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

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

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

Section I: Efforts to Reach Regulatory Goals

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

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

In the cluster GS-11 and above, PWD are participating at a rate (8.36%) below the federal goal of 12%.

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

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.
   a. Cluster GS-1 to GS-10 (PWTD) Answer: No
   b. Cluster GS-11 to SES (PWTD) Answer: Yes

In the cluster GS-11 to SES, PWTD are participating at a rate 1.86% below the federal goal of 2%.

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

   Goals are communicated yearly through our outreach visits to the various business units.

Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the agency has in place.
A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR DISABILITY PROGRAM

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If “no”, describe the agency’s plan to improve the staffing for the upcoming year.

   Answer: Yes

2. Identify all staff responsible for implementing the agency’s disability employment program by the office, staff employment status, and responsible official.

<table>
<thead>
<tr>
<th>Disability Program Task</th>
<th># of FTE Staff by Employment Status</th>
<th>Responsible Official</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Full Time</td>
<td>Part Time</td>
</tr>
<tr>
<td>Processing applications from PWD and PWTD</td>
<td>6</td>
<td>0</td>
</tr>
<tr>
<td>Answering questions from the public about hiring authorities that take disability into account</td>
<td>6</td>
<td>0</td>
</tr>
<tr>
<td>Processing reasonable accommodation requests from applicants and employees</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>Section 508 Compliance</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>Architectural Barriers Act Compliance</td>
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<td>0</td>
</tr>
</tbody>
</table>

Pamela Roberts, HR Director, Pamela.S.Roberts@irsconsult.treas.gov and Staffing, Classification & Benefits Branch

Pamela Roberts, HR Director, Pamela.S.Roberts@irsconsult.treas.gov and Staffing, Classification & Benefits Branch

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Gregg Hofmaster, Executive Assistant, CC: Finance & Management Gregg.N.Hofmaster@irsconsult.treas.gov
<table>
<thead>
<tr>
<th>Disability Program Task</th>
<th># of FTE Staff by Employment Status</th>
<th>Responsible Official (Name, Title, Office, Email)</th>
</tr>
</thead>
</table>
| Special Emphasis Program for PWD and PWTD    | Full Time: 2  Part Time: 0  Collateral Duty: 0 | Susan Magee, EEO Manager, IRS-CC, Susan.EMagee@irsconsl.treasury.gov  
Keona Hill, EEO Specialist, IRS-CC, Keona.L.Hill@irsconsl.treasury.gov |

3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If “yes”, describe the training(s) that disability program staff have received. If “no”, describe the training(s) planned for the upcoming year.

Answer: No

Disability Law training or attendance at EXCEL is planned for the upcoming year.

**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**

The agency has not reported any program deficiencies involving 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 APPLICANTS WITH DISABILITIES**
1. Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.

We use the Workforce Recruitment Program and the various veterans’ placement program as sources of applicants with disabilities. We get many unsolicited job applicants. Efforts are underway to organize these applications in an efficient, user-friendly manner and hope to have the project completed during FY2018.

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.

Schedule A is available for use along with Veteran Appointment Authorities to non-competitively appoint PWD and PWTD and veterans with service-connected disability rating of 30% or more.

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.

When individuals apply utilizing the Schedule A Hiring Authority, their applications are reviewed by the servicing HR Specialist who confirms that the applicants meet the qualification requirements of the announced position and have provided required proof of disability. Applicants applying under the Schedule A Hiring Authority who are deemed qualified are referred to the hiring manager on a Schedule A certificate of eligibility with guidance on selection procedures including the application of veterans’ preference, when applicable. Managers have the option to interview and/or hire from the Schedule A certificate or to consider other candidates from other issued certificates (Merit Promotion, Non-Competitive, VRA, etc.).

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: Yes

The Human Resources Division publicizes fact sheets regarding special hiring authorities (including PWD, veterans, and disabled veterans) on a manager’s only SharePoint website. The fact sheets define the specific hiring authority, eligibility requirements for appointment, documentation required, benefits to the hiring manager, and links to additional information. Information regarding special hiring authorities is distributed periodically to Area Managers, Executives, Executive Assistants, and Administrative Officers via email along with a link to the SharePoint site.

**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.

We plan to establish contacts with Disabled Student Services’ Offices at the law schools we recruit at to reach and attract law students with disabilities.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

PWTD represented 1.54% of Counsel’s permanent workforce hires, falling just under the 2% benchmark.

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.
   a. New Hires for MCO (PWD) Answer: Yes
   b. New Hires for MCO (PWTD) Answer: Yes

In FY 2017 IRS-CC hired 25 Attorneys (2 PWD, 0 PWTD) and 28 Paralegals (3 PWD and 1 PWTD).

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.
   a. Qualified Applicants for MCO (PWD) Answer: No
   b. Qualified Applicants for MCO (PWTD) Answer: No

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

This is not an FY 2017 reporting requirement. IRS-CC will be taking appropriate steps to be able to report this information as part of the FY 2018 reporting period.

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.

All training and development opportunities are advertised Counsel-wide. Reasonable accommodations are made for all training.

**B. CAREER DEVELOPMENT OPPORTUNITIES**

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

IRS-CC does not have a formal CDP program.

2. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.
   
   a. Applicants (PWD)  Answer: No
   b. Selections (PWD)  Answer: No

IRS-CC does not have a formal CDP program.

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

   a. Applicants (PWTD)  Answer: No
   b. Selections (PWTD)  Answer: No

IRS-CC does not have a formal CDP program.

**C. AWARDS**
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.

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

The inclusion rate for PWD (22.58%) and PWTD (23.40%) in cash awards of $500 or less, fell below the inclusion rate for employees with no disability (24.02%). The inclusion rate for PWD (36.40%) and PWTD (46.80%) fell below the inclusion rate for employees with no disability (62.90%) for cash awards of $501 and greater.

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

   a. Pay Increases (PWD) Answer: No
   b. Pay Increases (PWTD) Answer: No

Counsel doesn't use quality step increases.

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.

   a. SES
      i. Qualified Internal Applicants (PWD) Answer: No
      ii. Internal Selections (PWD) Answer: No

   b. Grade GS-15
      i. Qualified Internal Applicants (PWD) Answer: No
      ii. Internal Selections (PWD) Answer: No

   c. Grade GS-14
      i. Qualified Internal Applicants (PWD) Answer: No
      ii. Internal Selections (PWD) Answer: No

   d. Grade GS-13
      i. Qualified Internal Applicants (PWD) Answer: No
      ii. Internal Selections (PWD) Answer: No

This is not an FY 2017 reporting requirement. Treasury and its bureaus will be taking appropriate steps to be able to report this information as part of the FY 2018 reporting period.
2. Does your agency have a trigger involving PWTD among the qualified *internal* applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

   a. SES
      i. Qualified Internal Applicants (PWTD) Answer: No
      ii. Internal Selections (PWTD) Answer: No
   b. Grade GS-15
      i. Qualified Internal Applicants (PWTD) Answer: No
      ii. Internal Selections (PWTD) Answer: No
   c. Grade GS-14
      i. Qualified Internal Applicants (PWTD) Answer: No
      ii. Internal Selections (PWTD) Answer: No
   d. Grade GS-13
      i. Qualified Internal Applicants (PWTD) Answer: No
      ii. Internal Selections (PWTD) Answer: No

This is not an FY 2017 reporting requirement. Treasury and its bureaus will be taking appropriate steps to be able to report this information as part of the FY 2018 reporting period.

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

   a. New Hires to SES (PWD) Answer: No
   b. New Hires to GS-15 (PWD) Answer: No
   c. New Hires to GS-14 (PWD) Answer: No
   d. New Hires to GS-13 (PWD) Answer: No

This is not an FY 2017 reporting requirement. Treasury and its bureaus will be taking appropriate steps to be able to report this information as part of the FY 2018 reporting period.
4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

   a. New Hires to SES (PWTD) Answer: No
   b. New Hires to GS-15 (PWTD) Answer: No
   c. New Hires to GS-14 (PWTD) Answer: No
   d. New Hires to GS-13 (PWTD) Answer: No

   This is not an FY 2017 reporting requirement. Treasury and its bureaus will be taking appropriate steps to be able to report this information as part of the FY 2018 reporting period.

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

   a. Executives
      i. Qualified Internal Applicants (PWD) Answer: No
      ii. Internal Selections (PWD) Answer: No

   b. Managers
      i. Qualified Internal Applicants (PWD) Answer: No
      ii. Internal Selections (PWD) Answer: No

   c. Supervisors
      i. Qualified Internal Applicants (PWD) Answer: No
      ii. Internal Selections (PWD) Answer: No

   This is not an FY 2017 reporting requirement. Treasury and its bureaus will be taking appropriate steps to be able to report this information as part of the FY 2018 reporting period.
6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.
   a. Executives
      i. Qualified Internal Applicants (PWTD) Answer: No
      ii. Internal Selections (PWTD) Answer: No
   b. Managers
      i. Qualified Internal Applicants (PWTD) Answer: No
      ii. Internal Selections (PWTD) Answer: No
   c. Supervisors
      i. Qualified Internal Applicants (PWTD) Answer: No
      ii. Internal Selections (PWTD) Answer: No

This is not an FY 2017 reporting requirement. Treasury and its bureaus will be taking appropriate steps to be able to report this information as part of the FY 2018 reporting period.

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

This is not an FY 2017 reporting requirement. Treasury and its bureaus will be taking appropriate steps to be able to report this information as part of the FY 2018 reporting period.

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

This is not an FY 2017 reporting requirement. Treasury and its bureaus will be taking appropriate steps to be able to report this information as part of the FY 2018 reporting period.
Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

   Answer: N/A

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

   The inclusion rate for PWD (13.36%) exceeded the inclusion rate of persons with no disability (7.75%) for voluntary separations. There was only one involuntary separation, a PWD.

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

   The inclusion rate for PWTD (12.76%) exceeded the inclusion rate of persons with no disability (7.75%) for voluntary separations.

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

   Our initial assessment is many of the separations of PWD and PWTD were retirements. We analyzed data provided by our Payroll and Processing Division. Measures need to be taken to increase separating employees’ completion of the exit interview.

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

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

Our agency doesn't have a public website.

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.

Our agency doesn't have a public website.

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.

IRS-CC doesn't have any identifiable accessibility or technical issues that need to be addressed at this time.

C. REASONABLE ACCOMMODATION PROGRAM

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

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

The average processing time for reasonable accommodations requested in FY 2017 was 24-48 hours from the date of receipt until the request left our office for further processing. The average processing time for requests after leaving our office and being processed by external offices was 28 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.

Counsel timely processed 145 reasonable accommodation requests in FY 2017. The average processing time for requests was 24-48 hours from the date of receipt until the request left our office for further processing. The average processing time for requests after leaving our office and being processed by external offices was 28 days. We conducted training for managers and supervisors on reasonable accommodation in Fundamentals of Leadership and Management training and Continuing Management Education training. During the reporting season, we also worked to
create a Reasonable Accommodation SharePoint website to track our accommodation requests and provide access to status updates to managers.

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

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

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

OPM established the requirement for Personal Assistance Services to be implemented in January 2018. For FY 2017, IRS-CC did not receive any requests for personal assistance services. During FY 2018, first quarter, Treasury EEO established a Personal Assistance Services (PAS) Working Group of which IRS-CC is a participant. The initial purpose of this working group is to establish and finalize a Statement of Work (SOW) for procuring a Treasury-wide PAS contact. This contract will allow IRS-CC to establish a purchase order against the Treasury-wide base contract. While the PAS contract is being established, the PAS working group will create the PAS policy and procedures. In the interim, the IRS-CC will follow existing reasonable accommodation policy and procedures to provide PAS.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

   Answer: No

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

   Answer: No

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION
1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?
   
   Answer: 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.

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: No

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.
<table>
<thead>
<tr>
<th>Trigger</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Barrier(s)</td>
<td></td>
</tr>
<tr>
<td>Objective(s)</td>
<td></td>
</tr>
<tr>
<td><strong>Responsible Official(s)</strong></td>
<td><strong>Performance Standards Address the Plan?</strong> (Yes or No)</td>
</tr>
<tr>
<td><strong>Barrier Analysis Process Completed?</strong> (Yes or No)</td>
<td><strong>Barrier(s) Identified?</strong> (Yes or No)</td>
</tr>
<tr>
<td><strong>Sources of Data</strong></td>
<td><strong>Sources Reviewed?</strong> (Yes or No)</td>
</tr>
<tr>
<td>Workforce Data Tables</td>
<td></td>
</tr>
<tr>
<td>Complaint Data (Trends)</td>
<td></td>
</tr>
<tr>
<td>Grievance Data (Trends)</td>
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<td>Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)</td>
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<td>Climate Assessment Survey (e.g., FEVS)</td>
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<td>Exit Interview Data</td>
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<td>Focus Groups</td>
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<td>Interviews</td>
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<td>Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)</td>
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<td>Other (Please Describe)</td>
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<tr>
<td><strong>Target Date (mm/dd/yyyy)</strong></td>
<td><strong>Planned Activities</strong></td>
</tr>
<tr>
<td>Fiscal Year</td>
<td><strong>Accomplishments</strong></td>
</tr>
</tbody>
</table>
4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

No identified barrier.

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

No identified barrier.

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.

No identified barrier.