

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

## National Archives and Records Administration - 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

In FY25, there were no triggers for PWD for both clusters (GS-1 to GS-10) and (GS-11 to SES). GS-1 to GS-10 had 22.3 Percent for PWD and GS-11 to SES had 15.1 Percent for PWD.

\* 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

In FY25, there were no triggers for PWTD for both clusters (GS-1 to GS-10) and (GS-11 to SES). GS-1 to GS-10 had 5.18 Percent for PWTD and GS-11 to SES had 3.38 Percent for PWTD.

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	1218	186	15.27	42	3.45
Grades GS-1 to GS-10	1215	271	22.30	63	5.19

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

On January 21, 2025, NARA issued a notice implementing a hiring freeze in accordance with the Presidential direction from January 20, 2025. Additional notices informed the hiring freeze had been extended through October 15, 2025. Consequently, the agency has not communicated numerical hiring goals to managers or recruiters in FY2025.

## 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

For FY25, sufficient qualified personnel was hired to implement the disability program.

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)
Special Emphasis Program for PWD and PWTD	0	0	0	Vacant, Special Emphasis Program Manager for PWD and PWTD
Processing applications from PWD and PWTD	1	0	0	Germeka Harrison, Selective Placement Program Coordinator (SPPC), Human Capital, Germeka.Harrisont@nara.gov
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Germeka Harrison, Selective Placement Program Coordinator (SPPC), Human Capital, Germeka.Harrisont@nara.gov
Section 508 Compliance	2	0	0	Jocelyn Blakely-Hill, IT Specialist, IT Specialist, Web Program Division Office of Innovation jocelyn.blakely-hill@nara.gov Farooq Khan, IT Specialist, Compliance & Investments Branch (ICC) Farooq.Khan1@nara.gov
Processing reasonable accommodation requests from applicants and employees	3	0	0	Courtney Whatley, Disability Program Manager, NEEO, courtney.whatley@nara.gov Sophia Spadacino, Disability Program and Anti-harassment Supervisor, NEEO, sophia.spadacino@nara.gov
Architectural Barriers Act Compliance	1	0	0	Alicia Stukes, Facilities & Materials Management Officer, Facility and Property Management Division, Alicia.Stukes@nara.gov

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

Answer: Yes

On January 31, 2025, the agency disseminated guidance on the updated Reasonable Accommodation (RA) process to comply with NARA's new policy regarding the return to in-person work. This guidance included several worksheets and checklists, as well as the EEOC's "Work at Home/Telework as a Reasonable Accommodation" documentation. Additionally, in February 2025, the agency conducted training sessions on the RA process and the new return-to-work policy for managers, supervisors, and employees.

On March 12, 2025, a NARA Notice was issued stating that Government Purchase Card was restricted for technical training required for an employee to obtain or maintain professional certifications or licenses necessary for their role. Consequently, paid training was not pursued for disability staff for the remaining FY.

In May of FY25, two Disability Program staff completed free Section 508 Compliance Training via section508.gov. This training was undertaken to ensure that all disseminated training materials, worksheets, and guidance provided to the agency are fully compliant with Section 508 standards.

Additionally, starting in FY25, weekly meetings were held with the Reasonable Accommodation Team (REACT) to review telework/remote work requests and ensure decisions complied with NARA's new policy regarding the return to in-person work. The REACT team consisted of the Disability program office, a representative from NGC and a representative from Human Capital.

## **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

### Section III: Program Deficiencies In The Disability Program

<b>Program name 1</b>	C.2.b.5
<b>Description of Program Deficiency</b>	Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.
<b>Objective</b>	Process case with timeframe set forth in procedures.
<b>Fiscal Year</b>	2025
<b>Responsible Official Name</b>	Courtney Whatley
<b>Responsible Official Name</b>	Emma James
<b>Responsible Official Name</b>	Sinndy Canot
<b>Responsible Official Title</b>	Disability Program Manager
<b>Responsible Official Title</b>	MECP Coordinator Specialist

## 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.

Throughout FY25, applicants with disabilities had the opportunity to apply to any NARA Merit Promotion vacancy through the appropriate non-competitive hiring authorities. NARA maintains a Selective Placement repository where candidates eligible for non-competitive hiring authorities, such as Schedule A, can upload a resume and required documentation for the consideration of NARA hiring managers.

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.

Schedule A language appears in Merit Promotion announcements, which include instructions for PWD and PWTD applying below Schedule A. In addition, we have implemented a resume repository, which enables hiring managers to direct hire persons with disabilities using Schedule A.

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.

1.The determination of eligibility for appointments below one of the hiring authorities that take disability into account is made through the documentation provided by the applicant (i.e., their resume, transcripts [if required by the position], officially signed Schedule A disability letter, and/or veterans disability rating letter).

2.The individual's name is added to a certificate created from the job announcement posting and forwarded to the Selecting Official. In addition, applicants to our Schedule A resume repository are reviewed by hiring managers and, if interested, are then reviewed by ARC to determine their eligibility for schedule A hiring. If verified, the hiring manager is notified to interview the applicant, and guidance is provided regarding the way the appointment will take place and the requirements for each appointment type.

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

Answer: Yes

Human Capital Specialists provide training to all new managers and supervisors during the 6-month Supervisor Development Program conducted two (2) times a year. NARA's shared services center for Staffing – Administrative Resource Center (ARC), conducts a Strategic Recruitment conversation with the hiring manager, and this includes discussing alternate hiring authorities, including Schedule A disability appointments. In addition, training was provided to hiring managers in the use of the Schedule A and Disabled Veterans resume repository.

### 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.

The Office of Human Capital has continued to make efforts to establish meaningful relationships with organizations and groups that support the hiring of veterans, military spouses, and individuals with disabilities. These outreach efforts include, but are not limited to, registering for events with organizations like Hiring Our Heroes and marketing our Selective Placement repository for individuals with non-competitive hiring authorities.

### 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

In FY25, there were no triggers for PWD and PWTD among new hires in the permanent workforce. PWD comprised 26.8 Percent of the new hires and PWTD comprised 4.1 Percent of the new hires.

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					
% of Qualified Applicants					
% of New Hires					

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

Due to administration efficiency efforts, hiring was curtailed in FY25. In FY25, there were no new hires for MCO's 0301,0343, and 2210.

For MCO 1001, only 1.13 Percent out of total referred applicants were hired. Only 7 Percent of PWD and 3 Percent of PWTD were referred, yielding no trigger.

For MCO 1420, only 3.1 Percent out of total referred applicants were hired. While 0 PWD and PWD were hired, only 10.5 of PWD and 6.3 Percent of PWTD were referred, yielding no trigger.

New Hires to Mission-Critical Occupations	Total (Number)	Reportable Disability New Hires (Percentage)	Targetable Disability New Hires (Percentage)
Numerical Goal	--	12%	2%

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

Due to administration efficiency efforts, hiring was curtailed in FY25. Impact is undetermined due to agency reduction measures.

For MCO 0301, 12.3 Percent of PWD and 7.1 Percent of PWTD applied.  
For MCO 0343, 12.4 Percent of PWD and 7.3 Percent of PWTD applied.  
For MCO 1001, 19.5 Percent of PWD and 13 Percent of PWTD applied.  
For MCO 1420, 17.3 Percent of PWD and 11.4 Percent of PWTD applied.  
For MCO 1421, 13.9 Percent of PWD and 8.4 Percent of PWTD applied.

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

Due to administration efficiency efforts, hiring was curtailed in FY25. Impact is undetermined due to agency reduction measures.

For MCO 0301, 0 PWD and 0 PTWD were promoted. While 7.8 Percent PWD and 5.8 Percent PWTD were referred, only 2.9 Percent of referred internal applicants were promoted, yielding no trigger.

For MCO 0343, 28.5 Percent of PWDs were promoted. While 0 Percent of PWTD were promoted, only 9.4 Percent were referred and only a total 8.2 Percent of referred internal applicants were promoted, yielding no trigger.

For MCO 1001, 25 Percent of PWD and 25 Percent of PWTD were promoted.

For MCO 1420, While only 4.3 Percent of PWD and 0 Percent PWTD were promoted, only 12 Percent of applicants were referred, yielding no trigger.

For MCO 1422, 7.14 Percent of PWD and 0 Percent PTWD were promoted. However, only 14 Percent of those referred were promoted, yielding no trigger.

## 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.

No targeted hiring occurred in FY25 due to the hiring freeze. The Office of Human Capital has a Voluntary Internship Program; in FY25, 9.2 percent of participants self-identified as having a disability per the SF-256 form. The Office of Human Capital has also worked to expand the use of the Pathways Program; while NARA did not make any hires, four participants from the Pathways recent graduates program were converted into career conditional hires.

### B. CAREER DEVELOPMENT OPPORTUNITIES

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

In FY25, NARA offered a managed mentoring program, non-competitive details, coaching programs and student internship programs. NARA also hosted a non-competitive career exploration program where five work units hosted informational sessions. Additionally, NARA sponsored the Fulbright-National Archives Heritage Science Fellowship.

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)
Fellowship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Internship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Mentoring Programs	N/A	N/A	N/A	N/A	N/A	N/A
Coaching Programs	N/A	N/A	N/A	N/A	N/A	N/A
Training Programs	N/A	N/A	N/A	N/A	N/A	N/A
Detail Programs	67	67	13.4%	13.4%	1.49%	1.49%
Other Career Development Programs	N/A	N/A	N/A	N/A	N/A	N/A

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

In FY25, the agency offered several career development opportunities to the workforce including Detail opportunities (67 participants), Mentoring opportunities (164 participants), Coaching program (101 participants), and Career Exploration opportunities (18 participants). However, only the EIG program required competition, which NARA did not sponsor in FY25. While the detailed program was not competitive, it did require supervisory approval. All programs were open to the workforce who were performing as fully successfully. For the Detail Program, 67 individuals participated with 13.4 Percent of the participants having a disability. One had a targeted disability at 1.49 Percent. Seven participants did not identify as having a disability at 10.4 Percent. In examining the percentage of selections to the total applicant category, there were no triggers for PWD.

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks

are the relevant applicant pool for the applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Applicants (PWTD)

Answer: Yes

b. Selections (PWTD)

Answer: No

In FY25, there were triggers for applicants and selections for PWTD. As indicated in the previous section, In FY25, the agency offered several career development opportunities to the workforce including Detail opportunities (67 participants), Mentoring opportunities (164 participants), Coaching program (101 participants), and Career Exploration opportunities (18 participants). However, only the EIG program required competition, which NARA did not sponsor in FY25. While the detail program was not competitive, it did require supervisory approval. All programs were open to the workforce who were performing as fully successfully. For the Detail Program, 67 individuals participated with 1.49 Percent of the participants having a targeted disability. Seven participants did not identify as having a disability at 10.4 Percent. In examining the percentage of selections to the total applicant category, there were triggers for PWTD.

## C. AWARDS

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

a. Awards, Bonuses, & Incentives (PWD)

Answer: Yes

b. Awards, Bonuses, & Incentives (PWTD)

Answer: Yes

In FY25, using the inclusion rate as the benchmark, there are triggers involving both PWD and PWTD.

For PWD, there are 5 triggers as follows: Time Off Awards 11 - 20 hours (PWD 6.1 Percent vs. No Disability 6.6 Percent); \$500 and under (PWD 162.3 Percent vs. No Disability 163.4 Percent); \$3000-\$3999 (PWD 44.8 Percent vs. No Disability 56.4 Percent); \$4000-\$4999 (PWD 0.44 Percent vs. No Disability 0.55 Percent); \$5000 or more (PWD 1.0 Percent vs. No Disability 2.4 Percent).

For PWTD, there were 3 triggers as follows: Time Off Awards 21 - 30 hours (PWTD 4.7 Percent vs. No Disability 7.0 Percent); Cash Awards \$3,000 - \$3,999 (PWTD 44.7 Percent vs. No Disability 56.4 Percent); Cash Awards \$5000 or more (PWTD 0 Percent vs. No Disability 2.4 Percent).

<b>Time-Off Awards</b>	<b>Total (Number)</b>	<b>Reportable Disability (Percentage)</b>	<b>Without Reportable Disability (Percentage)</b>	<b>Targeted Disability (Percentage)</b>	<b>Without Targeted Disability (Percentage)</b>
Time-Off Awards 1 - 10 hours: Awards Given	832.00	20.91	79.09	5.89	94.11
Time-Off Awards 1 - 10 Hours: Total Hours	6666.00	20.52	79.48	5.85	94.15
Time-Off Awards 1 - 10 Hours: Average Hours	8.01	7.86	8.05	7.96	8.02
Time-Off Awards 11 - 20 hours: Awards Given	160.00	17.50	82.50	5.00	95.00
Time-Off Awards 11 - 20 Hours: Total Hours	3064.00	17.49	82.51	3.72	96.28
Time-Off Awards 11 - 20 Hours: Average Hours	19.15	19.14	19.15	14.25	19.41
Time-Off Awards 21 - 30 hours: Awards Given	181.00	22.10	77.90	2.76	97.24
Time-Off Awards 21 - 30 Hours: Total Hours	4390.00	21.82	78.18	2.73	97.27
Time-Off Awards 21 - 30 Hours: Average Hours	24.25	23.95	24.34	24.00	24.26
Time-Off Awards 31 - 40 hours: Awards Given	144.00	18.75	81.25	5.56	94.44
Time-Off Awards 31 - 40 Hours: Total Hours	5728.00	18.72	81.28	5.45	94.55
Time-Off Awards 31 - 40 Hours: Average Hours	39.78	39.70	39.79	39.00	39.82
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	4013.00	18.56	81.44	5.51	94.49
Cash Awards \$500 and Under: Total Amount	699697.00	16.22	83.78	5.38	94.62
Cash Awards \$500 and Under: Average Amount	174.36	152.36	179.37	170.23	174.60
Cash Awards: \$501 - \$999: Awards Given	427.00	23.65	76.35	6.32	93.68
Cash Awards: \$501 - \$999: Total Amount	313147.00	23.57	76.43	5.93	94.07
Cash Awards: \$501 - \$999: Average Amount	733.37	730.82	734.15	687.85	736.44
Cash Awards: \$1000 - \$1999: Awards Given	942.00	22.19	77.81	5.73	94.27
Cash Awards: \$1000 - \$1999: Total Amount	1408388.00	22.37	77.63	5.76	94.24
Cash Awards: \$1000 - \$1999: Average Amount	1495.10	1507.18	1491.66	1503.33	1494.60
Cash Awards: \$2000 - \$2999: Awards Given	33.00	18.18	81.82	9.09	90.91
Cash Awards: \$2000 - \$2999: Total Amount	79431.00	17.95	82.05	9.86	90.14
Cash Awards: \$2000 - \$2999: Average Amount	2407.00	2376.00	2413.89	2610.00	2386.70
Cash Awards: \$3000 - \$3999: Awards Given	1334.00	15.44	84.56	3.52	96.48
Cash Awards: \$3000 - \$3999: Total Amount	4038917.00	15.41	84.59	3.51	96.49
Cash Awards: \$3000 - \$3999: Average Amount	3027.67	3020.83	3028.92	3020.00	3027.95
Cash Awards: \$4000 - \$4999: Awards Given	13.00	15.38	84.62	7.69	92.31
Cash Awards: \$4000 - \$4999: Total Amount	58418.00	15.22	84.78	7.10	92.90
Cash Awards: \$4000 - \$4999: Average Amount	4493.69	4447.00	4502.18	4145.00	4522.75
Cash Awards: \$5000 or more: Awards Given	54.00	9.26	90.74	0.00	100.00
Cash Awards: \$5000 or more: Total Amount	659176.00	6.68	93.33	0.00	100.00
Cash Awards: \$5000 or more: Average Amount	12206.96	8800.00	12554.61	0.00	12206.96

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

a. Awards, Bonuses, & Incentives (PWTB)

Answer: Yes

b. Pay Increases (PWTB)

Answer: No

In FY25, using the inclusion rate as the benchmark, there were triggers related to QSI's for PWD.

For PWD, there is 1 trigger related to QSI's as follows: QSI (PWD 0.44 Percent vs. No Disability 0.81 Percent).

Other Awards	Total (Number)	Reportable Disability (Percentage)	Without Reportable Disability (Percentage)	Targeted Disability (Percentage)	Without Targeted Disability (Percentage)
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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

In FY2025, the agency did not sponsor the Archivist's Achievement Awards.

## D. PROMOTIONS

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

a. SES

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

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

b. Grade GS-15

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

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

c. Grade GS-14

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

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

d. Grade GS-13

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

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

Due to administration efficiency efforts, hiring was curtailed in FY25. Impact is undetermined due to agency reduction measures.

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

a. SES

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

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

b. Grade GS-15

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

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

c. Grade GS-14

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

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

d. Grade GS-13

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

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

Due to administration efficiency efforts, hiring was curtailed in FY25. Impact is undetermined due to agency reduction measures.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires to SES (PWD) Answer: N/A

b. New Hires to GS-15 (PWD) Answer: N/A

c. New Hires to GS-14 (PWD) Answer: N/A

d. New Hires to GS-13 (PWD) Answer: N/A

Due to administration efficiency efforts, hiring was curtailed in FY25. Impact is undetermined due to agency reduction measures.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires to SES (PWTD) Answer: N/A

b. New Hires to GS-15 (PWTD) Answer: N/A

c. New Hires to GS-14 (PWTD) Answer: N/A

d. New Hires to GS-13 (PWTD) Answer: N/A

Due to administration efficiency efforts, hiring was curtailed in FY25. Impact is undetermined due to agency reduction measures.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

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

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

b. Managers

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

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

c. Supervisors

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

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

Due to administration efficiency efforts, hiring was curtailed in FY25. Impact is undetermined due to agency reduction measures.

6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

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

b. Managers

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

c. Supervisors

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

Due to administration efficiency efforts, hiring was curtailed in FY25. Impact is undetermined due to agency reduction measures.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- |                                    |             |
|------------------------------------|-------------|
| a. New Hires for Executives (PWD)  | Answer: N/A |
| b. New Hires for Managers (PWD)    | Answer: N/A |
| c. New Hires for Supervisors (PWD) | Answer: N/A |

Due to administration efficiency efforts, hiring was curtailed in FY25. Impact is undetermined due to agency reduction measures.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- |                                     |             |
|-------------------------------------|-------------|
| a. New Hires for Executives (PWTD)  | Answer: N/A |
| b. New Hires for Managers (PWTD)    | Answer: N/A |
| c. New Hires for Supervisors (PWTD) | Answer: N/A |

Due to administration efficiency efforts, hiring was curtailed in FY25. Impact is undetermined due to agency reduction measures.

## 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: Yes

Yes. NARA did convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service in FY 2025. Any previous Schedule A/disability hires who were not converted left the agency prior to their conversion eligibility dates.

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: Yes

b. Involuntary Separations (PWD)

Answer: Yes

In FY25 based upon the inclusion rates for separations, there were triggers for PWD. For both voluntary and involuntary separations PWD had higher inclusion rates for RIF's at 2.4 Percent compared to the inclusion rates for PWOD at 0.9 Percent; removals at 5.0 Percent compared to the inclusion rates for PWOD at 2.0 Percent; resignations at 9.8 Percent, compared to the inclusion rates for PWOD at 5.7 Percent; retirement at 8.2 Percent compared to the inclusion rates for PWOD at 8.0 Percent and other separations at 2.8 Percent compared to the inclusion rates for individuals without disabilities at 1.4 Percent.

Separations	Total (Number)	Reportable Disabilities (Percentage)	Without Reportable Disabilities (Percentage)
Permanent Workforce: Reduction in Force	30	2.37	0.94
Permanent Workforce: Removal	64	4.95	2.03
Permanent Workforce: Resignation	159	9.68	5.66
Permanent Workforce: Retirement	199	8.17	7.99
Permanent Workforce: Other Separations	42	2.80	1.44
Permanent Workforce: Total Separations	494	27.96	18.06

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: Yes

b. Involuntary Separations (PWTD)

Answer: Yes

In FY25, based upon the inclusion rates for separations, there were triggers for PWTD. For both voluntary and involuntary separations PWTD had higher inclusion rates removals at 4.7 Percent compared to the inclusion rates for PWOD at 2.0 Percent; resignations at 16.2 Percent, compared to the inclusion rates for PWOD at 5.7 Percent and retirement at 9.5 Percent compared to the inclusion rates for PWOD at 8.0 Percent.

Separations	Total (Number)	Targeted Disabilities (Percentage)	Without Targeted Disabilities (Percentage)
Permanent Workforce: Reduction in Force	30	0.94	1.22
Permanent Workforce: Removal	64	4.72	2.49
Permanent Workforce: Resignation	159	16.04	5.98
Permanent Workforce: Retirement	199	9.43	7.96
Permanent Workforce: Other Separations	42	0.94	1.73
Permanent Workforce: Total Separations	494	32.08	19.38

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.

Exit surveys results were analyzed for FY25. Seven questions concerned areas related to disability. Fourteen (14.6 Percent) percent of the respondents indicated that they were leaving NARA to work at another federal agency. Thirteen percent indicated that they were leaving NARA to work outside the Federal Government. Twenty-six (26.9 Percent) percent indicated they were retiring. One employee indicated they left because they were denied reasonable accommodation for teleworking and could not commute to office.

Further analysis of the 130 responses to the exit survey concerned areas related to disability shows the following. Question 1) 3.8 Percent indicated they disagreed when responding to the question "During my time at the agency, I believe NARA valued diversity....." Question 2) 17.6 Percent responded yes to the question "I used reasonable accommodations services while I worked at NARA". Question 3) 3.0 Percent responded negatively to "provide feedback about your experiences regarding the NARA's processes or practices for providing Reasonable Accommodations". Question 4) 1.5 Percent. responded negatively to "Provide feedback about your experiences regarding accessibility related to one or more of the following: Electronic documents or forms (for example, 508 compliant forms for requesting disability-related services and accommodations, surveys) Software applications, Technology hardware, Physical or structural features of the work environment (for example, workspaces, doors, hallways, restrooms). Question 5) 4.6 Percent responded negatively to "While you were employed at NARA, did you ever have an experience where you did not feel included in a NARA activity or program because of your disability?". Question 6) 1.5 Percent responded negatively to "Describe what NARA is doing well regarding recruitment, hiring, inclusion, career development, and/or retention for people with disabilities at NARA". Question 7) 2.3 Percent responded to the need for improvements to "Provide any suggestions you have to improve recruitment, hiring, inclusion, career development, and/or retention for people with disabilities at NARA".

## B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

1. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

<https://www.archives.gov/global-pages/accessibility>. This webpage provides a telephone number, a mailing address, and an email address for feedback. In addition, the website provides individuals with contact information for Section 508 Coordinators at NARA to file a complaint and provides a link for contact information for the Section 508 Coordinators.

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

<https://www.archives.gov/eo/policy/508-aba-rights>. This page provides information about the Architectural Barriers Act (ABA) and the Access Board that is responsible for enforcing the ABA. Additionally, the website provides a link for individuals to access information on the Access Board's standards which provides the link for information about filing a complaint under the ABA: Online ABA Complaint Form Email to [enforce@access-board.gov](mailto:enforce@access-board.gov) Fax to 202-272-0081 Mail to: Compliance and Enforcement Section Office of the General Counsel U.S. Access Board 1331 F Street, NW, Suite 1000 Washington, DC 20004-1111.

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.

NARA's EEO Disability Program Office and reasonable accommodation have shifted to another division in FY26. They plan to continue to monitor accessibility of agency facilities and/or assistive technology for NARA's workforce and the Public who visit NARA's buildings. The Disability Program Office tracks reasonable accommodation requests from employees and/or applicants and the public requiring accessibility of agency facilities and/or assistive technology as a form of an accommodation such as listening devices, digital timesheets, magnifying vision software, keyboards/mouse, voice recognition software and assistive equipment for hearing.

### C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

In FY25, the Disability program received a total of 308 RA requests. Out of the 308 requests, 281 cases have been closed at an average processing time of 31 days. Or-In FY25, 182 out of 308 cases were processed within 30 days. This indicates that 59 Percent of RA cases were processed timely.

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.

NARA monitors the processing of reasonable accommodations requests and trends by tracking all requests on our EXCEL database. In addition, we monitor accommodation trends annually, which tracks accommodations approved, denied and withdrawn from the RA process. Additionally, we created case summaries for reasonable accommodations requests where employees elect to participate in the reassignment process and assist managers and supervisors on conducting research for possible accommodations for employees. NARA's Interim Guidance 303-1, Reasonable Accommodation Policy and Procedures was updated in FY23.

On January 31, 2025, the Disability Program disseminated reasonable accommodation (RA) guidance to managers and supervisors as it relates to the new Return to In-Person Work policy outlined in NARA Notice 2025-038. This guidance was designed to assist leadership in reviewing and considering RA requests for telework or remote work. The Disability Program Office also developed and distributed several resources to help supervisors process requests from their staff, including: The Essential Function Worksheet, The Deciding Official RA Checklist and the Employee RA Checklist. Additionally, the EEO Disability Program collaborated with NARA's Learning and Development team to provide agency-wide training on this updated guidance. Sessions were held for managers and supervisors on February 4, 2025, and for employees on February 11, 2025. All training and materials and information were also shared via NARA's Internal Collaboration Network. Additionally, Starting in FY25, we held weekly meetings with the Reasonable Accommodation Team (REACT) to review telework/remote work requests and ensure decisions complied with NARA's new policy regarding the return to in-person work. The REACT team consisted of the Disability program office, a representative from NGC and a representative from Human Capital.

The updates made were to enhance the timeliness and efficiency of case processing for reasonable accommodations.

### 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.

Although there were no PAS requests in FY25, PAS guidance is included in NARA's Interim Guidance 303-1, Reasonable Accommodation Policy and Procedures.

## 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.

In FY25, NARA had no findings.

### 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.

In FY25, NARA had no findings.

## 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

### Source of the Trigger 1 (Workforce Data Table, Complaints data, FEVS, or other sources)

<b>Source</b>	Workforce Data (if so identify the table)
<b>Specific Workforce Data Table</b>	Workforce Data Table - B1
<b>Statement of Condition that was a Trigger for a Potential Barrier:</b> Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	<p>Trigger 4: Workforce Data Table B1-2 (Total Workforce-Distribution by Disability Status (Inclusion Rate)). Using the inclusion rate of persons without disabilities (PWOD) as a benchmark, there are triggers involving both PWD and PWTD.</p> <p>In FY25 based upon the inclusion rates for separations, there were triggers for PWD. For both voluntary and involuntary separations PWD had higher inclusion rates for RIF's at 2.4% compared to the inclusion rates for PWOD at 0.9%; removals at 5.0% compared to the inclusion rates for PWOD at 2.0%; resignations at 9.8%, compared to the inclusion rates for PWOD at 5.7%; retirement at 8.2% compared to the inclusion rates for PWOD at 8.0% and other separations at 2.8% compared to the inclusion rates for individuals without disabilities at 1.4%.</p> <p>In FY25 based upon the inclusion rates for separations, there were triggers for PWTD. For both voluntary and involuntary separations PWTD had higher inclusion rates removals at 4.7% compared to the inclusion rates for PWOD at 2.0%; resignations at 16.2%, compared to the inclusion rates for PWOD at 5.7% and retirement at 9.5% compared to the inclusion rates for PWOD at 8.0%.</p>
<b>Barrier Analysis Process Completed?</b>	N
<b>Barrier(s) Identified?</b>	N

### Statement of Identified Barrier:

Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.

<b>Barrier Name 1</b>	To be determined after FY25 Barrier Analysis
<b>Description of Policy, Procedure, or Practice</b>	To be determined.

### Objective(s) and Dates for EEO Plan

<b>Date Initiated</b>	05/07/2025
<b>Target Date</b>	08/15/2026
<b>Sufficient Funding / Staffing?</b>	Yes
<b>Date Modified</b>	
<b>Date Completed</b>	
<b>Objective Description</b>	Conduct a Barrier Analysis in FY26 from FY25 triggers. More detailed objectives will be generated once the barrier analysis is conducted and barriers identified for mitigation.

### Responsible Official(s)

<b>Title</b>	Model EEO Compliance Coordinator Specialist
<b>Name</b>	Emma James
<b>Standards Address The Plan?</b>	Yes

<b>Title</b>	Supervisor Disability Program
<b>Name</b>	Sophia Spadacino
<b>Standards Address The Plan?</b>	Yes

#### Planned Activities Toward Completion of Objective

<b>Target Date</b>	07/15/2026
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<b>Planned Activities</b>	Gather a Barrier Analysis Team to review identified triggers.
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<b>Sufficient Staffing &amp; Funding?</b>	Yes
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<b>Modified Date</b>	
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<b>Completion Date</b>	
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<b>Target Date</b>	07/07/2026
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<b>Planned Activities</b>	Review triggers and do analysis on possible causes.
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<b>Sufficient Staffing &amp; Funding?</b>	Yes
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<b>Modified Date</b>	
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<b>Completion Date</b>	
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<b>Target Date</b>	08/01/2026
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<b>Planned Activities</b>	Validate identified barriers.
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<b>Sufficient Staffing &amp; Funding?</b>	Yes
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<b>Modified Date</b>	
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<b>Completion Date</b>	
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<b>Target Date</b>	08/15/2026
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<b>Planned Activities</b>	Develop a plan of action to mitigate barriers.
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<b>Sufficient Staffing &amp; Funding?</b>	Yes
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<b>Modified Date</b>	
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<b>Completion Date</b>	
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#### Report of Accomplishments

<b>Fiscal Year</b>	2025
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<b>Accomplishment</b>	NNEO hired a Model EEO Compliance Coordinator Specialist to conduct Barrier Analysis.
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#### Source of the Trigger 2 (Workforce Data Table, Complaints data, FEVS, or other sources)

<b>Source</b>	Workforce Data (if so identify the table)
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<b>Specific Workforce Data Table</b>	Workforce Data Table - B9
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**Statement of Condition that was a Trigger for a Potential Barrier:**

Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?

Trigger 2: Workforce Data Table B9-2 (Employee Recognition and Awards-Distribution by disability (Inclusion Rate).

Using the inclusion rate of persons without disabilities (PWOD) as a benchmark, there are triggers involving both PWD and PWTD.

For PWD, there are 5 triggers as follows: Time Off Awards 11 - 20 hours (PWD 6.1% vs. No Disability 6.6%); \$500 and under (PWD 162.3% vs. No Disability 163.4%); \$3000-\$3999 (PWD 44.8% vs. No Disability 56.4%); \$4000-\$4999 (PWD 0.44% vs. No Disability 0.55%); \$5000 or more (PWD 1.0% vs. No Disability 2.4%).

For PWTD, there were 3 triggers as follows: Time Off Awards 21 - 30 hours (PWTD 4.7% vs. No Disability 7.0%); Cash Awards \$3,000 - \$3,999 (PWTD 44.7% vs. No Disability 56.4%); Cash Awards \$5000 or more (PWTD 0% vs. No Disability 2.4%).

**Barrier Analysis Process Completed?** N

**Barrier(s) Identified?** N

**Statement of Identified Barrier:**

Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.

**Description of Policy, Procedure, or Practice****Objective(s) and Dates for EEO Plan**

N/A

**Responsible Official(s)**

**Title** Supervisor Disability Program

**Name** Sophia Spadacino

**Standards Address The Plan?** Yes

**Title** Model EEO Compliance Coordinator Specialist

**Name** Emma James

**Standards Address The Plan?** Yes

**Planned Activities Toward Completion of Objective**

**Target Date** 07/07/2026

**Planned Activities** Review triggers and do analysis on possible causes.

**Sufficient Staffing & Funding?** Yes

**Modified Date**

**Completion Date**

**Target Date** 07/15/2026

**Planned Activities** Gather a Barrier Analysis Team to review identified triggers.

**Sufficient Staffing & Funding?** Yes

**Modified Date**

**Completion Date**

**Target Date** 08/01/2026

**Planned Activities** Validate identified barriers.

**Sufficient Staffing & Funding?** Yes

**Modified Date**

**Completion Date**

<b>Target Date</b>	08/15/2026
<b>Planned Activities</b>	Develop a plan of action to mitigate barriers.
<b>Sufficient Staffing &amp; Funding?</b>	Yes
<b>Modified Date</b>	
<b>Completion Date</b>	

<b>Report of Accomplishments</b>	
<b>Fiscal Year</b>	2025
<b>Accomplishment</b>	NNEO hired a Model EEO Compliance Coordinator Specialist to conduct Barrier Analysis.

<b>Source of the Trigger 3 (Workforce Data Table, Complaints data, FEVS, or other sources)</b>	
<b>Source</b>	Other
<b>Specific Workforce Data Table</b>	Workforce Data Table - B1
<b>Statement of Condition that was a Trigger for a Potential Barrier:</b> Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Trigger 1: Career Development Opportunities (Detail Program). For the Detail program, PWTD applied and were selected at a rate of 1.49%, below the 2% federal benchmark.
<b>Barrier Analysis Process Completed?</b>	N
<b>Barrier(s) Identified?</b>	N

<b>Statement of Identified Barrier:</b> Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	
<b>Barrier Name 1</b>	To be determined after FY25 barrier analysis conducted
<b>Description of Policy, Procedure, or Practice</b>	To be determined.

<b>Objective(s) and Dates for EEO Plan</b>	
<b>Date Initiated</b>	05/05/2026
<b>Target Date</b>	08/15/2026
<b>Sufficient Funding / Staffing?</b>	Yes
<b>Date Modified</b>	
<b>Date Completed</b>	
<b>Objective Description</b>	Trigger 2: Conduct a Barrier Analysis in FY26 from FY25 triggers. More detailed objectives will be generated once the barrier analysis is conducted and barriers identified for mitigation.

<b>Responsible Official(s)</b>	
<b>Title</b>	Supervisor Disability Program
<b>Name</b>	Sophia Spadacino
<b>Standards Address The Plan?</b>	Yes
<b>Title</b>	Model EEO Compliance Coordinator Specialist
<b>Name</b>	Emma James
<b>Standards Address The Plan?</b>	Yes

<b>Planned Activities Toward Completion of Objective</b>	
<b>Target Date</b>	08/15/2026
<b>Planned Activities</b>	Develop a plan of action to mitigate barriers.
<b>Sufficient Staffing &amp; Funding?</b>	Yes

**Modified Date****Completion Date****Target Date** 08/01/2026**Planned Activities** Validate identified barriers.**Sufficient Staffing & Funding?** Yes**Modified Date****Completion Date****Target Date** 07/15/2026**Planned Activities** Gather a Barrier Analysis Team to review identified triggers.**Sufficient Staffing & Funding?** Yes**Modified Date****Completion Date****Target Date** 07/07/2026**Planned Activities** Review triggers and do analysis on possible causes.**Sufficient Staffing & Funding?** Yes**Modified Date****Completion Date****Report of Accomplishments****Fiscal Year** 2025**Accomplishment** NEEO hired a Model EEO Compliance Coordinator Specialist to conduct Barrier Analysis.**Source of the Trigger 4 (Workforce Data Table, Complaints data, FEVS, or other sources)****Source** Workforce Data (if so identify the table)**Specific Workforce Data Table** Workforce Data Table - B9**Statement of Condition that was a Trigger for a Potential Barrier:** Trigger 3: Workforce Data Table B9-2 (Employee Recognition and Awards-Distribution by disability (Inclusion Rate)).

Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?

Statement of condition that was a trigger for a potential barrier:

Using the inclusion rate of persons without disabilities (PWOD) as a benchmark, there are triggers involving PWD.

For PWD, there is 1 trigger related to QSI's as follows: QSI (PWD 0.44% vs. No Disability 0.81%).

**Barrier Analysis Process Completed?** N**Barrier(s) Identified?** N**Statement of Identified Barrier:**

Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.

**Barrier Name 1** To be determined after FY25 barrier analysis conducted**Description of Policy, Procedure, or Practice** To be determined.**Objective(s) and Dates for EEO Plan****Date Initiated** 05/07/2025**Target Date** 08/15/2026**Sufficient Funding / Staffing?** Yes**Date Modified**

<b>Date Completed</b>	
<b>Objective Description</b>	Conduct a Barrier Analysis in FY26 from FY25 triggers. More detailed objectives will be generated once the barrier analysis is conducted and barriers identified for mitigation.
<b>Responsible Official(s)</b>	
<b>Title</b>	Supervisor Disability Program
<b>Name</b>	Sophia Spadacino
<b>Standards Address The Plan?</b>	Yes
<b>Title</b>	Model EEO Compliance Coordinator Specialist
<b>Name</b>	Emma James
<b>Standards Address The Plan?</b>	Yes
<b>Planned Activities Toward Completion of Objective</b>	
<b>Target Date</b>	07/07/2026
<b>Planned Activities</b>	Review triggers and do analysis on possible causes.
<b>Sufficient Staffing &amp; Funding?</b>	Yes
<b>Modified Date</b>	
<b>Completion Date</b>	
<b>Target Date</b>	07/15/2026
<b>Planned Activities</b>	Gather a Barrier Analysis Team to review identified triggers.
<b>Sufficient Staffing &amp; Funding?</b>	Yes
<b>Modified Date</b>	
<b>Completion Date</b>	
<b>Target Date</b>	08/01/2026
<b>Planned Activities</b>	Validate identified barriers.
<b>Sufficient Staffing &amp; Funding?</b>	Yes
<b>Modified Date</b>	
<b>Completion Date</b>	
<b>Target Date</b>	08/15/2025
<b>Planned Activities</b>	Develop a plan of action to mitigate barriers.
<b>Sufficient Staffing &amp; Funding?</b>	Yes
<b>Modified Date</b>	
<b>Completion Date</b>	
<b>Report of Accomplishments</b>	
<b>Fiscal Year</b>	2025
<b>Accomplishment</b>	NEEO hired a Model EEO Compliance Coordinator Specialist to conduct Barrier Analysis.

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.

The agency did not conduct a barrier analysis in FY25. In FY25, the agency hired a Model EEO Compliance Coordinator Specialist with the responsibility of conducting a barrier analysis of identified triggers. The identified triggers using FY25 workforce data will become the basis of a barrier analysis in FY26.

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

The agency did not conduct a barrier analysis in FY25.

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

The agency will conduct a barrier analysis on identified triggers from the FY25 workforce data and develop a plan of action to address barriers involving individuals with disabilities and targeted disabilities.