

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

Pension Benefit Guaranty Corporation - 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: Yes

PWD reflects a trigger at GS-15 grade level at 8.33 Percent and SL grade level (Other Senior Pay – Non-SES) at 8.82 Percent which falls under the 12 Percent PWD benchmark and is reflected in the chart below.

* 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

Where there is representation, we have determined there is not a trigger for grade level cluster GS-01 through GS-10. In the cluster GS-11 to SL, grades GS-11 through GS-15 were also at or above the PWTD 2 Percent goal. SL representation reflects a trigger because there is no representation at the SL level for PWTD.

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	807	130	16.11	33	4.09
Grades GS-1 to GS-10	28	8	28.57	2	7.14

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

The agency communicated its numerical goals through presentations to Senior Leadership and the Executive Management Committee (EMC) during the State of the Agency briefing held on May 1, 2025, and the goals are also documented in the agency's MD-715 report.

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)
Architectural Barriers Act Compliance	1	0	0	Alisa Cottone, Director, Workplace Solutions,
Processing applications from PWD and PWTD	12	0	0	Belinda Thomas-Blackwell Supervisory HR Specialist
Special Emphasis Program for PWD and PWTD	0	0	0	
Processing reasonable accommodation requests from applicants and employees	1	0	0	Roderick Duncan, ator, HRD Reasonable Accommodation Coordinator, HRD
Section 508 Compliance	0	0	9	Angela Watkins ce Team Chair IT Specialist and Section 508 Compliance watkins.angela@pbgc.gov
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Tamara Jackson Selective Placement Program jackson.tamara@pbgc.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 that disability program staff have received. If "no", describe the training planned for the upcoming year.

Answer: Yes

Staff members attended The Department of Veterans Affairs-VRE training courses titled: The Rumor Game on November 19, 2024.

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

HRD manages a centralized budget set aside to purchase items needed for reasonable accommodation.

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.

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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.

The Selective Placement Program Coordinator (SPPC) receives inquiries from job applicants with disabilities, including individuals with targeted disabilities daily via email and forwards Schedule A letters and resumes to the agency's disability program staffing specialist. The staffing specialist determines which hiring authorities the applicant is eligible for and whether the applicant is minimally qualified for the position. The staffing specialist then refers eligible and minimally qualified applicants to the hiring official with an explanation of how they should be considered.

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.

SPPC receives inquiries from job applicants with disabilities, including individuals with targeted disabilities daily via email and forwards Schedule A letters and resumes to the agency's disability program staffing specialist. The staffing specialist determines which hiring authorities the applicant is eligible for and whether the applicant is minimally qualified for the position. The staffing specialist then refers eligible and minimally qualified applicants to the hiring official with an explanation of how they should be considered.

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

SPPC incorporated Schedule A Hiring Authority into the PBGC managers and supervisors training. The SPPC made this a mandatory component of the "refresher" virtual reasonable accommodation training. The frequency of the training occurs once a year and the reasonable accommodation portion training is included in the new employee orientation.

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 Staffing and Classification Division attends career fairs specifically targeted at disabled veterans, including veterans with targeted disabilities. Hiring opportunities, the application process, and the various hiring authorities under which the attendees might be eligible are discussed at the career fair. The Human Resources Department has established a partnership with Veterans Affairs (VA) Veterans Readiness and Employment (VR&E). Through this partnership, the Staffing and Classification Division accepts resumes from disabled veterans including those with targeted disabilities and determines which candidates are eligible for noncompetitive referral under specific hiring authorities. Prior to the 2025 hiring freeze, PBGC hired two PWD veterans for senior-level, mission-critical positions. During the same period, five PWD veterans separated from the agency, including three from mission-critical roles (two General Attorneys and one IT Specialist).

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: No

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	439	11.85	0.23	5.47	0.00
% of Qualified Applicants	191	12.04	0.00	6.28	0.00
% of New Hires	3	33.33	0.00	33.33	0.00

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: No
- b. New Hires for MCO (PWTD) Answer: No

New Hires to Mission-Critical Occupations	Total (Number)	Reportable Disability New Hires (Percentage)	Targetable Disability New Hires (Percentage)
Numerical Goal	--	12%	2%
0905 GENERAL ATTORNEY	1	100.00	100.00
2210 INFORMATION TECHNOLOGY SPECIALIST	1	0.00	0.00

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: 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. 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: No
- b. Promotions for MCO (PWTD) Answer: No

However, an exception includes 2210 Information Technology Specialist. Based on the qualified, referred and interviewed internal applicants, no PWDs or PWTD were selected.

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.

PBGC provides access to career development, internal advancement, and leadership opportunities for employees with disabilities and employees with targeted disabilities by offering reasonable accommodations, targeted training, and non-competitive hiring authorities.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

In early FY 2025, PBGC offered several career development programs that required supervisory approval rather than a competitive application process. These included Project Management Certification and executive or conflict coaching, internal detail opportunities and the Pathways Program and Professional development for employees at all grade levels, including the Emerging Leaders Program (ELP).

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)
Fellowship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Detail Programs	N/A	N/A	N/A	N/A	N/A	N/A
Mentoring Programs	N/A	N/A	N/A	N/A	N/A	N/A
Other Career Development Programs	N/A	N/A	N/A	N/A	N/A	N/A
Coaching Programs	26	26	N/A	N/A	N/A	N/A
Training Programs	N/A	N/A	N/A	N/A	N/A	N/A
Internship Programs	261	5	N/A	N/A	N/A	N/A

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: No
- b. Selections (PWD) Answer: No

Not applicable. The Agency does not have career development programs that require competition.

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

Not applicable. The Agency does not have career development programs that require competition.

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

A trigger was identified within the \$3,000 to \$3,999 cash award category, where the inclusion rate for PWD was 10.34 Percent less than half the 23.81 Percent rate for employees without disabilities. Similarly, a trigger exists for PWTD in this same award bracket, as their inclusion rate of 11.11 Percent falls significantly below the 23.81 Percent benchmark for their non-disabled peers.

In the cash awards \$500 and under category, a trigger was also identified for PWTD. The inclusion rate of 11.11 Percent is substantially lower than the 28.51 Percent rate for employees without disabilities, indicating a potential disparity in lower-level recognition.

Regarding time-off awards, a trigger was identified in the 21–30-hour range. While the majority of the agency's time-off awards are distributed in the 31–40-hour range, the inclusion rate for PWTD in the 21–30-hour bracket is 0.00 Percent, compared to 1.09 Percent for persons without disabilities. Because no employees within the PWTD cohort received this specific award, it constitutes a zero-rate trigger.

Time-Off Awards	Total (Number)	Reportable Disability (Percentage)	Without Reportable Disability (Percentage)	Targeted Disability (Percentage)	Without Targeted Disability (Percentage)
Time-Off Awards 1 - 10 hours: Awards Given	24.00	12.50	87.50	4.17	95.83
Time-Off Awards 1 - 10 Hours: Total Hours	196.00	12.24	87.76	4.08	95.92
Time-Off Awards 1 - 10 Hours: Average Hours	8.17	8.00	8.19	8.00	8.17
Time-Off Awards 11 - 20 hours: Awards Given	21.00	14.29	85.71	4.76	95.24
Time-Off Awards 11 - 20 Hours: Total Hours	348.00	16.09	83.91	4.60	95.40
Time-Off Awards 11 - 20 Hours: Average Hours	16.57	18.67	16.22	16.00	16.60
Time-Off Awards 21 - 30 hours: Awards Given	13.00	15.38	84.62	0.00	100.00
Time-Off Awards 21 - 30 Hours: Total Hours	312.00	15.38	84.62	0.00	100.00
Time-Off Awards 21 - 30 Hours: Average Hours	24.00	24.00	24.00	0.00	24.00
Time-Off Awards 31 - 40 hours: Awards Given	1028.00	16.54	83.46	4.38	95.62
Time-Off Awards 31 - 40 Hours: Total Hours	4118.00	16.54	83.46	4.38	95.62
Time-Off Awards 31 - 40 Hours: Average Hours	40.00	40.00	40.00	40.00	40.00
Time-Off Awards 41 or more Hours: Awards Given	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0.00	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	0.00	0.00	0.00	0.00	0.00

Cash Awards	Total (Number)	Reportable Disability (Percentage)	Without Reportable Disability (Percentage)	Targeted Disability (Percentage)	Without Targeted Disability (Percentage)
Cash Awards \$500 and Under: Awards Given	267.00	16.48	83.52	1.50	98.50
Cash Awards \$500 and Under: Total Amount	125200.00	16.85	83.15	1.60	98.40
Cash Awards \$500 and Under: Average Amount	468.91	479.55	466.82	500.00	468.44
Cash Awards: \$501 - \$999: Awards Given	221.00	12.22	87.78	3.17	96.83
Cash Awards: \$501 - \$999: Total Amount	162187.00	11.99	88.01	3.14	96.86
Cash Awards: \$501 - \$999: Average Amount	733.88	720.00	735.81	727.86	734.07
Cash Awards: \$1000 - \$1999: Awards Given	647.00	17.77	82.23	4.02	95.98
Cash Awards: \$1000 - \$1999: Total Amount	881008.00	17.77	82.23	4.10	95.90
Cash Awards: \$1000 - \$1999: Average Amount	1361.68	1361.63	1361.69	1390.38	1360.48
Cash Awards: \$2000 - \$2999: Awards Given	660.00	15.76	84.24	4.09	95.91
Cash Awards: \$2000 - \$2999: Total Amount	1745184.00	16.00	84.00	4.05	95.95
Cash Awards: \$2000 - \$2999: Average Amount	2644.22	2684.54	2636.68	2620.00	2645.25
Cash Awards: \$3000 - \$3999: Awards Given	210.00	7.14	92.86	1.90	98.10
Cash Awards: \$3000 - \$3999: Total Amount	693316.00	7.08	92.92	1.83	98.17
Cash Awards: \$3000 - \$3999: Average Amount	3301.50	3273.33	3303.67	3175.00	3303.96
Cash Awards: \$4000 - \$4999: Awards Given	5.00	0.00	100.00	0.00	100.00
Cash Awards: \$4000 - \$4999: Total Amount	21500.00	0.00	100.00	0.00	100.00
Cash Awards: \$4000 - \$4999: Average Amount	4300.00	0.00	4300.00	0.00	4300.00
Cash Awards: \$5000 or more: Awards Given	54.00	9.26	90.74	0.00	100.00
Cash Awards: \$5000 or more: Total Amount	443200.00	9.93	90.07	0.00	100.00
Cash Awards: \$5000 or more: Average Amount	8207.41	8800.00	8146.94	0.00	8207.41

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 (PWTB)

Answer: No

b. Pay Increases (PWTB)

Answer: No

Other Awards	Total (Number)	Reportable Disability (Percentage)	Without Reportable Disability (Percentage)	Targeted Disability (Percentage)	Without Targeted Disability (Percentage)
Total Performance Based Pay Increases Awarded	30.00	10.00	90.00	0.00	100.00

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If "yes", describe the employee recognition program and relevant data in the text box.

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

D. PROMOTIONS

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

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

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 (PWTD) Answer: No
 - ii. Internal Selections (PWTD) Answer: No
- c. Grade GS-14

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

A trigger was identified regarding internal selections at the GS-14 level. Specifically, of the 14 internal selections made during this period, none were individuals with targeted disabilities (PWTD), despite 11 qualified applicants being PWTD. This disparity warrants further review of the applicant pool and selection process.

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 |

A trigger could not be determined for the GS-13, GS-15, and SES (SL) levels because no new hires were made in these categories during the 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. 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: 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 |

No triggers could be determined for this category as there were no selections made during the 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. 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 |

No triggers could be determined for this category as there were no selections made during the 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. 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: No
- ii. Internal Selections (PWTD) Answer: No

c. Supervisors

- i. Qualified Internal Applicants (PWTD) Answer: No
- ii. Internal Selections (PWTD) Answer: No

No triggers could be determined for this category as there were no selections made during the 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. 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: No
- b. New Hires for Managers (PWD) Answer: No
- c. New Hires for Supervisors (PWD) Answer: No

No triggers could be determined for this category as there were no selections made during the reporting period. No vacancy announcements for executives and managers.

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

No triggers could be determined for this category as there were no selections made during the reporting period. No vacancy announcements for executives and managers.

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

- 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: Yes

- 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: Yes

Involuntary Separations: A trigger exists for involuntary separations; the inclusion rate for PWD was 4.83 Percent, compared to an inclusion rate of 1.22 Percent for PWOD.

Separations	Total (Number)	Reportable Disabilities (Percentage)	Without Reportable Disabilities (Percentage)
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	0	0.00	0.00
Permanent Workforce: Resignation	0	0.00	0.00
Permanent Workforce: Retirement	0	0.00	0.00
Permanent Workforce: Other Separations	0	0.00	0.00
Permanent Workforce: Total Separations	0	0.00	0.00

- 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: No

b. Involuntary Separations (PWTD)

Answer: Yes

Involuntary Separations: A trigger was also identified for the PWTD group within involuntary separations. The PWTD inclusion rate of 2.78 Percent is higher than the 1.22 Percent rate for PWOTD.

Separations	Total (Number)	Targeted Disabilities (Percentage)	Without Targeted Disabilities (Percentage)
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	0	0.00	0.00
Permanent Workforce: Resignation	0	0.00	0.00
Permanent Workforce: Retirement	0	0.00	0.00
Permanent Workforce: Other Separations	0	0.00	0.00
Permanent Workforce: Total Separations	0	0.00	0.00

- 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 Office of Equal Employment Opportunity (OEEEO) does not have access to exit interview results; therefore, it cannot directly assess employee-reported reasons for separation. However, based on available personnel data, several factors contributed to separation activity among PWD and PWTB during the reporting period. These factors include resignations, retirements, retirement incentives, the expiration of time-limited student appointments, and, in rare instances, death.

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.

In compliance with Section 508 of the Rehabilitation Act, PBGC is committed to ensuring its web pages are accessible to everyone, including individuals with disabilities. In accordance with our accessibility policies, the Agency takes all necessary steps to ensure effective communication with applicants, participants, federal personnel, and the public.

When experiencing accessibility issues while navigating pbgc.gov, the Webmaster at webmaster@pbgc.gov should be contacted (per PBGC Website Policies and Procedures).

Users requiring assistive technology (such as a screen reader, Braille reader, or TTY) to access website materials should contact the PBGC Webmaster at webmaster@pbgc.gov or 202-326-4343. When contacting the following information should be provided:

The nature of the accessibility problem.
Your preferred format for receiving the material.
The specific web address (URL) of the requested material.
Your contact information.

Telecommunications Support Users requiring accessibility assistance can also contact the Federal Information Relay Service at 1-800-400-7242 for TTY/Voice communication. TTY/ASCII users may also dial 711.

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.

The following link is information on Architectural Barriers: <http://www.pbgc.gov/about/pg/footer/aba>

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.

PBGC remains committed to ensuring full physical access to its facilities for individuals with disabilities. Supporting this mission, the Agency's Section 508 Compliance Team, composed of representatives from various departments, continues to raise disability awareness through the PBGC Tech U Learning Series. This year-round program provides live, hands-on virtual courses designed to help employees create internal and external communications that are fully accessible.

Additionally, the team hosts the annual "Mission Accessible" series during the final week of National Disability Employment Awareness Month in October. This initiative promotes empathy and highlights how Information, Communication, and Technology (ICT) can be used to support the independence and professional capabilities of employees with disabilities within the federal workspace.

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.)

30 working 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.

1. PBGC effectively operates a Reasonable Accommodation (RA) Program for qualified individuals with disabilities, supported by a centralized RA fund and a designated Reasonable Accommodation Coordinator.
2. During FY 2025, PBGC received and timely processed 100 Percent (208 out of 208) of reasonable accommodation requests.
3. PBGC actively collaborates with the Job Accommodation Network (JAN) to identify best practices and solutions for employee needs.
4. PBGC ensures easy access to interpreter services for applicants and employees who are deaf or hard of hearing through the continued operation of its Interpreter Services Program.
5. PBGC maintains information about the Workforce Recruitment Program and the Reasonable Accommodation Program on the Human Resources Department (HRD) intranet page.
6. PBGC has relocated to a GSA building. Should accommodations for deaf or hard-of-hearing visitors be requested, the Agency will coordinate with the Physical Security Department within Workplace Solutions (WSD).
7. PBGC maintains an annual mandatory RA training requirement for all supervisors and managers. Multiple training sessions were hosted and delivered during this reporting period.
8. The HRD Reasonable Accommodation brochure is provided to all new hires during New Employee Orientation (NEO). Additionally, the RA Coordinator briefs all new employees on procedures during NEO. This information is also permanently available on the Agency's intranet via the Employee and Labor Relations Management Division (ELRMD) and on the public website.

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 Personal Assistance Services (PAS) policy is integrated into the broader Reasonable Accommodations Policy. Both policies received EEOC approval in FY 2019 and are maintained on the PBGC intranet. Additionally, PAS training was incorporated into the mandatory FY 2025 Reasonable Accommodation training for all supervisors.

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.

Answer to question 1. During FY 2025, 66 Percent of complaints alleging non-sexual harassment, exceeded the 25.37 Percent governmentwide average for disability-based harassment complaints.

Yes, the Agency had one finding of discrimination involving a failure to provide a reasonable accommodation during the last fiscal year. Corrective actions included a compensatory damage payment, attorney fees, leave restoration, Reasonable Accommodation training for HRD staff, and a 90-day posting of the notice of finding.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer: No

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

Answer: Yes

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.

Answer to question 1. During FY 2025, 33 Percent of complaints filed at PBGC alleged a failure to provide reasonable accommodation. This rate is notably lower than the government-wide average of 47.30 Percent.

Yes, the Agency had one finding of discrimination involving a failure to provide a reasonable accommodation during the last fiscal year. Corrective actions included a compensatory damages payment, attorney fees, leave restoration, Reasonable Accommodation training for HRD staff, and a 90-day posting of the notice of finding.

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

Source of the Trigger 1 (Workforce Data Table, Complaints data, FEVS, or other sources)

Source	Workforce Data (if so identify the table)
Specific Workforce Data Table	Workforce Data Table - B1
Statement of Condition that was a Trigger for a Potential Barrier: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	A trigger has been identified regarding the representation of Persons with Disabilities (PWD) and Persons with Targeted Disabilities (PWTD) in the workforce compared to their representation in senior-level and high-grade positions
Barrier Analysis Process Completed?	N
Barrier(s) Identified?	N

Statement of Identified Barrier:

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

Description of Policy, Procedure, or Practice

Objective(s) and Dates for EEO Plan

Date Initiated	10/01/2026
Target Date	10/01/2028
Sufficient Funding / Staffing?	Yes
Date Modified	
Date Completed	
Objective Description	To identify, analyze, and eliminate barriers that impact the recruitment, advancement, and retention of PWD and PWTD within the workforce.

Responsible Official(s)

Title	Acting OEEEO Director
Name	Hope Fuller
Standards Address The Plan?	Yes
Title	Agency Leadership
Name	Various Individuals
Standards Address The Plan?	Yes
Title	HRD

Name	HRD
Standards Address The Plan?	Yes

Planned Activities Toward Completion of Objective

Target Date	09/30/2027
Planned Activities	HRD will continue to provide training on disability related topics, including reasonable accommodations training for managers/supervisors and employees.
Sufficient Staffing & Funding?	Yes

Modified Date

Completion Date

Target Date	09/30/2027
Planned Activities	The agency will continue to operate a robust inter-departmental Section 508 Compliance Team and offer hands-on Section 508 accessibility training and awareness to all employees.
Sufficient Staffing & Funding?	Yes

Modified Date

Completion Date

Target Date	09/30/2027
Planned Activities	OEEO will continue to provide training opportunities on topics related to equal employment opportunity for all.
Sufficient Staffing & Funding?	Yes

Modified Date

Completion Date

Report of Accomplishments

Fiscal Year	2025
Accomplishment	The Human Resource Department continued to provide training on topics that included disability awareness.

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.

Not Applicable

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

Not Applicable

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.

OEEO will continue to conduct analysis to address the identified triggers.