

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

Morris K. Udall Scholarship and Excellence in National Environmental Policy Foundation - FY 2025

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

Section I: Efforts to Reach Regulatory Goals

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

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

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

* 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: No |

There was only one employee in the AD-01 to AD-10 cluster, and they reported having a disability but not a targeted disability.

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

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

In FY25 the agency provided training on how employees may voluntarily update their disability data through the employee databases and GSA. Additionally, the EEO director and General Counsel reviewed with hiring managers and staff the types of data the agency reports to the EEOC, including the numeric goals related to PWD and PWTD.

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	Total Full Time	Total Part Time	Total Collateral Duty	Responsible Official (Name, Title, Office Email)
Special Emphasis Program for PWD and PWTD	0	0	0	
Processing applications from PWD and PWTD	0	0	1	Sara Moeller, COO, moeller@udall.gov
Answering questions from the public about hiring authorities that take disability into account	0	0	1	Sara Moeller, COO, moeller@udall.gov
Section 508 Compliance	0	0	1	Sara Moeller, COO, moeller@udall.gov
Architectural Barriers Act Compliance	0	0	1	Sara Moeller, COO, moeller@udall.gov
Processing reasonable accommodation requests from applicants and employees	0	0	1	Hiring lead for each individual hiring action or the employee's supervisor

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

GSA provides support in this area for both accommodations and staffing, when appropriate. The EEO Director and General Counsel provide training to supervisors and all staff about disabilities, including staff that carry out responsibilities related to disabilities.

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

The agency provides funding to GSA to provide related services and will review the agreement in the future to determine whether additional disability program services are appropriate.

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.

To ensure that its open positions are appropriately advertised to persons with disabilities and persons with targeted disabilities, the agency will consider posting future job announcements on one or all of the following platforms: abilityJOBS.com, disabledpersons.com, and abilitylinks.org.

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.

The Udall Foundation is an excepted service agency and has authority to “appoint such personnel as may be necessary to carry out the provisions of [the Udall Foundation authorizing legislation], without regard to the provisions of title 5 governing appointments in the competitive service.” 20 USC §5608(1)(A). As such, the Udall Foundation is already able to use hiring authority with significant flexibility to hire persons with disabilities and persons with targeted disabilities.

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority; and, (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

The Udall Foundation is an excepted service agency and has authority to “appoint such personnel as may be necessary to carry out the provisions of [the Udall Foundation authorizing legislation], without regard to the provisions of title 5 governing appointments in the competitive service.” 20 USC §5608(1)(A). As such, the Udall Foundation is already able to use hiring authority with significant flexibility to hire persons with disabilities and persons with targeted disabilities.

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: N/A

The Udall Foundation is an excepted service agency and has authority to “appoint such personnel as may be necessary to carry out the provisions of [the Udall Foundation authorizing legislation], without regard to the provisions of title 5 governing appointments in the competitive service.” 20 USC §5608(1)(A). As such, the Udall Foundation is already able to use hiring authority with significant flexibility to hire persons with disabilities and persons with targeted 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.

The Udall Foundation reviewed numerous programs and resources for agencies that are designed to identify and hire persons with disabilities as well as assist them with securing employees. The Udall Foundation will consider utilizing one or more of the following programs/resources in its future hiring, as appropriate for the individual hiring actions: OPM Talent Portal, OPM Workforce Recruitment Program, America Job Centers, Veteran Rehabilitation and Employment Program, and the Employer Assistance and Resource Network on Disability Inclusion (EARN).

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", describe the trigger(s) below.

a. New Hires for Permanent Workforce (PWD)

Answer: No

b. New Hires for Permanent Workforce (PWTD)

Answer: No

N/A – the agency did not hire any permanent employees in FY 25.

New Hires	Total (Number)	Reportable Disability Permanent Workforce (Percentage)	Reportable Disability Temporary Workforce (Percentage)	Targeted Disability Permanent Workforce (Percentage)	Targeted Disability Temporary Workforce (Percentage)
% 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

N/A - the agency has not defined MCO positions.

New Hires to Mission-Critical Occupations	Total (Number)	Reportable Disability New Hires (Percentage)	Targetable Disability New Hires (Percentage)
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. 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

N/A - the agency has not defined MCO positions.

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

N/A - the agency has not defined MCO positions.

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.

The Udall Foundation continues to engage GSA CABS on potential support for programs that support persons with disabilities (PWD) and targeted disabilities (PWTD). On December 11, GSA CABS informed the Udall Foundation that this support has not historically been an available business line offered to agencies, but they will check internally to see if this has changed. Additionally, on November 25, the EEO director contacted the Small Agency Council (SAC) and inquired about engaging other small agencies on this topic. The EEO Director was referred to the SAC Equal Employment Opportunity Committee. The Committee circulated the Udall Foundation’s request for feedback on December 10, 2024 but the EEO director did not receive any responses or recommendations. Until such support is received, the Udall Foundation will continue to utilize exit interviews and survey data to gather feedback on ways to improve opportunities for advancement to PWD and PWTD.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

The Udall Foundation continues to engage GSA CABS on potential support for programs that support persons with disabilities (PWD) and targeted disabilities (PWTD). On December 11, GSA CABS informed the Udall Foundation that this support has not historically been an available business line offered to agencies, but they will check internally to see if this has changed. Additionally, on November 25, the EEO director contacted the Small Agency Council (SAC) and inquired about engaging other small agencies on this topic. The EEO Director was referred to the SAC Equal Employment Opportunity Diversity and Inclusions Committee. The Committee circulated the Udall Foundation’s request for feedback on December 10, 2024 but the EEO director did not receive any responses or recommendations. Until such support is received, the Udall Foundation will continue to utilize exit interviews and survey data to gather feedback on ways to provide career development opportunities.

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 Applicants (Percentage)	Total Participants Selectees (Percentage)	PWD Applicants (Percentage)	PWD Selectees (Percentage)	PWTD Applicants (Percentage)	PWTD Selectees (Percentage)
Internship Programs	1	1	0	0	0	0
Mentoring Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	0	0
Training Programs	0	0	0	0	0	0
Detail Programs	0	0	0	0	0	0
Other Career Development Programs	0	0	0	0	0	0
Fellowship 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

N/A – the agency does not have any career development programs for PWD.

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

N/A – the agency does not have any career development programs for PWTD.

C. AWARDS

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

a. Awards, Bonuses, & Incentives (PWD)

Answer: No

b. Awards, Bonuses, & Incentives (PWTD)

Answer: No

N/A – the agency does not currently track this data.

Time-Off Awards	Total (Number)	Reportable Disability (Percentage)	Without Reportable Disability (Percentage)	Targeted Disability (Percentage)	Without Targeted Disability (Percentage)
Time-Off Awards 1 - 10 hours: Awards Given	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 1 - 10 Hours: Total Hours	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 1 - 10 Hours: Average Hours	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 hours: Awards Given	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 Hours: Total Hours	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 Hours: Average Hours	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 hours: Awards Given	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Total Hours	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Average Hours	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 hours: Awards Given	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Total Hours	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Average Hours	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Awards Given	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	0.00	0.00	0.00	0.00	0.00

Cash Awards	Total (Number)	Reportable Disability (Percentage)	Without Reportable Disability (Percentage)	Targeted Disability (Percentage)	Without Targeted Disability (Percentage)
Cash Awards \$500 and Under: Awards Given	0.00	0.00	0.00	0.00	0.00
Cash Awards \$500 and Under: Total Amount	0.00	0.00	0.00	0.00	0.00
Cash Awards \$500 and Under: Average Amount	0.00	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Awards Given	0.00	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Total Amount	0.00	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Average Amount	0.00	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Awards Given	0.00	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Total Amount	0.00	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Average Amount	0.00	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Awards Given	0.00	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Total Amount	0.00	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Average Amount	0.00	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Awards Given	0.00	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Total Amount	0.00	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Average Amount	0.00	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Awards Given	0.00	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Total Amount	0.00	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Average Amount	0.00	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Awards Given	0.00	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Total Amount	0.00	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Average Amount	0.00	0.00	0.00	0.00	0.00

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTB for quality step increases or performance-based pay increases? If "yes", describe the trigger(s) below.

- a. Awards, Bonuses, & Incentives (PWTB) Answer: No
- b. Pay Increases (PWTB) Answer: No

N/A – the agency does not currently track this data.

Other Awards	Total (Number)	Reportable Disability (Percentage)	Without Reportable Disability (Percentage)	Targeted Disability (Percentage)	Without Targeted Disability (Percentage)
Total Performance Based Pay Increases Awarded	0.00	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

N/A – the agency does not currently track this data.

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 (PWTD) Answer: N/A
 - ii. Internal Selections (PWTD) Answer: N/A
- b. Grade GS-15
 - i. Qualified Internal Applicants (PWTD) Answer: N/A
 - ii. Internal Selections (PWTD) Answer: N/A
- c. Grade GS-14
 - i. Qualified Internal Applicants (PWTD) Answer: N/A
 - ii. Internal Selections (PWTD) Answer: N/A
- d. Grade GS-13
 - i. Qualified Internal Applicants (PWTD) Answer: N/A
 - ii. Internal Selections (PWTD) Answer: N/A

N/A – the agency did not promote any employees in FY 25.

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: N/A
 - ii. Internal Selections (PWTD) Answer: N/A
- b. Grade GS-15

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

- c. Grade GS-14
 - i. Qualified Internal Applicants (PWTD) Answer: N/A
 - ii. Internal Selections (PWTD) Answer: N/A

- d. Grade GS-13
 - i. Qualified Internal Applicants (PWTD) Answer: N/A
 - ii. Internal Selections (PWTD) Answer: N/A

N/A – the agency did not promote any employees in FY 25.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

N/A – the agency did not hire any employees in FY 25.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires to SES (PWTD) Answer: N/A
- b. New Hires to GS-15 (PWTD) Answer: N/A
- c. New Hires to GS-14 (PWTD) Answer: N/A
- d. New Hires to GS-13 (PWTD) Answer: N/A

N/A – the agency did not hire any employees in FY 25.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

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

b. Managers

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

c. Supervisors

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

N/A – the agency did not promote any employees in FY 25.

6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

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

b. Managers

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

c. Supervisors

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

N/A – the agency did not promote any employees in FY 25.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

N/A – the agency did not hire any employees in FY 25.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

N/A – the agency did not hire any employees in FY 25.

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

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

Answer: N/A

N/A – the agency did not have any Schedule A employees in FY 25.

- 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 – the agency does not currently track this data.

Separations	Total (Number)	Reportable Disabilities (Percentage)	Without Reportable Disabilities (Percentage)
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	0	0.00	0.00
Permanent Workforce: Resignation	0	0.00	0.00
Permanent Workforce: Retirement	0	0.00	0.00
Permanent Workforce: Other Separations	0	0.00	0.00
Permanent Workforce: Total Separations	0	0.00	0.00

- 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(s) in the text box.

a. Voluntary Separations (PWTD)

Answer: No

b. Involuntary Separations (PWTD)

Answer: No

N/A – the agency does not currently track this data.

Separations	Total (Number)	Targeted Disabilities (Percentage)	Without Targeted Disabilities (Percentage)
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	0	0.00	0.00
Permanent Workforce: Resignation	0	0.00	0.00
Permanent Workforce: Retirement	0	0.00	0.00
Permanent Workforce: Other Separations	0	0.00	0.00
Permanent Workforce: Total Separations	0	0.00	0.00

- 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 – the agency does not currently track this data.

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://udall.gov/AboutUs/DigitalAccessibilityStatement.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://udall.gov/AboutUs/EEO.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.

The agency has an Interagency Agreement with Federal Occupational Health for employee accessibility requests, such as ergonomic furniture and technology equipment. Additionally, the agency is currently redesigning its large conference room to improve acoustics and accessibility.

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.)

The agency responds within 10 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 processes requests in a timely manner and has provided approved accommodations to employees in multiple program areas. The agency also provides interim accommodations when appropriate and necessary for accommodation requests that require an extended interactive process before a final accommodation determination can be made. The agency provides EEO and/or reasonable accommodation training to all employees and supervisors annually.

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.

1. 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.

There have been no requests for PAS. Should there be a request, the agency would respond according to its existing policy which is a component of the reasonable accommodation policy.

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: N/A

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Answer: N/A

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

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: N/A

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: N/A

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.

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: N/A

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

4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities. Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.

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