

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

DOD Army and Air Force Exchange Service - 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: No

* 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 (GS or Alternate Pay Planb)	Total	Reportable Disability Total	Reportable Disability Percentage (Numerical Goal 12 Percent)	Targeted Disability Total	Targeted Disability Percentage (Numerical Goal 2 Percent)
Grades GS-11 to SES	2069	290	14.02	66	3.19
Grades GS-1 to GS-10	8998	1462	16.25	311	3.46

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

AAFES' submits quarterly reports identifying the overall disability numbers as well as both cluster equivalents. Both clusters are above the 2 Percent goal for PWTD.

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

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 (Name, Title, Office Email)
Answering questions from the public about hiring authorities that take disability into account	155	0	0	Recruiters, HR Techs, and Human Resource Managers 800-508-8466
Special Emphasis Program for PWD and PWTD	1	0	0	N/A Awaiting language updates from the EEOC
Section 508 Compliance	1	0	0	Tom Giangreco IT Policy and Planning Manager Giangrecot@aafes.com
Processing applications from PWD and PWTD	126	0	0	Employee Relations Managers, Human Resource Managers & Recruiters 800-508-8466
Architectural Barriers Act Compliance	1	0	0	Shabeeb Tayara Vice President, Project Management Division Tayaras@aafes.com
Processing reasonable accommodation requests from applicants and employees	126	0	0	Employee Relations Managers, Human Resource Managers & Recruiters 800-508-8466

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

Yes - EEO Training for new Human Resource Managers and Supervising People with Disabilities.

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

Yes

Section III: Program Deficiencies In The Disability Program

Section IV: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

AAFES' Equal Employment Opportunity (EEO) office established a searchable Vocational Rehabilitation Contacts list to assist Employee Relations Managers (ERM), Human Resource Managers (HRM), Human Resources Business Partners for Headquarters, Talent Managers, and Recruiters with outreach and recruitment efforts for PWTD.

Vocational rehabilitation counselors can assist the agency with filling open positions with qualified job seekers with disabilities, assess the workplace, help current employees become more aware of key disability issues and provide training and accommodation assistance.

Customized Services may include:

- Hiring & Retention Assistance-Select from the most qualified job candidates who meet your business needs, and enhance employee retention and productivity:
 - o Job and career fairs;
 - o Candidate screening, matching and referral;
 - o Training programs to prepare job candidates for employment with your business;
 - o Follow-up to ensure the new employee has the accommodations and support needed to be productive and retain employment.
- Disability Awareness & Education-Learn about key disability employment issues in the workplace:
 - o Disability awareness training and presentations;
 - o Business symposia and expos.
- Worksite & Job Process Assessments-Identify solutions to physical or other barriers that may limit your ability to recruit, hire, retain or accommodate an employee with a disability. Assess the:
 - o Physical worksite;
 - o Workplace technology;
 - o Interview process.

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.

As a non-appropriated fund instrumentality (NAFI) agency, Schedule A does not apply to the Exchange.

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.

N/A

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: N/A

N/A

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.

- AAFES currently seeks other agencies assistance with accommodations, hiring, and maintaining employment. Some of the sources include:
- Vocational Rehabilitation Contacts – Lists over one hundred agencies across the nation with potential candidates and accommodations.
 - Job Accommodation Network (JAN) – provides assistance with accommodation process, accommodation ideas, product vendors, referral to other resources, and ADA compliance assistance.
 - Computer/Electronic Accommodations Program (CAP)- provide assistive technology and accommodations to support individuals with

disabilities and wounded, ill and injured Service members throughout the federal government in accessing information and communication technology.

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

No

New Hires	Total (Number)	Reportable Disability Permanent Workforce (Percentage)	Reportable Disability Temporary Workforce (Percentage)	Targeted Disability Permanent Workforce (Percentage)	Targeted Disability Temporary Workforce (Percentage)
% of Total Applicants	6429	11.70	0.00	1.20	0.00
% of Qualified Applicants	420	10.95	0.00	0.95	0.00
% of New Hires	113	16.81	0.00	6.19	0.00

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

- a. New Hires for MCO (PWD) Answer: No
- b. New Hires for MCO (PWTD) Answer: No

No

New Hires to Mission-Critical Occupations	Total (Number)	Reportable Disability New Hires (Percentage)	Targetable Disability New Hires (Percentage)
Numerical Goal	--	12%	2%
2091 RETAIL OPERATORS	94	14.89	6.38

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: No
- b. Qualified Applicants for MCO (PWTD) Answer: No

No

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

- a. Promotions for MCO (PWD) Answer: No
- b. Promotions for MCO (PWTD) Answer: No

No

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

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

A. ADVANCEMENT PROGRAM PLAN

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

Career development programs – such as conferences, trainings, tuition assistance, and rotational assignments – are proven strategies this agency uses. Below are some best practices to ensure employees with disabilities have equal access to such programs:

- Hold supervisors accountable for implementing management practices that support equal opportunity;
- Ensure all online professional development classes and materials are fully accessible;
- Ensure workplace events are accessible to employees with disabilities.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

The Exchange’s culture recognizes that PWD and PWTD are vital human capital that add to this agency’s bottom line. In turn, AAFES has and will continue to invest in them. Some of the career paths to aid them are:

- Orientation and On-boarding Programs
- Career Development Programs (including on the job training)
- Leadership Development Program (LDP) and Executive Leadership Development Program (ELDP), to include Mentoring Programs

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

Career Development Opportunities	Total Participants Applicants (Percentage)	Total Participants Selectees (Percentage)	PWD Applicants (Percentage)	PWD Selectees (Percentage)	PWTD Applicants (Percentage)	PWTD Selectees (Percentage)
Internship Programs	0	0	0	0	0	0
Training Programs	0	0	0	0	0	0
Detail Programs	0	0	0	0	0	0
Mentoring Programs	0	0	0	0	0	0
Other Career Development Programs	0	223	0	13	0	3.59
Coaching 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

No

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: No

b. Selections (PWTD)

Answer: No

No

C. AWARDS

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

a. Awards, Bonuses, & Incentives (PWD)

Answer: No

b. Awards, Bonuses, & Incentives (PWTD)

Answer: No

No

Time-Off Awards	Total (Number)	Reportable Disability (Percentage)	Without Reportable Disability (Percentage)	Targeted Disability (Percentage)	Without Targeted Disability (Percentage)
Time-Off Awards 1 - 10 hours: Awards Given	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 1 - 10 Hours: Total Hours	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 1 - 10 Hours: Average Hours	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 hours: Awards Given	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 Hours: Total Hours	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 Hours: Average Hours	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 hours: Awards Given	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Total Hours	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Average Hours	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 hours: Awards Given	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Total Hours	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Average Hours	0.00	0.00	0.00	0.00	0.00
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 (Number)	Reportable Disability (Percentage)	Without Reportable Disability (Percentage)	Targeted Disability (Percentage)	Without Targeted Disability (Percentage)
Cash Awards \$500 and Under: Awards Given	14316.00	15.15	84.85	3.36	96.64
Cash Awards \$500 and Under: Total Amount	1571950.00	15.16	84.84	3.31	96.69
Cash Awards \$500 and Under: Average Amount	109.80	109.88	109.79	108.24	109.86
Cash Awards: \$501 - \$999: Awards Given	264.00	13.64	86.36	3.41	96.59
Cash Awards: \$501 - \$999: Total Amount	173100.00	13.68	86.32	3.29	96.71
Cash Awards: \$501 - \$999: Average Amount	655.68	657.64	655.37	633.33	656.47
Cash Awards: \$1000 - \$1999: Awards Given	142.00	15.49	84.51	2.82	97.18
Cash Awards: \$1000 - \$1999: Total Amount	162850.00	14.43	85.57	2.76	97.24
Cash Awards: \$1000 - \$1999: Average Amount	1146.83	1068.18	1161.25	1125.00	1147.46
Cash Awards: \$2000 - \$2999: Awards Given	18.00	5.56	94.44	0.00	100.00
Cash Awards: \$2000 - \$2999: Total Amount	36000.00	5.56	94.44	0.00	100.00
Cash Awards: \$2000 - \$2999: Average Amount	2000.00	2000.00	2000.00	0.00	2000.00
Cash Awards: \$3000 - \$3999: Awards Given	38.00	18.42	81.58	10.53	89.47
Cash Awards: \$3000 - \$3999: Total Amount	114000.00	18.42	81.58	10.53	89.47
Cash Awards: \$3000 - \$3999: Average Amount	3000.00	3000.00	3000.00	3000.00	3000.00
Cash Awards: \$4000 - \$4999: Awards Given	20.00	10.00	90.00	0.00	100.00
Cash Awards: \$4000 - \$4999: Total Amount	80000.00	10.00	90.00	0.00	100.00
Cash Awards: \$4000 - \$4999: Average Amount	4000.00	4000.00	4000.00	0.00	4000.00
Cash Awards: \$5000 or more: Awards Given	0.00	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Total Amount	0.00	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Average Amount	0.00	0.00	0.00	0.00	0.00

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", describe the trigger(s) below.

- a. Awards, Bonuses, & Incentives (PWTD) Answer: No
- b. Pay Increases (PWTD) Answer: No

No

Other Awards	Total (Number)	Reportable Disability (Percentage)	Without Reportable Disability (Percentage)	Targeted Disability (Percentage)	Without Targeted Disability (Percentage)
Total Performance Based Pay Increases 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

No

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: No
 - ii. Internal Selections (PWTD) Answer: No
- b. Grade GS-15
 - i. Qualified Internal Applicants (PWTD) Answer: No
 - ii. Internal Selections (PWTD) Answer: No
- c. Grade GS-14
 - i. Qualified Internal Applicants (PWTD) Answer: No
 - ii. Internal Selections (PWTD) Answer: No
- d. Grade GS-13
 - i. Qualified Internal Applicants (PWTD) Answer: No
 - ii. Internal Selections (PWTD) Answer: No

No

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: No
 - ii. Internal Selections (PWTD) Answer: No
- b. Grade GS-15

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

c. Grade GS-14

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

d. Grade GS-13

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

No

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: No

b. New Hires to GS-15 (PWD) Answer: No

c. New Hires to GS-14 (PWD) Answer: No

d. New Hires to GS-13 (PWD) Answer: No

No

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: No

b. New Hires to GS-15 (PWTD) Answer: No

c. New Hires to GS-14 (PWTD) Answer: No

d. New Hires to GS-13 (PWTD) Answer: No

No

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: No

ii. Internal Selections (PWD) Answer: No

b. Managers

i. Qualified Internal Applicants (PWD) Answer: No

ii. Internal Selections (PWD) Answer: No

c. Supervisors

i. Qualified Internal Applicants (PWD) Answer: No

ii. Internal Selections (PWD) Answer: No

No

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: No
- ii. Internal Selections (PWTD) Answer: No

b. Managers

- i. Qualified Internal Applicants (PWTD) Answer: No
- ii. Internal Selections (PWTD) Answer: No

c. Supervisors

- i. Qualified Internal Applicants (PWTD) Answer: No
- ii. Internal Selections (PWTD) Answer: No

No

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: No
- b. New Hires for Managers (PWD) Answer: No
- c. New Hires for Supervisors (PWD) Answer: No

No

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: No
- b. New Hires for Managers (PWTD) Answer: No
- c. New Hires for Supervisors (PWTD) Answer: No

No

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: N/A

N/A

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

No

Separations	Total (Number)	Reportable Disabilities (Percentage)	Without Reportable Disabilities (Percentage)
Permanent Workforce: Reduction in Force	32	0.39	0.11
Permanent Workforce: Removal	618	3.83	2.89
Permanent Workforce: Resignation	6241	29.26	30.98
Permanent Workforce: Retirement	361	2.08	1.72
Permanent Workforce: Other Separations	203	1.05	0.99
Permanent Workforce: Total Separations	7455	36.62	36.68

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

No

Separations	Total (Number)	Targeted Disabilities (Percentage)	Without Targeted Disabilities (Percentage)
Permanent Workforce: Reduction in Force	32	0.75	0.13
Permanent Workforce: Removal	618	3.01	3.04
Permanent Workforce: Resignation	6241	25.31	30.92
Permanent Workforce: Retirement	361	1.75	1.78
Permanent Workforce: Other Separations	203	1.13	0.99
Permanent Workforce: Total Separations	7455	31.95	36.86

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.

N/A

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.

The Exchange did license a 508 compliance testing program and it was run against our various websites to validate our compliance. We passed that testing review. That tool has to be re-licensed annually. The agency is in the process of re-enabling the tool for our use again to continue our ongoing testing and validation of our websites. When non-compliant issues are found, the Exchange will perform the required program updates in order to bring the specific site back into a compliant state. The Exchange Information Technology division has ensured the printers and copiers are 508 compliant.

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

The employee and applicant's rights under Architectural Barriers Act have not been published on our websites. However, this agency will address this and update the progress in future reports.

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 GFY 2017, this agency purchased a product to assist with becoming 508 compliant. The focus is to target external websites, newly developed webpages, and sites that require major rework. Legacy systems will eventually be added to this list of priorities.

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 GFY 2020, the Exchange developed a new system for tracking reasonable accommodation requests for time frames for resolution. Ongoing enhancements, to include improved reporting, are underway.

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 Exchange strives to ensure that reasonable accommodations are completed and ensures all request have been addressed and closed.

Furthermore, the Exchange will strive to address the timeliness within the program.

EEO office has developed an online course, "Supervising People with Disabilities." This course identifies an important foundation for supervisors and managers pertaining to the laws regarding people with disabilities. It will also enhance their ability to supervise talented and qualified people with disabilities. Continuous updates to the course are implemented to reflect changes in regulations.

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.

For some individuals with disabilities, Personal Assistance Services (PAS) help make employment possible. People with significant disabilities use PAS, on a day-to-day basis in the workplace. PAS allows them to be at work and without which, they could not. Examples of workplace PAS vary, but may involve activities such as retrieving materials out of reach, putting on or removing outerwear, assistance with eating, assistance using the restroom, job related travel, services during telework, etc. PAS is not required to be provided for commuting to and from work or for medical services.

The Exchange will provide personal assistance services during work and job related travel for our eligible associates. To be eligible, the individual must have a targeted disability as listed in the self-identification section of the Exchange Employee Self Service (ESS) and the assistance must be tied to his/her type of disability. Once the PAS has been provided, the associate must be able to safely perform the essential functions of the job without posing a direct threat to their safety.

The Exchange has flexibility in providing PAS for our associates. The Exchange can choose to work with a PAS provider, assign a current associate to perform these tasks as part of their primary job, or hire a full-time associate or contractor to provide the services.

Associates will request PAS using the Reasonable Accommodation system.

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.

This agency had no findings of discrimination.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

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: No

3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year please describe the corrective measures taken by the agency.

There were no findings of discrimination involving reasonable accommodations.

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: 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

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