



**Strategic Plan for the Recruitment, Hiring and
Retention of Individuals with Disabilities
FY 2011 - 2015**



**NATIONAL ARCHIVES
AND RECORDS ADMINISTRATION**

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Introduction

The National Archives and Records Administration (NARA) is our national record keeper. An independent agency created by statute in 1934, NARA safeguards the records of all three branches of the Federal Government. Our job is to ensure continuing access to essential documentation and, in doing so, we serve the broad spectrum of American society – all seek answers from the records we preserve.

NARA is committed to maintaining a diverse workforce at all levels. To meet the challenges of the 21st century, NARA must continuously strive for a workforce that reflects America, and promote an environment that places high value on individual respect, dignity and professional growth. NARA's ability to attract, develop and retain a quality diverse workforce is the key to NARA's success.

On July 26, 2010, during the celebration of the 20th Anniversary of the Americans with Disabilities Act (ADA), President Obama signed Executive Order 13548 establishing plans for the Federal Government to hire more people with disabilities. NARA has an obligation to be a model employer of individuals with disabilities, and to comply with Executive Order 13548.

During his remarks, the President emphasized his intent to place a new focus on hiring Americans with disabilities across the federal government. Specifically, he stated that "...[This] Executive Order will establish the federal government as a model employer of individuals with disabilities, which will encourage private employers to follow their example. So, we're going to boost recruitment, we're going to boost training, and we're going to boost retention. We'll better-train hiring managers, and each agency will have a senior official who's accountable for achieving the goals we set."¹

This Strategic Plan for Recruitment, Hiring and Retaining Individuals with Disabilities is our path to enhance the representation of people with disabilities and become a model employer. To guide this initiative, NARA has identified four multi-year strategic goals that form the foundation for this plan over the next five years: These goals are:

- Establish Agency commitment for hiring, recruiting and retention of individuals with disabilities;
- Educate the NARA workforce on special programs for individuals with disabilities;
- Increase recruitment, hiring and retention to reach a workforce representation of 2% for persons with targeted disabilities and 8% for all persons with disabilities.
- Administer an effective reasonable accommodation program.

¹ Taken from Remarks by the President on 20th Anniversary of the Americans with Disabilities Act (The White House, South Lawn, July 26, 2010, Office of the Press Secretary)

In support of these goals, we have identified nine strategies and 24 specific tasks that NARA will begin to implement in Fiscal Year 2011 to enhance the employment and representation of individuals with disabilities at all levels.

Progress against these goals and strategies will be assessed each year as part of our human capital accountability efforts to comply with any reporting requirement issued by the U.S. Office of Personnel Management (OPM). In addition, this plan will be revised each year to reflect updated strategies for addressing underrepresentation of individuals with disabilities at NARA.

PURPOSE AND SCOPE

The purpose of this plan is to outline basic policy, legal authority, and responsibilities for the administration of NARA's Strategic Plan for the Recruitment, Hiring and Retention of Individuals with Disabilities. It further provides goals and strategies for increasing the employment of disabled individuals at NARA.

The U.S. Office of Personnel Management (OPM) sets policy and provides guidance to federal agencies on the development and administration of model strategies for the recruitment, hiring and retention of individuals with disabilities.

The Strategic Plan for the Recruitment, Hiring and Retention of Individuals applies to all positions in all pay plans, unless specifically exempt by statute.

This plan is reviewed and updated on an annual basis.

LEGAL AUTHORITY

As outlined in the Rehabilitation Act of 1973, authorization is given "to develop and implement comprehensive and continuing State plans for meeting the current and future needs for providing services to handicapped individuals and to provide such services for the benefit of such individuals, serving first those with the most severe handicaps, so that they may prepare for and engage in gainful employment."

Further, on July 26, 2010, President Obama issued Executive Order (EO) 13548, which directs Executive departments and agencies to improve their efforts to employ Federal workers with disabilities and targeted disabilities through increased recruitment, hiring, and retention of these individuals. OPM, in consultation with the White House, the Department of Labor (DOL), the Equal Employment Opportunity Commission (EEOC), and the Office of Management and Budget (OMB), has developed, as required by the EO, model recruitment and hiring strategies for agencies to use to increase their employment of people with disabilities. Executive Order 13548 demonstrates the President's strong commitment to making the Federal Government a welcoming place for people with disabilities where they can thrive and make the most of their talents and abilities.

EQUAL EMPLOYMENT OPPORTUNITY (EEO) POLICY

It is the policy of the National Archives and Records Administration to prohibit discrimination and to ensure equal employment opportunity for all applicants and employees without regard to race, color, religion, sex, sexual orientation and genetic information, national origin, age or disability.

DESIGNATION OF RESPONSIBILITY

- A. The Chief Human Capital Officer, is responsible for:
 - 1. Overseeing the planning and implementation of this plan;
 - 2. Communicating the plan to NARA's managers and employees;
 - 3. Certifying that the plan exists and is current; and
 - 4. Submitting reports to OPM as necessary.

- B. The Office of Equal Employment Opportunity and Diversity Management (NEEO) is responsible for:
 - 1. Annually developing and updating the plan;
 - 2. Recommending the recruitment strategies and programs identified within the plan;
 - 3. Implementing strategies to increase recruitment, hiring and retention of individuals with disabilities;
 - 4. Implementing changes to programs and procedures to eliminate practices that act as barriers to the hiring and advancement of individuals with disabilities; and
 - 5. Preparing reports and responding to inquiries about program activities.

- C. The Office of Talent Management is responsible for:
 - 1. Conducting recruitment and hiring practices that align with the plan and promote the advancement of individuals with disabilities; and
 - 2. Implementing strategies to increase recruitment, hiring and retention of individuals with disabilities;
 - 3. Providing advice and assistance to selecting officials when vacancies occur in underrepresented occupations.

- D. Hiring officials are responsible for complying with the objectives of this plan whenever possible to promote the advancement of individuals with disabilities.

Analysis

Total employment for NARA at the beginning of Fiscal Year 2011 was 2,812². Tables 1-3 show a 3-year trend analysis of NARA’s disability workforce composition as of October 1, 2010. When evaluating the composition of our workforce to determine if underrepresentation exists, NARA measures itself against the Federal Civilian Workforce (FCW). The Federal Civilian Workforce is defined by OPM as full and part-time permanent non-military employees working in non-Postal Executive Branch agencies of the U.S. Government. Measuring ourselves against the FCW enables us to see how our workforce compares to other Federal agencies.

Our analysis shows that individuals with targeted disabilities comprise 1.71 percent of NARA’s workforce. While they comprise a small percentage of NARA’s total workforce, their representation is higher than the Federal average of 0.88%. NARA still recognizes the responsibility to employ people with disabilities, especially targeted disabilities³. At the same time, NARA needs to improve the retention rate for individuals with disabilities by providing accommodations when possible, and providing training and developmental opportunities. If we are able to retain employees with disabilities, we will show an actual increase in overall representation.

Table 1: NARA’s Disability Workforce Composition – FY 2008-FY 2010

TOTAL WORKFORCE						
Disability Status	FY 2008	%	FY 2009	%	FY 2010	%
TOTAL EMPLOYEES	2572	100	2666	100	2812	100
NO DISABILITY	2374	92.30	2448	91.82	2553	90.79
NOT IDENTIFIED	38	1.48	42	1.58	63	2.24
ALL DISABILITIES	160	6.22	176	6.60	196	6.94
TARGETED DISABILITIES	42	1.63	46	1.73	48	1.71
<i>Federal Civilian Workforce with Targeted Disabilities</i>	24,427	0.88	24,663	0.88	Data not yet published	

A short-term analysis of *Table 1* illustrates that the number of people with disabilities at NARA has increased over the past three years. However, the representation of individuals with disabilities has remained virtually unchanged despite a steady growth of NARA’s workforce.

² Total employment includes permanent staff onboard as of October 1, 2010.

³ Targeted disabilities are disabilities (deafness, blindness, missing extremities, partial paralysis, complete paralysis, convulsive disorders, mental retardation, mental illness, and distortion of limbs and/or spine) identified by the Equal Employment Opportunity Commission for special emphasis in affirmative action planning.

Tables 2 and 3 below reveal why there has been no change in the participation rate of individuals with disabilities in the NARA workforce.

Table 2: New Hires for Individuals with Disabilities in NARA’s Workforce - FY 2008-FY 2010

ACCESSIONS						
Disability Status	FY 2008	%	FY 2009	%	FY 2010	%
NO DISABILITY	197	93.36	194	88.18	202	78.29
NOT IDENTIFIED	4	1.90	5	2.27	23	8.91
ALL DISABILITIES	10	4.74	21	9.55	33	12.79
TARGETED DISABILITIES	1	0.47	4	1.82	5	1.94
<i>NARA’s Total Accessions</i>	211	100	220	100	258	100

Table 2: Separations of Individuals with Disabilities in NARA’s Workforce - FY 2008-FY 2010

SEPARATIONS						
Disability Status	FY 2008	%	FY 2009	%	FY 2010	%
NO DISABILITY	173	90.58	145	91.19	177	87.62
NOT IDENTIFIED	5	2.62	3	1.89	6	2.97
ALL DISABILITIES	13	7.03	11	6.92	19	9.41
TARGETED DISABILITIES	2	1.05	3	1.89	3	1.49
<i>NARA’s Total Separations</i>	191	100	145	100	202	100

Table 2 shows a substantial increase in the hiring of individuals with disabilities from FY 2008 to FY 2010. However, Table 3 shows that they have been leaving the workforce at almost the same rate at which they were hired. For example, in FY 2009 four persons with targeted disabilities were hired and during that same fiscal year three left the workforce. Therefore, NARA is only realizing slight increases in the overall population of individuals with disabilities.

Goals & Strategies

NARA has identified four multi-year strategic goals that together form the foundation for improving our recruitment, hiring and retention strategy for individuals with disabilities:

- **Establish Agency commitment for hiring, recruiting and retention of individuals with disabilities;**
- **Educate the NARA workforce on special programs for individuals with disabilities;**
- **Increase recruitment, hiring and retention to reach a workforce representation of 2% for persons with targeted disabilities and 8% for all persons with disabilities.**
- **Administer an effective reasonable accommodation program.**

In support of these goals, we have identified 16 specific strategies that NARA will undertake in Fiscal Years 2011-2015 to enhance the representation of individuals with disabilities at all levels. These strategies are discussed in detail on the following pages.

Goal 1 – Establish Agency commitment.

NARA's leadership, along with the Office of Equal Employment Opportunity and Diversity Management and the Office of Talent Management, is dedicated to working together to develop a solid foundation to accomplish the goals set forth in this plan. The following strategies are designed to strengthen and enhance our commitment to recruit, employ and retain individuals with disabilities.

Strategy A: Develop a solid foundation to accomplish the goals set forth in Executive Order 13548.

**Task A-1:* Appoint a senior-level agency official responsible for overseeing the plan.

Task A-2: Establish a detail to the Office of Talent Management to assist in implementation of strategic plan.

**Task A-3:* Issue a NARA Notice from the Agency Head encouraging managers and supervisors to recruit, hire, and retain people with disabilities, including the agency's performance goals, describing the agency's obligation to do so under the Executive Order.

**Task A-4:* Establish a full-time position for a Selective Placement Coordinator.

*Required items per John Berry's memo in Attachment 1 of Model Strategies for Recruitment and Hiring of People with Disabilities as required under Executive Order 13548, dated 11/8/10

Strategy B: Ensure a collaborative effort is established among Senior Leadership, HR, EEO and hiring managers.

**Task B-1:* Establish an internal network of recruiters agency-wide to assist with the recruitment and retention of individuals with disabilities.

Goal 2 – Educate the NARA workforce on special programs for people with disabilities.

NARA is committed to administering effective training courses to educate all NARA hiring managers and staff on special programs and resources for people with disabilities.

Strategy A: Conduct mandatory training for Senior Leadership, hiring managers, and Human Capital staff.

**Task A-1:* Develop and administer training to all hiring managers and other appropriate personnel on the use of effective tools to recruit, hire, and retain individuals with disabilities.

Task A-2: Create a link on the NARA@work webpage that includes resources regarding employment of disabled for employees with disabilities and hiring managers.

**Task A-3:* Assess the impact of the training of managers on use of effective tools to recruit, hire, and retain individuals with disabilities.

Goal 3 – Increase recruitment, hiring and retention to reach a workforce representation of 2% for persons with targeted disabilities and 8% for all persons with disabilities.

*Required items per John Berry's memo in Attachment 1 of Model Strategies for Recruitment and Hiring of People with Disabilities as required under Executive Order 13548, dated 11/8/10

NARA must make it a priority to do a better job of recruiting, hiring, and retaining people with disabilities. By utilizing effective recruitment and outreach efforts, NARA will begin to realize an increase in the overall representation of people with disabilities. NARA's goal for the next five years is to increase the total representation of individuals with disabilities to 8% and increase the population of individuals with targeted disabilities to 2% of the total workforce. In order to meet these goals, NARA has set an annual hiring goal of 13% for all individuals with disabilities and 2% for targeted disabilities for all hires for each year over the next five years. At the same time, based on NARA's low retention rate of individuals with disabilities, especially targeted disabilities, we must closely monitor and track the status of their employment, and adjust yearly hiring goals, as needed. If we are unable to retain employees with disabilities, hiring goals will need to be increased.

Strategy A: Utilize available recruitment tools to actively recruit qualified people with disabilities.

Task A-1: Review and analyze potential sources for disability candidates and initiate at least one partnership to help expand disability recruitment efforts.

Task A-2: Expand use of VA's Compensated Workers Transition Program (CWTP) at NARA's Record Centers.

Task A-3: Create a distribution list of organizations that target disabled people to post vacancy announcements.

Strategy B: Ensure tools used within the selection process support employment of persons with disabilities.

Task B-1: Review and update vacancy announcements to ensure information is included on how to apply under Schedule A.

Strategy C: Assess turnover rate for employees with disabilities and identify barriers to retention.

Task C-1: Assess current retention and separation rates for employees with disabilities.

Task C-2: Meet with managers and supervisors of current and past employees with disabilities to identify barriers to retention and strategies to increase retention of employees.

Strategy D: *Increase return to work outcomes.

Task D-1: Identify injured employees, defined under the Federal Employees' Compensation Act (FECA) as PR (Entitled to payment on periodic roll) or PN (Entitled

* Required items per John Berry's memo in Attachment 1 of Model Strategies for Recruitment and Hiring of People with Disabilities as required under Executive Order 13548, dated 11/8/10

to payment on periodic roll but determined to have no wage earning-capacity or re-employment potential for indefinite future) who would benefit from permanent accommodations and reassignment.

Task D-2: Develop a description of how the agency will increase return-to-work outcomes, and coordinate with the Department of Labor's Office of Workers' Compensation Programs (OWCP) to ensure accommodations made available to injured Federal employees who sustain serious workplace injuries or illnesses are suitable.

Task D-3: Make an effort to ensure the retention of those who are injured on the job by working to improve, expand, and increase a return-to-work program for those employees who sustain work-related injuries and illnesses as defined under FECA and to increase the availability of temporary job modifications by providing light or limited duty.

Task D-4: Provide quarterly monitoring of return-to-work successes under the President's Protecting Our Workers and Ensuring Reemployment (POWER) Initiative.

Goal 4 – Administer an effective reasonable accommodation program.

Executive Order 13164 required agencies to establish procedures for handling requests for reasonable accommodations. In compliance with the EO, on April 1, 2003 NARA put in place the policy directive NARA 303 – *Processing Reasonable Accommodation Requests for Employees and Applicants with Disabilities*. NARA is committed to training all managers and supervisors on the NARA 303 directive to ensure proper procedures are followed and employees receive fair accommodations.

NARA is committed to providing reasonable accommodations to its employees and applicants for employment to ensure that individuals with disabilities enjoy full access to equal employment opportunity at NARA. Therefore, it is essential that the reasonable accommodation program is administered in an effective and efficient manner that utilizes available resources that support the success of the program.

Strategy A: Require training for managers and supervisors on NARA 303 – *Processing Reasonable Accommodation Requests for Employees and Applicants with Disabilities*.

Task A-1: Conduct reasonable accommodation training course offered on a bi-annual basis.

Task A-2: Develop online and/or webinar training on the reasonable accommodation process and procedures.

Task A-3: Inform all employees of the proper procedures for requesting a reasonable accommodation.

Strategy B: Utilize available resources for obtaining reasonable accommodations for NARA employees.

Task B-1: Continue partnership with DOD's Computer/Electronic Accommodations Program (CAP)

Task B-2: Consult with DOL's Job Accommodations Network (JAN) for advice on reasonable accommodation requests.

Task B-3: Establish a centralized budget for all reasonable accommodations.

Lastly, the following action plan summarizes our strategies and assigns timeframes for accomplishing them. Progress against our goals and strategies will be assessed each year as part of our human capital accountability efforts and OPM's reporting requirement. In addition, this plan will be revised each year to reflect updated strategies as necessary to address changes in the underrepresentation of individuals with disabilities at NARA.

Action Plan

NARA's Strategic Plan for Individuals with Disabilities Action Plan for Goals, Strategies and Measures

GOAL 1 – Establish Agency commitment.			
Strategy A: Develop a solid foundation to accomplish the goals set forth in Executive Order 13548.			
TASKS	SUPPORTING UNIT(S)	PROJECTED COMPLETION DATE	PERFORMANCE MEASURES/RESULTS
A-1. Appoint senior-level agency official responsible for overseeing the plan.	N	Mar 2011	CHCO in charge of plan oversight
A-2. Establish a detail to HR to assist in implementation of Strategic Plan.	NAH	Mar 2011	Detail in place for 120 days to 1 year
A-3. Issue NARA notice from Agency Head encouraging managers and supervisors to recruit, hire, and retain people with disabilities, including the agency's performance goals, describing the agency's obligation to do so under the Executive Order.	NEEO	FY 2011	Copy of NARA Notice
A-4. Establish an FTE for a Selective Placement Coordinator (SPC).	N, NAH	FY2012	New position for SPC
Strategy B: Ensure a collaborative effort is established among Senior Leadership, HR, EEO and hiring managers.			
B-1. Establish an internal network of recruiters agency-wide to assist with the recruitment and retention of individuals with disabilities.	NAH, NEEO	Sep 2011	Interdepartmental committee established to assist with outreach and recruitment strategies
GOAL 2 – Educate the NARA workforce on special programs for people with disabilities.			
Strategy A: Conduct mandatory training for Senior leadership, hiring managers, and HR staffing and employee relations specialists.			
TASKS	SUPPORTING UNIT(S)	PROJECTED COMPLETION DATE	PERFORMANCE MEASURES/RESULTS
A-1. Develop and administer training for all hiring managers and other appropriate personnel on use of effective tools to recruit, hire, and retain individuals with disabilities.	NAH, NEEO	FY 2012	Mandatory training is implemented for managers and supervisors

A-2. Create a link on NARA@work webpage that includes resources for the employment of individuals with disabilities.	NAH, NEEO	FY 2012	Resource web page established on NARA's intranet
A-3. Assess impact of training of managers' use of effective tools to recruit, hire, and retain individuals with disabilities.	NAH	FY2012	Summary report on impact of training
GOAL 3 – Increase recruitment, hiring and retention to reach a workforce representation of 2% for persons with targeted disabilities and 8% for all persons with disabilities.			
Strategy A: Utilize available recruitment tools to actively recruit qualified people with disabilities.			
TASKS	SUPPORTING UNIT(S)	PROJECTED COMPLETION DATE	PERFORMANCE MEASURES/RESULTS
A-1. Review and analyze potential sources for disability candidates and initiate at least one partnership to help expand disability recruitment efforts.	NAH	FY 2011	Establish contact with an external organization to receive resumes for referral
A-2. Expand use of VA's Compensated Workers Transition Program (CWTP) at NARA's Record Centers	NEEO, NAH	Completed	Increase in number of FRCs utilizing the CWTP
A-3. Create a distribution list of organizations that target disabled people to post vacancy announcements.	NAH	FY 2011	Documented distribution list
Strategy B: Ensure tools used within the selection process support employment of persons with disabilities.			
B-1. Review and update vacancy announcements to ensure information is included on how to apply under Schedule A.	NAH	FY 2011	Vacancy announcement template identifying info on Schedule A
Strategy C: Assess turnover rate for employees with disabilities and identify barriers to retention.			
C-1. Assess current retention and separation rates for employees with disabilities.	NAH, NEEO	FY2012	Share results with senior leadership of each major organizational unit
C-2. Meet with managers and supervisors of current and past employees with disabilities to identify barriers to retention and strategies to increase retention of employees.	NAH, NEEO	FY2012	Summary report of identified barriers and strategies to overcome barriers

Strategy D: – Increase return-to-work outcomes.			
D-1. Identify injured employees, defined under the Federal Employees' Compensation Act (FECA) as PR (Entitled to payment on periodic roll) or PN (Entitled to payment on periodic roll but determined to have no wage earning-capacity or re-employment potential for indefinite future) who would benefit from permanent accommodations and reassignment.	NAH	Ongoing	Working Spreadsheet
D-2. Develop a description of how the agency will increase return-to-work outcomes and coordinate with the Department of Labor's Office of Workers' Compensation Programs (OWCP) to ensure accommodations made available to injured Federal employees who sustain serious workplace injuries or illnesses are suitable.	NAH	Completed	Documented process identifying how accommodations will be available to qualifying injured employees
D-3. Make an effort to ensure the retention of those who are injured on the job by working to improve, expand, and increase a return-to-work program for those employees who sustain work-related injuries and illnesses as defined under FECA and to increase the availability of temporary job modifications by providing light or limited duty.	NAH	Completed	Offer training on a continual basis for all NARA supervisors on the return to work program documented in NARA directive 316
D-4. Provide quarterly monitoring of return-to-work successes under the President's Protecting Our Workers and Ensuring Reemployment (POWER) Initiative.	NAH	Ongoing	Documented metrics
GOAL 4 – Administer an effective reasonable accommodation program.			
Strategy A: Require training for managers and supervisors on NARA 303 – <i>Processing Reasonable Accommodation Requests for Employees and Applicants with Disabilities.</i>			
TASKS	SUPPORTING UNIT(S)	PROJECTED COMPLETION DATE	PERFORMANCE MEASURES/RESULTS
A-1. Conduct reasonable accommodation training course offered on a bi-annual basis	NEEO	Ongoing	All new supervisors/hiring managers are trained on reasonable accommodation
A-2. Develop online/webinar training for reasonable accommodation process and procedures	NEEO, NAO	FY 2011	Offer training on a continual basis for all NARA employees

A-3. Inform all employees of the proper procedures for requesting a reasonable accommodation	NEEO	FY 2011	Draft and release a NARA Notice
Strategy B: Utilize available resources for obtaining reasonable accommodations for NARA employees.			
B-1. Continue partnership with DOD's Computer/Electronic Accommodations Program (CAP)	NHP, NEEO	Ongoing	Continue to provide free electronic/computer accommodations to employees with disabilities
B-2. Consult with DOL's Job Accommodations Network (JAN) for advice on reasonable accommodation requests	NEEO	As needed	Consult with DOL's Job Accommodations Network (JAN) for advice on reasonable accommodation requests
B-3. Establish a centralized budget for reasonable accommodations	NAB, NEEO	FY 2012	Sufficient funding is in place for NEEO to cover all necessary reasonable accommodations