

DOD DNGB Pennsylvania National Guard

For period covering October 1, 2020 to September 30, 2021

**PART A**  
Department  
or Agency  
Identifying  
Information

<b>1. Agency</b>	1. DOD DNGB Pennsylvania National Guard		
<b>1.a</b> 2nd level reporting component			
<b>2. Address</b>	2. DEPARTMENT OF MILITARY AND VETERANS AFFAIRS FT INDIANTOWN GAP		
<b>3. City, State, Zip Code</b>	3. Annville, PA 17003-5002		
<b>4. Agency Code</b>	<b>5. FIPS code(s)</b>	<b>4. NGPA</b>	<b>5. 3373</b>

**PART B**  
Total  
Employment

<b>1.</b> Enter total number of permanent full-time and part-time employees	<b>1.</b> 1221
<b>2.</b> Enter total number of temporary employees	<b>2.</b> 459
<b>3. TOTAL EMPLOYMENT [add lines B 1 through 2]</b>	<b>4.</b> 1680

**PART C**

Agency Official(s) Responsible  
For Oversight of EEO  
Program(s)

Title Type	Name	Title
Head of Agency	Mark Schindler	The Adjutant General
Principal EEO Director/Official	Millicent Carvalho-Grevious	State Equal Employment Manager
Principal MD-715 Preparer	Patrice Lundsted	Equal Employment Specialist

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<b>PART D</b> List of Subordinate Components Covered in This Report	<b>Subordinate Component and Location</b> (City/State)	<b>Country</b>	<b>Agency Code</b>
<b>EEOC FORMS and Documents</b>	<b>Required</b>	<b>Uploaded</b>	
Agency Strategic Plan	Y	Y	
Alternative Dispute Resolution Procedures	Y	Y	
Personal Assistance Services Procedures	Y	Y	
Reasonable Accommodation Procedure	Y	Y	
Organization Chart	Y	Y	
EEO Policy Statement	Y	Y	
Anti-Harassment Policy and Procedures	Y	Y	
Diversity Policy Statement	N	Y	
EEO Strategic Plan	N	N	
Disabled Veterans Affirmative Action Program (DVAAP) Report	N	N	
Federal Equal Opportunity Recruitment Program (FEORP) Report	N	N	
Human Capital Strategic Plan	N	N	
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	N	N	

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**EXECUTIVE SUMMARY: MISSION**

The Pennsylvania National Guard (PANG) has a dual State and Federal Mission. The State mission is to provide support to the Governor and citizens of Pennsylvania in the event of civil disturbance or natural disaster. Under the Federal Mission, the President of the United States has the power to call the National Guard into Federal Service in the defense of the United States, its vested interest, and our allies. The Pennsylvania National Guard falls under the National Guard Bureau (NGB) in Washington D.C. for allocation of resources (human and monetary), policy dissemination and adherence to policy, regulations and laws. In order to accomplish State and Federal missions, the PA National Guard employs Army and Air Guard service members, Department of Defense federal civilian personnel, and State employees. The PA National Guard employs dual-status technicians and non-dual status federal civilian employees. Dual-status technicians are considered military technician employees as they are required to be a member of the military and wear their military uniform to work.

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**EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F**

Only agencies with less than 200 employees in the PWF are required to submit Part E.2 – E.5, including a summary of the Essential Elements, Workforce Analyses, Accomplishments, and Planned Activities.



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**EXECUTIVE SUMMARY: WORKFORCE ANALYSES**

Only agencies with less than 200 employees in the PWF are required to submit Part E.2 – E.5, including a summary of the Essential Elements, Workforce Analyses, Accomplishments, and Planned Activities.

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**EXECUTIVE SUMMARY: ACCOMPLISHMENTS**

Only agencies with less than 200 employees in the PWF are required to submit Part E.2 – E.5, including a summary of the Essential Elements, Workforce Analyses, Accomplishments, and Planned Activities.

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**EXECUTIVE SUMMARY: PLANNED ACTIVITIES**

Only agencies with less than 200 employees in the PWF are required to submit Part E.2 – E.5, including a summary of the Essential Elements, Workforce Analyses, Accomplishments, and Planned Activities.


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**CERTIFICATION of ESTABLISHMENT of CONTINUING  
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS**

 am the  
(Insert Name Above) (Insert official  
title/series/grade above)

Principal EEO Director/Official for

  
(Insert Agency/Component Name above)

The agency has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and, as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program, are included with this Federal Agency Annual EEO Program Status Report.

The agency has also analyzed its work force profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure or practice is operating to disadvantage any group based on race, national origin, gender or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.

I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.

\_\_\_\_\_  
Signature of Principal EEO Director/Official  
Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with  
EEO MD-715.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Agency Head or Agency Head Designee



\_\_\_\_\_  
Date

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**Agency Self-Assessment Checklist**



**Essential Element: A Demonstrated Commitment From agency Leadership**

 <b>Compliance Indicator</b>		<b>Measure Has Been Met</b>		<b>For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b>
 <b>Measures</b>		Yes	No	
	A.1. The agency issues an effective, up-to-date EEO policy statement.		X	EO/EEO policy memo remains the same until a new Adjutant General assumes command and signs an updated policy memo. This occurs about every 3-4 years. The most recent TAG was officially appointed approximately mid-FY21 and signed updated EO/EEO policy memo during FY22.
	A.1.b. Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)] If the EEO policy statement covers any additional bases (e.g., marital status, veteran status and political affiliation), please list them in the comments column.	X		

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## Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	A.2. The agency has communicated EEO policies and procedures to all employees.				
	A.2.a. Does the agency disseminate the following policies and procedures to all employees:				
	A.2.a.1. Anti-harassment policy? [see MD 715, II(A)]	X			
	A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]		X		RA policy for the Agency is in the process of being updated with the goal of getting TAG signature by end of FY22. Upon approval, this policy will be disseminated and posted throughout the Agency.
	A.2.b. Does the agency prominently post the following information throughout the workplace and on its public website:				
	A.2.b.1. The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R. § 1614.102(b)(7)]	X			
	A.2.b.2. Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 CFR § 1614.102(b)(5)]	X			
	A.2.b.3. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	X			<a href="https://www.pa.ng.mil/Offices-Programs/State-Equal-Employment-Manager-SEEM/">https://www.pa.ng.mil/Offices-Programs/State-Equal-Employment-Manager-SEEM/</a>
	A.2.c. Does the agency inform its employees about the following topics:				
	A.2.c.1. EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If "yes", please provide how often and the means by which such training is delivered.	X			1-2x/year through classroom setting, group discussion, and/or online
	A.2.c.2. ADR process? [see MD-110, Ch. 3(II)(C)] If "yes", please provide how often.	X			1-2x/year
	A.2.c.3. Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If "yes", please provide how often.	X			1-2x/year
	A.2.c.4. Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If "yes", please provide how often.	X			1-2x/year
	A.2.c.5. Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] If "yes", please provide how often.	X			1-2x/year

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 Compliance Indicator		Measure Has Been Met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	
 Measures	A.3. The agency assesses and ensures EEO principles are part of its culture.			N/A
A.3.a. Does the agency provide recognition to employees, supervisors, managers and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a)(9)] If "yes", provide one or two examples in the comments section. .		X		This MAJ Octavius V. Catto Medal was created by the PA National Guard in honor of a civil rights activist and community leader who was killed in 1871 during efforts to protect the voting rights of Black citizens. Annually, the Agency nominates and recognizes personnel through awarding the MAJ Octavius V. Catto medal.
A.3.b. Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]		X		DEOCS (organizational climate survey)

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**Agency Self-Assessment Checklist**

**Essential Element: B Integration of EEO into the agency's Strategic Mission**



 <b>Compliance Indicator</b>		<b>Measure Has Been Met</b>		<b>For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b>
		<b>Yes</b>	<b>No</b>	
 <b>Measures</b>	B.1. The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.			N/A
B.1.a. Is the agency head the immediate supervisor of the person ("EEO Director") who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]		X		On 1 June 2021 a memorandum was signed by TAG directing the EEO Director reports directly to TAG.
B.1.a.1. If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If "yes," please provide the title of the agency head designee in the comments.				X EEO Director reports to the agency head.
B.1.a.2. Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]			X	As of FY22 the organizational chart is being addressed to clarify reporting structure for the EEO office.
B.1.b. Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]		X		
B.1.c. During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comments column.		X		Annually meets with the Adjutant General to discuss the MD-715 and elements of the model EEO program.
B.1.d. Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]		X		



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**Agency Self-Assessment Checklist**

 <b>Compliance Indicator</b>		<b>Measure Has Been Met</b>			<b>For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b>
 <b>Measures</b>		Yes	No	N/A	
B.2.a. Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)] If not, identify the office with this authority in the comments column.		X			
B.2.b. Is the EEO Director responsible for overseeing the completion of EEO counseling? [see 29 CFR §1614.102(c)(4)]		X			
B.2.c. Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]		X			
B.2.d. Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]		X			
B.2.e. Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]		X			
B.2.f. Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]		X			
B.2.g. If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2); (c)(3)]				X	no subordinate level components

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 Measures		Yes	No	N/A	
B.3.a. Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]		X			
B.3.b. Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.		X			The agency Strategic Plan 2021-2025 includes diversity and EEO. One goal is to "Demonstrate competent, trusted and ethical leadership down to the lowest level; where uniqueness of cultures and perspectives are not only valued but appreciated. Where diversity and inclusion are not programs but rather the fabric of who we are. We will embrace and encourage personal differences as a valued asset.

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	<b>Compliance Indicator</b>		<b>Measure Has Been Met</b>			<b>For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b>
	<b>Measures</b>		Yes	No		
		B.4. The agency has sufficient budget and staffing to support the success of its EEO program.				
		B.4.a. Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:				
		B.4.a.1. to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	X			
		B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]	X			
		B.4.a.11. to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	X			
		B.4.a.2. to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	X			
		B.4.a.3. to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR §§ 1614.102(c)(5); 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	X			
		B.4.a.4. to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.	X			
		B.4.a.5. to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]	X			
		B.4.a.6. to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	X			
		B.4.a.7. to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)] If not, please identify the systems with insufficient funding in the comments section.	X			
		B.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]	X			
		B.4.a.9. to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I; EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C. 1]	X			
		B.4.b. Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	X			
		B.4.c. Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	X			
		B.4.d. Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II) (A) of MD-110?	X			
		B.4.e. Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	X			

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	B.5. The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills				
	B.5.a. Pursuant to 29 CFR §1614.102(a)(5), have all managers and supervisors received orientation, training, and advice on their responsibilities under the following areas under the agency EEO program:				
	B.5.a.1. EEO complaint process? [see MD-715(II)(B)]	X			
	B.5.a.2. Reasonable Accommodation Procedures? [see 29 CFR § 1614.102(d)(3)]	X			
	B.5.a.3. Anti-harassment policy? [see MD-715(II)(B)]	X			
	B.5.a.4. Supervisory, managerial, communication and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	X			
	B.5.a.5. ADR, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	X			
 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	B.6. The agency involves managers in the implementation of its EEO program.				
	B.6.a. Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	X			
	B.6.b. Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	X			
	B.6.c. When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	X			
	B.6.d. Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR §1614.102(a)(5)]	X			

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Essential Element: C Management and Program Accountability

 Compliance Indicator		Measure Has Been Met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	
	C.1. The agency conducts regular internal audits of its component and field offices.			
C.1.a. Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.		X		SEEM meets with TAG annually to discuss EO/EEO program barriers and successes.
C.1.b. Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.		X		SEEM maintains contact with major command EOAs/EEO Counselors and obtains reportable data on regular basis.
C.1.c. Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]		X		

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 <b>Compliance Indicator</b>		<b>Measure Has Been Met</b>			
 <b>Measures</b>		Yes	No	N/A	<b>For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b>
C.2.a. Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]		X			This function currently handled under Labor Relations.
C.2.a.1. Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]		X			
C.2.a.2. Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]		X			IG, Labor Relations, or MSRB
C.2.a.3. Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]		X			IG, Labor Relations, or MSRB
C.2.a.4. Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [See Enforcement Guidance, V.C.]		X			
C.2.a.5. Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see Complainant v. Dep't of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Dep't of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.		X			
C.2.a.6. Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR §1614.203(d)(2)]		X			
C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR §1614.203(d)(3)]		X			
C.2.b.1. Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR §1614.203(d)(3)(D)]		X			
C.2.b.2. Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]		X			
C.2.b.3. Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR §1614.203(d)(1)(ii)(B)]		X			
C.2.b.4. Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR §1614.203(d)(3)(i)(M)]		X			
C.2.b.5. 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.		X			
C.2.c. Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR §1614.203(d)(6)]		X			

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C.2.c.1. Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR §1614.203(d)(5)(v)] If “yes”, please provide the internet address in the comments column.



X

[https://  
www.pa.ng.mil/  
Offices-Programs/  
State-Equal-  
Employment-  
Manager-SEEM/](https://www.pa.ng.mil/Offices-Programs/State-Equal-Employment-Manager-SEEM/)

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	Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
	Measures		Yes	No		
		C.3. The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.				
		C.3.a. Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	X			TAG memo signed 10 June 2019, subject "Evaluation of Managers and Supervisors of Technicians on Efforts to Ensure Equal Employment Opportunity."
		C.3.b. Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:				
		C.3.b.1. Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]	X			
		C.3.b.2. Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	X			
		C.3.b.3. Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	X			
		C.3.b.4. Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	X			
		C.3.b.5. Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	X			
		C.3.b.6. Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]	X			
		C.3.b.7. Support the EEO program in identifying and removing barriers to equal opportunity?. [see MD-715, II(C)]	X			
		C.3.b.8. Support the anti-harassment program in investigating and correcting harassing conduct?. [see Enforcement Guidance, V.C.2]	X			
		C.3.b.9. Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	X			
		C.3.c. Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	X			
		C.3.d. When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	X			Head of Agency is the decision maker and final authority regarding agency's position on EEO matters



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Agency Self-Assessment Checklist

	Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
	Measures	C.4. The agency ensures effective coordination between its EEO program and Human Resources (HR) program.	Yes	No	N/A	
		C.4.a. Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	X			
		C.4.b. Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]	X			
		C.4.c. Does the EEO office have timely access to accurate and complete data (e.g., demographic data for the workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	X			
		C.4.d. Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	X			Exit interview data is not available for FY21. HRO is looking into establishing a process to conduct and collect exit interviews.
		C.4.e. Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:				
		C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	X			
		C.4.e.2. Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	X			Title 5 positions are announced through USA Jobs and the PA National Guard Association Job Board which is accessed by disabled veterans.
		C.4.e.3. Develop and/or provide training for managers and employees? [see MD-715, II(C)]	X			
		C.4.e.4. Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	X			
		C.4.e.5. Assist in preparing the MD-715 report? [see MD-715, II(C)]	X			

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Agency Self-Assessment Checklist





 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	C.5. Following a finding of discrimination, the agency explores whether it should take a disciplinary action.				
	C.5.a. Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR §1614.102(a)(6); see also Douglas v. Veterans Administration, 5 MSPR 280 (1981)]	X			
	C.5.b. When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If "yes", please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	X			1
	C.5.c. If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct (e.g., post mortem to discuss lessons learned)? [see MD-715, II(C)]	X			
 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	C.6. The EEO office advises managers/supervisors on EEO matters.				
	C.6.a. Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If "yes", please identify the frequency of the EEO updates in the comments column.	X			State Equal Employment Manager (SEEM) participates quarterly with Commanders Ready & Resilient Council regarding updates on EO complaints. Meets with the State Joint Diversity Council 3-4 times/year during which EO/EEO climate issues are discussed.
	C.6.b. Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [see MD-715 Instructions, Sec. I]	X			

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**Agency Self-Assessment Checklist**



**Essential Element: D Proactive Prevention**

 <b>Compliance Indicator</b>		<b>Measure Has Been Met</b>			<b>For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b>
 <b>Measures</b>		Yes	No	N/A	
D.1.a. Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]		X			
D.1.b. Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; and/or external special interest groups? [see MD-715 Instructions, Sec. I]		X			
D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]			X		HRO is looking into an effective way of conducting exit interviews.
 <b>Compliance Indicator</b>		<b>Measure Has Been Met</b>			<b>For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b>
 <b>Measures</b>		Yes	No	N/A	
D.2.a. Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]		X			
D.2.b. Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]		X			
D.2.c. Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]		X			At bi-weekly managers staff meeting
D.2.d. Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, and/or external special interest groups? [see MD-715 Instructions, Sec. I] If "yes", please identify the data sources in the comments column.		X			Complaints, climate surveys

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## Agency Self-Assessment Checklist



 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	D.3. The agency establishes appropriate action plans to remove identified barriers.				
	D.3.a. Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	X			
	D.3.b. If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	X			
	D.3.c. Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	X			
	D.4. The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.				
	D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.	X			Request was made on 2/24/22 to have the AAP posted on the SEEM's public page at <a href="https://www.pa.ng.mil/Offices-Programs/State-Equal-Employment-Manager-SEEM/">https://www.pa.ng.mil/Offices-Programs/State-Equal-Employment-Manager-SEEM/</a>
	D.4.b. Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR §1614.203(d)(1)(i)]	X			
	D.4.c. Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR §1614.203(d)(1)(ii)(A)]	X			
	D.4.d. Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR §1614.203(d)(7)(ii)]	X			

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**Agency Self-Assessment Checklist**



**Essential Element: E Efficiency**

 <b>Compliance Indicator</b>		<b>Measure Has Been Met</b>		<b>For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b>
		Yes	No	N/A
 <b>Measures</b>	E.1. The agency maintains an efficient, fair, and impartial complaint resolution process.			
	E.1.a. Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	X		
	E.1.b. Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	X		
	E.1.c. Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?	X		
	E.1.d. Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments.	X		30-60 days
	E.1.e. Does the agency ensure that all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?	X		
	E.1.f. Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	X		
	E.1.g. If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	X		
	E.1.h. When the complainant did not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	X		
	E.1.i. Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?	X		
	E.1.j. If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comments column.			X Agency utilized trained employees and/or Investigations & Resolutions Directorate (IRD) instead of contractors.
	E.1.k. If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	X		
	E.1.l. Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	X		

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## Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
E.2.a. Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)] If "yes", please explain.	E.2. The agency has a neutral EEO process.	X			The agency representative in EEO formal complaints does not conduct legal sufficiency reviews of EEO matters. When necessary and requested by the EEO office, legal sufficiency reviews conducted outside the EEO office are handled by Judge Advocates (JAs) separate and apart from the agency's defensive function. For example, field JAs instead of Joint Force Headquarters JAs.)
E.2.b. When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If "yes", please identify the source/ location of the attorney who conducts the legal sufficiency review in the comments column.		X			PA National Guard Brigades and Wings have assigned Judge Advocates (JAs). These JAs can be called upon to conduct legal sufficiency reviews. Their locations are scattered throughout PA.
E.2.c. If the EEO office relies on the agency's defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]		X			
E.2.d. Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]		X			
E.2.e. If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004)]		X			

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Agency Self-Assessment Checklist

	Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
	Measures	E.3. The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	Yes	No	N/A	
	E.3.a. Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]		X			
	E.3.b. Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]		X			Mediation is voluntary but supervisors and managers commit full support to the program
	E.3.c. Does the Agency encourage all employees to use ADR, where ADR is appropriate? [See MD-110, Ch. 3(IV)(C)]		X			
	E.3.d. Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]		X			
	E.3.e. Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]		X			
	E.3.f. Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]		X			

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Agency Self-Assessment Checklist



	Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
	Measures	E.4. The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Yes	No	N/A	
		E.4.a. Does the agency have systems in place to accurately collect, monitor, and analyze the following data:				
		E.4.a.1. Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	X			
		E.4.a.2. The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	X			Disability info is not always available
		E.4.a.3. Recruitment activities? [see MD-715, II(E)]	X			
		E.4.a.4. External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]		X		Collected data does not parcel out this information (external vs. internal applicants.)
		E.4.a.5. The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(4)]	X			
		E.4.a.6. The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	X			
		E.4.b. Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]		X		The military members of the agency take annual command climate surveys. Civilian employees may not be surveyed on a regular basis unless they still assigned to a military command.



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	Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
	Measures		Yes	No		
	E.5.a. Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If "yes", provide an example in the comments.	E.5. The agency identifies and disseminates significant trends and best practices in its EEO program.	X			A complaint tracker is maintained capturing data such as (pre)complaint file date/suspense date, status regarding procedural steps to ensure adherence with process, whether or not disciplinary action is taken as applicable etc.
	E.5.b. Does the agency review other agencies' best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If "yes", provide an example in the comments.		X			The National Guard Bureau's policy for reasonable accommodation was considered in updating the agency's policy.
	E.5.c. Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]		X			

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## Agency Self-Assessment Checklist



## Essential Element: F Responsiveness and Legal Compliance

 Compliance Indicator		Measure Has Been Met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A
 Measures	F.1. The agency has processes in place to ensure timely and full compliance with EEOC orders and settlement agreements.			
	F.1.a. Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	X		
	F.1.b. Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	X		
	F.1.c. Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	X		
	F.1.d. Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	X		
	F.1.e. When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX) (H)]			X No orders issued
 Compliance Indicator	F.2. The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Measure Has Been Met		For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A
	F.2.a. Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	X		
	F.2.a.1. When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]	X		
	F.2.a.2. When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]			X No finding of discrimination nor orders of relief issued in FY20.
	F.2.a.3. When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 CFR §1614.403(e)]	X		
	F.2.a.4. Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	X		

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 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
F.3.a. Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	F.3. The agency reports to EEOC its program efforts and accomplishments.		X		As of FY22 Agency is compliant with submitting the report to EEOC at OFONOFEAR@e Prior to this, the EEOC url at NoFEAR.URLS@ was non-functional and submissions came back as undeliverable/ unknown address/ access denied.
F.3.b. Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]		X			

Essential Element: O Other

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Plan to Attain Essential Elements

PART H.1

Brief Description of Program  
Deficiency:

A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]

The agency does not disseminate the following policies and procedures to all employees: Reasonable Accommodation policy

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
02/01/2022	09/30/2022			RA policy for the Agency is in the process of being updated with the goal of getting TAG signature by end of FY22. Upon approval, this policy will be disseminated and posted throughout the Agency.

Responsible Officials

Title	Name	Standards Address the Plan?
Equal Employment Specialist	Patty Lundsted	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
04/01/2022	Update the RA policy to incorporate recently published guidance from the National Guard Bureau.	Yes		
06/01/2022	Have updated RA policy reviewed utilizing applicable staff routing procedures.	Yes		
09/30/2022	Have updated RA policy signed by TAG and disseminated throughout the agency.	Yes		

Accomplishments

Fiscal Year	Accomplishment
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**Plan to Attain Essential Elements**

**PART H.2**

Brief Description of Program  
Deficiency:

A.1.a. Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "Yes", please provide the annual issuance date in the comments column. [see MD-715, II(A)]

The agency does not annually issue a signed and dated EEO policy statement. Rather, the policy statement is updated and re-issued when a new Adjutant General assumes command which is approximately every 3-4 years. The most recent TAG was officially appointed approximately mid-FY21 and signed updated EO/EEO policy memo in FY22.

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**Plan to Attain Essential Elements**

**PART H.3**

Brief Description of Program Deficiency:	B.1.a.2. Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]
--	---

As of FY22 the organizational chart is to be updated. For FY21, the agency's organizational chart does not clearly define the reporting structure for the EEO office IAW 29 CFR §1614.102(b)(4)

**Objectives for EEO Plan**

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
05/10/2022	09/30/2023			Identify EEO office within the Agency's Organization Chart

**Responsible Officials**

Title	Name	Standards Address the Plan?
SEEM	Dr. Millicent Carvalho-Grevious	Yes

**Planned Activities**

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2022	Discuss with senior leaders how the DMVA Organization Chart does not include or list an EEO office.	Yes		

**Accomplishments**

Fiscal Year	Accomplishment
2022	On 24 May 2022, the SEEM contacted TAG regarding the need to have an organizational chart clarifying the EEO office direct reports to TAG. TAG initiated getting the change made.

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**Plan to Attain Essential Elements**

**PART H.4**

Brief Description of Program Deficiency:	D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]
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The agency does conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities IAW 29 CFR §1614.203(d)(1)(iii)(C)

**Objectives for EEO Plan**

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
05/10/2022	09/30/2023			Incorporate questions into the exit interviews or surveys that ask how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities.

**Responsible Officials**

Title	Name	Standards Address the Plan?
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**Planned Activities**

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2023	SEEM office to request HRO add a question to the exit survey asking how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities.	Yes		

**Accomplishments**

Fiscal Year	Accomplishment
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**Plan to Attain Essential Elements**

**PART H.5**

Brief Description of Program Deficiency: E.4.b. Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]

The agency does not have a system in place to re-survey the workforce on a regular basis IAW MD-715 Instructions, Sec. I

**Objectives for EEO Plan**

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
05/10/2022	09/30/2023			Establish a system to re-survey the workforce on a regular basis IAW MD-715 Instructions, Sec. I

**Responsible Officials**

Title	Name	Standards Address the Plan?
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**Planned Activities**

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2023	SEEM office to meet with senior leaders to determine how to establish a system to re-survey the workforce on a regular basis.	Yes		

**Accomplishments**

Fiscal Year	Accomplishment
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**DOD DNGB Pennsylvania National Guard**

**For period covering October 1, 2020 to September 30, 2021**

**Plan to Attain Essential Elements**

**PART H.6**

Brief Description of Program Deficiency:	E.4.a.4. External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]
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The Applicant Flow Data Detail Report received by the Agency does not discern between external and internal applicants, therefore the Agency is unable to report on external and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]

**Objectives for EEO Plan**

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
07/08/2020	09/30/2021	09/30/2023		Determine if and how such data could be collected.

**Responsible Officials**

Title	Name	Standards Address the Plan?
SEEM and HRO	Millicent Carvalho-Grevious and COL Patrick Moore	No

**Planned Activities**

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/0023	SEEM office meet with HRO to determine if and how such data could be collected.	Yes		

**Accomplishments**

Fiscal Year	Accomplishment
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**DOD DNGB Pennsylvania National Guard**

**For period covering October 1, 2020 to September 30, 2021**

**Plan to Attain Essential Elements**

**PART H.7**

Brief Description of Program Deficiency:	F.3.a. Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]
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As of FY22, the Agency is complaint with this. For FY21, the Agency was unable to submit the No FEAR Act report directly to EEOC because their url was not functioning.

**Objectives for EEO Plan**

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
04/04/2019	09/30/2019		03/31/2022	Seek resolution for submitting No FEAR Act data to EEOC

**Responsible Officials**

Title	Name	Standards Address the Plan?
Equal Employment Specialist	Patty Lundsted	No

**Planned Activities**

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
04/04/2019	Contact NGB EO Office to request guidance on how to submit No FEAR Act data to EEOC.	Yes		04/09/2019

**Accomplishments**

Fiscal Year	Accomplishment
2018	Emailed NGB EO Office inquiring if they are aware of a solution for submitting No FEAR Act data to EEOC because when this worker submits the report to NoFEAR.URL@eeoc.gov this worker receives the emailed response, "Delivery has failed to these recipients or groups." NGB EO Office responded recommending contacting the EEOC.
2022	In March 2022, the Associate Director, Office of Federal Operations, EEOC, sent an email to EEO Directors and Officials directing them to send EEOC's copies of the No Fear Report to OFONOFEAR@eeoc.gov. Agency has complied with this guidance.

DOD DNGB Pennsylvania National Guard

For period covering October 1, 2020 to September 30, 2021

Plan to Eliminate Identified Barriers

**MD-715 – Part J**  
**Special Program 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 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	Yes
b.Cluster GS-11 to SES (PWD)	Answer	Yes

a. Per workforce data Table B4 (Permanent), 12 out of 347 or 3% of employees are PWD. This includes both T32 and T5 employees. If only T5 employees are considered, 6% are PWD. b. Per workforce data Table B4 (Permanent), 10 out of 317 or 3% of employees are PWD. This includes both T32 and T5 employees. If only T5 employees are considered, 0% 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	Yes
b.Cluster GS-11 to SES (PWTD)	Answer	Yes

a. Per workforce data Table B4 (Permanent), 2 out of 347 or 1% of employees are PWTD. This includes both T32 and T5 employees. b. Per workforce data Table B4 (Permanent), 1 out of 317 or 0% of employees are PWTD. This includes both T32 and T5 employees.

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

Discussions among Agency EEO/EO office, Human Resources, Labor Relations, and Agency Head (TAG)

**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

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	
Architectural Barriers Act Compliance	0	0	1	Scott Niles Human Resources Deputy Director scott.d.niles.civ@army.mil
Special Emphasis Program for PWD and PWTD	0	0	1	Patty Lundsted Equal Employment Specialist patrice.m.lundsted.civ@army.mil
Processing applications from PWD and PWTD	0	0	1	Scott Niles Human Resources Deputy Director scott.d.niles.civ@army.mil
Answering questions from the public about hiring authorities that take disability into account	0	0	1	Scott Niles Human Resources Deputy Director scott.d.niles.civ@army.mil
Processing reasonable accommodation requests from applicants and employees	0	0	1	Scott Niles Human Resources Deputy Director scott.d.niles.civ@army.mil
Section 508 Compliance	0	0	1	Scott Niles Human Resources Deputy Director scott.d.niles.civ@army.mil

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

Staff attended various EO/EEO trainings through Defense EO Management Institute, EEO Commission, and/or Army Learning Management System.

## 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: 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.

Prior to advertising any position to the public, the Agency is required to vet applicants through the DoD Priority Placement Program (PPP) for persons who have been displaced from Federal Government employment. If a qualified applicant is identified and certified through PPP that person is offered the job. The next pool of applicants would come from internal resources to include internal agency and Federal employees. Only after these measures have been taken can the job be announced to the public. Veterans receive preference. The State Equal Employment Manager's office will encourage and coordinate with HR to recruit persons with disabilities. However, HR has to follow their procedural processes.

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

N/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.

N/A

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

## 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 State Equal Employment Manager attended a conference promoting hiring of PWD/PWTD.

## 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 | Yes |
| b. New Hires for Permanent Workforce (PWTD) | Answer | Yes |

a. Workforce Table B8 New Hires reports 2 out of 397, or 0%, of new hires identified as PWD. b. Workforce Table B8 New Hires reports 0 out of 397, or 0%, of new hires identified as 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. 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 | N/A |
| b. New Hires for MCO (PWTD) | Answer | N/A |

Workforce Table B7 (New Hires for MCOs by Disability) does not provide data on applicant External Selections.

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.

- |  |        |     |
|--|--------|-----|
| a. Qualified Applicants for MCO (PWD)  | Answer | N/A |
| b. Qualified Applicants for MCO (PWTD) | Answer | N/A |

Workforce Table B7 (New Hires for MCOs by Disability) does not provide data on "qualified internal applicants."

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 | N/A |
| b. Promotions for MCO (PWTD) | Answer | N/A |

Workforce Tables do not provide data on promotions to, or within, the MCOs.

## Section IV: 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.

All employees have the same rights and opportunities for advancement. Announcements for advancements are made through channels that include anti-discriminating practices and reasonable accommodations.

### B. CAREER DEVELOPMENT OPPORTUNITIES

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

Career enhancing trainings, conferences, and/or online courses are regularly available and announced to employees.

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		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (#)	Selectees (#)	Applicants (#)	Selectees (#)
Internship Programs						
Fellowship Programs						
Mentoring Programs						
Coaching Programs						
Training Programs						
Detail Programs						
Other Career Development Programs						

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 N/A
- b. Selections (PWD) Answer N/A

Data for Workforce Tables B12 (Career Development for Senior Grade Levels) and B20 (Career Development for Management Positions) not available.

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 N/A
- b. Selections (PWTD) Answer N/A

Data for Workforce Tables B12 (Career Development for Senior Grade Levels) and B20 (Career Development for Management Positions) not available.

## 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

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 No
- b. Pay Increases (PWTD) Answer No

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 No
- b. Other Types of Recognition (PWTD) Answer No

## D. PROMOTIONS

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

- a. SES
- i. Qualified Internal Applicants (PWD) Answer N/A
- ii. Internal Selections (PWD) Answer N/A
- b. Grade GS-15

i. Qualified Internal Applicants (PWD)	Answer	N/A
ii. Internal Selections (PWD)	Answer	N/A
c. Grade GS-14		
i. Qualified Internal Applicants (PWD)	Answer	N/A
ii. Internal Selections (PWD)	Answer	N/A
d. Grade GS-13		
i. Qualified Internal Applicants (PWD)	Answer	N/A
ii. Internal Selections (PWD)	Answer	N/A

Data for Workforce Tables B11 (Internal Competitive Promotions for Senior Grade Levels) and B19 (Internal Competitive Promotions for Management Positions) not available.

2. Does your agency have a trigger involving PWTB 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 (PWTB)	Answer	N/A
ii. Internal Selections (PWTB)	Answer	N/A
b. Grade GS-15		
i. Qualified Internal Applicants (PWTB)	Answer	N/A
ii. Internal Selections (PWTB)	Answer	N/A
c. Grade GS-14		
i. Qualified Internal Applicants (PWTB)	Answer	N/A
ii. Internal Selections (PWTB)	Answer	N/A
d. Grade GS-13		
i. Qualified Internal Applicants (PWTB)	Answer	N/A
ii. Internal Selections (PWTB)	Answer	N/A

Data for Workforce Tables B11 (Internal Competitive Promotions for Senior Grade Levels) and B19 (Internal Competitive Promotions for Management Positions) not available.

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

Data for Workforce Table B15 (New Hires for Senior Grade Levels) and B18 (New Hires for Management Positions) not available.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB 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 (PWTB)	Answer	N/A
b. New Hires to GS-15 (PWTB)	Answer	N/A
c. New Hires to GS-14 (PWTB)	Answer	N/A
d. New Hires to GS-13 (PWTB)	Answer	N/A

Data for Workforce Table B15 (New Hires for Senior Grade Levels) and B18 (New Hires for Management Positions) not available.



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

Data for Workforce Data Tables B11 (Internal Competitive Promotions for Senior Grade Levels) and B19 (Internal Competitive Promotions for Management Positions) not available.

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

Data for Workforce Data Tables B11 (Internal Competitive Promotions for Senior Grade Levels) and B19 (Internal Competitive Promotions for Management Positions) not available.

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

Data from Workforce Tables B15 (New Hires for Senior Grade Levels) and B18 (New Hires for Management Positions) not available.

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

Data from Workforce Tables B15 (New Hires for Senior Grade Levels) and B18 (New Hires for Management Positions) not available.

## Section V: 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 CFR § 213.3102(u)(6)(i))? If “no”, please explain why the agency did not convert all eligible Schedule A employees.

Answer N/A

2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.

a. Voluntary Separations (PWD)	Answer	No
b. Involuntary Separations (PWD)	Answer	No

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

4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

N/A

## B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

Agency's public websites for Reasonable Accommodation, Personal Assistance Services, Section 508 and complaint info are <https://www.pa.ng.mil/Offices-Programs/State-Equal-Employment-Manager-SEEM/> and/or <https://www.pa.ng.mil/Offices-Programs/Human-Resources/Jobs-Employment/>.

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.

Agency's public website for Reasonable Accommodations, including rights under the Architectural Barriers Act, is <https://www.pa.ng.mil/Offices-Programs/Human-Resources/Jobs-Employment/>.

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.

No known plans at this time.

## 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.)

Agency did not process any RA requests in FY21.

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.

RA policy in is the process of being updated to reflect current guidance and procedures.

## 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.

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.

N/A Agency did not receive a request for Personal Assistance Services in FY21.

### Section VI: 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 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.

#### 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.

### Section VII: Identification and Removal of Barriers

Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Answer No

2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?

Answer N/A

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments

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

N/A

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

N/A

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

N/A