

EEOC Form

U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

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 plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

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) | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| b. Cluster GS-11 to SES (PWD) | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

In FY20, 4.76% of the benchmark was achieved for Cluster GS-1 to GS-10 for PWD, and 8.16% of the benchmark was achieved for Cluster GS-11 to SES for PWD. Based on the limited data/information available, NRO was not able to identify or obtain specific triggers.

The NRO Office of Equality and Inclusion (OE&I) and Office of Human Resources (OHR) will collaborate on developing an Affirmative Action Plan for Recruitment, Hiring, Advancement and Retention of Persons with Disabilities in 2021.

In FY20, the NRO launched HireVue, a tool that enables virtual interviews, which significantly increased interview capacity and the ability to continue interviewing during the COVID-19 pandemic by using video-enabled technology. The NRO has leveraged HireVue to conduct more than 800 video-enabled interviews with a completion rate of 72%.

The NRO continues to expand diversity hiring and recruitment efforts to build a diverse talent pool by leveraging sophisticated sourcing and Talent Acquisition technology and tools to intentionally diversify the NRO's talent pool. NRO will employ branding and recruitment messaging via mobile devices and sponsored job aids, leverage niche job boards and engage with professional organizations to cultivate familiarity with the NRO brand and reach specialized professionals, create and track effectiveness of candidate search strings and sourcing criteria and resources, and showcase the NRO's diverse and inclusive culture by enhancing the organization's public-facing branding on NRO.gov and social media channels.

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)	Yes X	No
b. Cluster GS-11 to SES (PWTD)	Yes X	No

In FY20, 0% was achieved for Cluster GS-1 - GS-10, and 0.89% for Cluster GS-11 to SES.

OE&I and OHR will collaborate on developing an Affirmative Action Plan for Recruitment, Hiring, Advancement and Retention of Disabled Persons in 2021. Based on the limited data/information available, NRO was not able to identify or obtain specific triggers.

In FY20, the NRO launched HireVue, a tool that enables virtual interviews, which significantly increased interview capacity and the ability to continue interviewing during the COVID-19 pandemic by using video-enabled technology. The NRO has leveraged HireVue to conduct more than 800 video-enabled interviews with a completion rate of 72%.

The NRO continues to expand diversity hiring and recruitment efforts to build a diverse talent pool by leveraging sophisticated sourcing and Talent Acquisition technology and tools to intentionally diversify the NRO's talent pool. NRO will employ branding and recruitment messaging via mobile devices and sponsored job aids, leverage niche job boards and engage with professional organizations to cultivate familiarity with the NRO brand and reach specialized professionals, create and track effectiveness of candidate search strings and sourcing criteria and resources, and showcase the NRO's diversity and inclusive culture by enhancing the organization's public-facing branding on NRO.gov and social media channels.

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

In FY20, the NRO's OHR has communicated the numerical goals to hiring managers and recruiters in the following ways:

- In FY20 NRO OHR published the *NRO Workforce Strategy 2020-2030*, which was widely disseminated across the NRO via internal websites, workforce announcements, and during strategic workforce management board reviews.
- The *Workforce Strategy's* Strategic Objective 4: Advance Diversity and Inclusion, lists as a critical focus area for the NRO, our planned recruitment hiring levels for increasing NRO diverse staff.
- In FY20 NRO OHR published the *NRO Cadre Hiring Strategy 2020-2030*, which supports and cascades from the *NRO Workforce Strategy* and also reiterates diversity-focused hiring milestones and details the opportunities to reach diverse applicants.
- The OHR Recruitment Group (RG) has actively participated in hiring panels to ensure panel members take into account agency DE&I objectives.
- The OHR Workforce Strategy Group (WSG) frequently collaborates with RG to ensure that NRO recruitment efforts and hiring activities are aligned to both the *NRO Workforce Strategy* and the *Cadre Hiring Strategy*.
- OHR strategic plans are reviewed annually to ensure they remain timely, relevant, and dynamic.

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.

Yes No

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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	3	2		Deputy Chief Recruitment Group
Answering questions from the public about hiring authorities that take disability into account	3	2		Chief Recruitment Group
Processing reasonable accommodation requests from applicants and employees	2	0	2	Chief, Accommodations Program
Section 508 Compliance	1		1	508 Compliance Program Manager
Architectural Barriers Act Compliance	1			Director, NRO Management Services & Operations Directorate
Special Emphasis Program for PWD and PWTD	1			Chief, Disability Program

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.

Yes No

(By the end of FY20, the Disability Program had two key vacancies, appropriate training will be provided to the new Disability staff in FY21.)

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*.

Yes No

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 Applicants with Disabilities

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

- In FY20 NRO OHR published the Workforce Strategy, which proposed strategies and best practices for identifying and hiring qualified individuals with disabilities.
- OHR Recruiters targeted a multitude of diversity-focused recruitment events to build relationships with several universities who have a large population of persons with disabilities. These include Gallaudet University, the University of Connecticut, and Norfolk State University (an HBCU).
- The NRO OHR Reached across the Intelligence Community to identify diversity-focused hiring events and venues such as the IC Centers of Academic Excellence (CAE) Program to engage with CAE Program Coordinators.
- OHR and OE&I are collaborating to develop an affirmative action plan for the recruitment, hiring, advancement and retention of PWDs and PWTDs.
- NRO OHR leveraged disability-focused special hiring programs like the Wounded Warrior Project and Operation Warfighter.
- The NRO provided applicants the opportunity to identify as a person with a disability through our application platforms (JazzHR and USAJobs).
- NRO OHR leveraged improved system integration and data management practices and improved utility of workforce metrics to develop numerous workforce reports and dashboards that inform senior leaders and hiring officials with insight for hiring a more diverse workforce with disabilities and targeted disabilities.

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 PWTDD for positions in the permanent workforce.

Currently, NRO does not use Schedule-A (Title 5) hiring authorities because it is a Title 10 agency. NRO uses the authority granted by section 1601 to structure NRO recruitment and appointment programs that provide the most direct access to local or national sources of high-quality, diverse candidates. Consistent with merit system principles, NRO has the authority to identify, recruit, and appoint directly from any non-Federal applicant source with or without public notification or vacancy notices.

OE&I and OHR are collaborating on an EEO Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities for sourcing PWD and PWTDD applicants.

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.

NRO does not use Schedule-A (Title 5) hiring authorities because it is a Title 10 agency. NRO uses the authority granted by section 1601 to structure NRO recruitment and appointment programs that provide the most direct access to local or national sources of high-quality, diverse candidates. Consistent with merit system principles, NRO has the authority to identify, recruit, and appoint directly from any non-Federal applicant source with or

without public notification or vacancy notices. OHR's data analytics show the levels of diversity within the applicant and new hire population.

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.

Yes No N/A

As a Title 10 Excepted Service agency, the NRO does not use Schedule A excepted service hiring authority under Title 5. Using 1601 hiring authority, a person with disabilities could be hired non-competitively if they meet the skill requirements.

NRO University instructs Hiring Advisors and Ambassadors on a variety of mandatory training topics and knowledge assessments prior to their attending recruitment events. This instruction includes equity training, which covers hiring authorities that take disability into account. The training also highlights reasonable accommodations that the NRO provides to PWDs during the recruitment process.

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.

NRO continues to reach out to groups such as the Spectrum Group, the American Federation for the Blind, the Americans with Disabilities Act National Network, the National Association of the Deaf; and learning institutions such as Gallaudet University and the National Technical Institute for the Deaf.

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)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
b. New Hires for Permanent Workforce (PWTD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

In accordance with FY20 OHR data tables, 2.94% of the benchmark was achieved for new hires for PWD, and 0.74% of the benchmark was achieved for new hires for PWTD. Based on the limited data/information available NRO was not able to identify or obtain specific triggers.

The NRO continues to expand diversity hiring and recruitment efforts to build a diverse talent pool by leveraging sophisticated sourcing and Talent Acquisition technology and tools to intentionally diversify the NRO's talent pool. NRO will employ branding and recruitment messaging via mobile devices and sponsored job adds, leverage niche job boards and professional organizations to cultivate familiarity with the NRO brand and reach specialized professionals, create and track effectiveness of candidate search strings and sourcing criteria and resources, and showcase the NRO's diversity and inclusive culture by enhancing the organization's branding on NRO.gov and social media channels.

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) | Yes | X | No |
| b. New Hires for MCO (PWTD) | Yes | X | No |

In accordance with FY20 OHR data tables, 0.0% of the qualified applicant pool is identified as PWD, and 0.0% is identified as PWTD. Based on the limited data/information available, NRO was not able to identify or obtain specific triggers.

The NRO continues to expand diversity hiring and recruitment efforts to build a diverse talent pool by leveraging sophisticated sourcing and Talent Acquisition technology and tools to intentionally diversify the NRO's talent pool, especially in mission-critical occupations.

NRO will employ branding and recruitment messaging via mobile devices and sponsored job adds, leverage niche job boards and professional organizations to cultivate familiarity with the NRO brand and reach specialized professionals, create and track effectiveness of candidate search strings and sourcing criteria and resources, and showcase the NRO's diversity and inclusive culture by enhancing the organization's branding on NRO.gov and social media channels

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) | Yes | X | No |
| b. Qualified Applicants for MCO (PWTD) | Yes | X | No |

In accordance with FY20 OHR data tables, there was 0% of PWD qualified internal applicants, and 0% of PWTD qualified internal applicants for any of the mission-critical occupations. Based on the limited data/information available, NRO was not able to identify or obtain specific triggers.

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) | Yes | X | No |
| b. Promotions for MCO (PWTD) | Yes | X | No |

Based on the limited data/information available, NRO was not able to identify or obtain specific triggers.

In accordance with FY20 OHR data tables, three job series indicated qualified PWD or PWTD internal candidates for promotions for permanent mission-critical positions.

In job series 0560, there was one qualified internal candidate (4.76% of the applicant pool) for PWD and 0% candidates for PWTD. No PWD or PWTD internal candidates were selected.

In job series 0801, there were three qualified candidates (15% of the applicant pool) for PWD, and 0% candidates for PWTD. Two PWD internal candidates were selected.

In job series 1102, there were four qualified candidates (12.12% of the applicant pool) for PWD candidates, and 0% PWTD candidates. One PWD internal candidate was selected.

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.

The NRO OHR Strategic Objective 4: Advance Diversity & Inclusion ensures sufficient opportunities for advancement for PWDs and PWTDs in the following ways.

- OHR NRO University (NROU), provides 508 compliant training and promotional opportunities to PWDs and PWTDs through a self-nomination process.
- In FY20, OHR partnered with NRO components and stakeholders on the following initiatives to ensure compliance and advancement opportunities for PWDs and PWTDs.
 - Partnering with the OE&I Disability Program to remove workplace barriers and adjust architectural, technological and administrative barriers for PWDs and PWTDs to ensure accessibility and provides opportunity to advance from recruitment to retirement.
 - Partnering with the OE&I Accommodations Program (AP), pursuant to the American with Disabilities Act and the Rehabilitation Act as well as other federal laws and regulations, to afford qualified individuals with disabilities an equal opportunity starting with the position application process and throughout employment by enabling the employee to perform the essential functions of the position held or desired, to enable individuals with disabilities to enjoy equal benefits and privileges of employment enjoyed by employees without disabilities.
 - Supporting the OE&I Inclusion Program in strengthening the NRO Disability Network Employee Resource Group for PWDs and PWTDs and advocates on matters concerning equal opportunity and accessibility. The group encourages individuals, managers, and leadership to create an inclusive environment and provide opportunities for everyone to contribute, grow, and advance.

B. Career Development Opportunities

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

PWDs and PWTDs can engage in both internal and external training as well as joint duty activities with other agencies for professional development. The NRO offers the following career development opportunities.

- The NRO University produced a catalog of remote-accessible trainings to enable out-of-the-office professional development training opportunities during the pandemic.
- The NRO updated and published the FY20 NRO Cadre Promotion Guides and Career Planning Guides, which map learning and development opportunities.
- The NRO partnered with the Virginia Polytechnic Institute Systems Engineering Master's Degree Program to provide a second cohort of 10 participants.
- NRO External Learning Opportunities Program provided Cadre-specific training opportunities for executive leadership programs including the Defense Civilian Emerging Leader Program, the Executive Leadership Development Program, the Defense Senior Leader Development Program, and competitive Civilian and Military Fellowships.
- NRO Internships began in the summer of FY 2020. NRO initiated paid summer internships for undergraduate and graduate students with the intent to convert successful interns to full-time permanent employees upon graduation.
- NRO Voluntary Mentoring Program pairs government employees with more experienced individuals who share their expertise and organizational knowledge to further the mentee's job performance and professional growth.
- NRO Leadership Coaching Program leverages professionally certified coaches and is open to all government Civilians and Military personnel currently assigned to the NRO.
- Career Broadening Assignments via The IC Civilian Joint Duty Program is the Civilian personnel rotation program designed specifically for employees of the IC.

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		PWT	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	No Data Available					
Fellowship Programs	0	0	0	0	0	0
Mentoring Programs	40	40	Not tracked	Not tracked	Not tracked	Not tracked

Coaching Programs	70	70	Not tracked	Not tracked	Not tracked	Not tracked
Training Programs	248	80	Not tracked	Not tracked	Not tracked	Not tracked
Detail Programs	0	0	0	0	0	0
Other Career Development Programs	0	0	0	0	0	0

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

a. Applicants (PWD) Yes No
b. Selections (PWD) Yes No

N/A

Based on the limited data/information available, NRO was not able to identify or obtain specific triggers.

4. 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) Yes No
b. Selections (PWTD) Yes No

N/A

Based on the limited data/information available, NRO was not able to identify or obtain specific triggers.

C. Awards

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTB 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)	Yes	X	No
b. Awards, Bonuses, & Incentives (PWTB)	Yes	X	No

In accordance with FY20 OHR data tables, the following metrics are provided.

Time Off Awards 1-10 hrs. PWD=33.33% PWTB=0% (1 out of 3 awards, value= 8 hrs.)

No Time Off Awards were given for 11-20 hours.

One Time Off Award was given for 21-30 hours; no awards were given to PWDs or PWTBs.

Time Off Awards 31-40 hrs. PWD=50% (1 out of 2 awards, value=40 hrs.) PWTB=0%

No Time Off Awards were given for 41 hours or more.

No Cash Awards were given for amounts \$0.00-\$999.00

Cash Awards for amounts \$1,000.00-\$1,999: PWD=9.09% (1 out of 11 awards, value=\$1500.00); PWTB=0%

Four Cash Awards were given for amounts \$2,000.00-\$2999.00; no awards were given to PWDs or PWTBs.

Two Cash Awards were given for amounts \$3,000.00-\$3999.00; no awards were given to PWDs or PWTBs.

One Cash Awards was given for amounts \$4,000.00-\$4999.00; no awards were given to PWDs or PWTBs.

There were no Cash Awards given for amounts \$5,000 or more.

Based on the limited data/information available, NRO was not able to identify or obtain specific triggers.

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

"yes", please describe the trigger(s) in the text box.

a. Pay Increases (PWD)	Yes	X	No
b. Pay Increases (PWTB)	Yes	X	No

In accordance with FY20 data tables, 5 out of 79 Quality Step increases went to PWDs, or 6.33% and 0% went to PWTBs. Based on the limited data/information available, NRO was not able to identify or obtain specific triggers.

3. If the agency has other types of employee recognition programs, are PWD and/or PWTB 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)	Yes	No	N/A	X
b. Other Types of Recognition (PWTD)	Yes	No	N/A	X

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)	Yes	X	No
ii. Internal Selections (PWD)	Yes	X	No

b. Grade GS-15

i. Qualified Internal Applicants (PWD)	Yes	X	No
ii. Internal Selections (PWD)	Yes	X	No

c. Grade GS-14

i. Qualified Internal Applicants (PWD)	Yes	X	No
ii. Internal Selections (PWD)	Yes	X	No

d. Grade GS-13

i. Qualified Internal Applicants (PWD)	Yes	X	No
ii. Internal Selections (PWD)	Yes	X	No

In accordance with OHR FY20 data tables, the data for promotion of PWDs reflects the following.

	<u>Qualified Internal PWD Applicants</u>	<u>Internal PWD Selections</u>
SES Exec. Level	None	None
Grade GS-15	None	None
Grade GS-14	1 PWD (out of 42=2.38%)	1 PWD (out of 19 selected=5.26%)
Grade GS-13	6 PWDs (out of 80=7.5%)	2 PWDs (out of 31 selected=6.45%)

Based on the limited data/information available, NRO was not able to identify or obtain specific triggers. Self-identification is voluntary. COVID-19 restrictions impeded planned FY20 OHR and OE&I planned campaign plans to encourage PWDs and PWTDs to self-identify. When planned activities resume, specific campaigns for PWDs and PWTD self-identification will resume.

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)	Yes X	No
ii. Internal Selections (PWTD)	Yes X	No

b. Grade GS-15

i. Qualified Internal Applicants (PWTD)	Yes X	No
ii. Internal Selections (PWTD)	Yes X	No

c. Grade GS-14

i. Qualified Internal Applicants (PWTD)	Yes X	No
ii. Internal Selections (PWTD)	Yes X	No

d. Grade GS-13

i. Qualified Internal Applicants (PWTD)	Yes X	No
ii. Internal Selections (PWTD)	Yes X	No

In accordance with FY20 OHR data tables, the data for promotion of Qualified Internal Applicants for PWTD are: SES 0%, GS-15 0%, GS-14 0%, and GS-13 0%.

The data for Internal Selectees to the senior grade levels are: are SES 0%, GS-15 0%, and GS-14 0% GS-13 0%. Based on the limited data/information available, NRO was not able to identify or obtain specific triggers.

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)	Yes X	No
b. New Hires to GS-15 (PWD)	Yes X	No
c. New Hires to GS-14 (PWD)	Yes X	No
d. New Hires to GS-13 (PWD)	Yes X	No

New Hires to SES 0%

New Hires to GS-15 0%

New Hires to GS-14 0%

New Hires to GS-13 0%

Based on the limited data/information available, NRO was not able to identify or obtain specific triggers.

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)	Yes	X	No
b. New Hires to GS-15 (PWTD)	Yes	X	No
c. New Hires to GS-14 (PWTD)	Yes	X	No
d. New Hires to GS-13 (PWTD)	Yes	X	No

In accordance with FY20 OHR data tables, the data for PWTD new hires to the senior grade level reflects the following.

New Hires to SES 0%

New Hires to GS-15 0%

New Hires to GS-14 0%

New Hires to GS-13 0%

COVID-19 restrictions impeded planned FY20 OHR operations. When operations resume, specific internal hiring plans will continue. Based on the limited data/information available, NRO was not able to identify or obtain specific triggers.

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)	Yes	X	No
ii. Internal Selections (PWD)	Yes	X	No

b. Managers

i. Qualified Internal Applicants (PWD)	Yes	X	No
ii. Internal Selections (PWD)	Yes	X	No

c. Supervisors

i. Qualified Internal Applicants (PWD)	Yes		No	X
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ii. Internal Selections (PWD)

Yes

No

In accordance with FY20 OHR data tables, the data for PWD qualified internal applicants and/or selectees for promotions to supervisory positions reflects the following.

	<u>Executives</u>	<u>Managers</u>	<u>Supervisors</u>
Qualified Internal Applicants:	0%	0% (3)	11.32% (1 PWD out of 19)
Internal Selections:	0%	0% (1)	8.33% (1 PWD out of 12)

Based on the limited data/information available, NRO was not able to identify or obtain specific triggers.

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)

Yes

No

ii. Internal Selections (PWTD)

Yes

No

b. Managers

i. Qualified Internal Applicants (PWTD)

Yes

No

ii. Internal Selections (PWTD)

Yes

No

c. Supervisors

i. Qualified Internal Applicants (PWTD)

Yes

No

ii. Internal Selections (PWTD)

Yes

No

In accordance with FY20 OHR data tables, the data for PWTD qualified internal applicants and/or selectees for promotions to supervisory positions reflects the following.

	<u>Executives</u>	<u>Managers</u>	<u>Supervisors</u>
Qualified Internal Applicants:	0%	0%	0%
Internal Selections:	0%	0%	0%

Based on the limited data/information available, NRO was not able to identify or obtain specific triggers.

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)

Yes

No

b. New Hires for Managers (PWD)

Yes

No

c. New Hires for Supervisors (PWD)

Yes

No

In accordance with FY20 OHR data tables, the data for PWD selectees for new hires to supervisory positions reflects the following.

New Hires for Managers (PWD) 0% (out of 7 candidates)

New Hires for Executives (PWD) 0% (out of 7 candidates)

New Hires for Supervisors (PWD) 5.0% (1 out of 20 candidates)

Based on the limited data/information available, NRO was not able to identify or obtain specific triggers.

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) | Yes X | No |
| b. New Hires for Managers (PWTD) | Yes X | No |
| c. New Hires for Supervisors (PWTD) | Yes X | No |

In accordance with FY20 OHR data tables, the data for PWD selectees for new hires to supervisory positions reflects the following.

New Hires for Managers (PWTD) 0% (out of 7 candidates)

New Hires for Executives (PWTD) 0% (out of 7 candidates)

New Hires for Supervisors (PWTD) 0% (out of 20 candidates)

Based on the limited data/information available, NRO was not able to identify or obtain specific triggers.

Section V: 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.

Yes No X

NRO does not use Schedule-A (Title 5) hiring authorities because it is a Title 10 agency. NRO uses the authority granted by section 1601 to structure NRO recruitment and appointment programs that provide the most direct access to local or national sources of high-quality, diverse candidates

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) | Yes | No X |
| b. Involuntary Separations (PWD) | Yes | No X |

In accordance with FY20 OHR data tables, the data for PWDs among voluntary and involuntary separations reflects the following.

83.72% of NRO personnel who separated voluntarily or involuntarily had no disability versus 6.98% who had a disability.

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) | Yes | No X |
| b. Involuntary Separations (PWTD) | Yes | No X |

In accordance with FY20 OHR data tables, the data for PWTDs among voluntary and involuntary separations reflects there were no separations of PWTDs.

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*.

In accordance with FY20 OHR data tables, no exit interview data was provided.

B. Accessibility of Technology and Facilities

Pursuant to 29 C.F.R. § 1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the

accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

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

The following link can be found on NRO's homepage under > Site Policies > Accessibility > Accessibility/Section 508 (link): https://dodcio.defense.gov/DODSection508/Std_Stmt.aspx. The site provides users a link to Section 508 of the Rehabilitation Act and a link to a DOD Section 508 Form if they experience any accessibility difficulties. Additionally, at NRO's homepage under offices > Office of Equality and Inclusion there is an overview of OEI and its functions. OEI will continue to evaluate the content on this site and update as necessary in FY20.

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.

In FY20, the NRO did not issue a notice of rights pursuant to 29 C.F.R 1614.203(d) (4) on their public website. NRO explains employees and applicant rights under the Architectural Barriers Act to include a description of how to file a complaint as part of the complaint process. An overview of OEI's functions are provided on NRO.gov.

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.

COVID-19 restrictions impeded operations and significantly slowed progress and results to include staffing vacancies for the majority of the year. In FY21 The NRO will resume FY20 plans to add a landing to explore the possibilities for the existing external ramp adjacent to Tower 1 to make it ADA-compliant and plans to address the lift to the Cafeteria Mezzanine and JD Hill Mezzanine areas to make them more accessible. In addition, the Disability Program will continue to pursue the use of speech to text technology to streamline the post captioning process for videos, and begin the process for a barrier analysis.

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.)

For the time period of October 1, 2019 to September 30, 2020, Reasonable Accommodations requests were handled on a priority basis in a timely, efficiently, and in a fair manner per NRO's Reasonable Accommodations process. The Accommodations Program average processing time for requested accommodations was 29 days; 70% of requests were processed in 20 days or less.

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.

COVID protocol began in March 2020 and continued throughout FY20, which impacted planned initiatives. In spite of COVID protocol, the Accommodations Program (AP) remained available to NRO staff and operational. The AP Chief left in April; however, the AP staff continued to focus on strengthening the staff's knowledge of the reasonable accommodations process as well as learning about laws and best practices in the field of disability services. Specifically The AP staff virtually participated in multiple events and forums, including the following:

- NELI training focused on reasonable accommodation case law
- EEOC information sessions focused on reasonable accommodation case law and guidance
- AP hosted FBI EEO Attorney Advisor to share best practices
- RA Case Manager and Sign Language Interpreter attended an interpreting workshops hosted by NSA
- ADA & FMLA compliance updates
- ODNI led IC RA Practitioner conference calls
- DOL/ODEP's FEED virtual meetings

The AP staff began the upgrade for the E.A.S.E. request database, which will resume in FY21. Also, the five-month vacancy in 2020 for Chief, Accommodations Program was filled in September 2020.

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 for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

COVID protocol began in March 2020 and continued throughout FY20, which impacted planned initiatives. In spite of COVID protocol, the Accommodations Program effectively fulfilled 100% of the 986 hours of Reasonable Accommodation requests for Personal Assistance Services for PWTs. A contract remains in place for Workplace Personal Assistant/Reader services for the NRO workforce. PWTs enter requests for PAS into our E.A.S.E. (Equal Accessibility Services Environment) database to schedule services needed. PAS are expected to increase in 2021.

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?

Yes No N/A

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?

Yes No N/A

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

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?

Yes No N/A

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?

Yes No N/A

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

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?

Yes No X

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

Yes No N/A X

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	
Barrier(s)	
Objective(s)	
	Performance Standards Address the Plan? (Yes or No)

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
Fiscal Year	Accomplishments			

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

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

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.