

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

To capture agencies’ affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 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. Within the GS-1 to GS-10 cluster, 10.6% of permanent employees identified as PWD. b. Within the GS-11 to SES cluster, 10.1% of permanent employees identified as PWD.

*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If “yes”, describe the trigger(s) in the text box.
- a. Cluster GS-1 to GS-10 (PWTD)

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

Answer No

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-11 to SES					
Grades GS-1 to GS-10					

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

OHR and Recruitment Group (RG) work in conjunction with Directorate and Office (D&O) and Career Field leadership to determine the most critical hiring requirements and skill sets needed to fill the most critical mission requirements throughout the organization. Per the Presidential Mandates and Executive Orders, numerical goals will not be used.

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	
Answering questions from the public about hiring authorities that take disability into account	0	1	0	Vicky G. Deputy Chief Recruitment Group
Processing applications from PWD and PWTD	0	1	0	Vicky G. Deputy Chief Recruitment Group
Processing reasonable accommodation requests from applicants and employees	2	0	0	Maggie B. Chief, Accessibility and Accommodations Program
Special Emphasis Program for PWD and PWTD	0	0	0	(See Part G - B.4.a.8)
Architectural Barriers Act Compliance	2	0	0	Tyrone D. Director dindalty@nro.mil
Section 508 Compliance	1	0	0	Maia C. Director, IT Policy and Governance

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

The Accommodations Program (AP) and Disability Program (DP) staff continued strengthening the staff's knowledge of the reasonable accommodations process, expanding understanding of updated laws and best practices in the field of disability services, as well as participating in a multitude of events and forums during the FY24 reporting period. Program staff participated in the following: Interagency- agency working groups, the International Association of Accessibility Professionals webinars, and Great Lakes ADA self-paced webinars.

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

A 2025-2028 budget plan was created to address enterprise-wide reasonable accommodations and accessibility needs. The following are a snapshot of accommodations and accessibility projects funded during the reporting period: In FY 24, NRO/OEEO funded emergency evacuation chairs and scooters; In FY 24, NRO/OEEO maintained the established funding source for the Communication Directorate to purchase assistive technology for RA requests; and In FY 24, NRO/OEEO funded over 15 built-environment projects across the enterprise to include: Built-environment audits, automatic door openers, factory designs for accessibility improvement projects, and sidewalk rehabilitation

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	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.		
Objective	The NRO’s Accessibility and Accommodations Program staff will process all accommodation requests in accordance with the time frame set forth in NI 80-3-3, Reasonable Accommodations Process.		
Target Date	Dec 31, 2025		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	

Section IV: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency’s recruitment program plan for PWD and PWTD

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

The NRO Recruitment Group has developed and executed on plans to focus several recruitment events per year on hiring individuals with disabilities. These plans direct recruiters and hiring advisors at the NRO to work with several universities with a large population of persons with disabilities, such as Gallaudet University, and to leverage other disability-focused special hiring programs like the Wounded Warrior Project and Operation Warfighter. NRO applicants are provided the opportunity to identify as a person with a disability through our application platforms (JazzHR and USAJobs). While the NRO participates in recruitment events and career fairs in which persons with disabilities (PWD) and persons with targeted disabilities (PWTD) candidates attend, the organization relies on self-reporting from the candidates when they apply to vacancies on NRO.gov. The candidates are also encouraged to self-identify in their HR records during orientation once they enter on duty. 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 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 PWTD 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.

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.

Answer N/A

As a Title 10 Excepted Service agency, the NRO cannot use Schedule A hiring authority under Title 5. The NRO's own recruitment targets included the goal to increase the number of PWD and PWTD within its application pool and workforce population. NRO OHR also included training for hiring managers on the use of its 1601 hiring authority to non-competitively hire PWDs as warranted. NROU 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.

The NRO participates in the ABILITY career fair, which is one of the top virtual events of participation for PWD and PWTD. We also had events scheduled with CareerEco, in which many PWD and PWTD candidates are included in outreach to students, recent graduates and professionals. A recruitment event was also planned for Gallaudet University, an institution providing education to the deaf and hard of hearing.

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 No

a. For FY24, 11.0% of new hires for the permanent workforce identified as PWD.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants					
% of Qualified Applicants					
% of New Hires					

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission- critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for MCO (PWD) Answer Yes
- b. New Hires for MCO (PWTD) Answer Yes

• For Intelligence (0132), 0.0% of new hires identified as PWTD. • For Budgeting (0560), 0.0% of new hires identified as PWD and 0.0% of new hires identified as PWTD. • *For Engineering (0801) and Science (1301), 8.8% of new hires identified as PWD and 1.8% of new hires identified as PWTD. • For General Business/Acquisitions PM (1101), 6.7% of new hires identified as PWD and 6.7% of new hires identified as PWTD. • For Contracts (1102), 5.9% of new hires identified as PWD and 0.0% of new hires identified as PWTD. • For Math/Statistics (1501), 0.0% of new hires identified as PWTD. *Engineering and Science are often combined in applicant and hiring data. Occupation 0801 had very large new hire figures, while 1301 had very small new hire figures for FY24, likely because of data being combined during application/hiring process.

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

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Qualified Applicants for MCO (PWD) Answer Yes
- b. Qualified Applicants for MCO (PWTD) Answer Yes

• For Budgeting (0560), 1.2% of the qualified internal applicants for internal competitive promotion identified as PWTD. • For Engineering (0801), 9.8% of qualified internal applicants for internal competitive promotion identified as PWD. Note: The 501 Goal was used as the relevant applicant pool as the benchmark. The general population within the competitive grades is generally considered to be “qualified internal applicants” as the NRO uses rank-in-person vs rank-in-position.

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 Yes
- b. Promotions for MCO (PWTD) Answer Yes

• For General Business/Acquisitions PM (1101), 0.0% of the internal selections for internal competitive promotion identified as PWD, compared to 9.1% PWD who applied for promotion. • For Math/Statistics (1501), 0.0% internal selections for internal competitive promotion identified as PWD and 0.0% identified as PWTD, compared to 20.0% PWD and 20.0% PWTD applied for promotion. • For Information Technology (2210), 0.0% of internal selections for internal competitive promotion identified as PWTD, compared to 6.3% who applied for promotion. Note: The percent of employees who applied for promotion was used as the benchmark, as the NRO uses rank-in-person vs rank-in-position.

Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities,

awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

A. ADVANCEMENT PROGRAM PLAN

Describe the agency's plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

The NRO Workforce Strategy 2025-2030 Strategic Objective #2 is to Attract and Acquire Talent and Strategic Objective #3 Grow and Develop Professionals. PWD, including PWTD, are a critical piece of NRO's efforts to attract, hire and develop the right talent to meet critical mission needs. The outreach methodologies outlined previously, coupled with NRO's early-career profession growth, world-wide development, and leadership development programs provide venues for all employees, to include PWD and PWTD to succeed within the organization.

B. CAREER DEVELOPMENT OPPORTUNITES

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

NROU provides training and materials to all employees to assist with career growth and professional development. This push for career development opportunities stems from the NRO Workforce Strategy 2020-2030 Strategic Objective 2: "Grow and Develop Employees." Employees can engage in a variety of internal and external training opportunities as well as joint duty activities with other agencies for professional development. In FY24, the NRO offered junior through advanced Leadership Development programs, Internships, Fellowships, Mentoring, Coaching, and Career Broadening Assignments.

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 (%)
Mentoring Programs			NoData	NoData	NoData	NoData
Coaching Programs			NoData	NoData	NoData	NoData
Detail Programs			NoData	NoData	NoData	NoData
Other Career Development Programs			0.00	0.00	0.00	0.00
Internship Programs			7.1	10.8	NoData	NoData
Fellowship Programs			NoData	NoData	NoData	NoData
Training Programs			8.3	11.2	1.5	2.2

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 Yes

b. Selections (PWD)

Answer No

a. For Internship Programs, 7.1% of applicants identified as a PWD, compared to the 501 Goal of 12.0%. For Training Programs, 8.3% of applicants identified as a PWD, compared to the 501 Goal of 12.0%. For Other Career Development Programs, 0.0% of applicants identified as a PWD.

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If "yes",

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describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Applicants (PWTD)

Answer Yes

b. Selections (PWTD)

Answer No

a. For Internship Program, there was not enough PWD information to identify triggers for PWTD. For Training Programs, 1.5% of applicants identified as a PWTD, compared to the 501 Goal of 2.0%. For Other Career Development Programs, 0.0% of applicants identified as a PWTD, compared to the 501 Goal of 2.0%.

C. AWARDS

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

a. Awards, Bonuses, & Incentives (PWD)

Answer Yes

b. Awards, Bonuses, & Incentives (PWTD)

Answer Yes

Triggers were noted in every Time-Off Award level; two Time-Off Award levels did not have a trigger for PWTD. • Time-Off Awards (1-10 hours): PWD received an award at a rate of 26.0% and PWTD received an award at a rate of 23.3%, compared to 30.9% non-PWD. • Time-Off Awards (11-20 hours): PWD received an award at a rate of 1.9% and PWTD received an award at a rate of 0.0%, compared to 4.3% non-PWD. • Time-Off Awards (21-30 hours): PWD received an award at a rate of 2.9% and PWTD received an award at a rate of 0.0%, compared to 6.2% non-PWD. • Time-Off Awards (31-40 hours): PWD received an award at a rate of 0.0% and PWTD received an award at a rate of 0.0%, compared to 0.6% non-PWD. Triggers were noted in all but one Cash Award level; two Cash Award levels did not have a trigger for PWTD. • Cash Awards (\$500 and under): PWD received an award at a rate of 0.1% and PWTD received an award at a rate of 0.0%, compared to 2.8% non-PWD. • Cash Awards (\$501 - \$999): PWD received an award at a rate of 1.9% and PWTD received an award at a rate of 0.0%, compared to 2.5% non-PWD. • Cash Awards (\$1000 - \$1999): PWD received an award at a rate of 20.2% and PWTD received an award at a rate of 13.3%, compared to 22.8% non-PWD. • Cash Awards (\$2000 - \$2999): PWD received an award at a rate of 35.6%, compared to 38.0% non-PWD. • Cash Awards (\$3000 - \$3999): PWD received an award at a rate of 12.5%, compared to 16.4% non-PWD. Cash Awards (\$5000 or more): PWD received an award at a rate of 8.7% and PWTD received an award at a rate of 10.0%, compared to 11.5% non-PWD.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance- based pay increases? If “yes”, please describe the trigger(s) in the text box.

a. Pay Increases (PWD)

Answer Yes

b. Pay Increases (PWTD)

Answer Yes

a. PWD received a QSI at a rate of 22.1%, compared to 35.3% non-PWD. b. PWTD received a QSI at a rate of 13.3%, compared to 35.3% non-PWD.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
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3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.

- | | | |
|--------------------------------------|--------|-----|
| a. Other Types of Recognition (PWD) | Answer | N/A |
| b. Other Types of Recognition (PWTD) | Answer | N/A |

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 | Yes |

c. Grade GS-14

- | | | |
|--|--------|-----|
| i. Qualified Internal Applicants (PWD) | Answer | No |
| ii. Internal Selections (PWD) | Answer | Yes |

d. Grade GS-13

- | | | |
|--|--------|----|
| i. Qualified Internal Applicants (PWD) | Answer | No |
| ii. Internal Selections (PWD) | Answer | No |

b. Internal competitive promotion data for SES or Equivalent could not be determined; Senior grades are rank-in-position instead of rank-in-person like the lower competitive grades. c. Among those promoted from Grade GS-15 into SES positions, 0.0% identified as PWD. Internal applications and qualified internal applicants for internal competitive promotions at this level was not available. d. Among those selected for promotion, 5.9% identified as PWD, compared to 9.8% who applied for promotion and identified as PWD. Note: The percent of employees who applied for promotion was used as the benchmark for selections, as the NRO uses rank-in-person vs rank-in-position.

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

a. SES

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

b. Grade GS-15

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

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ii. Internal Selections (PWTD)	Answer	Yes
c. Grade GS-14		
i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	No
d. Grade GS-13		
i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	No

a. Internal competitive promotion data for SES or Equivalent could not be determined; Senior grades are rank-in-position instead of rank-in-person like the lower competitive grades. b. Among those promoted from Grade GS-15 into SES positions, 0.0% identified as PWTD. Internal applications and qualified internal applicants for internal competitive promotions at this level was 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	No
b. New Hires to GS-15 (PWD)	Answer	No
c. New Hires to GS-14 (PWD)	Answer	No
d. New Hires to GS-13 (PWD)	Answer	No

Note: The 501 Goal was used as the relevant applicant pool as the benchmark. The general population within the competitive grades is generally considered to be “qualified internal applicants” as the NRO uses rank-in-person vs rank-in-position.

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

a. New Hires to SES (PWTD)	Answer	N/A
b. New Hires to GS-15 (PWTD)	Answer	N/A
c. New Hires to GS-14 (PWTD)	Answer	N/A
d. New Hires to GS-13 (PWTD)	Answer	N/A

Note: Applicants that declared a disability did not have a corresponding disability code in the applicant tracking system; therefore, figures for Persons with a Targeted Disability among Voluntarily Identified Applicants or Qualified External Applicants could not be determined.

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.

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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 No

ii. Internal Selections (PWD) Answer Yes

c. Supervisors

i. Qualified Internal Applicants (PWD) Answer Yes

ii. Internal Selections (PWD) Answer Yes

a. Qualified internal applicants for Executives could not be determined to compare against the 501 Goal. Because applicants could not be determined, there is no benchmark for comparing internal selections; however, 0.0% of employees selected for promotion into an Executive position identified as PWD. b. Among those designated as Managers, who were selected for promotion, 0.0% identified as PWD compared to 25.0% of internal applicants who identified as PWD. c. Among those designated as Supervisors, who were qualified internal applicants, 8.4% identified as PWD compared to the 501 Goal of 12.0%. Additionally, among those designated as Supervisors, who were selected for promotion, 4.0% identified as PWD compared to 4.8% of internal applicants who identified as PWD.

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 No

ii. Internal Selections (PWTD) Answer No

c. Supervisors

i. Qualified Internal Applicants (PWTD) Answer No

ii. Internal Selections (PWTD) Answer Yes

a. Qualified internal applicants for Executives could not be determined to compare against the 501 Goal. Because applicants could not be determined, there is no benchmark for comparing internal selections; however, 0.0% of employees selected for promotion into an Executive position identified as PWTD. c. Among those designated as Supervisors, who were selected for promotion, 4.0% identified as PWTD compared to 4.8% of internal applicants who identified as PWTD.

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 Yes

- b. New Hires for Managers (PWD) Answer No
- c. New Hires for Supervisors (PWD) Answer No

a. Among those selected as New Hires, 0.0% identified as PWD, compared to 14.3% of applicants. b. An applicant benchmark for PWD could not be determined at the Manager level. c. An applicant benchmark for PWD could not be determined at the Supervisor level.

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

a. An applicant benchmark for PWTD could not be determined at the Executive level. b. An applicant benchmark for PWTD could not be determined at the Manager level. c. An Applicant benchmark for PWTD could not be determined at the Supervisor level.

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer N/A

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) Answer Yes
- b. Involuntary Separations (PWD) Answer No

c. Employees who identified as PWD voluntarily separated at a rate of 12.5%, compared to 7.7% for non-PWD.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
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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 Yes

b.Involuntary Separations (PWTD)

Answer No

e. Employees who identified as PWTD involuntarily separated at a rate of 10.0%, compared to 7.7% for non-PWD.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
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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.

The Top Reasons for resignation provided in FY24 exit survey results, among employees who identified as a PWD include: • My agency's lack of telework opportunities • Support for elder care needs • Level of guidance and mentoring I received

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

<https://www.nro.gov/accessibility/>

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

<https://www.nro.gov/accessibility/>

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.

The NRO has expanded its built-environment efforts across the enterprise. All NRO-owned sites will have a built-environment audit to create a baseline of accessibility strengths and areas for enhancement. In relation to technology, NRO has a designated 508 Program Manager focused on 508 compliances.

C. REASONABLE ACCOMMODATION PROGRAM

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

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

In FY24, reasonable accommodations requests were handled on a priority basis in a timely, efficient, and fair manner per NRO's Reasonable Accommodations process. The Accessibility and Accommodations Program (AAP) processed requests with an average processing time of 38 days.

2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

In FY24, OEEEO, in collaboration with OHR, provided ongoing RA information sessions to all new officers to include managers and supervisors; OEEEO initiated bi-annual check-ins with customers regarding their approved reasonable accommodations; and OEEEO maintained an electronic tracking system for reasonable accommodations to monitor requests over 45 days.

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.

In FY24, personal assistance service (PAS) requests were handled in a timely, efficient, and fair manner per NRO's Personal Assistance Services process. There was one active PAS requirement, which originated in 2017 and these services are being provided outside of the designated PAS contract.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the governmentwide average?

Answer Yes

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Answer Yes

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?

Answer Yes

2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?

Answer No

3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

N/A

Section VIII: Identification and Removal of Barriers

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

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

Answer No

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

Answer N/A

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments
4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

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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