

# MD-715 – Part J

## Special Program 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 plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

### Section I: Efforts to Reach Regulatory Goals

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

**1. Using the goal of 12% as the benchmark, does your agency have a trigger involving 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) | Yes 0 | No X |
| b. Cluster GS-11 to SES (PWD)  | Yes 0 | No X |

In FY 2023, PWD accounted for 29.00% of all permanent employees at the GS-1 to GS-10 grade-level cluster and 16.87% of all permanent employees at the GS-11 to SES grade-level cluster.

**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) | Yes 0 | No X |
| b. Cluster GS-11 to SES (PWTD)  | Yes 0 | No X |

In FY 2023, for the GS-1 to GS-10 cluster, PWTD workforce participation was 4.25%. For the GS-11 to SES cluster, PWTD workforce participation was 2.06%. The true workforce participation rate of PWTD may be higher, since these figures do not account for PWTD employees hired through 10-point Veterans' Preference based on a service-connected disability who did not elect to identify their disability. These figures also do not include employees who declined to identify their specific disability.

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

DOT issued an agency-wide memorandum in 2011 and again in 2014 communicating specific numerical goals for DOT and each OA.

Recruitment activities are evaluated by the OAs' Offices of Human Resources. The information is communicated throughout DOT. Workforce statistical data reports are provided to hiring managers and supervisors.

## 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.**

Yes X      No 0

DOT meets these requirements by having its Disability Resource Center (DRC) (<https://www.transportation.gov/drc/disability-resource-center>), Departmental Disability Program Manager, disability employment managers, a Departmental selective placement program manager, and Schedule A Hiring Coordinators at each OA. The Department also has full-time staff to assist applicants, process reasonable accommodation requests, manage special emphasis programs for persons with disabilities, and ensure compliance with the Architectural Barriers Act and Section 508 of the Rehabilitation Act for accessible communication technology. Although DOCR and the OA civil rights offices have been under-resourced, the new Administration is addressing these needs with budget increases to fill vacancies and DOCR expects to onboard a new Disability Program Manager in FY 2024.

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	4	0	0	OA HR Staff; Valerie Jones, Chief, DOT Automated Staffing Team, <a href="mailto:Valerie.a.Jones@dot.gov">Valerie.a.Jones@dot.gov</a>
Answering questions from the public about hiring authorities that take disability into account	4	0	0	OA HR Staff; Valerie Jones, Chief, DOT Automated Staffing Team, <a href="mailto:Valerie.a.Jones@dot.gov">Valerie.a.Jones@dot.gov</a>
Processing reasonable accommodation requests from applicants and employees	1	0	0	Michele Magana, Manager, DOT Disability Resource Center; <a href="mailto:Michele.Magana@dot.gov">Michele.Magana@dot.gov</a>
Section 508 Compliance	1	0	3	LaVette Sydnor, Section 508 Program Coordinator, Office of the Chief Information Officer (OCIO) <a href="mailto:Darnellia.Sydnor@dot.gov">Darnellia.Sydnor@dot.gov</a>
Architectural Barriers Act Compliance	5	0	0	Yvonne Medina, Director, Office of Facilities, Information, and Asset Management; <a href="mailto:Yvonne.Medina@dot.gov">Yvonne.Medina@dot.gov</a>
Special Emphasis Program for PWD and PWTD	4	0	11	Yvette Rivera, Departmental Office of Civil Rights, <a href="mailto:Yvette.Rivera@dot.gov">Yvette.Rivera@dot.gov</a>

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

Yes X

No 0

DOT provides communication skills and anti-harassment training to all DOT staff, along with reasonable accommodation training, as part of its model EEO program efforts.

The DRC provides training on Schedule A hiring to OAs.

#### B. Plan to Ensure Sufficient Funding for the Disability Program

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

Yes X

No 0

DOT funds the Agency’s DRC, which manages centralized interpreting services and personal assistance services for any DOT applicant or employee with a disability.

#### Section III: Plan to Recruit and Hire Individuals with Disabilities

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

## A. Plan to Identify Job Applicants with Disabilities

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

DOT utilizes a Selective Placement Program Manager, Schedule A Coordinators in Operating Administrations, Human Resources Specialists, and designated recruitment teams to identify and recruit applicants with disabilities using the strategies below.

DOT regularly participates in job and career fairs for persons with disabilities. People with disabilities and disabled veterans are included as part of the recruitment teams. University and college offices for students with disabilities, in addition to career services offices, are contacted for recruitment purposes.

DOT utilizes public, private, and non-profit entities to include the Department of Labor's Employer Assistance and Resource Network; state and local vocational rehabilitation agencies and employment offices; the Office of Personnel Management's Shared List of People with Disabilities; the Workforce Recruitment Program database; the Department of Veterans Affairs, Wounded Warrior Office, and Vets 2 Feds; military installations and transition offices; Department of Defense, Operation Warfighter Program; the National Naval Officers Association; and disability-related advocacy organizations whose primary focus is working to employ people with disabilities.

The DOT Executive Agent has a standard list of professional organizations and academic institutions that automatically receive a copy of all job announcements posted via USAJobs.

DOT's departmental recruitment council will develop a departmental recruitment plan that will align with the agency's Human Capital Operating Plan, which includes benchmarks for recruitment and hiring of persons with disabilities and targeted disabilities.

### 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 agency and its OAs utilize Schedule A hiring authority to recruit PWD and PWTD into the workforce. Additionally, DOT uses the Veterans' Hiring Process extensively, which includes veterans with service-connected disabilities.

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- 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.**

All vacancies that are advertised “government-wide” and “all sources” include a statement on People with Disabilities and consideration under special appointing authorities. Eligibility criteria are addressed on open competitive vacancy announcements to educate those candidates unfamiliar with application procedures, forms, and requirements. Additionally, reasonable accommodation statements are included on vacancy announcements to notify applicants with disabilities. Applicants who are eligible under special appointing authorities and meet the job qualifications are referred to hiring managers on a non-competitive certification list. Human Resources Specialists discuss with hiring officials the use of hiring flexibilities, non-competitive appointment authorities to include Schedule A, and disabled veterans’ appointments. Additionally, people with disabilities can send their resumes directly to the DOT Selective Placement Coordinator.

- 4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If “yes”, describe the type(s) of training and frequency. If “no”, describe the agency’s plan to provide this training.**

Yes X      No 0      N/A 0

DOT provides training on hiring authorities, including Schedule A, at least annually. DOT also maintains the Disability Program website (<https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/people-disabilities>), which is a resource for job applicants and human resources professionals. Additionally, DOT has a resource on its intranet for managers to use for hiring people with disabilities. DOT also provides managers with the policy on Reasonable Accommodations and DOT hiring tool kit for managers.

## **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.**

See answer for A.2 in Section III.

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

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

a. New Hires for Permanent Workforce (PWD)	Yes 0	No X
b. New Hires for Permanent Workforce (PWTD)	Yes 0	No X

Of the 3574 new hires to the permanent workforce, 29.63% were PWD and 2.46% were PWTD. In FY 2023, there were not triggers for either PWD or PWTD among the new hires to the permanent workforce.

- 2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.**

a. New Hires for MCO (PWD)	Yes 0	No X
b. New Hires for MCO (PWTD)	Yes X	No 0

The hiring rate of PWD for all MCO's exceeded 12% except for Air Traffic Control (ATC), which had a hiring rate of PWD of 7.04%. When comparing hiring rate to the qualified applicant pool, there were no triggers for PWD in the ten MCOs.

The hiring rate for PWTD was less than 2% for the MCO of Aerospace Engineering, Aviation Safety, Civil Engineering, General Engineering, ATC, and Transportation Specialist. The hiring rate of PWTD was greater than 2% for Electronics Engineering, Miscellaneous Administration and Program, Motor Carrier Safety, and Program Analysis. Additionally, eight of the ten MCO have triggers for PWTD when comparing new hires to qualified applicants.

**3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified *internal* applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.**

a. Qualified Applicants for MCO (PWD)	Yes X	No 0
b. Qualified Applicants for MCO (PWTD)	Yes X	No 0

Comparing the applicant pool to the qualified internal applicant pool, triggers exist for most MCO for both PWD and PWTD. In all cases but one (Electronics Engineering), however, these triggers are based on very small differences.

**4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.**

a. Promotions for MCO (PWD)	Yes X	No 0
b. Promotions for MCO (PWTD)	Yes X	No 0

Comparing employees promoted to MCO to qualified internal applicants, we see triggers for PWD only amongst ATC. Electronics Engineering actually shows a large increase in representation of PWD between qualification and promotion so that the final percentage promoted in this MCO more accurately reflects the original applicant pool. Triggers exist for PWTD for half of the MCO, but in most cases (except Civil Engineering), however, these triggers are based on very small differences.

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

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

### A. Advancement Program Plan

**Describe the agency’s plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.**

DOT provides training and career development opportunities for all employees, including those with disabilities. Employees are notified of developmental and training opportunities via venues such as the DOT Rotational Assignment Program, The Learning Highway, Career Advancement Webinar Series, Webinar Libraries, Training and Development e-mail systems, and Employee Awareness Programs. Online learning opportunities are accessible to all DOT employees through the Department's eLearning System (DOTLearns). DOT also connects with ERGs to share information with their members on available career development opportunities. Advertisements for training and workshops include language on reasonable accommodations. All marketing and promotional materials designed to inform DOT of training and professional development are 508-compliant.

The Department has a DOT-wide mentoring program that incorporates diversity and inclusion. DOT also manages an executive coaching program that offers individual and team coaching for GS-15 and SES employees. The Department also has developed a series of Career Path Guides that employees can access and utilize to identify the competencies required for success in various DOT occupational fields, including mission critical occupations. DOT has incorporated disability as tenet of inclusion in agency and subagency-wide trainings and initiatives, increasing representation and visibility for PWD and PWTD and prioritizing the need for accessible transparent career opportunities and career paths upon hire.

Promotion opportunities are posted on internal intranet sites and on USAJOBS, and emails are sent to employees and agency employee resource groups with links to vacancy announcements on USAJOBS.

## B. Career Development Opportunities

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

DOT continues to promote and create career development opportunities for all DOT employees. These opportunities include career counseling, workshops on mentoring, interviewing, resume writing, and professional imaging. Additionally, as noted above, DOT has developed career path guides that are available to all employees.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	5,071	627	12.4	11.8	3.8	3.3
Fellowship Programs	6	0	0.0	0.0	0.0	0.0
Mentoring Programs	178	65	36.5	96.9	4.5	12.3
Coaching Programs	14	3	21.4	100.0	0.0	0.0
Training Programs	1,259	212	16.8	99.5	2.1	12.3
Detail Programs	133	16	12.0	18.8	0.0	0.0
Other Career Development Programs	204	30	14.7	46.7	1.5	6.7

**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.**

a. Applicants (PWD) Yes 0 No X  
b. Selections (PWD) Yes X No 0

Based on the available demographic information for several different types of career development programs, in FY 2023, DOT identified possible triggers for PWD among selectees for internships only. DOT will conduct additional analysis to confirm these possible triggers.

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

a. Applicants (PWTD) Yes X No 0

b. Selections (PWTD) Yes X No 0

Based on the available demographic information for several different types of career development programs, in FY 2023, DOT identified possible triggers for PWTD among selectees for internships only. Additionally, some smaller programs had no or few PWTD applicants. DOT will conduct additional analysis to confirm these possible triggers.

### 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) Yes 0 No X

b. Awards, Bonuses, & Incentives (PWTD) Yes 0 No X

Compared to the inclusion rate, PWD and PWTD received cash and time off awards at higher rates. PWD were very slightly less likely to receive large individual cash awards, but both PWD and PWTD were more likely to receive large time off awards.

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

a. Pay Increases (PWD) Yes X No 0

b. Pay Increases (PWTD) Yes X No 0

PWD and PWTD had higher likelihood of achieving QSI compared to the workforce as a whole. However, PWD and PWTD in the executive service were less likely to receive SES performance awards.

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

a. Other Types of Recognition (PWD) Yes 0 No 0 N/A X

b. Other Types of Recognition (PWTD) Yes 0 No 0 N/A X

#### 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.**

a. SES

i. Qualified Internal Applicants (PWD)      Yes 0      No X

ii. Internal Selections (PWD)      Yes 0      No X

b. Grade GS-15

i. Qualified Internal Applicants (PWD)      Yes X      No 0

ii. Internal Selections (PWD)      Yes 0      No X

c. Grade GS-14

i. Qualified Internal Applicants (PWD)      Yes X      No 0

ii. Internal Selections (PWD)      Yes 0      No X

d. Grade GS-13

i. Qualified Internal Applicants (PWD)      Yes X      No 0

ii. Internal Selections (PWD)      Yes 0      No X

For each of the senior grade levels, the proportion of PWD amongst those promoted was higher than in the internal qualified applicant pool. However, the representation among of PWD amongst qualified internal applicants was lower than the internal applicant pool as a whole for each senior grade level.

In FY 2023, no data were available to separate internal applicants or qualified applicants to the SES from external applicants. However, the percentage of PWD promoted in the SES fell short of the 12% benchmark.

**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.**

a. SES

i. Qualified Internal Applicants (PWTD)	Yes X	No 0
ii. Internal Selections (PWTD)	Yes 0	No X

b. Grade GS-15

i. Qualified Internal Applicants (PWTD)	Yes X	No 0
ii. Internal Selections (PWTD)	Yes 0	No X

c. Grade GS-14

i. Qualified Internal Applicants (PWTD)	Yes X	No 0
ii. Internal Selections (PWTD)	Yes 0	No X

d. Grade GS-13

i. Qualified Internal Applicants (PWTD)	Yes 0	No X
ii. Internal Selections (PWTD)	Yes X	No 0

For each of the senior grade levels (except grade GS-13), the proportion of PWTD amongst those promoted was higher than in the internal qualified applicant pool. However, the representation among of PWTD amongst qualified internal applicants was lower than the internal applicant pool as a whole for each senior grade level.

In FY 2023, no data were available to separate internal applicants or qualified applicants to the SES from external applicants. However, the percentage of promoted PWTD in the SES exceeded both the 2% and 3% benchmarks.

**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.**

a. New Hires to SES (PWD)	Yes 0	No X
b. New Hires to GS-15 (PWD)	Yes 0	No X
c. New Hires to GS-14 (PWD)	Yes 0	No X
d. New Hires to GS-13 (PWD)	Yes 0	No X

Hiring of PWD exceeded the benchmark from the qualified applicant pool at every senior grade level.
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**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.**

a. New Hires to SES (PWTD)	Yes X	No 0
b. New Hires to GS-15 (PWTD)	Yes 0	No X
c. New Hires to GS-14 (PWTD)	Yes X	No 0
d. New Hires to GS-13 (PWTD)	Yes X	No 0

Hiring of PWTD exceeded the benchmark from the qualified applicant pool only at GS-15, although changes were small for GS-13 and GS-14. No PWTD were hired to SES in FY 2023.
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**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.**

a. Executives

i. Qualified Internal Applicants (PWD)	Yes	X	No	0
ii. Internal Selections (PWD)	Yes	0	No	X

b. Managers

i. Qualified Internal Applicants (PWD)	Yes	X	No	0
ii. Internal Selections (PWD)	Yes	0	No	X

c. Supervisors

i. Qualified Internal Applicants (PWD)	Yes	X	No	0
ii. Internal Selections (PWD)	Yes	0	No	X

For each of the supervisory groups, the proportion of PWD amongst those promoted was higher than in the internal qualified applicant pool. However, the representation of PWD amongst qualified internal applicants was lower than the internal applicant pool as a whole for each supervisory group.

**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.**

a. Executives

i. Qualified Internal Applicants (PWTD)	Yes	X	No	0
ii. Internal Selections (PWTD)	Yes	0	No	X

b. Managers

i. Qualified Internal Applicants (PWTD)	Yes	X	No	0
ii. Internal Selections (PWTD)	Yes	0	No	X

c. Supervisors

i. Qualified Internal Applicants (PWTD)	Yes	X	No	0
ii. Internal Selections (PWTD)	Yes	0	No	X

For each of the supervisory groups, the proportion of PWTD amongst those promoted was higher than in the internal qualified applicant pool. However, the representation among of PWTD amongst qualified internal applicants was lower than the internal applicant pool as a whole for each supervisory group.

**7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.**

a. New Hires for Executives (PWD)	Yes 0	No X
b. New Hires for Managers (PWD)	Yes 0	No X
c. New Hires for Supervisors (PWD)	Yes 0	No X

Hiring of PWD exceeded the benchmark from the qualified applicant pool at every supervisory grouping.

**8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.**

a. New Hires for Executives (PWTD)	Yes X	No 0
b. New Hires for Managers (PWTD)	Yes X	No 0
c. New Hires for Supervisors (PWTD)	Yes 0	No X

Hiring of PWTD was lower than representation among the qualified external applicant pool for Executives and Managers.

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

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

### A. Voluntary and Involuntary Separations

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

Yes X      No 0      N/A 0

- 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)**      Yes X      No 0

**b. Involuntary Separations (PWD)**      Yes X      No 0

Based on the inclusion rate, in FY 2023, the voluntary separation rate for PWD (4.93%) was higher than that of employees without a disability (4.79%). The PWD involuntary separation rate (2.48%) exceeded the non-PWD involuntary separation rate (1.97%) in FY 2023.

**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.**

<b>a. Voluntary Separations (PWTD)</b>	<b>Yes</b> X	<b>No</b> 0
<b>b. Involuntary Separations (PWTD)</b>	<b>Yes</b> X	<b>No</b> 0

Based on the inclusion rate, in FY 2023, the voluntary separation rate for PWTD (5.58%) was higher than that of employees without a targeted disability (4.80%). The involuntary separation rate for PWTD (3.06%) was higher than that of employees without a targeted disability (2.04%).

**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*.**

FY 2023 exit interview data show that 10.3% of respondents (29 individuals) self-identified as a person with a disability (PWD) (49.1% of applicants indicated no disability and 40.6% of respondents did not answer); 7.1% of respondents identified themselves as having a targeted disability (20 individuals). Exit survey results indicate that, in general, PWD cited more reasons for their departure (that is, replied “Agree” or “Strongly Agree” to multiple criteria). More than half of all departing PWD respondents and PWTD respondents indicate that one or more of the five most highly cited factors (Leadership, Nature of Work, Work/Life Balance, Fairness, and Employee Interactions) contributed to their departure. Although EEO environment was less commonly cited as a reason for leaving (34.5% of PWD and 40.0% of PWTD respondents), employees without a disability cited this less often (12.2%).

## **B. Accessibility of Technology and Facilities**

Pursuant to 29 C.F.R. § 1614.203(d)(4), Federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. §§ 4151-4157), concerning the accessibility of agency facilities). In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

**1. Please provide the internet address on the agency’s public website for its notice explaining employees’ and applicants’ rights under Section**

**508 of the Rehabilitation Act, including a description of how to file a complaint.**

<https://www.transportation.gov/accessibility> and  
<https://www.transportation.gov/mission/office-secretary/office-chief-information-officer/digital-accessibility-statement>

**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.transportation.gov/mission/facility-accessibility>

**3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.**

The DRC provides technical assistance to DOT staff on issues related to accessible facilities and technology.

DOT's headquarters building was constructed with the goal of accessibility and compliance with the Architectural Barriers Act and Access Board requirements. As DOT consolidates or moves to new workspaces, facility accessibility is a priority. GSA assists with the DOT's leased space needs and with appropriate contractual lease language.

### **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.)**

Based on a review of data from the DOT Reasonable Accommodation Management System, initial requests for reasonable accommodations were processed in an average time frame of 112 business days in FY 2023.

**2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.**

The DRC is centrally funded and provides reasonable accommodations to employees and job applicants. A delivery model of this type ensures fair and consistent outcomes throughout DOT. This program is funded through the Working Capital Fund. DRC also provides training for certain accommodations to ensure the employee's success in using the identified product. This training is usually contracted with an outside vendor. The vendor is provided with the employee's contact information and contacts the employee to schedule the training directly with the employee.

DRC provides services such as sign language interpreting and PAS services through nationwide contracts. Staff interpreters are also available to provide interpreting services. DRC also provides captioning services and assistive technology-related trainings.

In FY 2021, DOT issued DOT Order 1011.1B: "Procedures for Processing Reasonable Accommodation Requests from Job Applicants and DOT Employees with Disabilities." It establishes written procedures for the provision of reasonable accommodations for employees and applicants at the agency, including timely processing of requests as well as timely providing approved accommodations.

This update clarifies roles and responsibilities for the decision-making process, includes requirements to respond to public questions regarding reasonable accommodation, and incorporates requirements to ensure personal assistance services are available to individuals who require such services as a reasonable accommodation.

#### D. Personal Assistance Services Allowing Employees to Participate in the Workplace

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

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

The DRC has provided Personal Assistance Services (PAS) since 2004.

PAS are available to DOT employees throughout the United States. Currently, PAS are in place in for employees in Washington, D.C.; Cambridge, MA; Seattle, WA; and Atlanta, GA.

The PAS is processed in the same manner as a reasonable accommodation. The employee requests the PAS by informing either his or her supervisor, human resources personnel, designated decision maker, or other suitable DOT representative that they require assistance with daily life activities because of a medical condition/targeted disability. The employee and/or representative contacts the DRC to speak with a Reasonable Accommodation Analyst to begin the interactive process.

Employees who are required to travel can utilize PAS via:

- Nationwide contract: Services are procured through DRC's Nationwide contract, or
- Invitational Travel: employee has their own Personal Assistant (typically a spouse or family member).

Once an employee has been approved for PAS, the vendor is immediately notified. The vendor contacts the employee within 24 hours to discuss approved services and set up a schedule of services.

DRC has a PAS coordinator on-site at DOT Headquarters. This allows for easier handling of customer late/last minute PAS requests, and issues and complaints can be addressed quickly.

DRC has updated its Handbook to reflect the expansion of their PAS to meet the revised requirements, as mentioned in Subsection C Question 2 of this section. The agency has also posted an FAQ on PAS on its public-facing website.

## Section VI: EEO Complaint and Findings Data

### A. EEO Complaint data involving Harassment

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

Yes 0      No X      N/A 0

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

Yes 0      No X      N/A 0

- 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.**

The agency had one finding of harassment based on disability in FY 2023. In compliance with the Administrative Judge's Order, DOT amended personnel files, restored leave, and provided notice of the Finding and EEO training to the relevant office and relevant staff. The Department continues to implement a Departmental Anti-Harassment Policy, and DOOCR and DOHRM collaborate to oversee each OA's Anti-Harassment Program. Per DOT's policy, all DOT employees and supervisors/managers receive annual training on the anti-harassment program, including information about the prohibition against harassment on the basis of disability.

### B. EEO Complaint Data involving Reasonable Accommodation

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

Yes 0      No X      N/A 0

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

Yes X      No 0      N/A 0

**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.**

DOT and its OAs hosted many trainings throughout FY 2023 to support a safe and inclusive workplace culture. Many of these trainings focused on EEO and nondiscrimination topics, including reasonable accommodation, while others focused on communication skills to create a more productive and civil work environment.

## Section VII: Identification and Removal of Barriers

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

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

Yes ☒ No ☐

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

Yes ☒ No ☐ N/A ☐

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

Trigger 1	People with targeted disabilities (PWTD) have a participation rate in DOT's workforce below 2%.			
Barrier(s)	Recruitment Practices; DOT focuses recruitment on distributing competitive vacancy announcements.			
Objective(s)	Increase hiring manager and HR Specialist awareness and knowledge of how to use non-competitive hiring authorities for individuals with disabilities (Schedule A; "On-the-Spot" within FAA). Increased awareness of this hiring flexibility will serve the longstanding Departmental goal for PWTD to comprise 3% of all new hires.			
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)		
Anne Audet, Director, DOHRM; Irene Marion, Director, DOCR		Yes		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing	Modified Date	Completion Date

		& Funding (Yes or No)	(mm/dd/yyyy)	(mm/dd/yyyy)
Ongoing	Educate hiring managers and HR Specialists on available hiring flexibilities to include Schedule A through the revamped and user-friendly hiring tool kit.	Yes		09/30/2023
Ongoing	DOCR will analyze data regarding disability status reporting of preference eligible veterans to determine what, if any, outreach education should be developed to encourage identifying as a PWD/PWTD.	Yes		09/30/2023 UPDATED 09/30/2024
Fiscal Year	Accomplishments			
2023	<p>DOT achieved this goal in FY 2023, with a participation rate of 2.29% for PWTDS, which represents a substantial increase compared with the FY 2021 participation rate of 0.77% and the FY 2022 participation rate of 1.57%, per MD-715 workforce tables. Among new hires to the permanent workforce in FY 2023, 2.46% were PWTD, thus exceeding the 2% benchmark hiring goal.</p> <p>DOT recognizes that many veterans hired with preference based on 30% or more disability do not report a targeted disability on the SF-256 during the onboarding process. DOHRM and DOCR are considering opportunities to enhance DOT data on employees with disabilities.</p> <p>DOHRM continued to utilize its automated Hiring Toolkit for Hiring Managers and HR Specialists, which clearly delineates the steps of using the Schedule A authority.</p> <p>DOHRM continued ongoing training of HR Staffing Specialists on the DOT Schedule A Hiring Authority process as laid out in the Departmental Personnel Manual.</p> <p>OST HR Operations has communicated the Schedule A hiring process through the OA/HR Partnership meeting and participated in all Schedule A hiring events at DOT.</p>			

Trigger 2	<p>FY 2023 exit interview data indicate that, in general, PWD cited more reasons for their departure (that is, replied "Agree" or "Strongly Agree" to multiple criteria). More than half of all departing PWD respondents and PWTB respondents indicate that Leadership, Nature of Work, Work/Life Balance, Fairness, and Employee Interactions contributed to their decision to separate. Other employees cited these reasons far less. Although EEO environment was less commonly cited as a reason for leaving (34.5% of PWD and 40% of PWTB respondents), employees without a disability cited this yet less often (12.2%).</p> <p>In FY 2023, however, PWD and PWTB were only slightly more likely to separate than employees who did not indicate any disability. Separations as a percentage of the corresponding onboard workforce (inclusion rate) were 7.41 % for PWD and 8.64% for PWTB, compared to 6.76% for employees without a disability.</p>			
Barrier(s)	Retention; workplace conditions and career opportunities may be affecting the work environment for PWTB.			
Objective(s)	Identify specific workplace issues related to fairness in the workplace that may be impacting retention, including educating employees and managers about available career development opportunities; and promoting awareness on executive communication skills and reasonable accommodation			
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)		
Anne Audet, Director, DOHRM; Irene Marion, Director, DOCR		Yes		
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
Ongoing	Educate employees and supervisors on available career development opportunities	Yes		09/30/2022
Ongoing	Educate managers and supervisors on effective communication with staff and the availability of mediation services, and the anti-harassment program.	Yes		09/30/2022
Ongoing	Provide additional training on reasonable accommodation to supervisors and managers	Yes		09/30/2023 UPDATED 09/30/2024

Fiscal Year	Accomplishments
2023	<p>In late FY 2019, the Department adopted its Anti-Harassment Policy and in FY 2020, the Department began to implement procedures, including timeframes for investigations and regular training on the program for all staff, with specific trainings provided for supervisors and managers. The policy covers all groups, including persons with disabilities. DOT continued to increase program awareness for all employees and will support the development of improved trainings in FY 2023.</p> <p>The Department continued to collect and analyze data on employee participation in competitive career development opportunities to aid with educating employees on the various opportunities available to them. DOT's DEIA Strategic Plan emphasizes the need to track participation in specific types of agency-offered opportunities and provided technical assistance as needed.</p>

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

Not applicable.

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

The planned activities are ongoing. Under the framework of the DEIA Strategic Plan, DOT is conducting in-depth data analysis and developing metrics to evaluate impacts of actions to remove barriers in employment and retention for persons with targeted disabilities.

**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.**

The planned activities are ongoing. Under the framework of the DEIA Strategic Plan, DOT is conducting in-depth data analysis and developing metrics to evaluate impacts of actions to remove barriers in employment and retention for persons with targeted disabilities.

