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SUMMARY
PROMISING AND EMERGING PRACTICES FOR
ENHANCING THE EMPLOYMENT OF INDIVIDUALS
WITH DISABILITIES INCLUDED IN PLANS
SUBMITTED BY FEDERAL AGENCIES UNDER
EXECUTIVE ORDER 13548

Office of Disability Employment Policy
U.S. Department of Labor

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I. INTRODUCTION

1. Background

On July 26, 2010, President Obama signed **Executive Order 13548** to establish the Federal Government as a model employer of individuals with disabilities and to improve efforts to employ workers with disabilities through increased recruitment, hiring, and retention. Efforts to become a model employer include increasing the number of individuals with disabilities in the Federal workforce by 100,000 over five years, including specific goals for hiring individuals with targeted disabilities. As part of this directive, the Executive Order called for each agency to develop an agency-specific plan for promoting employment opportunities for individuals with disabilities. Agency plans were developed in consultation with and, as appropriate, subject to approval by, the Director of the Office of Personnel Management (OPM) and the Director of the Office of Management and Budget (OMB).

Agency plans were required to include performance targets and numerical goals for employment of individuals with disabilities and sub-goals for employment of individuals with targeted disabilities. Also, the Executive Order directed each agency to designate a senior-level agency official to be accountable for enhancing employment opportunities for individuals with disabilities, including targeted disabilities. Specifically, the official is accountable for developing and implementing the agency's plan, creating related recruitment and training programs, and coordinating employment counseling to match the career aspirations of individuals with disabilities to the needs of the agency. Further, in implementing their plans, agencies, to the extent permitted by law, must increase utilization of the Federal government's Schedule A hiring authority for persons with disabilities and increase participation of individuals with disabilities in internships, fellowships, and training and mentoring programs.

The Executive Order requires OPM to assist agencies with implementation of their plans and for the Director of OPM, in consultation with the Director of OMB, to implement a system for reporting regularly to the President, the heads of agencies, and the public on agencies' progress. Also, the Director of OPM, in consultation with the Secretary of Labor and the Chair of the Equal Employment Opportunity Commission (EEOC), must identify and assist agencies in implementing strategies for retaining Federal workers with disabilities including, but not limited to, training; the use of centralized funds to provide reasonable accommodations; increasing access to accessible technologies; and ensuring the accessibility of physical and virtual workplaces.

Furthermore, agencies must work to improve, expand, and increase successful return-to-work outcomes for employees who sustain work-related injuries and illnesses by increasing the availability of job accommodations and light or limited-duty jobs; removing disincentives for claimants under the Federal Employees' Compensation Act (FECA) to return to work; and taking other appropriate measures. Related to this, the Secretary of Labor, in consultation with the Director of OPM, must pursue innovative re-employment strategies and develop policies, procedures, and structures that foster improved return-to-work outcomes, including overall reform of the FECA system. The Secretary of Labor must also propose specific outcome

measures and targets by which each agency's progress in carrying out the return-to-work and FECA claims processing efforts can be assessed.

Executive Order 13548 augments and complements the requirements under Section 501 of the Rehabilitation Act and implementing regulations and management directives (including Management Direct 715), requiring Federal departments, agencies, and instrumentalities in the executive branch to prepare affirmative action programs for the hiring, placement, and advancement of individuals with disabilities.

2. Purpose of report

This summary report identifies promising and emerging practices for advancing the recruitment, hiring, and retention of individuals with disabilities identified in 10 selected agency plans submitted under Executive Order 13548. This summary report does not attempt to identify all promising and emerging practices used by these Federal agencies; rather, it only addresses those identified in their plans. This summary report may be used by Federal agencies to learn about practices that may facilitate achievement of the overarching goal of the Executive Order—to ensure that the Federal government becomes a model for the employment of individuals with disabilities.

3. Approach and methodology

The following approach and methodology were used to identify the practices included in this report. First, a review of the literature was conducted to identify existing frameworks describing promising and emerging practices for employing people with disabilities in the public and private sectors. Second, a template was prepared for use in reviewing agency plans within the context of the following major topic areas:

- Inclusive agency-wide culture (including commitment by agency leadership and issuance of policy statements);
- Self-identification, quantitative analysis, and goals and benchmarks;
- Outreach and recruitment;
- Hiring, career development and advancement, and retention;
- Reasonable accommodation policies and procedures;
- External and internal communication of agency policies and procedures;
- Accessible information and communication technology; and
- Accountability and continuous improvement.

Third, a scan of all agency plans was conducted (using the aforementioned template) and 10 agency plans were selected. The primary criteria used to select the 10 agency plans was their breadth, depth, and uniqueness of promising and emerging practices as determined collaboratively by EEOC, OPM and DOL. The agencies selected were:

- Agriculture (AG)
- Defense (DoD)
- Education (ED)

- Equal Employment Opportunity Commission (EEOC)
- Health and Human Services (HHS)
- Labor (DOL)
- Office of Personnel Management (OPM)
- Social Security Administration (SSA)
- Treasury (Treasury)
- Veterans Affairs (VA)

Fourth, an agency-by-agency plan review was completed using the template and descriptions of each agency's promising and emerging practices were prepared. Finally, a thematic analysis was completed under which each practice was categorized appropriately under the eight major topics.

These major topics serve as the framework for this summary report. For each promising and emerging practice identified, the report includes citations to the page number in an agency's plan. For reference, the actual agency plans are available at www.max.gov, a password-protected site for Federal employees.

II. INCLUSIVE AGENCY-WIDE CULTURE

1. Developing policy statements and recognizing the importance of leadership, commitment, infrastructure, and accountability

- Affirming that leadership commitment, at all levels of the agency, is essential for success. [SSA at pages 13-14]
- Affirming in policy statements the agency's commitment to equal employment opportunity for people with disabilities and taking affirmative steps to employ, retain, and advance qualified individuals with disabilities at all levels and job positions. [DOL at page 3]
- Circulating memoranda (annually) signed by leadership expressing support for the Executive Order [DoD at page 6] and the requirements of Section 501 and 504 of the Rehabilitation Act to facilitate hiring, placement, and advancement of people with disabilities. [EEOC at page 2]
- Adopting a comprehensive, aggressive, deliberate, continual approach and series of initiatives with leadership as the catalyst, the creation of a strong infrastructure and successful implementation through senior leadership, commitment, and accountability. [AG at pages 3, 18; DoD at page 6; ED at page 5; DOL at page 3; SSA Executive Summary]
- Conducting a summit to secure support, promote dialogue, and explore implementation issues. [DoD at page 6]
- Including disability as part of all of the agency's diversity policies and activities. [ED at page 5; DOL at page 3; OPM at page 1; SSA Executive Summary]

2. Making (and publicizing) the “business case” for employing qualified individuals with disabilities

- The business case is simple—commitment of the agency to being a model employer. [ED at page 6]
- Implementing the Executive Order and Section 501 and 504 is not only the right thing to do, but it is also good for government and good for the agency, as it increases the pool of highly qualified people from which the agency draws talent. [EEOC at page 1]

3. Encouraging workers with disabilities and other employees to identify barriers without fear of reprisal

- Encouraging workers with disabilities and other employees to identify barriers, issues, and individual and systemic concerns, without fear of reprisal, and also providing mechanisms such as surveys to allow them to provide this information anonymously. [AG at page 16; VA at page 27]

4. Establishing a universal policy providing workplace flexibility, including the use of telework, flexiplace, and flextime options

- Establishing a universal policy providing workplace flexibility and accommodations for all applicants and employees, with and without disabilities, who can document the need for such flexibility and accommodations, including the use of telework, flexiplace, and flextime options. [AG at pages 14-15; EEOC at page 9; DOL at page 18]
- Implementing work-life programs and initiatives to help employees balance the needs of the workplace with the rest of their lives. [Treasury at page 7]
- Publicizing workplace flexibility strategies [EEOC at page 9], including initiating an aggressive campaign to increase the use of telework for all employees. [AG at page 15]

III. SELF-IDENTIFICATION, QUANTITATIVE ANALYSIS, AND GOALS AND BENCHMARKS

1. Inviting self-identification of applicants and employees

- Encouraging employees (including new and existing employees) with disabilities to self-identify as a person with a disability, for example sending an annual broadcast message from agency leadership encouraging self-identification [AG at page 9; DoD at page 10] or distributing a memorandum to all employees allowing them to self-identify and explaining benefits and protections. [EEOC at page 2]

- Developing and initiating an aggressive marketing campaign to promote the process of updating profiles. [DOL at pages 12-13]
- Increasing education and awareness of the SF 256-Self-Identification of Disability Form, the source of Federal disability statistics [DoD at page 10] and informing employees of how self-identification benefits them. [VA at page 11]
- Including a description and explanation of the SF 256-Self-Identification of Disability Form at new employee orientation. [EEOC at page 14; SSA at page 19]
- Distributing a memorandum to human resource (HR) directors providing guidance on effective use of the SF 256-Self-Identification of Disability Form during the on-boarding process. [DoD at page 10]
- Re-surveying employees on a periodic basis [HHS at page 4] and on an annual basis. [AG at page 9; DoD at page 10; OPM at page 2; EEOC at page 2]

2. Conducting quantitative analysis and establishing goals and benchmarks

[NOTE: The Executive Order plans generally identified goals but did not provide comprehensive descriptions of the processes used for conducting the quantitative analyses and tracking outcomes. These processes are more fully described in the agencies' reports submitted pursuant to Management Directive 715.]¹

Examples of hiring goals:

- ED—increase the total number of individuals with disabilities to at least **10.5%** in FY 2012 and to at least **12%** in FY 2015; increase the total number of individuals with targeted disabilities to at least **3.5%** in FY 2012 and to at least **5.5%** in FY 2015. [ED at page 8]
- EEOC—five year plan is to increase the overall number of individuals with disabilities to at least **20%** of permanent workforce and increase the number of

¹ To successfully remove barriers, an agency must do effective barrier analysis, which requires identification of the root cause of the trigger(s), such as a lower than expected participation in the workforce. When the root cause is identified, the agency then needs to develop a comprehensive action plan to eliminate the barrier. The plan should be disseminated to agency managers, who should work in collaboration with the EEO Office to implement the plan. The plan should be regularly reviewed and updated to report on progress in eliminating the root cause found, or address modifications that may be needed to the plan if new barriers are found. It is important that agencies move beyond merely identifying triggers showing the low participation of people with disabilities in the workforce to actually identifying the underlying barrier. Only then can agencies develop the most effective action plans specifically tailored to address that particular barrier. Once the agency identifies its unique barriers, it can incorporate the possible practices discussed below into an action plan tailored to remove those specific barriers. Only by doing focused barrier analysis can an agency determine which of the following practices are best suited for the agency to address and eliminate an identified barrier.

individuals with targeted disabilities to least **5%** of the permanent workforce. [EEOC at pages 2-3]

- HHS—increase the total number of individuals with disabilities to at least **6.8%** in FY 2012 (9.5% of new hires) and to at least **8%** in FY 2015 (11% of new hires); increase the number of individuals with targeted disabilities to at least **1.6%** in FY 2012 (.30% of new hires) and to at least **2.5%** in FY 2015 (.30% of new hires). [HHS at page 13]
- DOL—increase the percent of individuals with disabilities in current workforce to **11.3%** in FY 2016 and increase the percentage of individuals with targeted disabilities to at least **3%** in FY 2016. [DOL at page 5]
- Focusing on increasing the employment rate of people with disabilities and targeted disabilities, not merely hiring such employees especially in light of the number of individuals with disabilities leaving the workforce [EEOC at page 3]; including goals relating both to new hires as well as the permanent workforce. [HHS at page 13]
- Setting performance targets and numerical goals that will make the department a model employer. Each departmental agency will have an individual goal and each agency head will be held accountable for a proportionate share of the overall departmental goal. [DOL at page 4]
- Setting goals for hiring or promoting into pay levels and occupations where individuals with reportable and targeted disabilities are not well represented. [VA at pages 8-9]
- Tracking and reporting progress closely and re-evaluating hiring and retention goals frequently, on at least quarterly intervals. Monitoring the projections will assist the agency to modify its strategic focus as its hiring climate changes. [ED at page 8]
- Updating the agency's Strategic Human Capital Plan to include hiring goals for people with disabilities and requiring the use of hiring and retention data as a critical factor in hiring and workforce succession planning. [OPM at page 2]

IV. OUTREACH AND RECRUITMENT

1. Outreach and recruitment sources

- General examples:
 - Using a number of free and user friendly databases to recruit new applicants with disabilities. [AG at pages 13-14; HHS at page 5; VA at page 8]

- Expanding applicant pools, with a goal of having at least one well-qualified applicant with a disability for each position that the agency announces. [EEOC at page 6]
- Using public recruiting sources, including OPM’s Shared List of People with Disabilities; One-Stop Career Centers established under the Workforce Investment Act; State vocational rehabilitation agencies and community rehabilitation programs; State employment agencies; Employment Networks established under the Ticket to Work program; independent living centers established under Title VII of the Rehabilitation Act; and the Department of Veterans Affairs Regional Offices. [AG at page 14; EEOC at page 7; HHS at page 3; DOL at pages 6-7; SSA at page 22; Treasury at page 7]
- Using and making arrangements, including establishing memoranda of understanding (MOUs) with educational institutions, including community colleges, universities, and other institutions of learning and/or training, including those that offer programs for individuals with specific disabilities, such as persons who are blind, deaf, and have learning disabilities. [AG at page 14; DOL at pages 6-7; SSA at page 36; VA at page 6]
- Using and making arrangements, including establishing memoranda of understanding (MOUs) with non-profit entities and social service agencies, including labor organizations, organizations of and for individuals with disabilities, and other such entities so that they may provide referrals, technical assistance, and other advice on proper placement, recruitment, and accommodations. [DOL at pages 6-7; Treasury at page 7]
- Using private recruiting sources, including professional organizations, consulting services, and companies with expertise in disability. [DoD at page 7; EEOC at pages 6, 13; OPM at page 5]

2. Infrastructure

- Organizing an agency disability recruitment team/task force. [DOL at page 6; VA at page 5]
- Developing capacity to offer training to disability groups and organizations on how potential applicants can apply for vacancies, including the use of Schedule A [EEOC at page 6] and regularly sending job vacancies and tips for applicants to an electronic mailing list of disability advocacy organizations. [DOL at page 6]

3. Other initiatives

- Developing an external communication and marketing plan targeted at individuals with disabilities, e.g., career fairs and indicating in job announcements that the agency is encouraging applications by qualified individuals with disabilities. [EEOC at page 6; SSA at pages 32-33]

- Increasing Job Opportunity Announcements that include information related to individuals with disabilities and individuals with targeted disabilities. [ED at page 14]
- Designing a fact sheet/brochure to use at career fairs and outreach events to market website information on career search and Schedule A hiring practices. [EEOC at page 14]
- Adopting an internal targeted recruitment initiative, e.g., engaging current employees or an employee resource group as referral sources.
 - Providing regular briefings and training to Affinity Groups as part of the Enterprise Hiring Ready-Cert-Go Initiative. [HHS at page 3]
 - Ensuring managerial strategic pre-recruitment discussions include hiring flexibilities. [HHS at page 5]
- Using social networking sites to reach organizations and inform them about departmental recruitment workshops, events, and job announcements, and to highlight the department's commitment to hiring people with disabilities. [DOL at page 6; Treasury at page 9]
- Developing programs for students and recent graduates with disabilities, including building a talent pipeline for youth and young adults with disabilities (transitioning high school students and college students) through mentoring, internships, and work experience programs; summer programs; career days; mock interviews and resume writing (including identifying key words in job descriptions to succeed in electronic keyword searches); youth motivational programs; and job shadowing activities. [AG at pages 13, 16-17; DoD at pages 7-8; ED at pages 11-12; EEOC at page 13; HHS at page 6; DOL at pages 9-10; OPM at page 5; SSA at pages 24-25; Treasury at page 12; VA at pages 4, 7]
 - Establishing a website to encourage mentoring and communication with students and student interns; marketing of website to include recruitment and communication with students who have disabilities. [AG at pages 13-14]
 - Tracking interns with disabilities included in internship programs. [AG at pages 16-17]
 - Establishing an accessible centralized one-stop application process for all interns, inclusive of students with disabilities. [AG at page 16; VA at page 4]
 - Establishing a centralized fund to support needed full-time equivalents (FTEs) and funding for payment of student interns with disabilities (under consideration). [AG at page 17]

- Holding formal and informal open houses and briefing sessions, preferably on agency premises, with representatives from recruiting sources. Following the briefing sessions, making formal arrangements for referral of applicants, follow up with sources. [AG at page 13; OPM at page 5]
- Offering technical assistance for persons with disabilities on how to prepare an application for a Federal job. [DOL at page 7; EEOC at page 6; Treasury at page 9]
- Developing specific and targeted strategies for recruiting, hiring, and integrating veterans with disabilities. [DoD at page 11; HHS at page 11; DOL at pages 6, 9, 13; SSA at page 36; Treasury at page 9]

V. **HIRING, CAREER DEVELOPMENT AND ADVANCEMENT, AND RETENTION**

1. **Hiring**

- Reviewing qualification standards and modifying the application process:
 - Reviewing, modifying, and simplifying the application process for individuals with disabilities. [HHS at page 4]
 - Assisting hiring managers in the identification of the essential functions of positions to ensure applicants have the requisite knowledge, skills, and abilities to successfully perform the essential duties of the position. [HHS at page 5]
 - Ensuring that job announcements are clear, understandable, compliant with section 508 of the Rehabilitation Act, and explain in plain language the required qualifications and duties of the job and provide contact information for reasonable accommodations [HHS at page 4; VA at page 10]; have plain language about reasonable accommodations in the application process [AG at page 11]; and eliminate physical requirements when possible. [VA at page 10]
 - Mandating the utilization of the Hiring Manager Feedback Form for applicant interviews. [HHS at page 5]
- Using special hiring authorities, including excepted hiring authorities for individuals with disabilities under Schedule A. [AG at pages 8-9; ED at page 10; EEOC at pages 7-9; DOL at pages 11-12; SSA at pages 22-23; Treasury at pages 8-9; VA at page 10]
 - Developing Schedule A Policies and Procedures [AG at pages 8-9; ED at page 10; EEOC at pages 7-9] and instructions. [VA at pages 9-10]
 - Implementing a priority consideration model in the hiring process requiring hiring managers to review pre-qualified candidates with disabilities for all grade levels

and in various job occupations (inclusive of the Senior Executive Service) in a departmental talent bank prior to the posting of job announcements. [DOL at pages 11-12]

- In the case that a hiring manager does not select a pre-qualified candidate with a disability, requiring that the hiring manager document for the record the reason for the non-selection. [DOL at page 12]
- Establishing a talent bank/database to collect resumes and disability certifications from people with disabilities and Schedule A candidates. [DOL at pages 11-12; SSA at pages 22-23; Treasury at page 9]
- Creating and using standard language in all Job Vacancy Announcements. [AG at pages 8-9; VA at page 10]
- Developing standardized training, including training materials for educating key internal and external stakeholders regarding Schedule A and special hiring authorities. [AG at pages 8-9; DOL at page 7; EEOC at pages 19-21; Treasury at page 9; VA at pages 9-10]
- Utilizing Schedule A not only for hiring but as a promotion and retention strategy [ED at page 10; VA at pages 15-16] and creating a merit promotion plan for Schedule A (Excepted Service). [VA at page 16]
- Establishing a Disability Task Force for Schedule A Hiring and Recruiting. [Treasury at page 9]
- Providing timely input and feedback on Schedule A Policies and Procedures to enhance quality assurance. [AG at page 9]
- Developing and implementing methods to track the number and processing of Schedule A applications [AG at pages 8-9; VA at pages 9-10] and publicize results. [VA at page 10]
- Providing monthly reports to the Secretary that measure progress. [AG at pages 8-9]
- Ensuring job offers are not rescinded for inappropriate reasons. [VA at pages 23-24]
- Using job fairs as hiring events. [DOL at page 6; SSA at page 36; VA at page 6]

2. Career development and advancement

- Providing mentoring opportunities. [DoD at page 8; EEOC at page 10; HHS at page 10; VA at page 14]

- Providing career enhancement/leadership development opportunities [DoD at page 8; EEOC at page 15; HHS at page 10; OPM at page 5; SSA at page 27; VA at pages 13-14], including reviewing employee development programs to ensure that no barriers exist for people with disabilities. [HHS at page 10]
- Tracking the number of employees who complete Individual Development Plans and enroll in mentoring programs. [HHS at page 10]
- Monitoring the composition of participants in training and mentoring programs and tracking and reporting participation rates. [VA at page 14]
- Developing Career Pathways project and other strategies to facilitate upward mobility for employees at lower-dead-end grades. [VA at page 15]
- Ensuring that advertisements for training/workshops in career development include language advising of the provisions of reasonable accommodations. [HHS at page 10]
- Determining whether management slots can be set aside for individuals with disabilities and informing supervisors of the need to nominate employees with disabilities. [VA at pages 13-14]

3. Retention

- Monitoring and addressing retention, including terminations.
 - Conducting exit interviews that include specific questions which will seek to determine if any reason related to the person's disability led to the decision to leave [AG at page 5; HHS at pages 3-4; DOL at page 13]; deploying online exit surveys. [EEOC at page 9; OPM at page 2; Treasury at page 7]
 - Analyzing and monitoring terminations of permanent employees and reporting to the Secretary and Administration on a quarterly basis. [Treasury at page 7; VA at page 12]
 - Conducting studies, identifying and implementing methods of collecting feedback on the needs and interests of employees with disabilities, including hosting regular focus groups and allowing for the submission of anonymous surveys. [AG at pages 15-16; EEOC at page 9; SSA at page 20]
 - Developing and implementing a plan to review proposed terminations to ensure disability accommodations were considered, where appropriate. [VA at page 12]
- Developing retention guidelines/manuals/initiatives.
 - Working with the agency organization for employees with disabilities to identify specific strategies for improving the retention numbers. [AG at pages 15-16]

- Adopting retention plans and strategies based on information obtained from surveys and exit interviews. [AG at page 16]
- Identifying solutions for reducing terminations of employees with mental illness. [VA at page 13]
- Developing and disseminating a procedures manual related to the retention of employees with disabilities and targeted disabilities. [HHS at page 9]
- Adopting disability management and prevention programs (return-to-work programs). [AG at page 18; DoD at page 9; ED at pages 12, 15; EEOC at pages 9-10; HHS at pages 10-11; DOL at pages 19-21; OPM at page 6; SSA at page 26; Treasury at page 14]

VI. REASONABLE ACCOMMODATION POLICIES AND PROCEDURES

1. Implementing (and updating) written procedures for processing requests for reasonable accommodations

- Updating reasonable accommodation policies and procedures consistent with the guidelines established by the EEOC, including updates to reflect the Americans with Disabilities (ADA) Amendments Act. [EEOC at page 9; AG at page 8]

2. Establishing an administrative mechanism such as a “centralized accommodation fund” and/or centralized source of expertise

- Establishing (investigating the development of) a centralized accommodation fund for minimizing the cost of an accommodation being assigned to a line manager’s budget, such as centralized payments for the costs of providing reasonable accommodations. [AG at pages 12-13; DoD at page 7; EEOC at page 5; HHS at page 8; DOL at page 17; OPM at page 2; SSA at page 28; VA at page 19]
- Establishing an administrative mechanism or centralized source of expertise (appointing a specific individual and/or establishing an office) for assessing, evaluating, and providing reasonable accommodations (including assistive technology) to ensure the effectiveness and efficiency of the reasonable accommodation process. [EEOC at page 5; DOL at page 17; SSA at page 28]

3. Providing training opportunities to learn about new strategies and devices

- Providing mandatory training to all managers and supervisors. [EEOC at page 17; HHS at page 9]

- Providing training opportunities for educating key internal stakeholders on how to request and fulfill reasonable accommodation requests for all agency employees. [AG at page 8; EEOC at pages 10, 14; OPM at page 3; Treasury at page 13; VA at page 3]

4. Creating a system for tracking accommodations to document and evaluate their use.

- Creating an enhanced system for tracking accommodations, including the use of the centralized accommodation fund and a process for accepting, reviewing, and funding requests from the agency's employees and managers [DOL at page 18; OPM at page 4; SSA at page 19; VA at pages 3, 17-18]; develop a manual and training on how to use the tracking system. [VA at pages 3, 17-18]

5. Establishing and/or continuing relationships with the Computer/Electronic Accommodations Program (CAP) and the Job Accommodation Network (JAN)

- Establishing and/or continuing relationships with the Department of Defense's Computer/Electronic Accommodations Program (CAP), the Department of Agriculture's TARGET Center, and/or the Department of Transportation's Disability Resource Center. [EEOC at page 9; HHS at page 8; DOL at page 18; Treasury at page 7]
- Consulting with the Department of Labor's Job Accommodation Network (JAN), for free, expert, and confidential guidance on workplace accommodations and disability employment issues. [EEOC at page 9; HHS at page 7; DOL at pages 17-18; Treasury at page 8]

VII. EXTERNAL AND INTERNAL COMMUNICATION OF AGENCY POLICIES AND PROCEDURES

1. External communications

- Targeting communications to disability organizations:
 - Establishing a national Disability Community Advisory Board to maintain connections with key non-profit organizations that represent individuals with disabilities. [AG at pages 6-7]
 - Offering in-person training to disability groups and organizations. [EEOC at page 6]
 - Developing a marketing initiative. [HHS at page 3]
- Using agency's external/public website to:
 - Post hiring goals and progress in achieving goals. [AG at page 5]

- Provide public access to agency's disability employment program, including guidance, supports, and leaders of initiative. [AG at page 5]
- Provide information on employment opportunities and the hiring process, and to assist in recruitment. [DoD at page 10; ED at page 13; HHS at page 5; OPM at page 5; SSA at pages 39-40; Treasury at page 8]
- Post updated reasonable accommodation procedures. [EEOC at page 9]

2. Internal communications

- Establishing agency-wide leadership communications network. [SSA at pages 17-18]
- Establishing a Disability Office that delivers a holistic approach to disability program management by bringing together the operational components of reasonable accommodation, case work, policy, oversight, and education. [Treasury at page 8]
- Establishing a Disability Employment Advisory Council composed of both national and regional representatives such as HR professionals, hiring managers, recruitment coordinators, and employees with disabilities [DOL at pages 7-8]; Disability Task Force with members from HR, EEO, and employees with disabilities. [Treasury at page 9]
- Establishing an agency-wide team which may also function as a disability-focused employee resource group (ERG) or affinity group. [AG at page 7; HHS at page 2; SSA at page 27; VA at page 26]
- Supporting a Community of Practice Committee consisting of employees with disabilities and hiring managers to increase the network of disability resources, host focus groups, discuss best practices, and share resources. [HHS at page 3]
- Developing and implementing an executive committee with direct access to the agency head. [HHS at page 7]
- Publicizing the agency's commitment in its internal publications (e.g., intranet, newsletters, and/or magazines):
 - Developing a centralized website as a one-stop shop for disability employment information and resources [AG at page 5]; Employees with Disabilities Resource Gateway [SSA at page 40]; IRS Information Center for Accessibility Needs website. [Treasury at page 8]
 - Using Intranet and email to assist in recruiting individuals with disabilities and to raise awareness. [ED at page 13; Treasury at page 9]
 - Updating Intranet with appropriate links and information on accelerated hiring processes. [HHS at page 5]

- Posting updated reasonable accommodation procedures on Intranet. [EEOC at page 9]
- Publishing newsletter with useful metrics and resources about agency progress on achieving goals [HHS at page 3]; featuring DisABILITY awareness [Treasury at page 7]; announcements regarding use of Schedule A for promotions, internships, and fellowships. [VA at page 10]
- Conducting surveys, special meetings, orientation, and training programs with executive, management, supervisory personnel, union officials, and employee representatives. [EEOC at page 7]
- Adopting a recognition and awards program, including rewarding managers who achieve their goals with performance based rewards and agency recognition. [EEOC at page 5; HHS at page 7; VA at page 10]

VIII. ACCESSIBLE INFORMATION AND COMMUNICATION TECHNOLOGY

1. Leadership and team approach

- Securing leadership at the highest levels of agency leadership to establish and sustain agency commitment. All Federal employees should understand the requirements of Section 508 and how they may apply to their business operations and processes. [AG at page 7]
- Establishing a network of individuals responsible for implementation.
 - Ensuring that the departmental Section 508 Officer meets monthly with the Departmental Disability Employment Program Manager to identify areas of collaboration to create an agency work environment that includes individuals with disabilities. [AG at page 7]
 - Ensuring collaboration between the departmental Section 508 Officer and the USDA Target Center to identify areas in which they can each support implementation of Section 508 throughout the department. [AG at pages 7-8]
 - Including the department's Section 508 Coordinator as part of the Information Management Team in the Office of the Chief Information Officer and recommending to the department's senior level official a comprehensive strategy to ensure that information and communication technology (ICT) inaccessibility is not a barrier to employment. [DOL at pages 14-15]

- Including the Section 508 Coordinator in Enterprise Architecture meetings and during the planning stages of any enterprise-wide or shared service system or application upgrades and replacements. [DOL at page 15]
- Including the Section 508 Coordinator in the monthly Technical Review Board meetings and engaged by various project managers involved in information technology (IT) modernization. [DOL at page 15]
- Including the Section 508 Coordinator as a partner with the Business Operations Center to ensure that the department's procurement officials and staff identify gaps where Section 508 compliance has not been fully achieved. [DOL at page 15]
- Partnering with the department's Forms Manager, the Section 508 Coordinator will include accessibility and Section 508 compliance of departmental forms in the updated versions of the section of the department's manual related to forms. [DOL at page 15]
- Providing the Employees with Disabilities Intercomponent Workgroup responsibility for formulating strategies for providing assistive technology, developing or recommending standards, and acting as advocates. [SSA at page 28]

2. Needs assessments and priorities

- Evaluating accessibility. [AG at pages 7-8; DOL at page 15; SSA at pages 28-29]

3. Formal policies, practices, and procedures

- Adopting specific technical ICT accessibility standards and functional performance criteria regarding software applications and operating systems; Web-based intranet and Internet information applications; telecommunication products; video and multimedia products; self-contained closed products (e.g., copiers and printers); and computers. [AG at page 8; EEOC at pages 10, 16; DOL at pages 14-15; SSA at page 29]
- Providing that the Section 508 Coordinator and the Business Operations Center will encourage project managers to include a Voluntary Product Accessibility Template (VPAT) as a deliverable in all Electronic and Information Technology (EIT) contracts. Project managers must then conduct acceptance testing against the VPAT to determine a product's Section 508 compliance prior to procurement or acceptance. [DOL at page 15]

4. Agency-wide infrastructure

- Conducting training for in-house staff, including program managers, contracting and procurement officers, software developers, web developers, video-multimedia

developers, and IT help desk staff. [AG at pages 7-8; HHS at page 9; DOL at pages 14-15; SSA at pages 28-29; Treasury at page 8]

- Deploying accessible ICT throughout the agency by, for example, establishing a mechanism for centralized testing, technical assistance, expertise and/or payment. [AG at pages 7-8; DOL at pages 14-15; SSA at pages 28-29]

5. Evaluation and accountability

- Notifying managers and employees about the agency's ICT accessibility policy. [AG at page 8; DOL at pages 14-15; SSA at pages 28-29]
- Involving individuals with disabilities and experts in the development, implementation, and evaluation of policy. [SSA at pages 28-29]
- Reporting by all components and offices on Section 508 issues needing correction and prioritizing a master list. [VA at page 24]
- If Section 508 compliance and usability issues are discovered after procurement, program agencies, will work with the developers to remediate. [DOL at page 15]

IX. ACCOUNTABILITY AND CONTINUOUS IMPROVEMENT

1. Training and networking with other agencies

- Providing training on disability-related issues, including attitudinal barriers, to all personnel, particularly those involved in the recruitment, hiring, promotion, and retention processes. [AG at pages 11-12; DoD at page 10; ED at page 12; EEOC at pages 7-9; HHS at page 7; DOL at pages 14-15; OPM at page 3; SSA at page 15; Treasury at pages 7, 13; VA at page 9]
- Host annual Leading Practices Summit. [ED at page 16]
- Providing mandatory training to managers and supervisors. [AG at pages 11-12; ED at page 10; EEOC at pages 7-9; HHS at page 7; DOL at pages 14-15; OPM at page 3; SSA at page 15; Treasury at page 13; VA at page 20]
- Providing specific training to managers and others on Schedule A and other special hiring authorities. [AG at page 12; EEOC at pages 7-9; HHS at page 7; DOL at pages 14-15; OPM at page 3; SSA at page 15; VA at pages 9, 20]
- Explaining to managers and supervisors how performance elements included in their performance plans related to the recruitment, hiring, advancement, and retention of persons with disabilities will be assessed. [AG at page 5; EEOC at pages 2, 4, 5; HHS at page 7; DOL at pages 5, 15; SSA at page 19; VA at page 22]

- Participating in interagency committees and work groups to share information on recent changes and best practices [EEOC at page 14]; work closely with OPM to build its inter-agency network, as it applies best practices and model strategies for successful recruitment of persons with disabilities. [ED at page 5]

2. Designating responsible individuals and assigning responsibility

- Designating Disability Program Managers [AG at page 5; DoD at page 7; EEOC at page 5; OPM at page 2; SSA at page 14; VA at page 3] and appointing disability coordinators at sub-agency and subordinate levels to process requests for reasonable accommodations. [DoD at page 11]
- Designating Selective Placement Coordinators. [DoD at page 7; EEOC at page 8; SSA at page 22; Treasury at page 8; VA at page 11]
- Assigning and defining the scope of responsibility and level of authority for implementation to specific individuals.
 - Appointment of senior level official: Chief Human Capital Officer [AG at pages 10-11; ED at page 10]; Deputy Assistant Secretary [DoD at page 5]; Office of Field Programs and Associate General Counsel [EEOC at page 4]; Assistant Secretary for Administration and Management [DOL at page 4]; Assistant Secretary for Human Resources and Administration [VA at pages 2, 22]; the Commissioner, Deputy Commissioner and functional Deputy Commissioners, and equivalents for each component. [SSA at pages 13-14]
 - Communication and collaboration among program operating components. [AG at pages 10-11; DoD at page 11; ED at page 10; EEOC at pages 4-5; DOL at pages 4, 11]
 - National leadership (Office of Disability Employment Policy). [DOL at page 11; EEOC at page 9; OPM at page 2]

3. Establishing accountability and continuous improvement mechanisms

- Conducting self-assessments of employment-related policies, practices, and procedures. [AG at page 5; EEOC at page 7]
- Tracking progress in achieving goals and reviewing monthly/quarterly all employment-related activities including collecting, maintaining, and reporting accurate employment information on disability and providing updates to include actions over previous quarter and planned initiatives/efforts for upcoming quarter. [AG at page 5; ED at page 17; EEOC at page 8; HHS at page 12; Treasury at page 9]

- Providing regularly scheduled (e.g., monthly/quarterly) reports to agency leadership [AG at page 5; ED at page 17; EEOC at page 14; HHS at page 12; DOL at page 16; OPM at page 3; SSA at page 20; Treasury at pages 15-16; VA at pages 9, 22]; sample Disability Hiring Report. [HHS at pages 14-15]

X. CONCLUSION

The strategies described in this summary report provide a framework for Federal agencies to evaluate and strengthen their affirmative action (AA) and equal employment opportunity (EEO) programs. Agencies might consider adopting some of these existing, emerging, and promising practices already being implemented and demonstrating results in the Federal workforce. These practices set forth a framework to proactively establish a model program for the employment of individuals with disabilities in the Federal sector; promote cross-agency collaboration; and develop organizational expertise and capacity to increase the representation of people with disabilities in the Federal sector. While these practices are not exhaustive or conclusive, they may assist Federal officials responsible for carrying out their AA and EEO responsibilities and achieve their obligations set forth under Section 501 of the Rehabilitation Act and Executive Order 13548.