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

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

## Section I: Efforts to Reach Regulatory Goals

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

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

       a. Cluster GS-1 to GS-10 (PWD)          Answer    No

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

> The 12% target was met for the lower grades but not higher grades cluster. Among BPA permanent employees on board at the end of FY22: PWD were more highly represented in the lower grades cluster (21.26%) and less represented in the GS11-SES cluster (10.55%)

\*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    No

> The 2% target is met for both grade clusters. Among BPA permanent employees on board at the end of FY23: PWTD were more highly represented in the lower grades cluster (4.32%) and less represented in the GS11-SES cluster (2.65%).

| Grade Level Cluster(GS or Alternate Pay Planb) | Total | Reportable Disability | | Targeted Disability | |
|---|---|---|---|---|---|
| | # | # | % | # | % |
| Numarical Goal | -- | 12% | | 2% | |
| Grades GS-11 to SES | 2926 | 307 | 10.49 | 74 | 2.53 |
| Grades GS-1 to GS-10 | 179 | 28 | 15.64 | 7 | 3.91 |

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

> Human Resources (HR) input: The HR office consults with hiring managers to advise them on the different hiring initiatives and non-competitive hiring eligibilities when they have a new vacancy to fill. We stress the ease in hiring SchA, 30% and VRA because it saves time in advertising the position if they select from the non-competitive database. Staffing doesn't report numerical goals to hiring managers. Civil Rights and Equal Employment Opportunity office: The CREEO office educates managers on the MD-715 report data/information and barrier analysis process to reinforce parity goals for women, minorities, persons with disabilities and

veterans. In FY23, on August 29, 2023, the new Equal Employment Specialist presented FY22 MD-715 information/data/report to MD-715 stakeholders during our annual MD-715 review. The recruiter, DEIA Outreach Specialist, and Disability Special Emphasis Program Manager SEPM were in attendance and provided a copy of the MD-715 report which communicated numerical goals to support recruitment, retention, and DEIA efforts. Culture Office: The Culture office has assembled a Culture Dashboard which highlights disability goals for hiring, retention and recruiting purposes. This dashboard can be viewed at any time by hiring supervisors, unit managers, and leadership for accountability purposes.

# 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

Disability Program: Four (4) FTEs are in place and one Vacant Postiion: • One (1) FTE EEO specialist/Disability Special Emphasis Program Manager (SEPM) for PWD and PWTD; • One (1) FTE Reasonable Accommodations Program Manager; • One (1) FTE Recruitment and Placement Supervisory Human Resource Specialist; • One (1) FTE Equal Employment Opportunity Specialist (EES)/Section 508 & 501 Program Manager) • One VACANT: Currently recruiting one (1) EES Disability Programs and Architectural Barriers Program (reference below) from a CREEO compliance approach.

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 | |
| Section 508 Compliance | 1 | 0 | 0 | Jeanna Ramos Equal Employment Specialist jaramos@bpa.gov |
| Processing applications from PWD and PWTD | 1 | 0 | 0 | Dayna Romancito Supervisory HR Specialist (Recruitment & Placement), dtromancito@bpa.gov |
| Answering questions from the public about hiring authorities that take disability into account | 1 | 0 | 0 | Richard Howard Human Resources Specialist bmgoldfarb@bpa.gov |
| Architectural Barriers Act Compliance | 0 | 0 | 0 | vacant Equal Employment Specialist |
| Special Emphasis Program for PWD and PWTD | 1 | 0 | 0 | Ernesto Jaquez Equal Employment Specialist ejaquez@bpa.gov |
| Processing reasonable accommodation requests from applicants and employees | 1 | 0 | 0 | Madeleine Goldfarb Reasonable Accommodations Program Manager bmgoldfarb@bpa.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

All disability program staff have attended the EEOC Disability Employment Program Manager (DEPM) course apart from one newly hired Equal Employment Specialist (EES). In FY23, the Civil Rights and Equal Employment Opportunity Office (CREEO) hired a new EES which was assigned to the Section 508 and 501 Disability Program in August 2023. This EES came from another federal agency and needed time to become oriented to the BPA and CREEO practices. She will attend the EEOC's Disability Program Manager training offered by the EEOC in May of 2024.

## 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    No

BPA's CREEO office is currently in the process of hiring two (2) new Equal Employment Specialists (EES). One EES position will focus on the Disability program to fill the Architectural Barriers Act Compliance program. CREEO is funded appropriately; however, due to the federal mandate of working in the office three days a week, finding staff willing to do so is challenging and poses a barrier in staffing positions within the BPA. This is a current challenge for most federal agencies and not unique to the BPA.

# 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.

Targeted Recruitment – We have designed a process to identify/track candidates from a variety of events and map the outreach efforts to actual hires at BPA to determine our success rate (or lack thereof). This process is underway in our Recruitment & Placement workgroup within Human Capital Management. Currently, we have met the CLF in both PWD and PWTD; therefore, the BPA's plan has been fully successful and will continue.

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 Culture Office's new DEIA Program Strategy will have a specific focus on outreach and inclusion efforts targeting the PWD and PWTD community (informed by data received from the disability community at BPA in the Culture Assessment and FEVS results) in collaboration with partner offices/orgs including: CREEO, Disability SEPM, Disability Awareness Employee Resource Group, HR/Recruiting, Reasonable Accommodations Manager, and others. The completion/target date of the new DEIA strategy is ongoing and specific target dates will be identified in strategy prior to roll-out. Culture and DEIA outreach specialist (position moved to DEIA Program within Culture Office in Q1 FY24) to prioritize work with partner offices/orgs and other internal stakeholders (including CREEO, Disability SEPM, Disability Awareness Employee Resource Group, HR/Recruiting, Reasonable

Accommodations Manager, and others) to identify local and national disability focused/serving organization(s) (including the Oregon State Department of Rehabilitation, Workforce Oregon, and the Incight organization) to establish, maintain contact with, partner, and build relationships with. Completion/target date is FY24. Culture and DEIA outreach specialist to prioritize work with partner offices/orgs and other internal stakeholders (including HR/Recruiting and CREEO) to design and develop a process and metrics for tracking PWD and PWTD candidates from outreach and recruiting events to then map the events to actual hires. Completion/target date is FY24. Information about the Schedule A Hiring Authority is available for managers on BPA's internal Manager's Resource page to support hiring manager's awareness of special hiring authorities. Also, HRSC-HA organization has established group inbox ScheduleA@bpa.gov which questions can be directed towards; plus, has designated HR Specialists accessing this group box to provide timely responses to inquiries and questions. In addition, prospective applicants can inquire about open vacancies, what is needed to apply using a non-competitive hiring authority, or to request to be added to the non-competitive database. HRSC-HA has dedicated HR staffing to check the box and to coordinate with addition of all new disabled candidates. BPA uses Schedule A, 30% Provisional, and VRA to recruit individuals with 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.

Targeted Recruitment – BPA has designed an effective process to identify/track candidates from a variety of events and map actual hires at BPA to determine our success rate (or lack thereof) for those under Schedule A or other hiring authority. This process is underway in our Recruitment & Placement workgroup within Human Resources. Our Recruitment Coordinator will be utilizing a program to monitor this activity in FY23 and FY24. The Recruitment Coordinator will let the hiring officials know about these relevant individuals and refer them to hiring officials with explanation of how and when each individual applicant may be appointed.

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

In FY23, Human Capital Management (HCM) offered training sessions educating managers on the use of hiring authorities and the benefits of hiring Schedule A candidates. One course offered to managers and supervisors is the "Personnel Basics for Federal Managers – Targeted Hiring" This course uses real-life examples to teach the nuts and bolts of federal personnel law and hiring in the federal environment and beneficial tool to support Schedule A hiring within the BPA. Managers also learn the basic structure of federal hiring procedures that will help navigate the process more efficiently.

## 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 BPA Disability Employment Program Manager, Ernesto Jaquez, maintained contact with the Association of State Administrators of Vocational Rehab, INCIGHT Oregon, Portland State University, Oregon State University and University of Oregon and Oregon and Washington Light House for the Blind. The Culture Office's new DEIA Program Strategy will have a specific focus on outreach and inclusion efforts targeting the PWD and PWTD community (informed by data received from the disability community at BPA in the Culture Assessment and FEVS results) in collaboration with partner offices/orgs. (Including CREEO, Disability SEPM, Disability Awareness Employee Resource Group, HR/Recruiting, Reasonable Accommodations Manager, and others), and is scheduled to be published and rolled-out in FY24. Completion/target date of new DEIA strategy is ongoing and specific target dates will be identified in strategy prior to roll-out. Culture and DEIA outreach specialist (position moved to DEIA Program within Culture Office in Q1 FY24) prioritizes work with partner offices/orgs and other internal stakeholders (including CREEO, Disability SEPM, Disability Awareness Employee Resource Group, HR/Recruiting, Reasonable Accommodations Manager, and others) to identify local and national disability focused/serving organization(s) (including the Oregon State Department of Rehabilitation, Workforce Oregon, and the Incight organization) to establish, maintain contact with, partner, and build relationships with. Completion/target date is FY24. Culture and DEIA outreach specialist to prioritize work with

partner offices/orgs and other internal stakeholders (including HR/Recruiting and CREEO) to design and develop a process and metrics for tracking PWD and PWTD candidates from outreach and recruiting events to then map the events to actual hires. Completion/target date is FY24.

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

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

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

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

Among 138 BPA permanent new hires, 9.42% were PWD and 0.0% were PWTD on a general average. Both are below the EEOC goals of 12% for PWD and 2% of PWTD. Individual examination of each series demonstrates: PWD series: 1101 (21.05%, 4) and 2210 (16.67%, 3) meet the EEOC target goal of 12%; whereas series 850 (0.00%, 0), 1130 (9.09%, 3), 2810 (6.67%, 2), and 5407 (6.25%, 1) do not meet the EEOC target goal. PWTD series: In all series 850 (0.00%,0), 1101 (0.00%, 0), 1130 (0.00%, 0), 2210 (0.00%, 0), 2810 (0.00%,0), and 5407 (0.00%,0) do not meet the EEOC target goal of 2%. This is also a trigger that will need to be explored to see if barriers exist within the BPA.

| New Hires | Total | Reportable Disability | | Targeted Disability | |
|---|---|---|---|---|---|
| | | Permanent Workforce | Temporary Workforce | Permanent Workforce | Temporary Workforce |
| | (#) | (%) | (%) | (%) | (%) |
| % of Total Applicants | 2719 | 7.02 | 0.00 | 3.31 | 0.00 |
| % of Qualified Applicants | 1506 | 6.51 | 0.00 | 3.12 | 0.00 |
| % of New Hires | 84 | 5.95 | 0.00 | 1.19 | 0.00 |

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

      a. New Hires for MCO (PWD)      Answer   Yes

      b. New Hires for MCO (PWTD)      Answer   Yes

FY23 Total PWD and PWTD New Hires: 145 Occupations with triggers: PWD (12%): 850 (2.76%, 8), 1101 (10%, 3), 1130 (5.28%, 16), 2210 (7.75%, 42), 2810 (3.95%, 3), 5407 (0.00%, 0) PWTD (2%): 1130 (1.65% 5), 5407 (0.00%, 0) Occupations without triggers: PWTD (2%): 850 (2.07%, 36), 1101 (5.52%, 16), 2210 (3.32%, 18), 2810 (2.63%, 2) According to the FY23 Data Tables, BPA demonstrates triggers in PWD in all mission-critical occupations (850, 1101, 1130, 2210, 2810, and 5407) falling below the EEOC goal of 12%. Recruitment efforts will need to be placed on all mission-critical occupations (850, 1101, 1130, 2210, 2810, and 5407) series. Triggers exist in all PWD MCO occupations. No triggers exist in the PWTD 850 (2.07%, 36), 1101 (5.52%, 16), 2210 (3.32%, 18), 2810 (2.63%, 2) MCO Occupations.

| New Hires to Mission-Critical Occupations | Total | Reportable Disability | Targetable Disability |
|---|---|---|---|
| | | New Hires | New Hires |
| | (#) | (%) | (%) |
| Numerical Goal | -- | 12% | 2% |
| 0850 ELECTRICAL ENGINEERING | 19 | 5.26 | 0.00 |
| 1101 GENERAL BUSINESS AND INDUSTRY | 18 | 0.00 | 0.00 |

| New Hires to Mission-Critical Occupations | Total | Reportable Disability | Targetable Disability |
|---|---|---|---|
| | | New Hires | New Hires |
| | (#) | (%) | (%) |
| Numerical Goal | -- | 12% | 2% |
| 1130 PUBLIC UTILITIES SPECIALIST | 15 | 6.67 | 0.00 |
| 2210 INFORMATION TECHNOLOGY MANAGEMENT | 20 | 10.00 | 5.00 |
| 2810 ELECTRICIAN (HIGH VOLTAGE) | 11 | 9.09 | 0.00 |
| 5407 ELECTRIC POWER CONTROLLING | 1 | 0.00 | 0.00 |

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

        a. Qualified Applicants for MCO (PWD)               Answer   Yes

        b. Qualified Applicants for MCO (PWTD)          Answer   Yes

According to FY23 Data Tables, for Qualified Internal Applicant (QIP) in all MCO categories are as follows: The total internal applicant pool for all MCO: 941 0850 – Total QIP (66) for PWD and PWTD • PWD (5.36%), RAP (8.59%), Result (Trigger) • PWTD (1.92%), RAP (3.54%), Result (Trigger) 1011 – Total QIP (121) for PWD and PWTD • PWD (8.26%), RAP (16.67%), Result (Trigger) • PWTD (5.79%), RAP (5.13%), Result (No Trigger) 1130 – Total QIP (195) for PWD and PWTD • PWD (6.15%), RAP (5.93%), Result (No Trigger) • PWTD (4.10%), RAP (0.73), Result (No Trigger) 2210 - Total QIP (143) for PWD and PWTD: • PWD (16.08%), RAP (13.51%), Result (No Trigger) • PWTD (11.89%), RAP (3.38%), Result (No Trigger) 2810 - Total QIP (155) for PWD and PWTD: • PWD (1.29%), RAP (9.96%), Result (Trigger) • PWTD (0.65%), RAP (1.66%), Result (Trigger) 5407 - Total QIP (66) for PWD and PWTD: • PWD (0.0%), RAP (8.03%), Result (Trigger) • PWTD (0.0%), RAP (1.46%), Result (Trigger) * Relevant Applicant Pool (RAP) (GS-13 used level used for this analysis)

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

According to FY23 Data Tables, for Qualified Internal Applicant (QIP) in all MCO categories are as follows: The total internal applicant pool for all MCO: 941 0850 – Total QIP (66) for PW, PWTD, and No Disability • No Dis (32.18%) and Promoted (7.14%) • PWD (5.36%), Promoted (8.59%), Result (Trigger) • PWTD (1.92%), Promoted (3.54%), Result (No Trigger) 1011 – Total QIP (121) for PWD, PWTD, and No Disability • No Dis (21.49%) and Promoted (27%) • PWD (8.26%), Promoted (0.1%), Result (Trigger) • PWTD (5.79%), Promoted (0.0%), Result (Trigger) 1130 – Total QIP (195) for PWD, PWTD, and No Disability • No Dis (20%) and Promoted (30.8%) • PWD (6.15%), Promoted 2810 - Total QIP (155) for PWD, PWTD, and No Disability • No Dis (52.46%) and Promoted (12.73%) • PWD (1.29%), Promoted (0%), Result (Trigger) • PWTD (0.65%), Promoted (0%), Result (Trigger) 5407 - Total QIP (66) for PWD, PWTD, and No Disability • No Dis (43.94%) and Promoted (20.76%) • PWD (3.03%%), Promoted (50%), Result (No Trigger) • PWTD (0%), Promoted (0%), Result (Trigger) * Relevant Applicant Pool (RAP) (GS-13 used level used for this analysis)

# 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.

Career Development opportunities are available to all BPA employees and reasonable accommodations are available for any employee who may have special needs; therefore, equity exists for advancement opportunities for all BPA employees. Data is not gathered on this topic.

## B. CAREER DEVELOPMENT OPPORTUNITES

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

1. Aspiring Manager Program The Aspiring Manager Program at BPA launched with a Pilot Cohort in January 2022. Aspiring Manager is a year-long cohort program consisting of six virtual instructor-led workshops and supplemental work to help participants understand the role of a manager at BPA and in the federal government. The program helps participants make an informed decision about whether to pursue a management career at BPA. 2. Aspiring Manager Workshops § Introduction to a Management Role at BPA § Leadership Behaviors § Powering Your Professional Growth for Aspiring Managers § Emotional Intelligence Foundations § Inclusive Leadership § Preparing for a Management Role 3. New Manager Leadership Journey The New Manager Leadership Journey program (NMLJ) prepares new managers and supervisors for the technical, interpersonal, and leadership skills they'll need to be successful managers at BPA. The Learning & Workforce Development team continues to offer curriculum for virtual delivery and added the following program elements: § Added more just-in-time learning and a la carte training offerings via WebEx § Utilized Percipio/Learning Nucleus platform for eLearning § Provided a tracking system for managers to track training requirements and progress § Promoted and supported the DOE Let's Lead curriculum § Provided a way for managers to apply for manager training credit toward other offerings Workshops The NMLJ curriculum includes two categories of training—required manager training and elective manager training. The required and elective curriculum blends vendor-provided courses, internally developed classes, and eLearning. DOE O 360.1C, 4k required new managers to take forty (40) hours of training within their first year and eighty (80) hours within their first two years. Due to the new DOE Training Order 360.1d, this hourly requirement is no longer in effect beginning in FY24. However, the outlined required courses below will continue to be a requirement. o Charting Your Course: A New Manager Overview: Charting Your Course is an orientation to the training plan for the first two years of a supervisory/manager appointment and outlines the requirements and electives of the program. Each new manager receives a customized 90-day training plan (see Appendix A – New Manager Training Plan). The course provides an overview of resources and support for first-time managers. It introduces them to the Pathfinder, one of many points of contact in the Human Resources Service Center. o Results-Focused Performance Management: A comprehensive overview of the performance management cycle, this course focuses on setting expectations, monitoring performance, providing effective performance feedback, and techniques to increase employee motivation. New managers develop the skills needed to create a strong performance plan, maintain high-performing teams, and understand the critical role of accountability. o Inclusive Leadership: Supporting BPA's initiative to encourage a diverse and inclusive workforce, this workshop focuses on recognizing the value and importance of inclusive leadership and the impact of psychological safety in inclusive environments. New managers identify three keys to building an inclusive culture and learn the five disciplines of inclusive leaders and the traits needed to create inclusive teams and work environments. o eLearning Classes: § Federal Merit System Overview § Utilizing and Managing Supplemental Labor § A Roadmap to Success: Hiring, Retaining and Including People with Disabilities § Supvy Whistleblower/PPP Brief *(earns 1.0 EEO credit hours) § Uniformed Services Employment and Reemployment Rights Act (USERRA) § Veterans Employment Training § Introduction to Performance Management § Elective Courses include courses designated with manager training credits, contributing to the 80-hour requirement. These courses typically have an all-manager audience and are focused on providing skills and tools for leading teams. All courses map to BPA's Leadership Behaviors. Elective courses are sponsored by the Learning & Workforce Development team or offered in collaboration with other BPA groups, such as Diversity and Inclusion, the Equal Employment Opportunity Office, and Safety. Apart from vendor-provided courses, Inclusive Leadership and Charting Your Course: A New Manager Overview, recordings are being made of all required courses, and many elective courses will convert to eLearning formats for 'just-in-time' training. These recordings allow managers to refresh their knowledge on topics or explore areas further. New Manager Peer Learning Groups In an all-virtual environment, capturing the camaraderie developed between participants in in-person training is difficult. New Manager Peer Learning Groups were created to bridge this gap, allowing managers a place to network and build peer relationships. The New Manager Peer Learning Groups are conducted virtually every quarter. They include presentations and discussion of leadership models, presentations from senior leaders on their leadership journey, resource sharing, and two twenty-minute discussion breakout sessions. New Manager Leadership Journey non-training resources Recognizing that development happens largely outside of the classroom, Learning & Workforce Development team created a suite of New Manager Resources to support extra-curricular growth. Current offerings include: § New Manager Onboarding Checklist § New Manager Training Audit and Tracker § A Pathfinder – Leadership & Workforce Development team member works with the new manager to

develop a customized New Manager Training Plan. § Discussion Guides for essential first 90-day meetings § Team Acceleration session resources. This program was redesigned and relaunched to a wider audience this year and includes a facilitated session setting the groundwork for successful new manager and team interactions. § Coaching Resources: promoting the OPM and BPA Culture Office's coaching programs

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 (%) |
| Mentoring Programs | | | | | | |
| Fellowship Programs | | | | | | |
| Other Career Development Programs | | | | | | |
| Coaching Programs | | | | | | |
| Training Programs | | | | | | |
| Internship Programs | | | | | | |
| Detail Programs | | | | | | |

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

not applicable

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

not applicable

## 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

At BPA in FY23, 63.44% or 1970 permanent employees received at least one cash, time off, quality step increase, or performance-

based pay increase. Of the PWD population (10.78% or 216 employees), 64.48% (58 employees) received at least one award. Of the PWTD population (2.60% or 81employees), 71.6% or 58 receive at least one award.

| Time-Off Awards | Total (#) | Reportable Disability % | Without Reportable Disability % | Targeted Disability % | Without Targeted Disability % |
|---|---|---|---|---|---|
| Time-Off Awards 1 - 10 hours: Awards Given | 255 | 6.57 | 8.15 | 6.17 | 6.69 |
| Time-Off Awards 1 - 10 Hours: Total Hours | 1859 | 49.55 | 59.74 | 46.91 | 50.39 |
| Time-Off Awards 1 - 10 Hours: Average Hours | 7.29 | 2.25 | 0.30 | 9.38 | -0.02 |
| Time-Off Awards 11 - 20 hours: Awards Given | 113 | 4.78 | 3.05 | 2.47 | 5.51 |
| Time-Off Awards 11 - 20 Hours: Total Hours | 1928 | 79.40 | 51.83 | 44.44 | 90.55 |
| Time-Off Awards 11 - 20 Hours: Average Hours | 17.06 | 4.96 | 0.70 | 22.22 | -0.54 |
| Time-Off Awards 21 - 30 hours: Awards Given | 167 | 3.58 | 5.93 | 1.23 | 4.33 |
| Time-Off Awards 21 - 30 Hours: Total Hours | 4872 | 105.37 | 173.65 | 37.04 | 127.17 |
| Time-Off Awards 21 - 30 Hours: Average Hours | 29.17 | 8.78 | 1.21 | 37.04 | -0.23 |
| Time-Off Awards 31 - 40 hours: Awards Given | 183 | 6.27 | 6.05 | 4.94 | 6.69 |
| Time-Off Awards 31 - 40 Hours: Total Hours | 7204 | 247.76 | 238.45 | 197.53 | 263.78 |
| Time-Off Awards 31 - 40 Hours: Average Hours | 39.37 | 11.80 | 1.62 | 49.38 | -0.19 |
| Time-Off Awards 41 or more Hours: Awards Given | 70 | 2.09 | 2.43 | 2.47 | 1.97 |
| Time-Off Awards 41 or more Hours: Total Hours | 3712 | 115.22 | 128.45 | 133.33 | 109.45 |
| Time-Off Awards 41 or more Hours: Average Hours | 53.03 | 16.46 | 2.18 | 66.67 | 0.45 |

| Cash Awards | Total (#) | Reportable Disability % | Without Reportable Disability % | Targeted Disability % | Without Targeted Disability % |
|---|---|---|---|---|---|
| Cash Awards: $501 - $999: Awards Given | 48 | 1.49 | 1.19 | 0.00 | 1.97 |
| Cash Awards: $501 - $999: Total Amount | 37808 | 1074.63 | 962.45 | 0.00 | 1417.32 |
| Cash Awards: $501 - $999: Average Amount | 787.67 | 214.93 | 33.19 | 0.00 | 283.46 |
| Cash Awards: $1000 - $1999: Awards Given | 63 | 1.79 | 1.40 | 1.23 | 1.97 |
| Cash Awards: $1000 - $1999: Total Amount | 94775 | 2415.22 | 2090.00 | 1234.57 | 2791.73 |
| Cash Awards: $1000 - $1999: Average Amount | 1504.37 | 402.54 | 61.47 | 1234.57 | 137.20 |
| Cash Awards: $2000 - $2999: Awards Given | 56 | 1.19 | 1.24 | 0.00 | 1.57 |
| Cash Awards: $2000 - $2999: Total Amount | 142704 | 3105.37 | 3112.43 | 0.00 | 4095.67 |
| Cash Awards: $2000 - $2999: Average Amount | 2548.29 | 776.34 | 103.75 | 0.00 | 1023.92 |

| Cash Awards | Total (#) | Reportable Disability % | Without Reportable Disability % | Targeted Disability % | Without Targeted Disability % |
|---|---|---|---|---|---|
| Cash Awards: $3000 - $3999: Awards Given | 184 | 7.16 | 5.68 | 6.17 | 7.48 |
| Cash Awards: $3000 - $3999: Total Amount | 710836 | 28002.99 | 22014.45 | 23782.72 | 29348.82 |
| Cash Awards: $3000 - $3999: Average Amount | 3863.24 | 1166.79 | 159.52 | 4756.54 | 22.03 |
| Cash Awards: $4000 - $4999: Awards Given | 323 | 8.96 | 11.20 | 9.88 | 8.66 |
| Cash Awards: $4000 - $4999: Total Amount | 1400212 | 38603.58 | 48626.88 | 43262.96 | 37117.72 |
| Cash Awards: $4000 - $4999: Average Amount | 4335.02 | 1286.79 | 178.78 | 5407.88 | -27.42 |
| Cash Awards: $5000 or more: Awards Given | 2062 | 66.87 | 70.56 | 79.01 | 62.99 |
| Cash Awards: $5000 or more: Total Amount | 18765897 | 557581.49 | 654050.27 | 650732.10 | 527875.98 |
| Cash Awards: $5000 or more: Average Amount | 9100.82 | 2489.20 | 381.59 | 10167.69 | 40.55 |

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

FY 2023, 180 Quality Step Increases (QSI) were given to BPA PWD and PWTD employees: 87.78% of BPAs permanent employees received a QSIs. Among PWD, 6.46% received a QSI and 10.77% PWTD received a QSI. The inclusion rates are statistically similar to the overall 7.67 % rate for BPA employees; therefore, triggers do not exist. There were 18 performance-based pay increases, representing insufficient data for statistical analysis.

| Other Awards | Total (#) | Reportable Disability % | Without Reportable Disability % | Targeted Disability % | Without Targeted Disability % |
|---|---|---|---|---|---|
| Total Performance Based Pay Increases Awarded | 18 | 0.30 | 0.70 | 0.00 | 0.39 |

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

BPA has a recognition program called Peer-2-Peer awards given to employees (coworkers) by employees (co-workers); however, this is a program that is not tracked based on disabilities. This program is driven by co-workers' appreciation for each other's work and support.

# 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   N/A

    ii. Internal Selections (PWD)        Answer   Yes

c. Grade GS-14

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

    ii. Internal Selections (PWD)        Answer   Yes

d. Grade GS-13

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

    ii. Internal Selections (PWD)        Answer   No

27 promotions, GS-15 11% internal selections; 101 promotions, GS-14 .07 PWD; 133, GS-13 14% PWD. In FY23, insufficient data to provide an accurate response for this question.

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   Yes

c. Grade GS-14

    i. Qualified Internal Applicants (PWTD)        Answer   N/A

    ii. Internal Selections (PWTD)        Answer   Yes

d. Grade GS-13

    i. Qualified Internal Applicants (PWTD)        Answer   No

    ii. Internal Selections (PWTD)        Answer   Yes

27 promotions, GS-15 4% internal selections PWTD; 101 promotions GS-14 .01% PWTD; 133, GS-13 .05% PWTD. In FY23, insufficient data to provide an accurate response for this question.

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 |

In FY23, insufficient data to provide an accurate response for this question. USA Staffing is unable to provide this level of diversity data. However, the DEIA office has access and is responsible for reporting all EEO data available in HRMIS, BPA's HR IT system. The EEO office will be meeting with HR and DEIA to open discussion on how to track this information for EEOC reporting purposes.

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 |

In FY23, insufficient data to provide an accurate response for this question. USA Staffing is unable to provide this level of diversity data. However, the DEIA office has access and is responsible for reporting all EEO data available in HRMIS, BPA's HR IT system. The EEO office will be meeting with HR and DEIA to open discussion on how to track this information for EEOC reporting purposes.

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 |

In FY23, insufficient data to provide an accurate response for this question. HR shared that BPA does not track this information. For this reason, the EEO office will be meeting with HR to open discussion on how to track this information for EEOC reporting purposes. USA Staffing is unable to provide this level of diversity data. However, the DEIA office has access and is responsible for reporting all EEO data available in HRMIS, BPA's HR IT system. The EEO office will be meeting with HR and DEIA to open discussion on how to track this information for EEOC reporting purposes.

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

In FY23, insufficient data to provide an accurate response for this question. HR shared that BPA does not track this information. For this reason, the EEO office will be meeting with HR to open discussion on how to track this information for EEOC reporting purposes.

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

USA Staffing does not have the relevant independent variable to permit this analysis.

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

In FY23, USA Staffing does not have the relevant independent variable to permit this analysis.

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

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

## A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

    Answer    Yes

Information gathered was verbal and supporting documentation was not provided by Human Resources Staffing.

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

    a.Voluntary Separations (PWD)                     Answer    No

    b.Involuntary Separations (PWD)                    Answer    No

PWD: There were 5 removals (involuntary separations) of the BPA permanent employees in FY23. Of these 1 (20%) was PWTD. The 5 removals accounted for 3.2% of BPA's 158 separations in FY23 but the 3 PWD removals represented is 1.58% of all PWD separations in FY23. In the voluntary separations category, there were 62 resignations in FY23. Of these 7 were PWTD. The 7 resignations account for 0.63% of the BPA's total 158 separations in FY23.

| Seperations | Total # | Reportable Disabilities % | Without Reportable Disabilities % |
|---|---|---|---|
| Permanent Workforce: Reduction in Force | 0 | 0.00 | 0.00 |
| Permanent Workforce: Removal | 5 | 0.90 | 0.07 |
| Permanent Workforce: Resignation | 62 | 2.09 | 1.98 |
| Permanent Workforce: Retirement | 66 | 1.49 | 2.20 |
| Permanent Workforce: Other Separations | 25 | 1.19 | 0.76 |
| Permanent Workforce: Total Separations | 158 | 5.67 | 5.01 |

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

PWTD: There were 62 resignations (involuntary separation) of the BPA permanent employees in FY23. Of these 1 (1.61%) were PWTD. Of the 62 resignations accounted for 39.24% of BPA's 158 separations in FY23 but 1 PWTD resignations represented is 33.33% of all PWTD separations in FY23. In the voluntary category, there were 62 resignations in FY23. Of this ,1 resignation account for 0.63% of the BPA's total separation in FY23.

| Seperations | Total # | Targeted Disabilities % | Without Targeted Disabilities % |
|---|---|---|---|
| Permanent Workforce: Reduction in Force | 0 | 0.00 | 0.00 |
| Permanent Workforce: Removal | 5 | 1.23 | 0.13 |
| Permanent Workforce: Resignation | 62 | 1.23 | 2.01 |

| Seperations | Total # | Targeted Disabilities % | Without Targeted Disabilities % |
|---|---|---|---|
| Permanent Workforce: Retirement | 66 | 1.23 | 2.15 |
| Permanent Workforce: Other Separations | 25 | 0.00 | 0.83 |
| Permanent Workforce: Total Separations | 158 | 3.70 | 5.12 |

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.

Staffing does not do exit interviews.

# 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.bpa.gov/about/careers/office-of-civil-rights-eeo

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.

In FY23, the Architectural Barrier Act information was not listed on the link below; however, information on how to file a complaint is listed. Site where complaint information is listed: https://www.bpa.gov/about/careers/office-of-civil-rights-eeo

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.

Section 508 of the Rehabilitation Act (29 USC § 794d) requires that Federal agencies' electronic and Information Communication Technology (ICT) is accessible to people with disabilities, including employees and members of the public. In FY22, Civil Rights and Equal Employment Opportunity Office (CREEO) experienced high CREEO staff turnover and lost their Section 508 Program Manager and the CREEO Director/Manager. For this reason, the Section 508 program was unable to give the program the attention it needed. In FY23, CREEO office hired an Equal Employment Specialist (EES) with experience in Section 508 compliance to assess the program, address concerns and highlight deficiencies existing in the current program. The outcome of the assessment determined: • Section 508 Program: Prior files were missing, program not operational, some administrative units (Sharepoint Migration and electronic forms) were moving toward compliance, but some BPA units were not aware of the need for Section 508 compliance. • Section 508 Policy: Department of Energy and the BPA policy were not in place. • Section 508 compliant process: Process not in place. • Exception Process: Not in place. Information Communication Technology for virtual meeting and trainings (Skype and WebEx): Non-Compliant or limited compliance. As BPA moves into FY24, the new Section 508 Program Manager will bring these findings to BPA's Executive leadership for awareness, funding, and to restart the program and to move the agency toward compliance and get BPA back on track.

# 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.)

As of FY23, the average time for processing requests was 25 days excluding requests for COVID telework and the vaccine mandate.

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.

This past year (FY23) RA provided additional trainings inclusive of Managers reasonable accommodation training, Employee reasonable accommodation training; Religious accommodation training as well as DOE wide disability summit participation. Our SharePoint site continues to be updated based on user feedback. RA monitors requests for trends which continue to be heavily centered on requests for telework. The RA program has identified a trend whereby the program receives more requests from employees in the mental health space that any other disability category.

## 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.

In FY23, BPA continues to process individual requests for PAS in a timely basis. All RA trainings for managers and employees are inclusive of PAS information.

# 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?

<div align="right">Answer     No</div>

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?

<div align="right">Answer     No</div>

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

N/A

## 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?

<div align="right">Answer     No</div>

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    No

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.

N/A

# Section VIII: Identification and Removal of Barriers

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

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

Answer    Yes

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

Answer    Yes

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

| Source of the Trigger: | Workforce Data (if so identify the table) |
|---|---|
| **Specific Workforce Data Table:** | Workforce Data Table - B1 |
| **STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:**<br><br>Provide a brief narrative describing the condition at issue.<br><br>How was the condition recognized as a potential barrier? | Section 508 Compliance |
| **STATEMENT OF BARRIER GROUPS:** | *Barrier Group* |
| **Barrier Analysis Process Completed?:** | Y |
| **Barrier(s) Identified?:** | Y |

| STATEMENT OF IDENTIFIED BARRIER:<br><br>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition. | **Barrier Name** | **Description of Policy, Procedure, or Practice** |
|---|---|---|
| | Section 508 | No policy |

| Objective(s) and Dates for EEO Plan | | | | | |
|---|---|---|---|---|---|
| **Date Initiated** | **Target Date** | **Sufficient Funding / Staffing?** | **Date Modified** | **Date Completed** | **Objective Description** |
| 04/24/2024 | 09/30/2028 | Yes | | | Objective: 1) Understand concerns raised by parties, 2) confirm concerns/issues exist, 3) identify the source and scope of the concern, 4) Research agency policy, 5) Address, if Equal Employment Specialist have authority to modify or change or report findings to Executive Leadership Team (ELT) for their address. |

| Responsible Official(s) | | |
|---|---|---|
| **Title** | **Name** | **Standards Address The Plan?** |
| Equal Employment Specialist/Section 508 Coordinator | Jeanna Ramos | Yes |
| Civil Rights and Equal Employment Manager | Vacant | Yes |

| Planned Activities Toward Completion of Objective | | | | |
|---|---|---|---|---|
| **Target Date** | **Planned Activities** | **Sufficient Staffing & Funding?** | **Modified Date** | **Completion Date** |
| 04/24/2028 | In early FY24, EES reported findings to the ELT and scheduled meetings to start the formulation of a Section 508 policy, procedural guide, and implementation plan. ELT assigned a special team to address these findings and concerns/issues for the agency. In addition, the ELT will be looking into software to address short-term needs to provide relief until the BPA ICT application and software upgrade can be implemented. | Yes | | |

| Report of Accomplishments | |
|---|---|
| **Fiscal Year** | **Accomplishment** |
| 2023 | Accomplishments:  Identified a concern and agency need; ELT acknowledges the complexity and scope; and ELT and assigned EES are both planning address from their individual scope of work and approach. BPA is currently working to update web-conferencing application software with a newer and more effective application (e.g. Microsoft Teams) to support people with visual challenges. |

| Source of the Trigger: | Other |
|---|---|
| **Specific Workforce Data Table:** | Data Table B |
| **STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:**<br><br>Provide a brief narrative describing the condition at issue.<br><br>How was the condition recognized as a potential barrier? | Focusing on the retention of Persons with Disabilities and Persons with Targeted Disabilities. Two concerns were voiced about Section 508 related issues with BPA Information Communication Technology platforms and research was conducted to understand the scope of the concerns reported to seek a solution. |

| **STATEMENT OF BARRIER GROUPS:** | *Barrier Group* |
|---|---|
| | People with Disabilities |
| | People with  Targeted Disabilities |

| **Barrier Analysis Process Completed?:** | Y |
|---|---|
| **Barrier(s) Identified?:** | Y |

| **STATEMENT OF IDENTIFIED BARRIER:**<br><br>Provide a succinct statement of the agency policy, procedure<br>or practice that has been determined to be the barrier of the<br>undesired condition. | **Barrier Name** | **Description of Policy, Procedure, or Practice** |
|---|---|---|
| | Section 508 Program Deficiency | No policy in place for Section 508 compliance, no procedures, practices vary depending on the unit and perceived importance of the need, and new Equal Employment Specialist in place for the program until May 2023 |

| Objective(s) and Dates for EEO Plan | | | | | |
|---|---|---|---|---|---|
| **Date Initiated** | **Target Date** | **Sufficient Funding / Staffing?** | **Date Modified** | **Date Completed** | **Objective Description** |
| | | | | | |

| Responsible Official(s) | | |
|---|---|---|
| **Title** | **Name** | **Standards Address The Plan?** |
| CREEO Manager | Vacant | Yes |

| Planned Activities Toward Completion of Objective | | | | |
|---|---|---|---|---|
| **Target Date** | **Planned Activities** | **Sufficient Staffing & Funding?** | **Modified Date** | **Completion Date** |
| 09/30/2029 | Formulate a policy and procedures once DOE publishes theirs, hire a Section 508 Program Manager, and set up CREEO Compliances for BPA. | Yes | | |

| Report of Accomplishments | |
|---|---|
| **Fiscal Year** | **Accomplishment** |

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

Budgetary and structural infrastructure needs and challenges would delay the completion of the planned activities. This is a major upgrade which requires system and infrastructure alterations that take time. There may be unforeseen complications and challenges due to the magnitude of this project and the limitations of existing systems and infrastructural needs. The agency began the upgrade before the concerns were raised and have come across challenges that have delayed implementation. The BPA will upgrade ICT applications/software and keep EEOC aware if planned activities, are not competed on time. BPA will strive to address the concerns of its employees until the project is accomplished. No completion date has set by the Information Technology team for the completion of this project due to these complications and challenges. Previous completion date was 2021.

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

Impacts: 1) a Section 508 complaint process is now in place, 2) Section 508 Program Manager has been identified, 3) ELT team members are currently assigned and will monitor progress made towards the elimination of above mentioned concern (question #3), 4) a policy, procedure and implementation plan are currently being developed with the approval of ELT, and 5) tools, resources and a Section 508 workgroup of technical experts have been assembled to address Section 508 concerns and challenges.

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.

In FY23, the above-mentioned trigger and barrier were not addressed due to the concerns/issues being identified within this fiscal year. The plan is to address the concern in FY24. The effort will require a full year due to the magnitude and scope of the project. In addition, the short-term solution will require market research, contracts, funding (e.g. software cost $1500+ per person per year), and training (IT, user training, and planning). ELT is currently exploring this option in FY24 and will have more information to share in FY24 MD-715 report.