715 - Part J
Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture Agency's affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), Equal Employment Opportunity Commission (EEOC) regulations (29 C.F.R. § 1614.203(e)) and Management Directive (MD) 715 require agencies to describe how their plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD 715 report.

Section I: Efforts to Reach Regulatory Goals

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

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving <u>PWD</u> 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)	Yes		No	x
b. Cluster GS-11 to SES (PWD)	Yes		No	x
For FY20, TRADOC exceeded the PWD 12% goal for permanent GS-10 equivalent and below and permanent GS-11 equivalent to SES, with 21.32% and 21.16%, respectively.				

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving <u>PWTD</u> 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)	Yes		No	x
b. Cluster GS-11 to SES (PWD)	Yes		No	x
For FY21, TRADOC exceeded the PWTD 2% goal for permanent GS-10 equivalent and below and permanent GS-11 equivalent to SES, with 9.69% and 5.75%, respectively.				

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

We communicated our hiring goals to our subordinate organizations' disability representatives via VTC in 2019, and in 2020 and 2021 we provided a copy of our MD 715 report to subordinate commands which discusses our personnel disability posture. Our current goal is that 2% of new hires be people with targeted disabilities. TRADOC does not have recruiters assigned to recruit civilians. Overall, TRADOC exceeds the EEOC's and Army goals for People with Disabilities

including People with Targeted Disabilities.

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 and 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.

	Yes	x	No	

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 PWTD	1			Mr. N. Jerome Willingham, Disability Program Manager, Command Diversity Office, nathaniel.j.willingham.civ@army.mil
Answering questions from the public about hiring authorities that take disability into account	1			Mr. N. Jerome Willingham, nathaniel.j.willingham.civ@army.mil

Processing reasonable accommodation requests from applicants and employees	1	1		Mr. N. Jerome Willingham, nathaniel.j.willingham.civ@army.mil
Section 508 Compliance		1		Mr. Robert Halpin, Webmaster, TRADOC G6, robert.b.halpin.civ@mail.mil
Architectural Barriers Act (ABA) Compliance		1		Mr. Jimmie Williams, Architect, TRADOC Engineers, G 1/4, jimmie.l.williams20.civ@mail.mil
Special Emphasis Program for PWD and PWTD	1			Mr. N. Jerome Willingham, nathaniel.j.willingham.civ@army.mil

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.

	Yes	x	No	
The DPM completed the DPM, EEO Officer, SEPM, Mediator and EEO Specialist courses conducted at DEOMI				

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*.

	Yes	x	No	

Section III: Plan to Recruit and Hire Individuals with Disabilities

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

A. Plan to Identify Job Applicants with Disabilities.

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

TRADOC uses a number of programs and resources to identify job applicants with disabilities and targeted disabilities, including the Workforce Recruitment Program for College Students and Recent Graduates, the Veteran's Affairs Non-Paid Work Experience Program, Office of Personnel Management's Bender List, The Army's People with Disabilities List, Wounded Warriors, local Rehab offices, and job announcements which include information on Schedule A.

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.

TRADOC makes use of Schedule A hiring authority to hire qualified individuals with disabilities and targeted disabilities. TRADOC used Schedule A authorities to hire nine civilians in FY 21. The majority of employees that are Schedule A eligible are given an excepted appointment and later converted to career conditional status after two years of satisfactory service.

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.

1. The DPM/Selective Placement Coordinator, reviews the resume and other documents against the job announcement and PD to see if the individual meets the basic requirements for the position. The DPM then coordinates with the servicing Civilian Personnel Advisory Center to verify that the individual is qualified for the position.

2. The DPM/Selective Placement Coordinator contacts the hiring official and informs him/her of the applicant and explains the Schedule A process to include types of appointment. The resume is then forwarded to the hiring official for his/her consideration. If the hiring official elects to hire the applicant, CPAC is informed. If the individual accepts the position, the DPM/Selective Placement Coordinator contacts the individual to see what, if any accommodations are needed for the person to perform the essential duties of the job. The DPM/Selective Placement Coordinator also keeps a copy of the resume and associated documents in a Resume Bank.

3. If application along with documentation is received directly by the Civilian Personnel Advisory Office (CPAC) from a job applicant, CPAC reviews the information and if the individual meets minimum standards and the Agency wants to hire using Schedule A, the individual's documentation minus the "Schedule A" letter is provided to the hiring official for her/his review and decision.

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.

	Yes	x	No	
Supervisors/hiring officials are trained on hiring authorities that take disability into account during Supervisor Development Training upon becoming a supervisor. Face to face Schedule A training is done on request from a command or activity. TRADOC's DPM has asked the Army to add "Schedule A" and Personal Assistance Services training in its online EEO training for supervisors that is required on an annual basis. TRADOC has provided information to hiring managers on the Schedule A process by way of information to Executive Officers of all TRADOC commands/activities for further dissemination to all supervisors and managers (this includes hiring officials) at least on a biennial basis.				

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.

TRADOC's DPM maintains contacts with the Veterans Affairs and Virginia's local Department of Aging and Rehabilitation offices that can assist with locating and hiring qualified individuals with disabilities including targeted disabilities. We also reach out to Department of Labor, Wounded Warriors, Workforce Recruitment Program (WRP), OPM's Bender List, and Army's People with Disabilities List when seeking qualified applicants with disabilities and targeted disabilities.

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)	Yes		No	x
b. New Hires for Permanent Workforce (PWTD)	Yes		No	x

In FY 21, 16% (219/1367) of external permanent new hires were people with disabilities and 5.6% (76/1367) of external permanent new hires were people with targeted disabilities.

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.

a. New Hires for MCO (PWD)	Yes		No	X
b. New Hires for MCO (PWTD)	Yes		No	X
TRADOC does not have Disability MCO Applicant Pool Data				

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.

a. Qualified Applicants for MCO (PWD)	Yes		No	
b. Qualified Applicants for MCO (PWTD)	Yes		No	
TRADOC does not have Disability MCO Applicant Pool Data				

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.

a. Promotions for MCO (PWD)	Yes		No	
b. Promotions for MCO (PWTD)	Yes		No	
TRADOC does not have Disability MCO Applicant Pool Data				

Section IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities

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

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

TRADOC's plan is to ensure individuals with disabilities, including targeted disabilities, are afforded the opportunity to receive mentoring and are encouraged to participate in training, including senior-leader development programs. TRADOC also publicizes and monitors career development programs of all employees to include those with disabilities.

B. Career Development Opportunities

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

TRADOC provides a number of opportunities for career development to its employees such as self-development and formal education. COVID 19, including funding, slowed participation in TRADOC's career development programs in FY 21 by all employees, including those with disabilities. TRADOC has established a new Enterprise Leader Development Program. The ELDP consolidates the best practices of both programs and extends leader development opportunities to a much broader training audience, including individuals with disabilities. TRADOC also has a Developmental Marketplace to provide opportunities for all its employees, including those with disabilities, to apply for developmental assignments within TRADOC. Due to impact of COVID-19, during this report period our training slowed but is picking up steam this FY.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate. [Collection begins with the FY 2018 MD 715 report, which is due on February 28, 2019.]

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	30	30	100.0%	100.0%	100.0%	100.0%
Fellowship Programs	NA	NA	NA	NA	NA	NA
Mentoring Programs	NA	NA	NA	NA	NA	NA
Coaching Programs	NA	NA	NA	NA	NA	NA
Training Programs	661	653	28.4%	28.1%	5.3%	5.2%
Detail Programs	NA	NA	NA	NA	NA	NA
Other Career Development Programs	NA	NA	NA	NA	NA	NA

* NA indicates TRADOC does not have a formal mentoring or coaching program, and that detail programs have not been tracked at this level of command. Personnel within this command usually makes use of mentoring and coaching programs at Department of the Army level.

3. Do triggers exist for <u>PWD</u> 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.

a. Applicants (PWD)	Yes		No	x
b. Selections (PWD)	Yes		No	x
During FY20, COVID-19 impacted our ability to deliver developmental training programs. We will watch the numbers in 2021 as the new programs begin to see if a trigger exists.				

4. Do triggers exist for <u>PWTD</u> among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

a. Applicants (PWTD)	Yes		No	x
b. Selections (PWTD)	Yes		No	x
During FY20, COVID-19 impacted our ability to deliver developmental training programs. We will watch the numbers in 2021 as the new programs begin to see if a trigger exists.				

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, and Incentives (PWD)	Yes		No	x
b. Awards, Bonuses, and Incentives (PWTD	Yes		No	x
No trigger was identified involving PWD or PWTD in the permanent workforce who received time-off awards. (The inclusion rate for PwTD is 40.9 percent, compared to the inclusion rate for PwD which is 41.7 percent, and the inclusion rate for people without disabilities is 37.5 percent.				

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)	Yes		No	x
b. Pay Increases (PWTD)	Yes	x	No	
A trigger was identified involving the percentage of PWTD who received a quality step increase. (In the permanent workforce, the inclusion rate for PwTD is 4.9 percent, compared to the inclusion rate for PwD which is 6.6 percent, and the inclusion rate for people without disabilities is 5.6 percent.				

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)	Yes		No	
b. Other Types of Recognition (PWTD)	Yes		No	
Not applicable. The command does not monitor lesser type awards at subordinate commands and activities.				

D. Promotions

1. Does your agency have a trigger involving <u>PWD</u> 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.

a. SES	i. Qualified Internal Applicants (PWD)	Yes		No	
	ii. Internal Selections (PWD)	Yes		No	
b. Grade GS-15	i. Qualified Internal Applicants (PWD)	Yes		No	
	ii. Internal Selections (PWD)	Yes		No	
c. Grade GS-14	i. Qualified Internal Applicants (PWD)	Yes		No	
	ii. Internal Selections (PWD)	Yes		No	
d. Grade GS-13	i. Qualified Internal Applicants (PWD)	Yes		No	
	ii. Internal Selections (PWD)	Yes		No	
Cannot confirm a trigger as TRADOC does not have access to disability applicant flow data.					

2. Does your agency have a trigger involving <u>PWTD</u> 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.

a. SES	i. Qualified Internal Applicants (PWTD)	Yes		No	
	ii. Internal Selections (PWTD)	Yes		No	
b. Grade GS-15	i. Qualified Internal Applicants (PWTD)	Yes		No	
	ii. Internal Selections (PWTD)	Yes		No	
c. Grade GS-14	i. Qualified Internal Applicants (PWTD)	Yes		No	
	ii. Internal Selections (PWTD)	Yes		No	
d. Grade GS-13	i. Qualified Internal Applicants (PWTD)	Yes		No	
	ii. Internal Selections (PWTD)	Yes		No	
Cannot confirm a trigger as TRADOC does not have access to disability applicant flow data.					

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWD</u> 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.

a. New Hires to SES (PWD)	Yes		No	
b. New Hires to GS-15 (PWD)	Yes		No	
c. New Hires to GS-14 (PWD)	Yes		No	
d. New Hires to GS-13 (PWD)	Yes		No	
Cannot confirm a trigger as TRADOC does not have access to disability applicant flow data.				

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWTD</u> 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.

a. New Hires to SES (PWTD)	Yes		No	
b. New Hires to GS-15 (PWTD)	Yes		No	
c. New Hires to GS-14 (PWTD)	Yes		No	
d. New Hires to GS-13 (PWTD)	Yes		No	
Cannot confirm a trigger as TRADOC does not have access to disability applicant flow data.				

5. Does your agency have a trigger involving <u>PWD</u> 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.

a. Executives	i. Qualified Internal Applicants (PWD)	Yes		No	
	ii. Internal Selections (PWD)	Yes		No	
b. Managers	i. Qualified Internal Applicants (PWD)	Yes		No	
	ii. Internal Selections (PWD)	Yes		No	
c. Supervisors	i. Qualified Internal Applicants (PWD)	Yes		No	
	ii. Internal Selections (PWD)	Yes		No	
Cannot confirm a trigger as TRADOC does not have access to disability applicant flow data.					

6. Does your agency have a trigger involving <u>PWTD</u> 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.

a. Executives	i. Qualified Internal Applicants (PWTD)	Yes		No	
	ii. Internal Selections (PWTD)	Yes		No	
b. Managers	i. Qualified Internal Applicants (PWTD)	Yes		No	
	ii. Internal Selections (PWTD)	Yes		No	
c. Supervisors	i. Qualified Internal Applicants (PWTD)	Yes		No	
	ii. Internal Selections (PWTD)	Yes		No	
Cannot confirm a trigger as TRADOC does not have access to disability applicant flow data.					

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.

a. New Hires for Executives (PWD)	Yes		No	
b. New Hires for Managers (PWD)	Yes		No	
c. New Hires for Supervisors (PWD)	Yes		No	
Cannot confirm a trigger as TRADOC does not have access to disability applicant flow data.				

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.

a. New Hires for Executives (PWTD)	Yes		No	
b. New Hires for Managers (PWTD)	Yes		No	
c. New Hires for Supervisors (PWTD)	Yes		No	
Cannot confirm a trigger as TRADOC does not have access to disability applicant flow data.				

Section V: Plan to Improve Retention of Persons with Disabilities

To be a 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 personal 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.

	Yes	x	No	
Of twelve employees eligible after two years of satisfactory service, ten were converted to competitive service and two found employment with other Federal agencies prior to completing two years of satisfactory service with TRADOC.				

2. Using the inclusion rate as the benchmark, did the percentage of <u>PWD</u> among voluntary and involuntary separations exceed that of persons without disabilities? If "yes", describe the trigger below.

a. Voluntary Separations (PWD	Yes	x	No	
b. Involuntary Separations (PWD)	Yes		No	x
Using the inclusion rate, PWD who voluntarily separated from TRADOC was 8.7% compared to 8.2% for those without disabilities. PWD who involuntarily separated from TRADOC was 1.2% compared to 1.3% for those without disabilities.				

3. Using the inclusion rate as the benchmark, did the percentage of <u>PWTD</u> among voluntary and involuntary separations exceed that of persons without disabilities? If "yes", describe the trigger below.

a. Voluntary Separations (PWTD	Yes		No	x
b. Involuntary Separations (PWTD)	Yes	x	No	
Using the inclusion rate, PWTD who voluntarily separated from TRADOC was 8.2% compared to 8.2% for those without disabilities. PWTD who involuntarily separated from TRADOC was 1.7% compared to 1.3% for those without disabilities.				

4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

Reasons were similar to individuals without disabilities such as voluntary retirement, death, VSIP, term expiration, removal, and resignation to accept another job. In 2021, we expect to have more comprehensive data as we implement a centralized exit survey vice decentralized exit interviews.

B. Accessibility of Technology and Facilities

Pursuant to 29 C.F.R. § 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.

The public website is http://www.tradoc.army.mil/index.asp. This website will refer the user to the DoD website.

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.

The public website is http://www.tradoc.army.mil/index.asp. This website will refer the user to the DoD website.

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.

TRADOC uses Unified Facility Criteria (UFC) 1-200-01 that provides applicability of model building codes and government unique criteria for typical design disciplines and building systems, as well as for accessibility, antiterrorism, security, high performance and sustainability requirements, and safety. This is standard application for new construction and renovations across the Army and not unique to TRADOC. In reference to technology, no programs have been implemented or planned as of 2020. TRADOC follows the Army/DoD/OMB guidance concerning 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.)

Reasonable accommodation requests at TRADOC HQ were processed within 30 business days, which includes the activity providing interim accommodations (100% within the 30 business day requirement with an average of 14 days). Enforcement of reporting is the most difficult aspect of determining compliance in this area.

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 effectiveness of our policies and procedures is good, especially at the headquarters. Our policy and procedures track with the U.S. Army's and EEOC policy. We make use of online training for reasonable accommodations as well as the traditional method of training when requested. Once the Army's automated tracking system becomes fully operational, i.e., hierarchy established, and enforced, our ability to track and monitor processing throughout TRADOC will further improve.

D. Personal Assistance Services Allowing Employees to Participate in the Workplace
Pursuant to 29 C.F.R. § 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.

As of this report, the DPM has not been informed of any employee with a targeted disability requesting the need for PAS.

Section VI: EEO Complaint and Findings Data

A. EEO Complaint data involving Harassment

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

	Yes		No	x

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?

	Yes		No	x

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.

No finding of discrimination.

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?

	Yes		No	x

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?

	Yes		No	X

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.

No findings of discrimination but one settlement.

Section VII: Identification and Removal of Barriers

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

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

	Yes		No	x

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

	Yes		No	x

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.

Trigger 1	Higher voluntary separation rate for PWD and involuntary separation rates for PWTD
Barrier(s)	Unknown
Objective(s)	Decrease the gap between PWD/PWTD voluntary separations and the rest of the workforce

Responsible Official(s)	**Performance Standards Address the Plan?**
Nathaniel J. Willingham	No

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/21	Conduct analysis to determine if trigger indicates a barrier to retention	Yes		
Fiscal Year	**Accomplishments**			
20	NSTR			

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

Unplanned EEO Complaint Manager retirement led to the TRADOC EEO team being short-staffed for the majority of the FY.

5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

Re-surveying the workforce helped to achieve more accurate data to gauge TRADOC's progress in meeting the federal goals.

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.

NA

Definitions

The following definitions apply to Management Directive 715: