

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

Department of Commerce - FY 2025

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

## Section I: Efforts to Reach Regulatory Goals

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

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

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

\* 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

| Grade Level Cluster<br>(GS or Alternate Pay Planb) | Total | Reportable<br>Disability Total | Reportable Disability<br>Percentage<br>(Numerical Goal<br>12 Percent) | Targeted Disability Total | Targeted Disability<br>Percentage<br>(Numerical Goal<br>2 Percent) |
|----------------------------------------------------|-------|--------------------------------|-----------------------------------------------------------------------|---------------------------|--------------------------------------------------------------------|
| Grades GS-11 to SES                                | 25935 | 3042                           | 11.73                                                                 | 603                       | 2.33                                                               |
| Grades GS-1 to GS-10                               | 5756  | 947                            | 16.45                                                                 | 187                       | 3.25                                                               |

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

The DOC's Office of Civil Rights (OCR) actively communicated disability hiring goals through specialized forums, including Disability/ Reasonable Accommodation (RA) Training. Additionally, Bureau HR teams and Veterans and Disability Employment Coordinators (VDECs) reinforced these priorities by discussing strategic recruitment approaches and the utilization of Schedule A candidates with hiring officials prior to each recruitment action, consistent with the new Merit Hiring Plan.

## Section II: Model Disability Program

*Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.*

### A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If "no", describe the agency's plan to improve the staffing for the upcoming year.

Answer: Yes

2. Identify all staff responsible for implementing the agency's disability employment program by the office, staff employment status, and responsible official.

| Disability Program Task                                                                        | Total Full Time | Total Part Time | Total Collateral Duty | Responsible Official<br>(Name, Title, Office Email)                                                     |
|------------------------------------------------------------------------------------------------|-----------------|-----------------|-----------------------|---------------------------------------------------------------------------------------------------------|
| Section 508 Compliance                                                                         | 5               | 0               | 0                     | Jennifer Jessup<br>DOC Section 508 Compliance Coordinator<br>jjessup@doc.gov                            |
| Processing applications from PWD and PWTD                                                      | 5               | 0               | 36                    | Roseal Fowlkes<br>Veterans Employment & Selective Placement<br>Program Manager<br>rfowlkes@doc.gov      |
| Architectural Barriers Act Compliance                                                          | 5               | 0               | 0                     | Joyce Long<br>Chief, Space Management Division<br>jlong@doc.gov                                         |
| Answering questions from the public about hiring authorities that take disability into account | 18              | 0               | 35                    | Roseal Fowlkes<br>Veterans Employment & Selective Placement<br>Program Manager<br>rfowlkes@doc.gov      |
| Processing reasonable accommodation requests from applicants and employees                     | 13              | 0               | 2                     | Laura Soria<br>Disability Program Manager/Reasonable<br>Accommodation Program Manager<br>LSoria@doc.gov |
| Special Emphasis Program for PWD and PWTD                                                      | 3               | 0               | 36                    | Laura Soria<br>Disability Program Manager/Reasonable<br>Accommodation Program Manager<br>LSoria@doc.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

Disability Program Managers (DPMs) received training from several sources, including the ASK EARN Training Center, the Office of Personnel Management (OPM), the EEOC, and the Department of Defense Computer/Electronic Accommodations Program Technology & Evaluation Center (CAPTEC), which provided training on conducting effective needs assessments for Bureau RA Coordinators (RACs). Bureau RACs also received training from their respective Bureaus, while the HQ DPM hosted monthly meetings to discuss updated guidance and policies.

### B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If "no", describe the agency's plan to ensure all aspects of the disability program have sufficient funding and other resources.

Answer: Yes

There are full-time Disability Program Managers at NOAA, Census and DOC Headquarters.

## Section III: Program Deficiencies In The Disability Program

|                                              |                                                                                                                                                                                                                                                                                              |
|----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Program name 1</b>                        | D.1.c                                                                                                                                                                                                                                                                                        |
| <b>Description of Program Deficiency</b>     | Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]                                               |
| <b>Objective</b>                             | Coordinate with OHRM to implement a standardized exit interview and/or separation survey process that captures actionable feedback from departing employees—including individuals with disabilities—on how the agency can improve recruitment, hiring, retention, and advancement practices. |
| <b>Planned Activities (Planned Activity)</b> | Develop questions for retention survey.                                                                                                                                                                                                                                                      |
| <b>Planned Activities (Planned Activity)</b> | Disseminate survey to OGC, Unions, Privacy Offices, Departmental Management Council, and the PHRM Council for testing, review and comments.                                                                                                                                                  |
| <b>Planned Activities (Planned Activity)</b> | Launch Retention Survey.                                                                                                                                                                                                                                                                     |
| <b>Planned Activities (Planned Activity)</b> | OCR will review the results from the Retention Survey and determine if improvements to applicable enterprise-wide policies, practices, and procedures are needed. Results will also be used in barrier analysis, if applicable                                                               |
| <b>Planned Activities (Planned Activity)</b> | OCR will review the results from the Retention Survey and will move forward with new considerations and/or improvements to applicable enterprise-wide policies, practices, and procedures.                                                                                                   |
| <b>Planned Activities (Planned Activity)</b> | Partner with the Census Bureau's Center for Behavioral Science Methods (CBSM) to implement survey via Qualtrics, a web-based survey tool to conduct survey research, evaluations and other data collection activities.                                                                       |
| <b>Fiscal Year</b>                           | 2025                                                                                                                                                                                                                                                                                         |
| <b>Responsible Official Name</b>             | Ben Kagan Guthrie                                                                                                                                                                                                                                                                            |
| <b>Responsible Official Name</b>             | Junish A. Arora                                                                                                                                                                                                                                                                              |
| <b>Responsible Official Name</b>             | Stacy Carter                                                                                                                                                                                                                                                                                 |
| <b>Responsible Official Title</b>            | Chief Human Capital Officer / Director of Human Resources (Acting)                                                                                                                                                                                                                           |
| <b>Responsible Official Title</b>            | Director, Office of Civil Rights                                                                                                                                                                                                                                                             |
| <b>Responsible Official Title</b>            | Director, Prevention Division                                                                                                                                                                                                                                                                |
| <b>Program name 2</b>                        | B.4.a.10                                                                                                                                                                                                                                                                                     |
| <b>Description of Program Deficiency</b>     | to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]                                                                                                                                                                                                 |
| <b>Objective</b>                             | To improve the timely processing of requests for reasonable accommodations.                                                                                                                                                                                                                  |
| <b>Fiscal Year</b>                           | 2025                                                                                                                                                                                                                                                                                         |
| <b>Responsible Official Name</b>             | Bismarck Myrick                                                                                                                                                                                                                                                                              |
| <b>Responsible Official Name</b>             | Jeremy Lawson                                                                                                                                                                                                                                                                                |
| <b>Responsible Official Name</b>             | Junish A. Arora                                                                                                                                                                                                                                                                              |
| <b>Responsible Official Name</b>             | Khalilah Ameen                                                                                                                                                                                                                                                                               |
| <b>Responsible Official Name</b>             | Laura Soria                                                                                                                                                                                                                                                                                  |
| <b>Responsible Official Name</b>             | Richard Grant                                                                                                                                                                                                                                                                                |
| <b>Responsible Official Name</b>             | Stacy Carter                                                                                                                                                                                                                                                                                 |
| <b>Responsible Official Title</b>            | Acting Director, Office of Civil Rights (NOAA)                                                                                                                                                                                                                                               |
| <b>Responsible Official Title</b>            | Director of Equal Employment Opportunity and Accessibility Office (NIST)                                                                                                                                                                                                                     |
| <b>Responsible Official Title</b>            | Director Office Equal Employment Opportunity (USPTO)                                                                                                                                                                                                                                         |
| <b>Responsible Official Title</b>            | Director, Office of Civil Rights                                                                                                                                                                                                                                                             |
| <b>Responsible Official Title</b>            | Director, Prevention Division, Office of Civil Rights                                                                                                                                                                                                                                        |
| <b>Responsible Official Title</b>            | Disability/RA Program Manager                                                                                                                                                                                                                                                                |

|                            |                                             |
|----------------------------|---------------------------------------------|
| Responsible Official Title | Reasonable Accommodation Coordinator (NIST) |
|----------------------------|---------------------------------------------|

## 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.

The DOC actively championed the recruitment and hiring of PWD and PWTD through a comprehensive, multi-channel strategy to include:

1. Targeted Sourcing & Non-Competitive Hiring: DOC utilized internal resume databases, the OPM Bender Disability Employment Registry, and specialized USAJOBS searches to identify highly qualified Schedule A candidates for employment consideration.
2. Strategic Partnerships & Pipeline Development: DOC actively participated in university job fairs and partnered with the Workforce Recruitment Program (WRP) to engage students and recent graduates. Additionally, DOC collaborated closely with the Veterans Vocational Rehabilitation Program and various Disabled Veterans Service Organizations to recruit eligible disabled veterans via alternative platforms like VetSuccess.gov.
3. Outreach and Education: To ensure a wide range of visibility, DOC promoted disability employment programs, Federal hiring processes, job vacancies, and reasonable accommodation resources across all DOC Bureau webpages and professional social media channels, including LinkedIn and Facebook.

USPTO maintained a dedicated employment portal (<https://www.uspto.gov/jobs/hiring-people-disabilities>) to equip job applicants with targeted accessibility resources. To further strengthen its early-career talent pipeline, USPTO cultivated partnerships with disability service offices at key recruiting colleges and universities.

NOAA executed a sourcing strategy to recruit veterans and PWD. Key initiatives include targeted outreach to vocational rehabilitation centers and veteran organizations, alongside resume mining via USAJOBS. Additionally, to maximize non-competitive hiring authorities, under the new Merit Hiring Plan, management is advised to review PWD candidate pools prior to releasing competitive public announcements on USAJOBS.

Census maintained dedicated routing through the OPM portal, providing applicants direct access to a Government-Wide directory of Selective Placement Coordinators also known as VDECs in DOC. Furthermore, the Census utilized a strategic partnership with the Department of Labor's Workforce Recruitment Program (WRP). This collaboration empowered hiring managers to proactively query a specialized talent database and partner seamlessly with the Census Human Resources Division to expedite candidate review and selection.

NIST utilized a comprehensive talent acquisition strategy to employ veterans and PWD. While all vacancies are universally advertised on USAJOBS, NIST actively leveraged a wide range of hiring mechanisms, including Direct-Hire, Delegated Examining, Merit Promotion, and Non-Competitive procedures. Furthermore, the NIST maximized the use of special appointment authorities, such as the Veterans Employment Opportunities Act (VEOA), the Veterans Recruitment Appointment (VRA), the 30 Percent or More Disabled Veteran authority, and Schedule A. To expedite placement, NIST's Veterans and Disability Employment Coordinator maintained a centralized talent registry of applicants eligible for non-competitive hiring (including Schedule A, VRA, and 30 Percent Disabled Veterans). This repository was accessible to the HR Operations Team, enabling the distribution of resumes of highly qualified candidates to hiring officials as soon as vacant positions are identified.

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 DOC actively promoted the Schedule A hiring authority to recruit and employ PWDs and PWTDs. To operationalize this, hiring managers were directed to partner with their Bureau VDECs for guidance. VDECs executed targeted outreach with vocational rehabilitation centers and disabled veterans' organizations, channeling applicants to dedicated Bureau talent repositories and USAJOBS. Furthermore, VDECs designed recruitment strategies, amplified vacancy visibility among Schedule A candidates, and served as principal representatives at disability-focused hiring events.

To streamline talent acquisition, eligible candidates submitted their resumes directly to VDECs for inclusion in an internal database. Upon receiving a Position Description (PD) for a new vacancy, VDECs curated and delivered resumes of highly qualified Schedule A candidates directly to the hiring official, enabling immediate interviews and expedited selections. For ongoing technical assistance, applicants consulted with their Bureau VDECs or the centralized DOC resource at [ScheduleA@doc.gov](mailto:ScheduleA@doc.gov).

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

To get the most out of the hiring pipeline for applicants utilizing special hiring authorities such as Schedule A, DOC's Human Resources Specialists and VDECs collaborated to verify eligibility and routed highly qualified candidates to hiring managers for employment consideration. To ensure efficiency, this workflow underwent continuous review and process improvement.

The intake and referral process was structured as follows:

- **USAJOBS Sourcing:** HR Specialists evaluated applications submitted via USAJOBS. Qualified candidates were referred directly to hiring officials, accompanied by comprehensive guidance on the VDEC role and non-competitive selection procedures.
- **Direct Application & Talent Pooling:** Bureau VDECs reviewed applications received directly from candidates or hiring managers, verified that both the candidate's qualifications and Schedule A documentation met OPM standards. Vetted resumes were then included within Bureau-specific talent databases.
- **Non-Competitive Direct Appointments:** For candidates applying directly to non-competitive vacancies, HR Specialists conducted qualification analysis and appointment eligibility assessments prior to forwarding their resumes to hiring managers.
- **Proactive Vacancy Matching:** Upon the identification of a new vacancy, Bureau VDECs queried the internal talent databases to identify suitable candidates. Matched resumes were delivered to the hiring official alongside guidance to facilitate immediate selection.

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

To ensure continuous adherence to Federal hiring standards, DOC mandated that all supervisors and hiring officials complete annual OPM training. Required coursework included Access Ability – Hiring Individuals with Disabilities, Uniformed Services Employment and Reemployment Rights Act (USERRA) guidelines, and Veterans Employment Training, all of which were accessible via the Commerce Learning Center. Furthermore, all newly appointed managers and supervisors completed a comprehensive supervisory training program within their first year in the role, which featured dedicated modules on the recruitment and hiring of PWD and PWTD.

## 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.

DOC cultivated partnerships with key organizations dedicated to advancing employment for PWD and PWTD, including "Hiring Our Heroes," RecruitMilitary, and various Vocational Rehabilitation Services. DOC actively executed targeted outreach by participating in specialized campus events, forging alliances with local universities to facilitate paid and unpaid internships, including the Department of War's Skillbridge Program. Furthermore, the DOC partnered closely with state-level Vocational Rehabilitation agencies—such as those in Maryland and Virginia—to provide expert candidate guidance on the Federal application process. To ensure seamless, direct access for applicants, all Bureau VDECs also known as Selective Placement Coordinators, were included in the OPM directory. USPTO maintained partnerships with collegiate disability service offices and local vocational rehabilitation centers to proactively source and recruit students and professionals with disabilities. To further strengthen this talent pipeline, the USPTO actively expanded its outreach initiatives. USPTO engaged with career service centers, disability program coordinators at targeted regional schools, and external disability advocacy organizations to establish new baseline partnerships and cultivate a broader, more robust network of diverse talent.

NOAA connected with vocational rehabilitation centers near cities where NOAA has a large presence and offered assistance to PWD and PWTD including training on how to understand and apply for federal positions.

NIST published contact information for its DPM and VDEC on its public-facing website. Guided by the NIST's overarching Strategic Recruitment Program Plan (established in FY 2023), the DPM served as the principal liaison, leading ongoing engagement and maintaining partnerships with external employment organizations to continuously expand the talent pipeline.

Census maintained partnerships to advance hiring and pipeline development. Key collaborations included partnering with the Department of War and the Department of Veterans Affairs (VA) to facilitate the Operation Warfighter (OWF) Internship Program for recovering service members and the Skillbridge program for transitioning service members. Additionally, the Census worked closely with the Department of Labor (DOL) to maximize the utilization of the Workforce Recruitment Program (WRP) and established Apprenticeship Programs to attract highly qualified talent.

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

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

a. New Hires for Permanent Workforce (PWD)

Answer: No

b. New Hires for Permanent Workforce (PWTD)

Answer: No

| New Hires                 | Total<br>(Number) | Reportable Disability<br>Permanent<br>Workforce<br>(Percentage) | Reportable Disability<br>Temporary<br>Workforce<br>(Percentage) | Targeted Disability<br>Permanent Workforce<br>(Percentage) | Targeted Disability<br>Temporary<br>Workforce<br>(Percentage) |
|---------------------------|-------------------|-----------------------------------------------------------------|-----------------------------------------------------------------|------------------------------------------------------------|---------------------------------------------------------------|
| % of Total Applicants     | 0                 | 0.00                                                            | 0.00                                                            | 0.00                                                       | 0.00                                                          |
| % of Qualified Applicants | 0                 | 0.00                                                            | 0.00                                                            | 0.00                                                       | 0.00                                                          |
| % of New Hires            | 1403              | 13.83                                                           | 1.00                                                            | 2.57                                                       | 0.21                                                          |

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

DOC has 10 MCOs (0301, 0343, 0482, 0905, 1101, 1224, 1301, 1340, 1530, and 2210) of which five revealed the following new hire data points which could be triggers for PWD/PWTD:

0482 Fishery Biology: 0 Percent PWD; 0 Percent PWTD

1101 General Business and Industry: 10.53 Percent PWD; 0 Percent PWTD

1301 Gen Phys Science: 9.09 Percent PWD; 0 Percent PWTD

1340 Meteorology: 0 Percent PWTD

2210 Information Technology Management: 1.33 Percent PWTD

(Source: FY25 MD-715 DOC Workforce Data Table – B6)

| New Hires to Mission-Critical Occupations | Total<br>(Number) | Reportable Disability<br>New Hires<br>(Percentage) | Targetable Disability<br>New Hires<br>(Percentage) |
|-------------------------------------------|-------------------|----------------------------------------------------|----------------------------------------------------|
| <b>Numerical Goal</b>                     | --                | 12%                                                | 2%                                                 |
| 0301 MISC ADMINISTRATION & PROGRAM        | 89                | 30.34                                              | 4.49                                               |
| 0343 MANAGEMENT & PROGRAM ANALYSIS        | 53                | 39.62                                              | 5.66                                               |
| 0482 FISHERY BIOLOGY                      | 6                 | 0.00                                               | 0.00                                               |
| 0905 GENERAL ATTORNEY                     | 69                | 17.39                                              | 4.35                                               |
| 1101 GENERAL BUSINESS AND INDUSTRY        | 19                | 10.53                                              | 0.00                                               |
| 1224 PATENT EXAMINER                      | 801               | 11.99                                              | 2.87                                               |
| 1301 GEN PHYSICAL SCIENTISTS              | 33                | 9.09                                               | 0.00                                               |
| 1340 METEOROLOGY                          | 36                | 27.78                                              | 0.00                                               |
| 1530 STATISTICIAN                         | 21                | 23.81                                              | 9.52                                               |
| 2210 INFORMATION TECHNOLOGY MANAGEMENT    | 75                | 24.00                                              | 1.33                                               |

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

a. Qualified Applicants for MCO (PWD)

Answer: N/A

b. Qualified Applicants for MCO (PWTD)

Answer: N/A

USA Staffing does not differentiate between internal and external applicants, therefore, we are not able to determine triggers.

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

a. Promotions for MCO (PWD)

Answer: N/A

b. Promotions for MCO (PWTD)

Answer: N/A

The qualified applicant pool benchmark comes from USA Staffing and DOC only had partial information to work with. Therefore, we are not able to determine triggers using the appropriate benchmarks without complete information.

## 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.

DOC ensured job opportunities were posted on USAJOBS providing awareness to PWD and PWTD of employment opportunities with the DOC. The DOC's Reasonable Accommodation Policy and POC for requesting an accommodation were also included in each announcement.

PWD and PWTD were made aware of various leadership/professional development programs. The competitive opportunities were announced via USAJOBS, and many other internal programs were opened to all employees and announced via internal broadcast messages. PWD and PWTD had an opportunity to compete for all announced programs.

PWD and PWTD had access to the DOC's web-based training program, Commerce Learning Center (CLC), which contained over 2,500 training courses to assist employees with managing their careers.

DOC continued to promote internal advancement opportunities for PWD and PWTD through Bureau-specific leadership development programs.

Here are some key aspects of these policies:

- Schedule A Hiring Authority - The Schedule A hiring authority is a non-competitive appointment authority that allows federal agencies to appoint eligible individuals with severe physical, cognitive, or psychiatric disabilities without the need for traditional competitive recruitment procedures.
- 30 Percent or More Disabled Veteran hiring Authority - This specific hiring authority is designed to target veterans with a disability rating of 30 percent or more. It allows us to appoint eligible veterans directly to positions without competition, streamlining the hiring process for those with significant disabilities.
- Collaboration with Veterans Affairs supporting agencies to enhance outreach and recruitment efforts - This collaboration helped identify and connect individuals with disabilities seeking employment opportunities.

### B. CAREER DEVELOPMENT OPPORTUNITIES

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

During FY25, the Office of the Secretary offered one formal leadership development opportunity: participation in GSA's White House Leadership Development Program (WHLDP), a competitive, government wide, 10 month rotational program for GS 15 and equivalent employees. 14 DOC employees applied, and 2 were selected to participate in the 2025–2026 cohort.

While the Office of the Secretary did not provide additional career development programs during the reporting period, it did deliver required supervisory training consistent with OPM's performance management and probationary management standards for more than 5,200 supervisors. It also offered enterprise-wide workforce learning sessions, including retirement benefits sessions attended by more than 4,000 employees and more than 200 training slots focused on preparing for potential reduction in force (RIF) scenarios. These offerings supported workforce readiness and statutory compliance but were not structured as career development programs.

NOAA offered Leadership Competencies Development Program (LCDP) - a competitive, 18-month program that provides a series of training and developmental experiences for a cadre of NOAA individuals, GS-13-15, who have high potential for assuming leadership responsibilities.

Due to funding restrictions, other Bureaus were not able to offer a robust career development program as was done in previous fiscal years.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate.

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

3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Applicants (PWD)

Answer: No

b. Selections (PWD)

Answer: No

The Office of the Secretary's career development programs for applicants and selectees were paused during FY25 due to funding constraints. As a result, centralized applicant flow data for internal programs was not collected, and no applicant pool existed from which to conduct a benchmark comparison. DOC will establish and implement an MD 715 compliant applicant flow data collection process in advance of the next reporting cycle in FY26 to ensure availability of the data necessary for future analyses.

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: Yes

b. Selections (PWTD)

Answer: Yes

Consistent with the Office of the Secretary, several DOC bureaus conducted limited career development program activities during the reporting period. As a result, applicant flow data for PWTD and associated selection outcomes were not consistently collected or centrally maintained across bureaus. Accordingly, DOC is unable to produce DOC wide PWTD applicant benchmarks for FY25.

To remediate this gap, DOC will implement a standardized process for collecting OPM Standard Form 256 (Self Identification of Disability) applicant flow data from USA Staffing, NFC HR/payroll systems, and eOPF records. This DOC wide data collection framework will support trigger identification beginning in FY26, contingent upon full compliance with OPM's Data Release Policy and applicable employee privacy requirements under 5 CFR Parts 293 and 297.

## C. AWARDS

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

a. Awards, Bonuses, & Incentives (PWD)

Answer: Yes

b. Awards, Bonuses, & Incentives (PWTD)

Answer: Yes

Data points which might indicate a trigger were revealed for the following:

PWD: Cash Awards – all categories (from \$500 and under to \$5000 or more).

PWTD: Time Off Hours 11 – 20; Time Off Hours 31 – 40; Cash Awards 501 – 1999; and Cash Awards 5000 or More.

(Source: FY25 MD-715 DOC Workforce Data Table – B9)

| <b>Time-Off Awards</b>                          | <b>Total<br/>(Number)</b> | <b>Reportable<br/>Disability<br/>(Percentage)</b> | <b>Without<br/>Reportable<br/>Disability<br/>(Percentage)</b> | <b>Targeted Disability<br/>(Percentage)</b> | <b>Without Targeted<br/>Disability<br/>(Percentage)</b> |
|-------------------------------------------------|---------------------------|---------------------------------------------------|---------------------------------------------------------------|---------------------------------------------|---------------------------------------------------------|
| Time-Off Awards 1 - 10 hours: Awards Given      | 1924.00                   | 13.15                                             | 86.85                                                         | 2.29                                        | 97.71                                                   |
| Time-Off Awards 1 - 10 Hours: Total Hours       | 13528.00                  | 13.18                                             | 86.82                                                         | 2.25                                        | 97.75                                                   |
| Time-Off Awards 1 - 10 Hours: Average Hours     | 7.03                      | 7.05                                              | 7.03                                                          | 6.91                                        | 7.03                                                    |
| Time-Off Awards 11 - 20 hours: Awards Given     | 881.00                    | 12.03                                             | 87.97                                                         | 1.48                                        | 98.52                                                   |
| Time-Off Awards 11 - 20 Hours: Total Hours      | 13740.00                  | 11.91                                             | 88.09                                                         | 1.38                                        | 98.62                                                   |
| Time-Off Awards 11 - 20 Hours: Average Hours    | 15.60                     | 15.44                                             | 15.62                                                         | 14.62                                       | 15.61                                                   |
| Time-Off Awards 21 - 30 hours: Awards Given     | 299.00                    | 16.72                                             | 83.28                                                         | 3.68                                        | 96.32                                                   |
| Time-Off Awards 21 - 30 Hours: Total Hours      | 7243.00                   | 16.53                                             | 83.47                                                         | 3.60                                        | 96.40                                                   |
| Time-Off Awards 21 - 30 Hours: Average Hours    | 24.22                     | 23.94                                             | 24.28                                                         | 23.73                                       | 24.24                                                   |
| Time-Off Awards 31 - 40 hours: Awards Given     | 349.00                    | 13.75                                             | 86.25                                                         | 1.72                                        | 98.28                                                   |
| Time-Off Awards 31 - 40 Hours: Total Hours      | 13369.00                  | 13.70                                             | 86.30                                                         | 1.68                                        | 98.32                                                   |
| Time-Off Awards 31 - 40 Hours: Average Hours    | 38.31                     | 38.17                                             | 38.33                                                         | 37.33                                       | 38.32                                                   |
| Time-Off Awards 41 or more Hours: Awards Given  | 0.00                      | 0.00                                              | 0.00                                                          | 0.00                                        | 0.00                                                    |
| Time-Off Awards 41 or more Hours: Total Hours   | 0.00                      | 0.00                                              | 0.00                                                          | 0.00                                        | 0.00                                                    |
| Time-Off Awards 41 or more Hours: Average Hours | 0.00                      | 0.00                                              | 0.00                                                          | 0.00                                        | 0.00                                                    |

| Cash Awards                                     | Total<br>(Number) | Reportable<br>Disability<br>(Percentage) | Without<br>Reportable<br>Disability<br>(Percentage) | Targeted Disability<br>(Percentage) | Without Targeted<br>Disability<br>(Percentage) |
|-------------------------------------------------|-------------------|------------------------------------------|-----------------------------------------------------|-------------------------------------|------------------------------------------------|
| Cash Awards \$500 and Under:<br>Awards Given    | 5000.00           | 11.74                                    | 88.26                                               | 2.02                                | 97.98                                          |
| Cash Awards \$500 and Under: Total<br>Amount    | 1698572.00        | 11.29                                    | 88.71                                               | 1.92                                | 98.08                                          |
| Cash Awards \$500 and Under:<br>Average Amount  | 339.71            | 326.61                                   | 341.46                                              | 323.67                              | 340.05                                         |
| Cash Awards: \$501 - \$999: Awards<br>Given     | 10411.00          | 8.78                                     | 91.22                                               | 1.88                                | 98.12                                          |
| Cash Awards: \$501 - \$999: Total<br>Amount     | 8233520.00        | 8.70                                     | 91.30                                               | 1.86                                | 98.14                                          |
| Cash Awards: \$501 - \$999: Average<br>Amount   | 790.85            | 783.38                                   | 791.57                                              | 779.64                              | 791.06                                         |
| Cash Awards: \$1000 - \$1999:<br>Awards Given   | 38346.00          | 6.97                                     | 93.03                                               | 1.67                                | 98.33                                          |
| Cash Awards: \$1000 - \$1999: Total<br>Amount   | 55002104.00       | 6.86                                     | 93.14                                               | 16.57                               | 83.43                                          |
| Cash Awards: \$1000 - \$1999:<br>Average Amount | 1434.36           | 1412.22                                  | 1436.02                                             | 14214.85                            | 1217.09                                        |
| Cash Awards: \$2000 - \$2999:<br>Awards Given   | 6402.00           | 10.90                                    | 89.10                                               | 2.44                                | 97.56                                          |
| Cash Awards: \$2000 - \$2999: Total<br>Amount   | 15344287.00       | 11.01                                    | 88.99                                               | 2.48                                | 97.52                                          |
| Cash Awards: \$2000 - \$2999:<br>Average Amount | 2396.80           | 2419.73                                  | 2393.99                                             | 2439.06                             | 2395.74                                        |
| Cash Awards: \$3000 - \$3999:<br>Awards Given   | 5896.00           | 11.08                                    | 88.92                                               | 2.32                                | 97.68                                          |
| Cash Awards: \$3000 - \$3999: Total<br>Amount   | 20140648.00       | 11.03                                    | 88.97                                               | 2.31                                | 97.69                                          |
| Cash Awards: \$3000 - \$3999:<br>Average Amount | 3415.99           | 3402.18                                  | 3417.70                                             | 3400.31                             | 3416.36                                        |
| Cash Awards: \$4000 - \$4999:<br>Awards Given   | 4466.00           | 10.08                                    | 89.92                                               | 2.08                                | 97.92                                          |
| Cash Awards: \$4000 - \$4999: Total<br>Amount   | 19664799.00       | 10.04                                    | 89.96                                               | 2.06                                | 97.94                                          |
| Cash Awards: \$4000 - \$4999:<br>Average Amount | 4403.22           | 4389.47                                  | 4404.77                                             | 4365.40                             | 4404.03                                        |
| Cash Awards: \$5000 or more:<br>Awards Given    | 12734.00          | 6.60                                     | 93.40                                               | 1.69                                | 98.31                                          |
| Cash Awards: \$5000 or more: Total<br>Amount    | 88528563.00       | 6.66                                     | 93.34                                               | 1.69                                | 98.31                                          |
| Cash Awards: \$5000 or more:<br>Average Amount  | 6952.14           | 7015.00                                  | 6947.70                                             | 6970.65                             | 6951.82                                        |

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

a. Awards, Bonuses, & Incentives (PWTB)

Answer: No

b. Pay Increases (PWTB)

Answer: Yes

PWTD: participation rate is 1.74 Percent

(Source: FY25 MD-715 DOC Workforce Data Table – B9)

| Other Awards                                     | Total<br>(Number) | Reportable<br>Disability<br>(Percentage) | Without<br>Reportable<br>Disability<br>(Percentage) | Targeted Disability<br>(Percentage) | Without Targeted<br>Disability<br>(Percentage) |
|--------------------------------------------------|-------------------|------------------------------------------|-----------------------------------------------------|-------------------------------------|------------------------------------------------|
| Total Performance Based Pay Increases<br>Awarded | 0.00              | 0.00                                     | 0.00                                                | 0.00                                | 0.00                                           |

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If "yes", describe the employee recognition program and relevant data in the text box.

a. Other Types of Recognition (PWD)

Answer: N/A

b. Other Types of Recognition (PWTD)

Answer: N/A

DOC does not have other types of employee recognition programs.

## D. PROMOTIONS

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

a. SES

i. Qualified Internal Applicants (PWTD)

Answer: N/A

ii. Internal Selections (PWTD)

Answer: No

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: No

d. Grade GS-13

i. Qualified Internal Applicants (PWTD)

Answer: N/A

ii. Internal Selections (PWTD)

Answer: No

USA Staffing does not differentiate between internal and external applicants, therefore, we are not able to determine triggers.

(Source: FY25 MD-715 DOC Workforce Data Table – B7)

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: No

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: No

d. Grade GS-13

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

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

Qualified Internal Applicants data comes from USA Staffing and DOC only had partial information to work with. DOC was able to assess the Internal Selections using MD-715 Data Tables. However, we are not able to determine triggers using the appropriate benchmarks without complete information.

(Source: FY25 MD-715 DOC Workforce Data Table – B7)

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

The qualified applicant pool benchmark comes from USA Staffing and DOC only had partial information to work with. DOC was able to assess the New Hires using MD-715 Data Tables. However, we are not able to determine triggers using the appropriate benchmarks without complete information.

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

The qualified applicant pool benchmark comes from USA Staffing and DOC only had partial information to work with. DOC was able to assess the New Hires using MD-715 Data Tables. However, we are not able to determine triggers using the appropriate benchmarks without complete information.

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: Yes

## b. Managers

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

## c. Supervisors

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

USA Staffing does not differentiate between internal and external applicants, therefore, we are not able to determine triggers.

(Source: FY25 MD-715 DOC Workforce Data Table – B8)

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: Yes |

## b. Managers

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

## c. Supervisors

- |                                         |             |
|-----------------------------------------|-------------|
| i. Qualified Internal Applicants (PWTD) | Answer: N/A |
| ii. Internal Selections (PWTD)          | Answer: No  |

USA Staffing does not differentiate between internal and external applicants, therefore, we are not able to determine triggers.

(Source: FY25 MD-715 DOC Workforce Data Table – B8)

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 |

The qualified applicant pool benchmark comes from USA Staffing and DOC only had partial information to work with. DOC was able to assess the New Hires using MD-715 Data Tables. However, we are not able to determine triggers using the appropriate benchmarks without complete information.

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 |

The qualified applicant pool benchmark comes from USA Staffing and DOC only had partial information to work with. DOC was able to assess the New Hires using MD-715 Data Tables. However, we are not able to determine triggers using the appropriate benchmarks without complete information.

## 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: No

Out of the 133 employees in Schedule A at the Census Bureau, 23 (17.29 Percent) were new hires. Of these, 16 (69.57 Percent) were identified as PWD, and 1 (4.35 Percent) as PWTD.

DOC does not have a centralized data repository that tracks this information.

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

a. Voluntary Separations (PWD)

Answer: No

b. Involuntary Separations (PWD)

Answer: No

| Separations                             | Total<br>(Number) | Reportable<br>Disabilities<br>(Percentage) | Without Reportable<br>Disabilities<br>(Percentage) |
|-----------------------------------------|-------------------|--------------------------------------------|----------------------------------------------------|
| Permanent Workforce: Reduction in Force | 0                 | 0.00                                       | 0.00                                               |
| Permanent Workforce: Removal            | 962               | 5.01                                       | 1.88                                               |
| Permanent Workforce: Resignation        | 1972              | 5.52                                       | 4.55                                               |
| Permanent Workforce: Retirement         | 3936              | 10.36                                      | 9.18                                               |
| Permanent Workforce: Other Separations  | 313               | 1.10                                       | 0.69                                               |
| Permanent Workforce: Total Separations  | 7183              | 21.99                                      | 16.30                                              |

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(s) in the text box.

a. Voluntary Separations (PWTD)

Answer: No

b. Involuntary Separations (PWTD)

Answer: No

| Separations                             | Total<br>(Number) | Targeted<br>Disabilities<br>(Percentage) | Without<br>Targeted Disabilities<br>(Percentage) |
|-----------------------------------------|-------------------|------------------------------------------|--------------------------------------------------|
| Permanent Workforce: Reduction in Force | 0                 | 0.00                                     | 0.00                                             |
| Permanent Workforce: Removal            | 962               | 4.68                                     | 2.22                                             |
| Permanent Workforce: Resignation        | 1972              | 5.64                                     | 4.65                                             |
| Permanent Workforce: Retirement         | 3936              | 11.95                                    | 9.26                                             |
| Permanent Workforce: Other Separations  | 313               | 1.24                                     | 0.73                                             |
| Permanent Workforce: Total Separations  | 7183              | 23.52                                    | 16.86                                            |

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.

DOC and its Bureaus did not record any Exit Interview Data during FY25.

## 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.commerce.gov/cr/complaints/section-508-architectural-barriers-act-aba-notice-rights>

2. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

<https://www.commerce.gov/cr/complaints/section-508-architectural-barriers-act-aba-notice-rights>

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.

In FY25, OCIO continued efforts to strengthen Section 508 governance and acquisition oversight processes, including continued review and refinement of Section 508 acquisition checklist procedures and coordination with Bureau accessibility representatives regarding Voluntary Product Accessibility Template (VPAT) reviews, procurement considerations, and accessibility compliance expectations. The DOC continued engagement with interagency accessibility initiatives and communities of practice, including participation in Federal CIO Council accessibility collaboration efforts and coordination activities intended to support consistent implementation approaches across DOC Bureaus. Efforts also continued toward improving awareness of accessibility responsibilities and strengthening accessibility integration into digital content, procurement, and IT governance processes. Coordinated activities included discussions related to accessibility review procedures, compliance monitoring approaches, and identification of opportunities for additional DOC-wide support resources. The DOC continued to evaluate opportunities to enhance centralized accessibility support capabilities and improved consistency in Section 508 implementation practices across Bureaus and operating units.

## 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.)

In FY25, DOC's Reasonable Accommodation Coordinators (RACs) received approximately 5803 RA requests, an increase from FY24's 2,047; 60 Percent were processed within established timelines.

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.

In FY25, DOC experienced another surge in RA requests due to the Return to Office Mandate. DOC processed over 5,500 RA requests (not including ASL requests) an increase of over 180 Percent from FY 24 (2,047) Timeliness was impacted by the significant increase in the number of RA requests submitted within a relatively short period of time. This led to longer than normal RA processing times across the DOC. To manage the increase, some Bureaus hired additional RA staff. The majority of the increase in RA requests was for some form of telework or remote work.

DOC Bureaus continued to offer reasonable accommodation training to employees, managers, and supervisors. During the new employees' orientation, Bureaus' RA staff provided information about reasonable accommodations. Some Bureaus also require new supervisors to attend training that included reasonable accommodation.

## D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

Pursuant to 29 CFR §1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.

1. Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

There were no requests for PAS.

## Section VII: EEO Complaint and Findings Data

### A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer: No

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

Answer: No

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.

During FY25, there were no findings of discrimination related to disability-based harassment. However, the DOC did settle cases involving disability-based harassment allegations.

### B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer: No

2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?

Answer: Yes

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.

During FY25 there were no findings of discrimination related to disability-based denial of reasonable accommodation.

## Section VIII: Identification and Removal of Barriers

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

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

Answer: No

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

Answer: No

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

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

N/A

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

N/A

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

N/A