

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

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

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their 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 C.F.R. § 1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with reportable and targeted disabilities in the federal government.

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.
 - a. Cluster GS-1 to GS-10 (PWD) Answer: No
 - b. Cluster GS-11 to SES (PWD) Answer: Yes

21% of NASA employees at grades GS-10 and below are PWD. However, only 9% those in grades GS-11 to SES are 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: Yes

5% of NASA employees at grades GS-10 and below are PWTD; but only 1% of those in grades GS-11 to SES are PWTD.

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

The Agency's EEO personnel has communicated the new numerical goals in various forums, including briefings for managers and supervisors; individual meetings with hiring managers and recruitment managers; All-Hands meetings for supervisors; and the distribution of information sheets to management with workforce goals.

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 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

The Agency has a designated Agency Disability Program Manager (DPM) in the Office of Diversity and Equal Opportunity. Additionally, the ten NASA Centers each have a designated DPM to manage the operational functions associated with the 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	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	10	0	0	All ten NASA Centers each have designated Human Capital personnel responsible for processing applications, including those from PWD.
Processing reasonable accommodation requests from applicants and employees	10	0	0	All ten NASA Centers each have designated DPMs who are responsible for processing accommodation requests.
Special Emphasis Program for PWD and PWTD	10	0	0	NASA has DPMs at each of the ten Centers responsible for managing SEP programs and activities across the agency.

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(s) that disability program staff have received. If “no”, describe the training(s) planned for the upcoming year.

Answer: Yes

In FY 2017, the Agency’s DPMs were trained on the Agency’s Reasonable Accommodation Procedures. These procedures are currently being updated to align with the new disability regulations, and the DPMs will be trained on the revisions in late FY 2018/early FY 2019. Additionally, the DPMs are provided with ongoing technical assistance and training from the Agency’s DPM during monthly meetings and on an ad hoc basis.

- Marshall Space Flight Center continued existing partnerships with the Alabama and Tennessee Departments of Vocational Rehabilitation and the Alabama School for the Deaf and Blind.

- Kennedy Space Center staff participated in the Bender Virtual Career Fair for People Living with Disabilities.

NASA Headquarters staff attended the Operation Warfighter Outreach Event at the USO Warrior and Family Center Fort Belvoir, VA, which included many participating agencies and a high volume of recovering service members seeking internships.

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.

NASA is in the process of gathering this information and will update this section when it is received.

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.

NASA is in the process of gathering this information and will update this section when it is received.

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: No

NASA plans to provide training on Schedule A to EEO and Human Capital personnel by the end of FY 2018.

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.

Stennis Space Center established partnerships with external disability organizations, including the Mississippi Department of Rehabilitation, the Gulf Coast Ability Works Business Council, and disability service departments at several local colleges and universities. Marshall Space Flight Center continued existing partnerships with the Alabama and Tennessee Departments of Vocational Rehabilitation and the Alabama School for the Deaf and Blind.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If “yes”, please describe the triggers below.
 - a. New Hires for Permanent Workforce (PWD) Answer: No
 - b. New Hires for Permanent Workforce (PWTD) Answer: Yes

NASA meets the goals for PWD, but is below the goals for PWTD. Of the 73 new hires in grades GS-10 and below, 31.5% have a disability and 4.1% have a targeted disability. Of the 533 new hires at GS-11 and above, 12.4% are PWD and 0.6% are PWTD.

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.
 - a. New Hires for MCO (PWD) Answer: No
 - b. New Hires for MCO (PWTD) Answer: No

A trigger exists for new hires in Astronomy and Space Science (1330), where PWDs accounted for 6% of new hires but none were PWTDs. (There were no triggers in the data on new hires for General Engineers, 0801; Electrical Engineers, 0850; Computer Engineers, 0854; Electronics Engineers, 0855; Aerospace Engineers, 0861; Physical Scientists (1301); and Contract Specialists (1102) - PWDs accounted for 15% or more and PWTDs accounted for 4% or more of all new hires in these MCOs.) Note that currently, NASA’s report for Table B7 does not include data by occupation, so data on the qualified applicant pool for MCOs are not available. NASA is working with the Office of Human Capital Management (OHCM) to update its data reports for FY 18.

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

For 2 of the 3 mission critical occupational categories (Engineering and Contracting), the representation of PWD was greater in the relevant applicant pool than among applicants found to be qualified (“referred applicants”):

- For engineering positions (0801, 0850, 0854, 0855, and 0860), PWD accounted for 15.4% of the relevant applicant pool, and 5.1% of the applications received.
- For contracting positions (1102), PWD accounted for 17.4% of the relevant applicant pool, and 6.7% of the applications received.
- There were no internal competitive promotions of Physical Scientists in FY 2017.

PWTD may be underrepresented in applications for both engineering and contracting positions, compared to the relevant applicant pool. PWTD accounted for 0.7% of applications, though accounted for 1.9% of the relevant applicant pool; there were no applications from PWTD for contracting positions, though they made up 3.7% of the relevant applicant pool.

NASA cautions that estimates of the relevant applicant pool are rough approximations. For ease of analysis, time-in-grade is measured at the beginning of

the fiscal year; this excludes some employees who reached 12 months or more in grade later in the year. Further, the analysis presented here includes individuals in the broader occupational category (e.g., all engineering positions) for specific OPM occupations (e.g., aerospace engineering). For example, the analysis assumes that all individuals in engineering positions would be eligible for aerospace engineering jobs; however, this assumption excludes individuals in other positions who possess the required knowledge, skills, and abilities for aerospace engineering positions, but are not currently in engineering positions.

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.
- a. Promotions for MCO (PWD) Answer: Yes
- b. Promotions for MCO (PWTD) Answer: No

A trigger exists for selections of PWD in engineering and contracting, compared to the qualified applicant pool. Although PWD were found to be qualified (2.4% and 11.5% of applicants for engineering and contracting positions, respectively), no PWD were selected for engineering positions and PWD accounted for 3.4% of those selected for contracting. No PWTD were found to be qualified or selected for either occupational category.

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.

The Agency's EEO and Human Capital communities have developed multiple strategies to track and monitor the professional development and advancement of employees with disabilities. First, the Agency continually reviews the participation data for this population to ensure continued participation in key training and development opportunities across the Agency. Secondly, the Agency continually monitors participation data for this population by grade level and professional category, and develops corrective action plans as appropriate and necessary. Finally, the Agency uses assistive technology to ensure that professional development opportunities are made available to PWD and PWTD.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

NASA conducts Agency-wide, competitive developmental programs for employees, including: NASA Foundations of Influence, Relationships, Success, and Teamwork (NASA FIRST) for grades GS-11 and GS-12; the Mid-Level Leadership Program (MLLP) for grades GS-13 through GS-15; and NASA's Leveraging Agency Supervisory Excellence and Resilience (LASER) program (the Agency's leadership development program for first-line supervisors with at least two years of supervisory experience at NASA). Although there were no new classes for these programs in 2017, both the MLLP and LASER program classes, selected in FY 2016, completed their program in FY 2017.

2. 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 applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

a. Applicants (PWD)

Answer: Yes

b. Selections (PWD)

Answer: No

A trigger exists for applicants, given that PWD make up 7.4% of the relevant applicant pool, but only 2.7% of those who applied to the MLLP. There is no trigger for selections; 2.5% of selectees are PWD.

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

a. Applicants (PWTD)

Answer: No

b. Selections (PWTD)

Answer: No

There are no triggers for PWTD applicants or selectees for the MLLP. PWTD account for 1.1% of the relevant applicant pool; no PWTD applied to the program.

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

There are no triggers. The inclusion rates for PWD and PWTD (at all grade-levels) are 9.2% and 1.3%, respectively. Both PWD and PWTD received time-off awards and cash awards in similar proportions to the inclusion rate.

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If "yes", please describe the trigger(s) in the text box.
 - a. Pay Increases (PWD) Answer: Yes
 - b. Pay Increases (PWTD) Answer: No

There may be a trigger for PWD but not for PWTD with regard to quality step increases (QSIs). PWD accounted for 4.1% of those receiving QSIs (compared to their conclusion rate of 9.2%); PWTD accounted for 0.2% of those receiving QSIs (compared to the inclusion rate of 1.3%).

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

NASA data reports do not currently contain this information. NASA is working to address this need.

D. PROMOTIONS

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.
 - a. SES
 - i. Qualified Internal Applicants (PWD) Answer: No
 - ii. Internal Selections (PWD) Answer: No
 - b. Grade GS-15
 - i. Qualified Internal Applicants (PWD) Answer: No
 - ii. Internal Selections (PWD) Answer: No
 - c. Grade GS-14
 - i. Qualified Internal Applicants (PWD) Answer: No
 - ii. Internal Selections (PWD) Answer: No
 - d. Grade GS-13
 - i. Qualified Internal Applicants (PWD) Answer: No
 - ii. Internal Selections (PWD) Answer: Yes

A trigger exists for internal selections for promotions to GS-13, but not for promotions to grades GS-14 and GS-15 (data are unavailable for SES positions). PWD account for 13.4% of the qualified internal applicants for promotions to GS-13, but account for only 9.2% of individuals selected. There are no triggers for qualified internal applicants at the senior grade levels.

2. Does your agency have a trigger involving PWTD among the qualified *internal* applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

a. SES

i. Qualified Internal Applicants (PWTD) 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

There are no triggers for qualified internal applicants or selectees at the senior grade levels.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

a. New Hires to SES (PWD) 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

Currently, NASA's applicant flow data reports do not include data on new hires by grade level, so data on the qualified applicant pool by grade are not available. NASA is working to update its data reports for FY 18. Notably, PWD accounted for a higher percentage of new hires at grades GS-13 and above (11.4%), than the existing workforce at the beginning of FY 17 (6.4%).

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

- | | |
|------------------------------|------------|
| a. New Hires to SES (PWTD) | 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 |

NASA's applicant flow data reports currently do not include data by grade level. Hiring data for FY 2017 shows that no PWTDs were hired at grades GS-13 and above.

5. Does your agency have a trigger involving PWD among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

a. Executives

- | | |
|----------------------------------------|------------|
| i. Qualified Internal Applicants (PWD) | 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 |

Currently, NASA's applicant flow data reports do not include data separated for executives, managers, and supervisors, so data on the qualified applicant pool for by these categories are not available. NASA is working to update its data reports for FY 18. Notably, the percentage of PWD in the relevant applicant pool (6.5%) is the same as the percentage of PWD in supervisory positions in FY 2017.

6. Does your agency have a trigger involving PWTD among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.
- a. Executives
 - i. Qualified Internal Applicants (PWTD) 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

Although NASA's applicant flow data reports do not include data separated for executives, managers, and supervisors, analyses show that the percentage of PWTD in the relevant applicant pool (1.0%) is similar to the percentage of PWTD in supervisory positions in FY 2017 (0.7%).

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.
- a. New Hires for Executives (PWD) Answer: No
 - b. New Hires for Managers (PWD) Answer: No
 - c. New Hires for Supervisors (PWD) Answer: No

Currently, NASA's applicant flow data reports do not include data separated for executives, managers, and supervisors, so data on the qualified applicant pool for by these categories are not available. NASA is working to update its data reports for FY 18. Notably, the percentage of PWD among new hires to supervisory positions (10.5%) is greater than the PWD in supervisory positions in FY 2017 (8.4%).

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.
- a. New Hires for Executives (PWTD) Answer: No
 - b. New Hires for Managers (PWTD) Answer: No
 - c. New Hires for Supervisors (PWTD) Answer: No

NASA's applicant flow data reports currently do not include data separated for executives, managers, and supervisors. Hiring data for FY 2017 shows that no

PWTDs were hired in supervisory positions in FY 2017.

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer: N/A

Currently, NASA does not track Schedule A conversions at the Agency level. Beginning in FY 2018, NASA will track all new Schedule A appointments to determine when and if they are converted into the competitive service, and, for those not converted, reasons why.

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

The number of separations is low for NASA overall (191 voluntary and 18 involuntary separations), rendering comparisons to the overall inclusion rate less meaningful. Of those who voluntarily separated from NASA, 24 were PWD (12.6%), which is higher than their overall representation at NASA (9.2% of the workforce). Of the 18 involuntary separations, 5 were PWD (27.8%).

3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If "yes", describe the trigger below.
 - a. Voluntary Separations (PWTD) Answer: No
 - b. Involuntary Separations (PWTD) Answer: No

There is no trigger among voluntary and involuntary separations of PWTD. Notably, only 5 PWTD voluntarily separated and there were no PWTD among involuntary separations.

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.

NASA does not currently conduct exit interviews.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 C.F.R. § 1614.203(d)(4), federal agencies are required to inform job 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.

Website: https://www.nasa.gov/accessibility/section508/sec508_overview.html

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.

This information isn't currently available on NASA's website. The NASA Office of Diversity and Equal Opportunity Office is in the process of updating its website and this information will be added.

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 regard to improving the accessibility of facility, NASA maintains an annual plan that identifies the facility accessibility needs of each NASA Center and their multi-year implementation plan. Agency leadership routinely reviews this plan and assesses status.

In regard to improving the accessibility of technology, the Agency has codified expectations in this arena in written policy in NPR 2800.2 – “Electronic and Information Technology Accessibility.” Additionally, the Agency's 508 Compliance Officer maintains an annual plan that is designed to strategically address any identified barriers in this arena. This FY, the focus is on updating the Agency's 508 website and linking it to the new 508 toolkit and other relevant resources. Additionally, the Agency also has an informal 508 Compliance ERG that is comprised of volunteer employees from various professional disciplines across the Agency who meet monthly and assess any gaps and challenges in this arena experienced by the user community and communicates them to the Agency's DPM and 508 Compliance Officer.

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.)

The average processing time for processing NASA RA requests is currently 45 calendar days.

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.

Some examples of the effectiveness of NASA's RA program are: (1) Over 3,000 managers and supervisors have been trained on their roles/responsibilities in the RA arena; (2) RA awareness briefings across the agency are routinely provided to new employees; new supervisors; and to summer interns; and (3) All ten NASA Centers have designated DPMs to process RA requests and to provide technical assistance to employees, interns, managers and supervisors.

D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

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

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

NASA began providing PAS in January 2018, as required by EEOC's new disability regulations. Therefore, NASA does not currently have any effective program practices to report to date in this arena.

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 government-wide average?

Answer: Yes

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.

N/A – there were no findings. In FY 2017, 39% of complaints filed (13 of 33) alleged harassment of a PWD (compared to 14.2% Government-wide).

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: Yes

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.

N/A – there were no findings. In FY 2017, 27% of complaints filed (9 of 33) alleged failure to provide a reasonable accommodation (compared to 9.7% Government-wide).

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.

Trigger 1	Although NASA exceeds the representation goals for PWD and PWTD in grades GS-10 and below, it does not meet the goals for higher grades. Among NASA employees at grades GS-10 and below, 15% are individuals with disabilities and 4% have targeted disabilities. However, at grades GS-11 and above, only 8% are IWD and just 1% have targeted disabilities. Among new hires, 8% were IWD and 0.3% were IWTD. Of the 70 new hires in grades GS-10 and below, 20% have a disability and 1.4% have a targeted disability. Of the 529 new hires at GS-11 and above, 6% are IWD and 0.2% are IWTD.	
Barrier(s)		
Objective(s)	NASA must obtain additional data and conduct further analyses to determine causes of differences observed in the data categories described above and the causes for such differences. NASA is committed to having a better understanding of EEO in the NASA work environment and is committed to enhancing its data analytical capabilities to clearly identify barriers to EEO and root causes of such barriers. NASA will continue its use of best practices, including Special Emphasis Programs, to address areas that indicate opportunity for improving EEO. With additional data, NASA will be better able to identify specific opportunities and develop data-driven solutions.	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
AA for Diversity and Equal Opportunity		No
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
Yes		No
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	
Complaint Data (Trends)	Yes	
Grievance Data (Trends)	Yes	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	
Exit Interview Data	No	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	
Other (Please Describe)	No	

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/28/2018	NASA will update and improve its standard data reports to ensure that the necessary data are available for conducting barrier analyses related to the disability program.	Yes		
09/28/2018	The NASA Office of Diversity and Equal Opportunity (ODEO) will partner with other NASA organizations to strengthen its data analytics capabilities to enable ODEO to conduct in-depth barrier analyses.	Yes		
09/30/2020	ODEO will leverage current NASA systems and develop additional data tools, including: the Federal Employee Viewpoint Survey, NASA Human Capital Management Workforce Analysis Business Intelligence Tools, climate surveys, pulse surveys, and potential new database systems. These additional tools will enhance ODEO's ability to analyze programs and practices at more granular levels.	Yes		
Fiscal Year	Accomplishments			
2017	NASA established an Agency-level Disability Working Group comprised of			

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

N/A These are new activities for FY 2018.

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

N/A These are new activities for FY 2018.

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 These are new activities for FY 2018.