

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

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

### Section I: Efforts to Reach Regulatory Goals

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

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

a. Cluster GS-1 to GS-10 (PWD) Answer    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		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-11 to SES					
Grades GS-1 to GS-10					

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

Offices and Divisions provide hiring goals to the Human Resources Organization (HRO), in turn the Talent Sourcing Team (TST) communicates the type of positions office and divisions plan to recruit.

### Section II: Model Disability Program

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

#### A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

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

Answer Yes

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Section 508 Compliance	1	0	0	Brook Aiken Section 508 Program Manager baiken@fdic.gov
Processing applications from PWD and PWTD	0	0	3	Mandy Singh Manager, Staffing, Classifications and Processing Operations msingh@fdic.gov
Special Emphasis Program for PWD and PWTD	1	0	0	Kara-Renée Pepin Disability Program Manager kpepin@fdic.gov
Answering questions from the public about hiring authorities that take disability into account	0	0	1	Roxana Flores Program Analyst rflores@fdic.gov
Processing reasonable accommodation requests from applicants and employees	4	0	0	Michelle Curry Reasonable Accommodations Program Manager michcurry@fdic.gov
Architectural Barriers Act Compliance	0	0	1	Gwenn Marley Chief, Space Planning Unit gmarley@fdic.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

Yes, the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period. Here are the two trainings: EEOC Disability Program Manager Training – This course outlines the roles and responsibilities of the Disability Program Manager and identifies some of the challenges faced. The main objective of a Disability Program Manager is to help agency management meet its affirmative employment responsibilities to ensure employment opportunities for persons with disabilities. FDIC Reasonable Accommodations Training – This online training provides supervisors and managers the tools needed to understand FDIC processes and policies regarding reasonable accommodations. This course is designed to provide supervisors with the tools and resources they need to effectively address reasonable accommodation requests from employees.

## 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

<b>Brief Description of Program Deficiency</b>	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.		
<b>Objective</b>	Obtain resources and implement strategies. In FY 2024, 83 percent of RA requests were timely. The RA program obtained temporary personnel support beginning November 2024. They also hired two full-time personnel to support the program in December 2024. The program implemented workforce optimization strategies, including the development of template responses for general inquiries and information submissions, as well as the creation of a new tracking system to monitor the length of pending cases.		
<b>Target Date</b>	Apr 30, 2025		
<b>Completion Date</b>	Apr 30, 2025		
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	

<b>Brief Description of Program Deficiency</b>	E.4.a.5. The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(4)]		
<b>Objective</b>	Migrate from SharePoint to ServiceNow, an internal, automated data collection system. The Reasonable Accommodation Program currently uses SharePoint while FDIC is in the process of building an automated system as required by EEOC.		
<b>Target Date</b>	Sep 30, 2024		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2024	We completed digitization of paper files; completion of requirements, user stories, and development of a system. Deployment was delayed due to Privacy Act concerns. FDIC is reevaluating the solution for additional controls and process improvements so that it can be implemented in calendar year 2025.	

## 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 FDIC participates in outreach that encompasses job applicants with disabilities. In 2024, FDIC recruiters participated in six events that included people with disabilities and 16 additional events focused on disabled veterans. The FDIC maintains relationships with 250 colleges and universities. Of those, 202 schools, or 80.8 percent, offer programs for persons with disabilities, and 46, or 18.4 percent, have been recognized for programs for persons with disabilities. Additionally, recruiters participated in the Federal Career Fair at Gallaudet University in Spring 2024.

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 FDIC utilizes Schedule A hiring authority 5 C.F.R. 213.3102 (u) for people with intellectual disabilities, severe physical disabilities or psychiatric disabilities. Agency vacancy announcements state that the agency is an equal opportunity employer and encourages candidates with disabilities to apply for all merit promotion recruitments external to the FDIC.

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.

See comments above, individuals are appointed to temporary, term, or permanent positions under the Schedule A hiring authority when there is a bona fide vacant position.

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 HRO provides guidance on Schedule A and other special hiring authorities to managers on an ongoing basis. This information may be provided during the recruitment consultation process and during HR client training sessions.

## 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 FDIC participates in outreach that includes potential job applicants with disabilities. In 2024, FDIC recruiters participated in six events for people with disabilities and 16 additional events for disabled veterans. The FDIC maintains relationships with 250 colleges and universities that includes schools offering programs for persons with disabilities. Additionally, recruiters participated in the Federal Career Fair at Gallaudet University in Spring 2024. In addition, the TST provides a notification of vacancy announcements for FDIC positions to multiple sources, including Vocational Rehabilitation Agencies for several states, the DC Department of Disability Services, Career Opportunities for Students with Disabilities, disABLEDPerson.com and Virginia Department for the Blind and Vision Impaired.

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

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

a. New Hires for Permanent Workforce (PWD) Answer Yes

b. New Hires for Permanent Workforce (PWTD) Answer Yes

PWD new hires were 7.98% and PWTD new hires were 1.06%.

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

% of Total Applicants	21279	4.57	1.98	2.20	0.87
% of Qualified Applicants	13538	4.58	1.91	2.13	0.81
% of New Hires	375	1.87	1.87	1.07	1.33

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

The qualified applicant pool benchmarks vary for each MCO, and the below listing identifies which MCOs showed less than expected participation, each exceeding the 1% trigger threshold for new hires. The Economist series had a qualified applicant pool benchmark of 6.10% (PWD) and 3.18% (PWTD). There were no new hires selected for PWD/PWTD. The Financial Administration and Program series had a qualified applicant pool benchmark of 3.70% (PWD) and 1.59% (PWTD). There were no new hires selected for PWD/PWTD. The Attorney series had a qualified applicant pool benchmark of 6.17% (PWD) and 2.33% (PWTD). There were no new hires selected for PWD/PWTD. The General Business series had a qualified applicant pool benchmark of 9.97% (PWD) and 4.00% (PWTD). There were no new hires selected for PWD/PWTD. The Financial Analysis series had a qualified applicant pool benchmark 4.66% (PWD) and 2.30% (PWTD). Here, PWD had a selection rate of 2.50% and PWTD had no new hires.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
0110 ECONOMIST	5	0.00	0.00
0501 FINANCIAL ADMINISTRATION AND PROGRAM	3	0.00	0.00
0570 FINANCIAL INSTITUTION EXAMINING	102	4.90	2.94
0905 ATTORNEY	52	0.00	0.00
1101 GENERAL BUSINESS AND INDUSTRY	17	0.00	0.00
1160 FINANCIAL ANALYSIS	40	2.50	0.00
2210 INFORMATION TECHNOLOGY SPECIALIST	14	7.14	7.14

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

a. Qualified Applicants for MCO (PWD) Answer Yes

b. Qualified Applicants for MCO (PWTD) Answer Yes

The relevant applicant pool benchmarks for qualified internal applicants are 14.38% (PWD) and 2.23% (PWTD) for each MCO series. The list below identifies which MCOs showed less than expected participation for PWD/PWTD, each exceeding the 1% trigger threshold for qualified internal applicants. Financial Administration positions indicated a trigger for qualified internal PWD applicants with a rate of 6.48%, which is below their 14.23% benchmark. Financial Institution Examination positions indicated a trigger for qualified internal PWD applicants with a rate of 5.67%, which is below their 14.23% benchmark. Attorney positions yielded no qualified internal applicants. Financial Analysis positions indicated a trigger for qualified internal PWD applicants with a rate of 7.16%, which is below their 14.23% benchmark. IT Management positions indicated a trigger for qualified internal PWD

applicants with a rate of 9.51%, which is below their 14.23% benchmark.

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

a. Promotions for MCO (PWD)

Answer Yes

b. Promotions for MCO (PWTD)

Answer Yes

The qualified applicant pool benchmarks vary for each MCO, and the below listing identifies which MCOs showed less than expected participation for PWD/PWTD, each exceeding the 1% trigger threshold for promotions. The Economist series had a qualified applicant pool benchmark of 16.67% for both PWD and PWTD. There were no promotion selections made for either PWD/PWTD. The Financial Administration and Program series had a qualified applicant pool benchmark of 6.48% for PWD and 2.43% for PWTD. There were no promotion selections made for either PWD/PWTD. The Financial Institution Examining series had a qualified applicant pool benchmark of 5.67% for PWD and 3.11% for PWTD. While there were selections made, the promotion rates were below their benchmarks at 3.94% and 1.79%, respectively. The Generalist series had a qualified applicant pool benchmark of 13.87 for PWD and 5.39% for PWTD. A trigger was present for PWTD as there were no internal promotion selections made. The Financial Analysis series had a qualified applicant pool benchmark of 7.16% for PWD and 1.91% for PWTD. There were no promotion selections made for either PWD/PWTD.

## 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 FDIC uses multiple methods to provide advancement opportunities for employees with disabilities as well as those with targeted disabilities. Agency employees can participate in career development plans, use the FDIC’s Professional Learning Account funds, the mentoring program, and participate in the external leadership programs. These programs are listed on the internal FDIC website, shared through Global Messenger to all employees and through division and office level communications.

### B. CAREER DEVELOPMENT OPPORTUNITES

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

The FDIC provides numerous programs and services to support the career development of employees through the Employee Life & Career Development (ELCD) section. Agency employees, their spouses/domestic partners, and children over the age of 16 can meet with a licensed career counselor/coach for support with resume development, interview preparation, career exploration, career development planning, and many more topics. Through this service, employees have access to six assessments including the Myers-Briggs Type Indicator, Strong Interest Inventory, StandOut, etc. In addition, employees are eligible to participate in developmental programs—FDIC Mentoring Program and Leadership Mentoring Program. These programs promote formal connections and mentorship between employees and leaders within the FDIC. ELCD also facilitates webinars several times a month on career development topics that are recorded and available on-demand. Information about the ELCD programs and services are marketed via global and direct messaging as well as comprehensive websites.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs						
Fellowship Programs						
Mentoring Programs						
Coaching Programs						
Training Programs						
Detail Programs						
Other Career Development Programs						

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 N/A

b. Selections (PWD)

Answer N/A

The EEOC instructed the FDIC that the definition of career development program/opportunities is the same in Part J, requiring competition to participate in training that would qualify employees for a promotion. The FDIC has no career development programs as defined in the instructions to MD-715 and as confirmed by the EEOC. While the FDIC does not have career development programs that, upon completion, necessarily “qualify a participant for a promotion,” all Financial Institution Examiners (Series 0570) are required to attend and complete four core training programs as a part of the commissioning process.

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 N/A

b. Selections (PWTD)

Answer N/A

Please see the response to question three above.

## 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

Employees who self-identified as PWD had less than expected participation for the Time Off Awards: 21-30 hours. The inclusion rate for this category was 10.71%, which is 3.67% below the workforce benchmark of 14.38%. In FY 2024, the FDIC did not award Time Off Awards: 41 or more hours, Cash Awards: \$4,000 -\$4,999 and Cash Awards: \$5,000 to any employee, resulting in a trigger within the awards category for PWTD.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	190.00	15.2632	84.7368	3.1579	96.8421
Time-Off Awards 1 - 10 Hours: Total Hours	1142.00	14.4483	85.5517	3.6778	96.3222
Time-Off Awards 1 - 10 Hours: Average Hours	6.01	5.6897	6.0683	7.0000	5.9783
Time-Off Awards 11 - 20 hours: Awards Given	33.00	21.2121	78.7879	9.0909	90.9091
Time-Off Awards 11 - 20 Hours: Total Hours	546.00	22.3443	77.6557	9.8901	90.1099
Time-Off Awards 11 - 20 Hours: Average Hours	16.55	17.4286	16.3077	18.0000	16.4000
Time-Off Awards 21 - 30 hours: Awards Given	28.00	10.7143	89.2857	3.5714	96.4286
Time-Off Awards 21 - 30 Hours: Total Hours	672.00	10.7143	89.2857	3.5714	96.4286
Time-Off Awards 21 - 30 Hours: Average Hours	24.00	24.0000	24.0000	24.0000	24.0000
Time-Off Awards 31 - 40 hours: Awards Given	40.00	17.5000	82.5000	5.0000	95.0000
Time-Off Awards 31 - 40 Hours: Total Hours	1554.00	18.0180	81.9820	5.1480	94.8520
Time-Off Awards 31 - 40 Hours: Average Hours	38.85	40.0000	38.6061	40.0000	38.7895
Time-Off Awards 41 or more Hours: Awards Given	0.00	0.0000	0.0000	0.0000	0.0000
Time-Off Awards 41 or more Hours: Total Hours	0.00	0.0000	0.0000	0.0000	0.0000
Time-Off Awards 41 or more Hours: Average Hours	0.00	0.0000	0.0000	0.0000	0.0000

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards \$500 and Under: Awards Given	9355.00	11.1598	88.8402	2.1593	97.8407
Cash Awards \$500 and Under: Total Amount	3504650.00	10.9626	89.0374	2.1165	97.8835
Cash Awards \$500 and Under: Average Amount	374.63	368.0077	375.4602	367.2030	374.7924
Cash Awards: \$501 - \$999: Awards Given	425.00	12.7059	87.2941	1.6471	98.3529
Cash Awards: \$501 - \$999: Total Amount	327323.00	12.5527	87.4473	1.6345	98.3655
Cash Awards: \$501 - \$999: Average Amount	770.17	760.8889	771.5229	764.2857	770.2703
Cash Awards: \$1000 - \$1999: Awards Given	2392.00	13.3779	86.6221	2.1739	97.8261
Cash Awards: \$1000 - \$1999: Total Amount	2975578.00	13.2773	86.7227	2.0391	97.9609
Cash Awards: \$1000 - \$1999: Average Amount	1243.97	1234.6094	1245.4165	1166.8269	1245.6850
Cash Awards: \$2000 - \$2999: Awards Given	499.00	11.6232	88.3768	2.6052	97.3948
Cash Awards: \$2000 - \$2999: Total Amount	1093449.00	11.7884	88.2116	2.7253	97.2747
Cash Awards: \$2000 - \$2999: Average Amount	2191.28	2222.4138	2187.1859	2292.3077	2188.5782



Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$3000 - \$3999: Awards Given	90.00	14.4444	85.5556	3.3333	96.6667
Cash Awards: \$3000 - \$3999: Total Amount	278566.00	14.9573	85.0427	3.4642	96.5358
Cash Awards: \$3000 - \$3999: Average Amount	3095.18	3205.0769	3076.6234	3216.6667	3090.9885
Cash Awards: \$4000 - \$4999: Awards Given	10.00	0.0000	100.0000	0.0000	100.0000
Cash Awards: \$4000 - \$4999: Total Amount	42000.00	0.0000	100.0000	0.0000	100.0000
Cash Awards: \$4000 - \$4999: Average Amount	4200.00	0.0000	4200.0000	0.0000	4200.0000
Cash Awards: \$5000 or more: Awards Given	9.00	0.0000	100.0000	0.0000	100.0000
Cash Awards: \$5000 or more: Total Amount	45000.00	0.0000	100.0000	0.0000	100.0000
Cash Awards: \$5000 or more: Average Amount	5000.00	0.0000	5000.0000	0.0000	5000.0000

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

N/A: The FDIC does not have traditional grades/steps as found in the GS scale, and the FDIC does not award Quality Step Increases. The FDIC’s performance-based pay system awards bonus shares and since individual employees have the opportunity to receive one or more bonus shares, table B-13 counts the number of shares awarded, not the individuals who received bonus shares.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	0.00	0.0000	0.0000	0.0000	0.0000

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

a. Other Types of Recognition (PWD)

Answer N/A

b. Other Types of Recognition (PWTD)

Answer N/A

## D. PROMOTIONS

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

a. SES

i. Qualified Internal Applicants (PWD)

Answer Yes

- |  |        |     |
|--|--------|-----|
| ii. Internal Selections (PWD)          | Answer | No  |
| b. Grade GS-15                         |        |     |
| i. Qualified Internal Applicants (PWD) | Answer | Yes |
| ii. Internal Selections (PWD)          | Answer | No  |
| c. Grade GS-14                         |        |     |
| i. Qualified Internal Applicants (PWD) | Answer | Yes |
| ii. Internal Selections (PWD)          | Answer | Yes |
| d. Grade GS-13                         |        |     |
| i. Qualified Internal Applicants (PWD) | Answer | Yes |
| ii. Internal Selections (PWD)          | Answer | Yes |

For SES or Equivalent, the percentage of qualified internal applicants who self-identified as PWD was 7.69%, which is below the relevant applicant pool benchmark of 14.38%. For Grade GS-15 or Equivalent, PWD made up 5.70% of the qualified internal applicant pool, compared to a benchmark of 14.38%. For Grade GS-14 or Equivalent, PWD comprised 8.14% of the qualified internal applicant pool which is below the 14.38% benchmark. Further, they were selected at a rate of 3.62%. For Grade GS-13 or Equivalent, applicants who self-identified as PWD made up 8.52% of the qualified internal pool, falling short of the 14.38% benchmark. Internal selections for this group were 5.91%, which is also below their representation among qualified applicants (8.52%).

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 | Yes |
| 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 | Yes |

For SES, the internal selection rate for positions was 0%, which is below the internal benchmark based on the qualified applicant

pool of 3.39%. For Grade GS-14 or Equivalent, the internal selection rate was 1.09%, which falls below the benchmark based on the qualified applicant pool of 3.29%. For Grade GS-13 or Equivalent, the qualified internal applicants who self-identified as PWTD presented a trigger only within their selection rate of 2.36% compared to the benchmark of 3.47%.

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	No

At the SES level, no PWDs were selected, compared to a benchmark of 9.53%. For GS-15, selections of PWD were 2.13%, which is below their benchmark of 6.58%. At the GS-14 level, the selection rate was 2.44%, compared to a benchmark of 6.71%.

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

At the SES level, no PWTD were selected, compared to a benchmark of 2.42%. At the GS-14 level, selections were 1.22%, compared to a benchmark of 3.04%.

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	Yes
ii. Internal Selections (PWD)	Answer	No
b. Managers		
i. Qualified Internal Applicants (PWD)	Answer	Yes
ii. Internal Selections (PWD)	Answer	Yes
c. Supervisors		
i. Qualified Internal Applicants (PWD)	Answer	Yes

## ii. Internal Selections (PWD)

Answer Yes

Executives who self-identify as a PWD comprised 7.77% of the qualified internal applicants, which was below their relevant applicant pool benchmark of 14.38%. Managers who self-identify as a PWD comprised 7.67% of the qualified internal applicants, which is below their relevant applicant pool benchmark of 14.38%. Further, the selections of managers who self-identified as a PWD was 2.22%, which is below the benchmark of qualified internal applicants of 7.67%. Supervisors who self-identify as a PWD comprised 3.14% of the qualified internal applicants, which was below their relevant applicant pool benchmark of 14.38%. Further, the selections of managers who self-identified as a PWD was 1.08%, which is below the benchmark of qualified internal applicants of 3.14%.

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 Yes

## b. Managers

## i. Qualified Internal Applicants (PWTD)

Answer No

## ii. Internal Selections (PWTD)

Answer Yes

## c. Supervisors

## i. Qualified Internal Applicants (PWTD)

Answer No

## ii. Internal Selections (PWTD)

Answer Yes

There were no internal selections for Executives who identified as a PWTD, compared to their qualified internal applicant pool benchmark of 3.49%. There were no internal selections for Managers who identified as a PWTD, compared to their qualified internal applicant pool benchmark of 3.60%. There were no internal selections of supervisors who self-identified as a PWTD compared to their benchmark of qualified internal applicants of 1.33%.

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

There were no new hires of Executives, Managers, and Supervisors who self-identified as a PWD compared to their respective qualified applicant pools of 9.68%, 2.68%, and 8.40%.

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

There were no new hires of Executives who self-identified as a PWTD compared to their respective qualified applicant pool of 2.38%. Managers had a 1.79% qualified applicant pool for PWTD, and no selections were made. There were no new hires of Supervisors who self-identified as a PWTD compared to their respective qualified applicant pool of 3.82%.

## 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 Yes

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 Yes

For reporting purposes, resignations and retirements are counted as voluntary separations. Reductions in force, removal, and other separations are counted as involuntary. The data indicates triggers in both voluntary and involuntary separations for PWD. The voluntary separation rate (retirement) was 18.78%, resulting in a trigger with a gap of +4.40 %. The involuntary separation (removal) rate for PWD was 16.67%, also exceeding the benchmark of 14.38%, resulting in a gap of +2.29%.

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	17	0.31	0.24
Permanent Workforce: Resignation	230	1.77	3.72
Permanent Workforce: Retirement	196	3.74	2.79
Permanent Workforce: Other Separations	70	1.77	0.93
Permanent Workforce: Total Separations	513	7.59	7.68

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 No

b. Involuntary Separations (PWTD)

Answer No

For reporting purposes, resignations and retirements are counted as voluntary separations. Reductions in force, removal, and other separations are counted as involuntary.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	17	0.00	0.26
Permanent Workforce: Resignation	230	2.01	3.47
Permanent Workforce: Retirement	196	6.04	2.86
Permanent Workforce: Other Separations	70	1.34	1.04
Permanent Workforce: Total Separations	513	9.40	7.63

- 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 FDIC reviewed exit survey data for PWD. During 2024, 34 respondents self-identified as PWD. The agency is cautious not to draw strong conclusions from a small sample of PWD participating in the exit survey. Exit survey data suggests that PWD rated two reasons for leaving as more important than other participants (those who did not identify as PWD): • diversity, equity, inclusion, accessibility, and fairness • relationships with immediate supervisors PWD also indicated less satisfaction than other participants with: • opportunities for advancement or career growth • diversity, equity, inclusion, accessibility, and fairness • quality of relationship with immediate supervisor • feedback received from immediate supervisor • quality of management A review of PWD commentary suggests that concerns over workplace culture, dissatisfaction with the reasonable accommodation process/outcome, and lack of flexibility related to travel, telework, and working remotely may have contributed to the exits of PWD survey participants.

## 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.

- 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.fdic.gov/accessibility/> Complaints alleging violations of Section 508 must be initiated within 180 calendar days of the alleged violation with the Office of Minority and Women Inclusion (OMWI). Contact Eric Atilano at EAtilano@FDIC.gov; or (703) 562-6073. An individual with a disability raising claims of discrimination based on disability in an employment related program (to include Section 508 violations), including applicants for employment, may file a complaint using Circular 2710.2, EEOC Discrimination Complaint Procedures. In order to file timely, the individual must contact an FDIC EEO Counselor with 45 calendar days of the alleged violation. Contact the FDIC EEO Counselor at EEO-Info@fdic.gov or by telephone at (703) 562-6100.

- 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.fdic.gov/accessibility/> Complaints alleging violations of FDIC facilities and architectural accessibility must be initiated within 180 calendar days of the alleged violation with the Office of Minority and Women Inclusion. Contact Eric Atilano, Equal Opportunity Compliance and Training Branch Chief, OMWI at EAtilano@FDIC.gov; or (703) 562-6073. Complaints alleging violations of FDIC facilities and architectural accessibility connected to employment must contact an FDIC EEO Counselor with 45 calendar days of the alleged violation. Contact FDIC EEO Counselor Donald Ballard (by mail) at the Federal Deposit Insurance Corporation, Office of Minority and Women Inclusion, 3501 Fairfax Drive, Room E-2076, Arlington, VA 22226; (by telephone) at (571) 355-1240; or (by email) at DoBallard@FDIC.gov.

- 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.

In FY 2025, the agency began realigning the role of the Disability Program Manager (DPM) within the Reasonable Accommodation (RA) team. This structural change allows for increased focus on cross-agency accessibility initiatives. Key planned priorities include: • Updating facilities systems to ensure proper signaling for non-fire emergencies; • Collaborating with the Schedule A hiring coordinator and workforce recruitment to promote hiring of highly qualified PWD/PWTD; • Strengthening the agency's Personal Assistance Services policy and procedures to improve visibility and understanding of procedures among employees and supervisors; and • Developing an internal directive that establishes clear expectations and guidance for accessible communication. (This directive will address the use of American Sign Language interpreters and Communication Access RealTime Translation services in meetings, trainings, and other internal/external events)

### 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.)

Approximately 28 days. Many are resolved in five days or less but some more complex requests take longer to resolve and involve our third-party healthcare provider.

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.

We provide approved accommodations in a timely manner once we receive a complete request as evidenced by our processing times. As part of our program we: conduct training for managers, supervisors and employees, ad hoc as well as at all staff and quarterly regional meeting events; monitor available data for trends to identify potential barriers and make process improvements; and have clear published agency guidance on the RA process, requirements, and available resources.

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

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

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

The FDIC has policies in place to process requests for PAS, provide timely services, and monitor the requests. We did not receive any PAS requests for FY 2024.

## 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 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 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.

There were no findings.

**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.

There were no findings.

**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



<b>Source of the Trigger:</b>	Workforce Data (if so identify the table)				
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B13				
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	Barrar Analysis efforts were paused to ensure compliance with newly-issued Executive Orders.				
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i> People with Disabilities People with Targeted Disabilities				
<b>Barrier Analysis Process Completed?:</b>	N				
<b>Barrier(s) Identified?:</b>	N				
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b> N/A		<b>Description of Policy, Procedure, or Practice</b> N/A		
<b>Objective(s) and Dates for EEO Plan</b>					
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>
<b>Responsible Official(s)</b>					
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>	
<b>Planned Activities Toward Completion of Objective</b>					
<b>Target Date</b>	<b>Planned Activities</b>			<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b> <b>Completion Date</b>
<b>Report of Accomplishments</b>					
<b>Fiscal Year</b>	<b>Accomplishment</b>				

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

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.

Not Applicable