

Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities¹

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 |

PCLOB does not fall under the GS schedule, as all staff are Administratively Determined (AD). PCLOB did not have any permanent staff whose salaries were equivalent to that of a GS-1 to GS-10 in FY2024. PCLOB had 28 permanent staff whose salaries were equivalent to that of a GS-11 to SES in FY2024. Seven of them (25%) self-identified as persons with disabilities (PWD), which falls above the 12% benchmark.

*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 |

PCLOB does not fall under the GS schedule, as all staff are Administratively Determined (AD). PCLOB did not have any permanent staff whose salaries were equivalent to that of a GS-1 to GS-10 in FY2024. PCLOB had 28 permanent staff whose salaries were equivalent to that of a GS-11 to SES in FY2024. None of them (0%) self-identified as persons with targeted disabilities (PWTD). This falls below the 2% benchmark and could be viewed as a trigger. However, PCLOB does not consider this to represent a trigger due to the exceedingly small cluster population.

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

¹At this time, Board lacks a quorum. The agency is publishing this plan to ensure continued compliance with the Americans with Disabilities Act of 1990, as amended, and applicable EEOC regulations and will reevaluate this plan and relevant agency policies when the Board regains quorum.

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

The EEO Director worked with hiring officials (including interviewers, the Chair, and the Board as a whole) on stated goals throughout FY2024.

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	
Architectural Barriers Act Compliance	0	0	1	Jenny Fitzpatrick (Executive Director, Director@plob.gov)
Special Emphasis Program for PWD and PWTB	0	0	1	Lindsay Kennedy (former Acting EEO Director, Lindsay.Kennedy@plob.gov)
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Traci Fisher (Chief Human Capital Officer, Human Resources, traci.fisher@plob.gov)
Processing reasonable accommodation requests from applicants and employees	0	0	1	Raheel Baig (Deputy Executive Director, Operations, Raheel.Baig@plob.gov)
Processing applications from PWD and PWTB	0	0	1	Traci Fisher (Chief Human Capital Officer, Human Resources, traci.fisher@plob.gov)
Section 508 Compliance	0	0	2	Preston McGill (Chief Information Officer, preston.mcgill@plob.gov) Alan Silverleib (Public Affairs Officer, Alan.Silverleib@plob.gov)

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

Answer Yes

The disability program staff completed training hosted by the Office of Personnel Management and participates in discussions and webinars on the subject sponsored by the Small Agency Council.

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: PCLOB does not currently require rating officials to evaluate the performance of managers and supervisors based on the provision of disability accommodations when such accommodations do not cause an undue hardship. PCLOB is working with IBC to update its performance appraisal system and expects to have EEO support as a distinct element for all supervisors once this update is completed. In the interim period, PCLOB has developed and implemented an employee satisfaction survey to, among other things, gather data on the performance of supervisors.

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.

In FY2024, PCLOB utilized a variety of recruitment strategies designed to increase the number of qualified applicants with disabilities and applicants with targeted disabilities within the major occupations. PCLOB utilized the following resources to identify job applicants with disabilities, including targeted disabilities: OPM’s Shared Register of Candidates with Disabilities (Bender List) and the Workforce Recruitment Program (WRP). The WRP is a recruitment and referral program that connects federal and private sector employers with college students and recent graduates.

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 PCLOB can use Schedule A appointing authority (5 C.F.R. 213.310(2)) and 30% or More Disabled Veteran appointing authority (5 U.S.C. 3112; C.F.R. 316.302, 316.402, and 315.707) to proactively hire PWD expeditiously. PCLOB job announcements contain information explaining how to apply under Schedule A and other excepted service hiring authorities.

- 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.

To determine if an applicant is eligible under Schedule A, the PCLOB's Shared Services Provider, IBC, reviews their application package to determine if they provided the required documentation (as described in the vacancy announcement from OPM's Disability Employment Page). The documentation is reviewed for eligibility under the hiring authority. This is applied when a candidate applies through USAJobs and/or directly to the agency. If the documentation submitted is unclear, we give tentative consideration under this hiring authority. In this case, if the individual is selected, we ask the selectee to furnish the appropriate documentation. When an applicant applies through USAJobs, we review their package for qualifications and eligibility. Those eligible and qualified under non-competitive hiring authorities are placed on a certificate of eligibles that is separate from those competitively eligible. Additionally, the HR POC sends the announcement to the Workforce Recruitment Program office for posting. If qualified candidates are found, the resumes are forwarded to the hiring official via email for consideration.

- 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

Since the PCLOB has the authority to hire directly without competitive requirements, the PCLOB is not limited to specific schedules. While our HR professionals understand specific hiring authorities, managers and supervisors understand that they can hire qualified candidates with disabilities without impediment. As such, no training is required.

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 PCLOB maintains regular contact with coordinators of the Department of Labor's Workforce Recruitment Program.

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 Yes

PCLOB hired 10 permanent employees in FY2024. Three of the new hires (30%) self-identified as a PWD, which falls above the 12% benchmark. None of the new hires (0%) self-identified as a PWTD. This falls below the 2% benchmark and could be viewed as a trigger. However, PCLOB does not consider this to represent a trigger due to the exceedingly small cluster population.

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

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

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	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

The data provided by USASTaffing does not identify which qualified applicants were PCLOB employees in FY2024.

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

- a. Promotions for MCO (PWD) Answer No
- b. Promotions for MCO (PWTD) Answer No

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.

Due to the small size of the agency, formal career ladders do not exist. Additionally, PCLOB has not had an instance where a qualified PWD or PWTD has not had employment opportunity equal to that of any other employee without a disability. If that situation were to arise, PCLOB would attempt reasonable accommodation when needed, appropriate, and where it does not cause an undue hardship to the agency (i.e., through assisted technology, work schedule change, PAS, etc.).

B. CAREER DEVELOPMENT OPPORTUNITES

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

PCLOB offers career development training that requires supervisor approval, but not competition. This includes mentoring, detail opportunities, and training opportunities. These are handled at the supervisor level, with awareness-raising by the CHCO. Additionally, PCLOB employees have discussions with their supervisors at the beginning of the performance period to discuss their development.

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	0	0	0	0	0	0
Fellowship 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
Mentoring Programs	0	0	0	0	0	0
Coaching Programs	0	0	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 N/A
- b. Selections (PWD) Answer N/A

N/A, see above.

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, see above.

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

Time-Off Awards	Total	Reportable Disability	Without Reportable Disability	Targeted Disability	Without Targeted Disability
Time-Off Awards 1 - 10 hours: Awards Given	11.00	27.2727%	72.7273%	0.0000%	100.0000%
Time-Off Awards 1 - 10 Hours: Total Hours	100.00	24.0000%	76.0000%	0.0000%	100.0000%
Time-Off Awards 1 - 10 Hours: Average Hours	9.09	8.0000	9.5000	0.0000	9.0909
Time-Off Awards 11 - 20 hours: Awards Given	9.00	22.2222%	77.7778%	0.0000%	100.0000%
Time-Off Awards 11 - 20 Hours: Total Hours	168.00	33.3333%	66.6667%	0.0000%	100.0000%
Time-Off Awards 11 - 20 Hours: Average Hours	18.67	28.0000	16.0000	0.0000	18.6667
Time-Off Awards 21 - 30 hours: Awards Given	2.00	50.0000%	50.0000%	0.0000%	100.0000%
Time-Off Awards 21 - 30 Hours: Total Hours	64.00	62.5000%	37.5000%	0.0000%	100.0000%
Time-Off Awards 21 - 30 Hours: Average Hours	32.00	40.0000	24.0000	0.0000	32.0000
Time-Off Awards 31 - 40 hours: Awards Given	0.00	0.0000%	0.0000%	0.0000%	0.0000%
Time-Off Awards 31 - 40 Hours: Total Hours	0.00	0.0000%	0.0000%	0.0000%	0.0000%
Time-Off Awards 31 - 40 Hours: Average Hours	0.00	0.0000	0.0000	0.0000	0.0000
Time-Off Awards 41 or more Hours: Awards Given	0.00	0.0000%	0.0000%	0.0000%	0.0000%
Time-Off Awards 41 or more Hours: Total Hours	0.00	0.0000%	0.0000%	0.0000%	0.0000%
Time-Off Awards 41 or more Hours: Average Hours	0.00	0.0000	0.0000	0.0000	0.0000

Cash Awards	Total	Reportable Disability	Without Reportable Disability	Targeted Disability	Without Targeted Disability
Cash Awards \$500 and Under: Awards Given	0.00	0.0000%	0.0000%	0.0000%	0.0000%
Cash Awards \$500 and Under: Total Amount	0.00	0.0000%	0.0000%	0.0000%	0.0000%
Cash Awards \$500 and Under: Average Amount	0.00	0.0000	0.0000	0.0000	0.0000
Cash Awards: \$501 - \$999: Awards Given	0.00	0.0000%	0.0000%	0.0000%	0.0000%
Cash Awards: \$501 - \$999: Total Amount	0.00	0.0000%	0.0000%	0.0000%	0.0000%
Cash Awards: \$501 - \$999: Average Amount	0.00	0.0000	0.0000	0.0000	0.0000
Cash Awards: \$1000 - \$1999: Awards Given	1.00	100.0000%	0.0000%	0.0000%	100.0000%
Cash Awards: \$1000 - \$1999: Total Amount	4500.00	100.0000%	0.0000%	0.0000%	100.0000%
Cash Awards: \$1000 - \$1999: Average Amount	4500.00	4500.0000	0.0000	0.0000	4500.0000
Cash Awards: \$2000 - \$2999: Awards Given	19.00	31.5789%	68.4211%	0.0000%	100.0000%
Cash Awards: \$2000 - \$2999: Total Amount	97100.00	36.8177%	63.1823%	0.0000%	100.0000%

Cash Awards	Total	Reportable Disability	Without Reportable Disability	Targeted Disability	Without Targeted Disability
Cash Awards: \$2000 - \$2999: Average Amount	5110.53	5958.3333	4719.2308	0.0000	5110.5263
Cash Awards: \$3000 - \$3999: Awards Given	7.00	0.0000%	100.0000%	0.0000%	100.0000%
Cash Awards: \$3000 - \$3999: Total Amount	45000.00	0.0000%	100.0000%	0.0000%	100.0000%
Cash Awards: \$3000 - \$3999: Average Amount	6428.57	0.0000	6428.5714	0.0000	6428.5714
Cash Awards: \$4000 - \$4999: Awards Given	8.00	25.0000%	75.0000%	0.0000%	100.0000%
Cash Awards: \$4000 - \$4999: Total Amount	55550.00	23.8524%	76.1476%	0.0000%	100.0000%
Cash Awards: \$4000 - \$4999: Average Amount	6943.75	6625.0000	7050.0000	0.0000	6943.7500
Cash Awards: \$5000 or more: Awards Given	0.00	0.0000%	0.0000%	0.0000%	0.0000%
Cash Awards: \$5000 or more: Total Amount	0.00	0.0000%	0.0000%	0.0000%	0.0000%
Cash Awards: \$5000 or more: Average Amount	0.00	0.0000%	0.0000%	0.0000%	0.0000%

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

As PCLOB does not use the general schedule scale, there are no actual QSIs.

Other Awards	Total	Reportable Disability	Without Reportable Disability	Targeted Disability	Without Targeted Disability
Total Performance Based Pay Increases Awarded	17.00	17.6471%	82.3529%	0.0000%	100.0000%

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

D. PROMOTIONS

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

- a. SES
 - i. Qualified Internal Applicants (PWD) Answer N/A

ii. Internal Selections (PWD)	Answer	N/A
b. Grade GS-15		
i. Qualified Internal Applicants (PWD)	Answer	No
ii. Internal Selections (PWD)	Answer	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

PCLOB does not have SES equivalent personnel. No triggers were identified.

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	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

PCLOB has no PWTD personnel. No triggers were identified.

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

PCLOB does not have SES equivalent personnel. PCLOB currently does not have access to applicant pool data.

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

PCLOB does not have SES equivalent personnel or PWTD personnel.

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

PCLOB does not have PWTD personnel.

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 PWTD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- a. New Hires for Executives (PWTD) Answer No
 - b. New Hires for Managers (PWTD) Answer No
 - c. New Hires for Supervisors (PWTD) Answer No

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 N/A

In FY2024, the PCLOB did not have any eligible Schedule A employees to convert into 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 Yes

b. Involuntary Separations (PWD) Answer No

There was one PWD separation among PCLOB's permanent staff in FY2024 compared to zero separations of persons without disabilities. However, PCLOB does not consider this to represent a trigger due to the exceedingly small cluster population.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
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	1	100.00	0.00
Permanent Workforce: Total Separations	1	100.00	0.00

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

There were no PWTD separations in the reporting period.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
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	1	0.00	0.00
Permanent Workforce: Total Separations	1	0.00	0.00

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. No such trigger has been identified.

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.pclob.gov/Legal/Eeo> (under "Accessibility Policy")

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.pclob.gov/Legal/Eeo> (under "Accessibility Policy")

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 PCLOB leases office space in a mixed public and government-tenant building which complies with the accessibility requirements. The PCLOB does not have any specific plans to adjust facilities or technology currently, but the PCLOB regularly assesses whether accessibility improvements to facilities need to be made. PCLOB ensures all postings are 508 compliant.

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 average processing time was 9 business 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.

PCLOB completed its RA policy, and has begun a training program for managers and employees. PCLOB occupies a floor in a privately owned and managed building. The building management company is responsible for facilities accessibility matters.

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 PCLOB did not receive a request for personal assistance services (PAS) during the reporting period.

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.

PCLOB had no complaints involving harassment during the reporting period.

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.

PCLOB had no complaints involving reasonable accommodation during the reporting period.

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.

The agency had not identified any barriers.

- 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