

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

**National Reconnaissance Office - FY 2025**

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

## Section I: Efforts to Reach Regulatory Goals

*EEOC regulations (29 CFR §1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with targeted disabilities in the federal government.*

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

- a. Cluster GS-1 to GS-10 (PWD) Answer: No
- b. Cluster GS-11 to SES (PWD) Answer: No

\* 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 Total	Reportable Disability Percentage (Numerical Goal 12 Percent)	Targeted Disability Total	Targeted Disability Percentage (Numerical Goal 2 Percent)
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 works 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 vital mission requirements throughout the organization. OHR provides regular updates to D&O and Career Field leadership as well as NRO senior leadership on the progress of selected candidates in the hiring pipeline to meet those mission requirements for planning purposes. Additionally, the NRO's own recruitment targets include the goal to increase the number of PWD and PWTD within its application pool and workforce population.

## 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	Total Full Time	Total Part Time	Total Collateral Duty	Responsible Official (Name, Title, Office Email)
Processing applications from PWD and PWTD	0	1	0	Brittany J. Chief Recruitment Group
Answering questions from the public about hiring authorities that take disability into account	0	1	0	Brittany J. Chief Recruitment Group
Architectural Barriers Act Compliance	2	0	0	Justin R. Director rollisju@nro.mil
Processing reasonable accommodation requests from applicants and employees	5	0	0	April S. Chief, Accessibility and Accommodations Program
Special Emphasis Program for PWD and PWTD	0	0	0	(See Part G - B.4.a.8)
Section 508 Compliance	1	0	1	Maia C. 508 Compliance 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.

Answer: Yes

The Accessibility and Accommodations Program (AAP) staff learn through: established SOPs given at onboarding; observing colleagues; discussions with colleagues; advice from AAP Chief; reading historical case material available in the program's database; EEOC and other training courses.

### B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If "no", describe the agency's plan to ensure all aspects of the disability program have sufficient funding and other resources.

Answer: Yes

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

## 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 OHR Recruitment Group develops plans to focus several recruitment events per year on hiring individuals with disabilities; however, these activities were impacted by the Federal hiring freeze in FY25 and unable to be conducted.

Additionally, the NRO provides applicants the opportunity to identify as a person with a disability through our application platforms (JazzHR and USAJobs). External job announcements were closed in second quarter for FY25 per the Federal hiring freeze and re-opened in August 2025 in preparation for FY26 hiring activities.

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 and annual during self-identification campaigns.

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 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 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 include metrics collection to identify PWD and PWTD within the applicant and new hire populations.

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 include the goal to increase the number of PWD and PWTD within its application pool and workforce population. OHR's data analytics include metrics collection to identify PWD and PWTD within the applicant and new hire populations. It further includes, and as part of this plan, training for hiring managers on the use of its 1601 hiring authority to non-competitively hire PWDs as warranted.

### 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.

These types of recruitment and outreach activities were planned although the organization was unable to be conducted them due to the Federal hiring freeze in FY25.

### C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If "yes", describe the trigger(s) below.

- a. New Hires for Permanent Workforce (PWD) Answer: No
- b. New Hires for Permanent Workforce (PWTD) Answer: Yes

• Among new hires for the Permanent Workforce, 0 Percent identified as a PWTD.

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

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

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

- For Intelligence (0132), 0.0 Percent of new hires identified as a PWD.
- For Security (0080), 0.0 Percent of new hires identified as a PWTD.
- For Budget Analysis (0560), 0.0 Percent of new hires identified as a PWD.
- For General Engineering (0801), 8.00 Percent of new hires identified as a PWD; and 0.0 Percent of new hires identified as a PWTD.
- For General Business/Acquisition PM (1101), 0.0 Percent of new hires identified as a PWD.
- For Contracting (1102), 0.0 Percent of new hires identified as a PWD.
- For Mathematics & Statistics (1501), 0.0 Percent of new hires identified as a PWD.
- For Information Technology (2210), 0.0 Percent of new hires identified as a PWD.

NOTE: Only MCOs that received one or more applicants who identified as a PWD were included.

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

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

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

- For Industrial Property Management (1103), 0.0 Percent of qualified internal applicants for competitive promotion identified as a PWD, compared to 60.0 Percent eligible. Note: There was one (1) qualified internal applicant for this MCO.
- For Information Technology (2210), 2.67 Percent of qualified internal applicants for competitive promotion identified as a PWD, compared to 48.61 Percent eligible.
- For Information Technology (2210), 0.67 Percent of qualified internal applicants for competitive promotion identified as a PWTD, compared to 4.17 Percent eligible.
- For Contracting (1102), 0.0 Percent of qualified internal applicants for competitive promotion identified as a PWTD, compared to 2.94 Percent eligible.

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: No

- For Intelligence (0132), 0.0 Percent of the selections for internal competitive promotion identified as a PWD, compared to 14.29 Percent who applied.
- For General Business/Acquisitions PM (1101), 0.0 Percent of the selections for internal competitive promotion identified as a PWD, compared to 33.33 Percent who applied.
- For General Physical Science (1301), 0.0 Percent of the selections for internal competitive promotion identified as a PWD, compared to 28.57 Percent who applied.

## 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 (Attract and Acquire Talent) and Strategic Objective #3 (Guide and Develop Professionals) establishes the framework for ensuring PWD, including PWTD, have equitable advancement opportunities throughout their careers. NRO's structured development pathways, inclusive advancement practices, and accountability measures ensure PWD and PWTD have the support, resources, and opportunities necessary to advance and contribute their critical skills to NRO's mission success.

### B. CAREER DEVELOPMENT OPPORTUNITIES

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

The NRO provides comprehensive career development opportunities through multiple integrated programs:

Leadership Development Programs offer tailored training for employees at all career stages, from emerging leaders to executives, through the Flagship Leadership Development Program. New supervisors receive specialized support through the Supervisor's Corner resource hub and the two-day "Supervising in a Joint Environment" course, which prepares them for effective leadership in joint operational settings.

Mentoring and Coaching initiatives pair employees with mentors to enhance technical skills, expand professional networks, and support career goal achievement. The Leadership Coaching Program specifically helps personnel identify core values, develop self-awareness, and align personal motivations with professional objectives.

External Learning Opportunities (ELO) Program enables civilian and military employees to pursue advanced learning through external government and non-government institutions, focusing on leadership and technical skill enhancement.

Additional career development opportunities for the workforce included:

- Organized and facilitated an inaugural workforce Career Development Day. The all-day event included a variety of in-person and virtual, large group, small group, and employee-led sessions. The event was conducted for NRO Cadre, military, CIA, and JDAs to engage in activities that promote career development.
- Updated resources for conducting meaningful quarterly performance check-ins between supervisors and employees. The resources and information sessions enable supervisors and employees to have conversations that are more effective on performance expectations, identifying areas for improvement, and removing roadblocks to a successful career.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate.

Career Development Opportunities	Total Participants Applicants (Percentage)	Total Participants Selectees (Percentage)	PWD Applicants (Percentage)	PWD Selectees (Percentage)	PWTD Applicants (Percentage)	PWTD Selectees (Percentage)
Mentoring Programs	NoData	NoData	NoData	NoData	NoData	NoData
Coaching Programs	NoData	NoData	NoData	NoData	NoData	NoData
Internship Programs	4961	37	8.65	2.70	NoData	2.70
Fellowship Programs	NoData	NoData	NoData	NoData	NoData	NoData
Detail Programs	NoData	NoData	NoData	NoData	NoData	NoData
Other Career Development Programs	21	21	23.8	23.8	44.76	4.76
Training 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. 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: Yes

• For the Internship Program, 8.6 Percent of applicants identified as a PWD and 2.7 Percent of the selectees identified as a PWD.

4. Do triggers exist for PWTB 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 (PWTB) Answer: No
- b. Selections (PWTB) Answer: No

NOTE: For the Internship Program, the percentage of PWTB among applicants could not be determined as there was not enough PWD information.

### 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) Answer: Yes
- b. Awards, Bonuses, & Incentives (PWTB) Answer: Yes

Triggers were noted in all four (4) awarded Time Off Award categories:

- Time Off Awards (1-10 hours): PWD received an award at a rate of 32.23 Percent, compared to 35.16 Percent Persons without Disability. PWTB received an award at a rate of 33.33 Percent.
- Time Off Awards (11-20): PWD received an award at a rate of 5.45 Percent, compared to 5.68 Percent Persons without Disability.
- Time Off Awards (21-30): PWD received an award at a rate of 0.47 Percent, compared to 2.20 Percent Persons without Disability. PWTB received an award at a rate of 0.0 Percent.
- Time Off Awards (31-40): PWD received an award at a rate of 0.24 Percent, compares to 0.92 Percent Persons without Disability. PWTB received an award at a rate of 0.0 Percent.

Triggers were noted in five (5) of the seven (7) awarded Cash Award categories:

- Cash Award (\$500 and Under): PWTB received an award at a rate of 0.0 Percent, compared to 5.68 Percent Persons without Disability.
- Cash Award (\$501-\$999): PWD received an award at a rate of 4.98 Percent, compared to 5.68 Percent Persons without Disability. PWTB received an award at a rate of 4.17 Percent.
- Cash Award (\$3000-\$3999): PWD received an award at a rate of 14.45 Percent, compared to 16.48 Percent Persons without Disability.
- Cash Award (\$4000-\$4999): PWD received an award at a rate of 13.27 Percent, compared to 16.12 Percent Persons without Disability.
- Cash Award (\$5000 or more): PWD received an award at a rate of 11.14 Percent, compared to 12.27 Percent Persons without Disability.

Time-Off Awards	Total (Number)	Reportable Disability (Percentage)	Without Reportable Disability (Percentage)	Targeted Disability (Percentage)	Without Targeted Disability (Percentage)
-----------------	----------------	------------------------------------	--	----------------------------------	--

Cash Awards	Total (Number)	Reportable Disability (Percentage)	Without Reportable Disability (Percentage)	Targeted Disability (Percentage)	Without Targeted Disability (Percentage)
-------------	----------------	------------------------------------	--	----------------------------------	--

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

a. Awards, Bonuses, & Incentives (PWTD) Answer: Yes

b. Pay Increases (PWTD) Answer: Yes

• Step Increases: PWD and PWTD received step increases at a lower rates than Persons without Disability.

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

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 (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

b. Grade GS-15

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

c. Grade GS-14

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

d. Grade GS-13

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

• Among those promoted from the GS-15 grade level into SES positions, 0.0 Percent identified as PWD, compared to 100 Percent non PWD.

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: No

ii. Internal Selections (PWTD) Answer: No

b. Grade GS-15

- |   |            |
|---|------------|
| i. Qualified Internal Applicants (PWTB) | Answer: No |
| ii. Internal Selections (PWTB)          | Answer: No |
| c. Grade GS-14                          |            |
| i. Qualified Internal Applicants (PWTB) | Answer: No |
| ii. Internal Selections (PWTB)          | Answer: No |
| d. Grade GS-13                          |            |
| i. Qualified Internal Applicants (PWTB) | Answer: No |
| ii. Internal Selections (PWTB)          | Answer: No |
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: Yes |
| b. New Hires to GS-15 (PWD) | Answer: Yes |
| c. New Hires to GS-14 (PWD) | Answer: Yes |
| d. New Hires to GS-13 (PWD) | Answer: Yes |
- Among all senior grade levels, 0.0 Percent of New Hires identified as PWD.
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: Yes |
| b. New Hires to GS-15 (PWTB) | Answer: Yes |
| c. New Hires to GS-14 (PWTB) | Answer: Yes |
| d. New Hires to GS-13 (PWTB) | Answer: Yes |
- Among all senior grade levels, 0.0 Percent of New Hires identified as PWTB.
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: No |
| ii. Internal Selections (PWD)          | Answer: No |
- b. Managers
- |  |            |
|--|------------|
| i. Qualified Internal Applicants (PWD) | Answer: No |
| ii. Internal Selections (PWD)          | Answer: No |
- c. Supervisors
- |  |            |
|--|------------|
| i. Qualified Internal Applicants (PWD) | Answer: No |
| ii. Internal Selections (PWD)          | Answer: No |
6. Does your agency have a trigger involving PWTB 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: No

ii. Internal Selections (PWTD) Answer: No

b. Managers

i. Qualified Internal Applicants (PWTD) Answer: Yes

ii. Internal Selections (PWTD) Answer: No

c. Supervisors

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

• Among those designated as Managers, who applied for internal promotion, 0.0 Percent identified as PWTD, compared to 6.25 Percent eligible to apply.

NOTE: Manager or supervisor is a designation identified at the employee level, within the employee system of record.

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: Yes

c. New Hires for Supervisors (PWD) Answer: Yes

• Among Executive New hires, 0.0 Percent identified as PWD, compared to 16.67 Percent who applied.

• Among New hires, later designated as managers, 0.0 Percent identified as PWD.

• Among New hires, late designated as supervisors, 0.0 Percent identified as PWD.

NOTE: Manager or supervisor is a designation identified at the employee level, within the employee system of record.

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: Yes

b. New Hires for Managers (PWTD) Answer: Yes

c. New Hires for Supervisors (PWTD) Answer: Yes

• Among Executive New hires, 0.0 Percent identified as PWTD.

• Among New hires, later designated as managers, 0.0 Percent identified as PWTD.

• Among New hires, late designated as supervisors, 0.0 Percent identified as PWTD.

NOTE: Manager or supervisor is a designation identified at the employee level, within the employee system of record.

## 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

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

Separations	Total (Number)	Reportable Disabilities (Percentage)	Without Reportable Disabilities (Percentage)
-------------	----------------	--------------------------------------	--

3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If "yes", describe the trigger(s) in the text box.

a. Voluntary Separations (PWTD)

Answer: Yes

b. Involuntary Separations (PWTD)

Answer: No

- Employees who identified as a PWTD voluntarily separated at a rate of 11.54 Percent, compared to 4.88 Percent Persons Without Disability.

Separations	Total (Number)	Targeted Disabilities (Percentage)	Without Targeted Disabilities (Percentage)
-------------	----------------	------------------------------------	--

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 FY25 Exit Survey results indicated the following as the Top 5 Reasons to separate from the organization, among individuals who identified as a PWD\*:

1. My agency's telework opportunities
2. Opportunities for job changes
3. The degree of toxicity/hostility within the workplace
4. Ability to balance work with my life outside of work
5. Organizational change (restructuring, reorganization)

\*NOTE: The Exit Survey is a voluntary survey, where not all employees who separate provide a response on the Exit Survey.

### 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/>

Employees or applicants are asked to describe the nature of the problem, the URL of the page they are having difficulty accessing, and their

contact information to the Office of Public Affairs at (703) 808-1198 or by fax at (703) 808-1171. Also, NRO lists the Rehabilitation Act information on each job posting (statement below). Job listings are available at <https://www.nro.gov/Careers/job-listings/>.

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/>.

If employees believe an NRO facility designed, built, altered, or leased with Federal funds does not comply with Architectural Barriers Act requirements, users are instructed to refer to the U.S. Access Board's website for more information, including filing a complaint via: [www.access-board.gov/enforcement/](http://www.access-board.gov/enforcement/)

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.

OEEEO funded accessibility audits at three facilities in FY25; a total four to date. In FY26, OEEEO is working with these sites on accessibility improvement projects informed by the audit findings. We plan to conduct 1-2 additional site audits in FY26. Additionally, in the immediate future we will deploy upgraded video phones for deaf/hard-of-hearing clients in the Spring 2026.

### 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.)

Defining 'processing' as 'open' to 'fulfilled', the average processing time for NRO Cadre requests in FY25 was 26 calendar days.

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

The program responds to hundreds of accommodation requests from sites around the world, addressing the needs of a hybrid workforce spanning NRO Cadre, Other Government Agency assignees and detailees, and contractors. The program effectively works with Facilities and IT counterparts to identify appropriate accommodations spanning furniture to work modifications to assistive technology.

In FY25, our program received 208 RA requests; NRO Cadre were 49 of those. Across the program, case length averaged 49 calendar days. (NOTE: Of note, AAP will continue to strive for timely accommodation request processing. However, achieving and maintaining an 100 Percent on-time rate for all requests is highly unlikely due to the Agency's secure operating environment, additional cybersecurity requirements, and lengthy contract timelines to onboard certain technologies.

The program worked with NRO University in FY25 to incorporate a Reasonable Accommodations module into web-based training, "Essentials for NRO Supervisors".

In response to feedback toward improving service animal processing at building entrances, AAP issued updated guidance to Security personnel and briefed them on best practices. AAP independently initiated and issued updated Mobility Scooter guidance, policy, and scooter locations map in FY25.

The program continues to carry out OEEEO's accessibility audit initiative across multiple sites and aligning future building projects with ABA recommendations.

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

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

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

The program does not currently have any PAS requests.

PAS procedure would follow NRO Instruction 80-3-3 guidance. Employees or their designate can request PAS via the Equal Accessibility Services Environment (EASE) request management tool.

## 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: 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?

Answer: 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?

Answer: 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?

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

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