to address any barriers.			Yes		

<b>Report of Accomplishments</b>	
<b>Fiscal Year</b>	<b>Accomplishment</b>

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

In 2019, FHFA analyzed its work force profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure or practice was operating to disadvantage any group based on race, national origin, gender or disability. The Agency reorganized and created a new Office of Equal Opportunity and Fairness (OEOF). During FY 20, the office was staffing up and laying the groundwork necessary to conduct future barrier analysis and studies.

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