

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 Yes
- b. Cluster GS-11 to SES (PWD) Answer Yes

Persons with disabilities make up 6.76% of the Agency's total permanent workforce, or 42 employees. FHFA does not utilize the GS pay scale, but three employees (0.48% of the FHFA workforce) at the EL 1-10 levels report having disabilities. At the EL-11 levels and above, 39 employees (6.28% of the FHFA workforce) report having disabilities.

*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 Yes
- b. Cluster GS-11 to SES (PWTD) Answer Yes

Persons with targeted disabilities make up 0.81% of the Agency's total permanent workforce, or five employees, and 1.01% of the Agency's total workforce, or six employees. There are no employees at the EL 1-10 levels who report having targeted disabilities. All six employees are at the EL-11 level or above.

Grade Level Cluster (GS or Alternate Pay Plan)	Total		Reportable Disability		Targeted Disability	
	#	%	#	%	#	%
Numerical Goal	--		12%		2%	
Grades GS-1 to GS-10	0		0	0.00	0	0.00
Grades GS-11 to SES	44		3	6.82	1	2.27

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

OHRM provides yearly RNO and disability hiring data to hiring managers and discusses various hiring flexibilities with managers during the hiring process. The EEO Director has also informed executives 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

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	
Processing applications from PWD and PWTB	0	0	1	Janice Obeido Senior Human Resources Specialist
Answering questions from the public about hiring authorities that take disability into account	0	0	1	Janice Obeido Senior Human Resources Specialist
Processing reasonable accommodation requests from applicants and employees	0	0	1	Joyce Wilson Senior Human Resources Specialist
Section 508 Compliance	1	0	1	Stuart Levy Supervisory Information Technology Specialist & James Myers Senior Information Technology Specialist
Architectural Barriers Act Compliance	0	0	1	DeWayne Perry Lead Facilities Operations Specialist Office of Facilities Operations Management
Special Emphasis Program for PWD and PWTB	1	0	0	Gwendolyn Jones Program Analyst Office of Minority and Women Inclusion

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

FHFA currently has six employees supporting various aspects of the Agency’s disability program. To emphasize the importance of the program, OTIM hired a full-time Senior Information Technology Specialist dedicated to supporting the Agency’s 508 Compliance Program. Additionally, other members of the disability program have received 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. The FHFA hosts webinars throughout the year related to managing individuals with disabilities. This topics include, but are not limited to: Handling a Psychiatric Crisis in the Workplace, Handling Behavioral Health: Legal Considerations and Clinical Overview, Managing Employees with Substance Use Disorders, and

Disability Accommodation in 60 Minutes.

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

Brief Description of Program Deficiency	D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]		
Objective	Continue to collect exit interview data.		
Target Date	Jun 30, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2018	FHFA has begun to request employees departing from the Agency to complete exit interviews. Currently the interview format is not specifically geared to evaluating whether employees with disabilities are leaving the Agency at a disproportionate rate, but OMWI and OHRM will collaborate during FY 2019 to add questions to the exit interviews to address this.	
Objective	Collect & analyze applicant flow data to identify and eliminate potential barriers to EEO in the workplace.		
Target Date	Sep 30, 2018		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2018	FHFA now has a system in place to track applicant flow data from USA Staffing. We are still in the process of gathering data in the system, but so far we have been able to assess 3,519 applications for 64 vacancies from 4/4/17 to 12/11/18.	

Brief Description of Program Deficiency	D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.		
Objective	The Agency will work on formatting its affirmative action plan and redacting it to ensure it does not contain any personally identifiable information and then post it on the Agency's public website.		
Target Date	Sep 30, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	

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 is a small organization and on average, we hire approximately 40 to 50 new employees each year. We strive to fill positions methodically and consider all hiring authorities when developing hiring plans. FHFA continues to maintain an open register of disabled veteran applicants who are 30 percent or more disabled. This register will be shared with hiring managers when vacancies are opened. The Office of Human Resources Management (OHRM) will inform 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. One of the main challenges FHFA must address is finding applicants, including veterans and disabled veterans, who are specialized in our mission areas such as economic modeling and analysis, or who have knowledge of the housing industry. FHFA has identified several organizations where we believe we will be able to reach candidates with disabilities, including individuals with targeted disabilities. Some of the partnerships and organizations we are working with or plan to work with include: • Navy Wounded Warrior-Safe Harbor: We have begun partnering with the transition coordinator at Navy Wounded Warrior-Safe Harbor at Walter Reed National Military Medical Center in Bethesda, MD. We are hopeful that this partnership will assist us in finding disabled veterans experienced in our Agency's career fields. • Office of the Assistant Secretary for Veterans' Employment and Training (OASVET): We will continue to work 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): We connected with this organization through a DAV Military Recruit Job Fair in Landover, MD. We shared the Administrative Office manager position located in OGC with this organization. We will continue to share job opportunities with them. • We are currently in the process of developing an in-house sign language class at FHFA to allow employees to become more capable of engaging with fellow employees who are hearing impaired. We want to spread disability awareness in the FHFA community so that everyone can create and maintain a work environment without barriers. We aim to make sure everyone is treated equally and with respect, no matter the circumstances. In addition to the programs listed above, FHFA has been implementing its applicant tracking system (ATS) which will allow the Agency to better track Schedule A applicants and share employment information with them. The ATS went live in early 2018. It is currently being tweaked to better fit FHFA's hiring processes. Once it is fully operational, it will assist the Agency in better serving individuals with disabilities, including targeted disabilities. The ATS will also facilitate the sharing of resumes with hiring managers. In late 2018, FHFA was also able to begin using USA Staffing to obtain applicant flow data. In FY 2019, FHFA will take affirmative steps to seek diversity in our workforce at all levels of the agency. We will increase brand awareness, foster relationships with organizations dedicated to the advancement of persons with disabilities including targeted disabilities, enhance public relations, participate at career fairs, educate managers on the benefits of the various hiring flexibilities, collaborate with offices to brainstorm innovative ideas for recruiting people with disabilities including individuals with targeted disabilities, identifying barriers, and placing advertisements in print and online. During FY 2019, we are engaging with an outside contractor to conduct barrier analysis.

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 recently implemented an applicant tracking system. FHFA is in the beginning stages of utilizing the system. Once staff is trained and the system is fully operational, it will allow the Agency to more efficiently and effectively monitor the Agency's Schedule A program. The system will also enable us 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. This increase in communication and resume management should result in additional hires of people with disabilities. In late 2018, FHFA was also able to begin using USA Staffing to obtain applicant flow data.

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 also verifies that the applicable disability falls 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 if they applied to a specific vacancy announcement. Applicants may also be referred without applying to a specific job announcement and they are 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 of the Schedule A hiring flexibilities at the onset of the recruitment process. 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 people with disabilities.

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.

FHFA participates in the following career fairs two to three times a year: Equal Opportunity Publications -- Careers & disABLED Career Expo and Recruit Military All Veterans Career Fair. Both organizations assist PWD, including PWTD, in securing and maintaining employment. FHFA also sometimes participates in the Workforce Recruitment Program (WRP) to recruit and hire interns.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

- a. New Hires for Permanent Workforce (PWD) Answer No
- b. New Hires for Permanent Workforce (PWTD) Answer No

FHFA’s FY 2018 data on new hires shows that while only 5.13% of the Agency’s new hires reported a disability, 2.56% of the new hires reported a targeted disability, thus exceeding the EEOC’s 2% benchmark for PWTD. FHFA will continue to use the methods described throughout this report, including Schedule A hiring and increasing awareness of hiring managers, in order to achieve the overall 12% hiring goal.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants					
% of Qualified Applicants					
% of New Hires					

- 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 N/A
- b. New Hires for MCO (PWTD) Answer N/A

For questions 2-4, we do not yet have enough data on mission critical applications in order to accurately assess and determine whether a trigger exists. We will continue with our applicant flow tracking and data analysis efforts described throughout this report and evaluate any possible issues.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	

- 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 N/A
 - b. Qualified Applicants for MCO (PWTD) Answer N/A

For questions 2-4, we do not yet have enough data on mission critical applications in order to accurately assess and determine whether a trigger exists. We will continue with our applicant flow tracking and data analysis efforts described throughout this report and evaluate any possible issues.

- 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 N/A
 - b. Promotions for MCO (PWTD) Answer N/A

For questions 2-4, we do not yet have enough data on mission critical applications in order to accurately assess and determine whether a trigger exists. We will continue with our applicant flow tracking and data analysis efforts described throughout this report and evaluate any possible issues.

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 agency. 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. As part of its commitment to employing and advancing people with disabilities, FHFA will evaluate its progress annually and the Agency will adjust the plan as needed to include innovative initiatives. In addition to reporting our progress in the MD-715, FHFA will review other data sources to better understand how current employees with disabilities are advancing and developing at the Agency, such as its diversity and inclusion culture assessment. The Office of Minority and Women Inclusion (OMWI) will also collaborate with OHRM, as well as division and office leaders, to foster a culture that supports diversity and inclusion at all levels and throughout Agency-wide programs. FHFA is also in the process of updating its training policy, and we will include language in this policy to address training opportunities for employees with disabilities. Last, FHFA will encourage managers to allow their employees, including those with disabilities, to seek out leadership trainings and mentoring and coaching opportunities.

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. Employees have the ability to access a blended approach to learning, including attending on-site/instructor led training courses, participating in online learning or technology-enabled learning events, and requesting 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, and executives. FHFA’s blended learning program encourages employees, including veterans, at all levels within the organization, to enhance their knowledge through formal in-house and external training, job rotations, details, one-on-one coaching, and self-development opportunities. These opportunities/programs include leadership training, 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). Doing so provides opportunities for all employees to identify training they believe will hone their technical skills to effectively do their jobs and enhance their careers. The Agency allocates funding, which allows 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. 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 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	8	0	NA	NA	NA	NA
Fellowship Programs	0	0	0	0	0	0
Mentoring Programs	0	0	0	0	0	0
Coaching Programs	30	30	N/A	1	N/A	2
Training Programs	0	0	0	0	0	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

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

FHFA does not have an applicable program to evaluate.

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

FHFA does not have applicable programs to evaluate.

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 No

The average award amount for employees with disabilities is slightly lower than the average amount for employees without disabilities. However, the total percentage of employees with disabilities receiving awards exceeds the percentage of employees without disabilities receiving awards. Further, 50% of employees with targeted disabilities received awards, and these award amounts exceeded those of employees without disabilities.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards: 1-9 hours : Total Time-Off Awards Given	3	0.00	100.00	0.00	0.00
Time-Off Awards: 9+ hours : Total Time-Off Awards Given	27	0.00	96.30	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$100 - \$500: Total Cash Awards Given	35	8.57	91.43	0.00	8.57
Cash Awards: \$501+: Total Cash Awards Given	205	5.85	94.15	0.98	4.88

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

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Quality Step Increases (QSI): Total QSIs Awarded	0	0.00	0.00	0.00	0.00
Performance Based Pay Increase	0	0.00	0.00	0.00	0.00

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 N/A
- b. Other Types of Recognition (PWTD) Answer N/A

D. PROMOTIONS

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

- a. SES
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer No
- b. Grade GS-15
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer No
- c. Grade GS-14
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer No
- d. Grade GS-13
 - i. Qualified Internal Applicants (PWD) Answer No
 - ii. Internal Selections (PWD) Answer No

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
- d. Grade GS-13
 - i. Qualified Internal Applicants (PWTD) Answer No
 - ii. Internal Selections (PWTD) Answer No

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

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

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 No

ii. Internal Selections (PWD) Answer No

c. Supervisors

i. Qualified Internal Applicants (PWD) Answer No

ii. Internal Selections (PWD) Answer No

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

b. Managers

i. Qualified Internal Applicants (PWTD) Answer No

ii. Internal Selections (PWTD) Answer No

c. Supervisors

i. Qualified Internal Applicants (PWTD) Answer No

ii. Internal Selections (PWTD) Answer No

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

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB 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 (PWTB) Answer No
- b. New Hires for Managers (PWTB) Answer No
- c. New Hires for Supervisors (PWTB) Answer No

With regard to questions 1-8 above, we have recently begun to evaluate data through our USA Staffing applicant flow tracking tool. At this time, we are not yet able to drill down to distinguish between internal and external applicants. In addition, we are not able to distinguish between applicants with disabilities and targeted disabilities, so we are conducting our review just based on overall identified disability status. This data is somewhat limited because the system does not yet have a record of all vacancies. Further, we are limited by whether or not the applicants identified themselves as having a disability. Therefore, we have not identified any triggers in the applicable fields. However, based on the available data, we observe that for the Agency’s highest level (executive) positions, we are not receiving a large number of applications from applicants who identify a disability. This number increases slightly in the non-executive senior level positions (EL 13-14). We can extrapolate from this very basic data assessment that as an Agency we may have strong opportunities to recruit and hire individuals with disabilities into these senior level EL13-14 positions and then train them over time so that they can eventually be promoted to EL-15 and executive level positions. OMWI and OHRM will collaborate over the coming months to ensure that we are continuing to expand our applicant pool and raising awareness among hiring managers of the hiring flexibilities involved in hiring applicants at all levels so that we can increase the numbers of individuals with disabilities in our Agency workforce.

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 Yes

In FY 2018 FHFA converted two employees with a disability 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

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Total Separations	37	8.11	91.89
Involuntary Separations	2	0.00	100.00
Voluntary Separation	35	8.57	91.43

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

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Total Separations	37	2.70	97.30
Involuntary Separations	2	0.00	100.00
Voluntary Separation	35	2.86	97.14

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/%E2%80%8BReasonable-Accommodation.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 recently hired a full-time 508 compliance specialist. This employee works to ensure that all of the Agency’s publicly posted documents are accessible.

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.)

18 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. Furthermore, FHFA will investigate whether there are temporary measures that could be taken to assist individuals with a disability in the case of a delay. 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, and also review any PAS that are granted 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 governmentwide average?

Answer Yes

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.

N/A With regard to question 1, we do not believe this is a trigger. Although our percentage exceeds the government-wide average of 18.05%, we have a relatively small number of formal complaints each fiscal year, so the percentage can increase with just one or two complaint filings. In FY 2018, two of the six complaints, or 33%, alleged harassment and asserted disability as a basis.

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

- 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 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.

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

Answer No

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

Answer N/A

- 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

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>In FY 2017, persons with disabilities made up 7.69% of FHFA’s new hires, which is less than the 12% EEOC benchmark.</p>
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p>

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>The average award amount for employees with disabilities is slightly lower than the average amount for employees without disabilities. However, the total percentage of employees with disabilities receiving awards exceeds the percentage of employees without disabilities receiving awards. Further, 50% of employees with targeted disabilities received awards, and these award amounts exceeded those of employees without disabilities.</p>
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p>

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>Persons with disabilities make up 6.76% of FHFA’s workforce, which is less than the EEOC’s 12% benchmark, and persons with targeted disabilities makes up 1.01% of FHFA’s workforce, which is less than the EEOC’s 2% benchmark.</p>
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p>

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