



**U.S. AIR FORCE**

## **Plan for Employment of Individuals with Disabilities**

**FY2014-FY2016**

### **LETTER FROM MR JOHN T. PARK**

I am honored to serve as the senior Air Force official to ensure the enhancement of employment opportunities for individuals with disabilities and individuals with targeted disabilities. In this capacity, I have the responsibility of overseeing the implementation of Executive Order 13548. Despite the current environment of a civilian hiring freeze, downsizing, and furloughs, we continue to make significant progress since March 2011, the initial date this plan was started. Our accomplishments to date include:

- Improved procedures resulting in an increased utilization of the Schedule A hiring authority.
- Published Knowledge Article “Employment of Individuals with Disabilities” on MyPers website.
- Increased number of students and recent graduates participating in the Workforce

- Increased number of students and recent graduates participating in the Workforce Recruitment Program (WRP) for college students with disabilities, to over 113 student participants and 7 students hired into permanent positions.
- Initiated actions to update New Employee Orientation and Civilian Personnel Management Course to include information regarding reasonable accommodation.
- Distributed an annual memo to all Air Force service employees requesting verification/updating their disability code in MyBiz.
- Air Force awarded the 2012 Secretary of Defense trophy for Outstanding Achievements in the Employment of Individuals with Disabilities.
- Participation rate of individuals with disabilities increased 2.4%, up from 8.1% in FY12 to 10.5% by mid-year FY13.

Although much as been accomplished, there still remains several goals to be attained. Going forward we will refocus our efforts on improving reasonable accommodation procedures, supporting the retention of employee with disabilities, and recruiting individuals with targeted disabilities. By implementing this plan, we will make great strides toward achieving our goals of Air Force becoming a model employer and employer of choice for individuals with disabilities.

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## INTRODUCTION

Approximately 54 million Americans are living with a disability. The Department of the Air Force (AF) has a vital interest in reducing discrimination against Americans living with a disability, in eliminating the stigma associated with disability, and in encouraging Americans with disabilities to seek employment in the Federal workforce. Americans with disabilities have an employment rate far lower than that of Americans without disabilities, and they are underrepresented in the Air Force as well. In FY2012 individuals with disabilities represented over 7 percent of the 147,685 permanent civilian employees of the Air Force, and individuals with targeted (or severe) disabilities represented less than 1 percent of that workforce. As a Federal employer, the Department of the Air Force has an obligation to be a model employer of individuals with disabilities, and to comply with Management Directives issued by the Equal Employment Opportunity Commission (EEOC).

On July 26, 2010, the President signed Executive Order 13548 to increase the employment opportunities for persons with disabilities at all levels and occupations in the Federal government. The Executive Order directs Executive departments and agencies to improve their efforts to improve the number of individuals with disabilities in the Federal workforce, including those with targeted disabilities, through increased recruitment, hiring, and retention of these individuals. The Office of Personnel Management (OPM) provided guidance to Federal agencies for their respective plan requirements to implement the Order in a memorandum dated November 8, 2010. The Department of the Air Force submitted its initial Plan for Employment of Individuals with Disabilities in March of 2011. As a result of the initiatives implemented by this plan, Air Force has exceeded its goal of 8% participation rate of individuals with disabilities and has currently achieved a 10.5% participation rate. This updated plan renews our commitment to increase the participation rate of individuals with disabilities and focus our energies on increasing the participation rate of individuals with targeted disabilities by:

- Recruiting widely for positions at all levels, including an emphasis on placing transitioning Wounded Warriors (AFW2);
- Providing opportunities for students recent graduates with disabilities in the Air Force;
- Identifying, analyzing and eliminating barriers to the employment of individuals with disabilities, with a focus on improving retention rates;
- Collecting and maintaining data to monitor progress;
- Providing reasonable accommodations for qualified applicants and employees with disabilities and training to managers on the obligation to provide such accommodations;
- Developing retention and return-to-work strategies for individuals with disabilities separated from employment due to an injury or illness incurred on the job;
- Providing appropriate training to all stakeholders to ensure they understand both the commitment of the Air Force to employ individuals with disabilities and knowledge of special programs to recruit and appoint qualified individuals with disabilities.

# PROJECTED HIRING PLAN

***Goal 1. Increase the employment rate of employees with targeted disabilities by improving employment opportunities for people with disabilities across all career fields and grade levels***

## **Current Data Collection and Workforce Statistics**

The Department of the Air Force currently collects data on the employment of people with disabilities using OPM's Standard Form, Self-Identification of Disability (SF 256). The SF 256 was originally implemented in 1978 as part of the President's Reorganization Plan. In 1980 it was determined that a select group of disabilities listed on the SF 256 should be targeted in the development of hiring goals. Criteria used to select these disabilities included severity, feasibility of recruitment, and availability of workforce data.

The SF 256 was revised again in 2010. It allows an employee to select from one of two categories of disabilities. One is Targeted/Severe Disabilities, which includes deafness, blindness, missing extremities, partial paralysis, complete paralysis, and other impairments such as epilepsy, severe intellectual disability, psychiatric disability, and Dwarfism. The second category is Other Disabilities, which include hearing impairments, visual impairments, physical conditions, speech/language conditions, and learning disabilities.

In September of 2011, Air Force employees were encouraged to self-identify by revalidating their disability status using MyBiz. Based on the data collected, the Department of the Air Force reported an increase in the participation rate of employees with disabilities from 6.1 % to 7.4% by mid FY12. Unfortunately, the percentage of employees with targeted disabilities remained at .6 %. Moving forward, we intend to work harder and smarter, to improve our ability to attract, hire, and retain individuals with disabilities, including individuals with targeted disabilities.

Annually, in October, Air Force employees will be afforded the opportunity to revalidate their disability status. The Air Force Disability Program Manager will distribute a memo explaining the Rehabilitation Act of 1973 requires each agency in the Executive branch of the Federal government to establish specific programs that will facilitate the hiring, placement and advancement of people with disabilities. The memo will assure employees that this self-disclosure will be kept in strict confidence and will not be used or be housed in individual personnel files. All reports generated will use aggregate totals and will not identify individual employees. Employees will also be informed that the participation in the disability reporting system is voluntary, with the exception of certain employees appointed under Schedule A, specifically 5 CFR 213.3102(u), which permits agencies to hire individuals with intellectual disabilities, severe physical disabilities, or psychiatric disabilities without competition.

This initiative, combined with increased use of the Schedule A hiring authority, has already reaped dramatic results by increasing the participation rate of individuals with disabilities from 7.4 % in FY2012 to 10.5 % by mid-year FY2013. As a result, Air Force will now concentrate its efforts to increase the participation rate of individuals with targeted disabilities to meet the DoD goal of 2%.

## **Recruitment Planning**

The President's Executive Order challenges the Federal government to hire 100,000 individuals with disabilities (IwD) over the next five years, including individuals with targeted disabilities (IwTD). The Air Force is enthusiastic in supporting the President's goal and is committed to improving employment opportunities for people with disabilities across all career fields and grade

with disabilities (IwD) over the next five years, including individuals with targeted disabilities (IwTD). The Air Force is enthusiastic in supporting the President’s goal and is committed to improving employment opportunities for people with disabilities across all career fields and grade levels.

The Air Force set a goal to achieve a diverse workforce by FY2016 that is composed of at least 8% of IwD and 2% of IwTD. This will entail more than doubling the current representation rate of IwTD and require a concerted effort and a leadership commitment. Air Force will follow the steps outlined in this plan as a starting point for meeting this goal, and pledges the commitment of our leadership.

Our plan emphasizes increasing the “employment rate” of people with disabilities and targeted disabilities, not merely hiring such employees. It is not enough to hire more employees with disabilities, especially if just as many or more of our employees with disabilities are leaving the workforce at the same time. We must also focus on ensuring that the participation rate of employees with disabilities in our permanent workforce increases by setting goals for hiring and promoting individuals with disabilities into pay levels and occupation where individuals are currently underrepresented. In 2011, in compliance with the requirements of Executive Order (EO) 13548, Air Force developed a five-year plan to increase the overall number of individuals with disabilities to 8% of the workforce and increase the number of employees with targeted disabilities to at least 2% of the workforce. To achieve these goals the Air Force appointed a Disability Program Manager (DPM) in July 2012 to implement the Air Force Plan for Employment for Individuals with Disabilities. The DPM has revised and updated this plan and it is consistent with OPM’s Workforce Distribution by Disability data. In addition to tracking and reporting progress, the DPM will re-evaluate these hiring and retention goals annually.

**Hiring Goals**

The EO requires Federal Agencies to hire 100,000 IwD over a five-year period and mandates that each agency establish numerical hiring goals for IwD and sub-goals for IwTD for every year covered by the plan. DoD’s Implementation Plan for Executive Order 13548 states that Components will collectively hire 36,000 IwD over the five year period, 9,250 of whom will have targeted disabilities. In light of current budget realities, we begin with the assumption that the total number of Air Force employees will remain roughly the same at 145,862 full time permanent employees over the next remaining three years of the plan. Given that assumption, we will achieve our goals if we employ 2,000 *new employees* with targeted disabilities from FY2013 through FY2016 while maintaining our current numbers of employees with disabilities and employees with targeted disabilities. This calculation is based on the total number of USAF civilian full time employees and does not include the number of temporary, term limited, part time, intermittent, non-appropriated funds, or employees who are local nationals.

Air Force can achieve this goal by setting yearly targets. Beginning in FY2013, we must increase our number of employees with targeted disabilities by at least 35% each year. Accordingly, this revised plan is designed to achieve a proportionate goal of 2,000 IwTD *new hires* through 2016 in order to meet the requirement of the EO and DoD’s established goal of 2% participation rate of IwTDs.

The following table illustrates yearly goals for total participation rate of employees with targeted disabilities through FY2016.

**Air Force Yearly Hiring Goals for Total Participation Rate of IwTDs**  
(based on a permanent workforce of 145,682 as of 31 Mar 2013)

FY	IwTD	Net Gains
Baseline 2012	913 or .6%	
2013	1,413 or .96%	500

2013	1,413 or .96%	500
2014	1,913 or 1.3%	500
2015	2,413 or 1.65%	500
2016	2,913 or 2%	500

To summarize: the Air Force has exceeded its goal to increase the total participation rate of employees with disabilities to 8% of the permanent workforce by FY2016 since as of the second quarter of FY13 the rate is 10.3%. We must now focus our energies to increase the total participation rate of individuals with targeted disabilities to 2%. Therefore, at the completion of FY2016 the Air Force will strive to maintain its current number of employees with disabilities and hire 2,000 *new* employees with targeted disabilities. Note, however that the Air Force’s ability to meet these goals is contingent upon the ability to continue regular hiring in the Air Force Civilian Service. Unfortunately, the effect of sequestration, furloughs, and a hiring freeze in FY 13 – and the real possibility of their continuation in FY 14 – may cause the Air Force to be unable to meet these goals. But the Air Force will continue to strive to meet our established goal of an 8% participation rate of individuals with disabilities and a 2% participation rate of individuals with targeted disabilities.

## **RECRUITMENT AND PLACEMENT**

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***Goal 2. Employ new strategies for the recruitment of individuals with disabilities by recruiting widely for positions at all levels of the Air Force’s workforce, including GS-13 to 15, and Senior Executive Service.***

### **Recruitment Strategies**

In order to create a diverse workforce that reflects the skills and abilities of individuals with disabilities, the Air Force will continue to implement new procedures for processing Schedule A applications. In November 2011, the Air Force extended the area of consideration for external applicants to automatically include any applicant who qualifies for the Schedule A hiring authority. Qualified Schedule A applicants are also referred to the appropriate Career Program Managers for consideration.

We will use OPM’s Shared Register of Candidates with Disabilities (the Bender List), the Workforce Recruitment Program database, utilize State and local vocational rehabilitation agencies, and identify key points of contacts among affinity groups, colleges and universities and community outreach groups to develop collaborative efforts with these organizations. This will expand our applicant data pool and increase the likelihood that at least one well-qualified applicant with a disability will be considered for each position the agency announces.

### **Vacancy Announcements**

Air Force will use plain language in vacancy announcements explaining use of Schedule A and reasonable accommodations for qualified applicants or employees with disabilities. All Air Force vacancy announcements are posted on USAJOBS and will include hot links to Air Force Directives explaining the Schedule A and the reasonable accommodation process. In addition, Air Force will use targeted outreach and advertising through various media, as appropriate to the staffing situation. For each position recruited using external sources, Air Force will include those applicants who have disabilities and are eligible for Schedule A appointment for each position recruited.

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## Recruitment Sources

Air Force has developed a variety of resources and networks to enhance opportunities for employment and assist in actively recruiting people with disabilities. Below are available resources that Air Force will use to reach candidates:

- USAJOBS link to Schedule A for all posted job announcements
- <https://max.omb.gov> database of resumes of applicants with disabilities
- Major job fairs and other career outreach events designed for candidates with disabilities
- State Vocational Rehabilitation Agencies (SVRAs)  
[http://wdcrobcolp01.ed.gov/Programs/EROD/org\\_list.cfm?category\\_ID=SVR](http://wdcrobcolp01.ed.gov/Programs/EROD/org_list.cfm?category_ID=SVR)
- U.S. Department of Veterans Affairs (VA)
- Workforce Recruitment Program for College Students with Disabilities (WRP)  
[www.wrp.gov](http://www.wrp.gov)
- OPM shared registers
- Air Force Schedule A résumé bank
- Federal Disability Workforce Consortium, an interagency organization  
<https://efedlink.org/login/index.cfm>
- OPM's disability website: <http://www.opm.gov/disability>

## Special Appointing Authorities

Air Force will continue to take advantage of the special appointing authorities available when employing people with disabilities. These special appointing authorities include:

- **Schedule A, 5 CFR 213.3102(u), for hiring people with severe physical disabilities.**  
This excepted authority is used to appoint persons with severe physical, psychiatric, or intellectual disabilities on a permanent, time-limited, or temporary basis who have documentation from either a licensed medical professional or a licensed vocational rehabilitation specialist or any Federal or State agency, or agency of the District of Columbia or a U.S. territory that issues or provides disability benefits. Under the Schedule A authority, the employee may qualify for conversion to permanent status after two consecutive years of satisfactory service.
- **5 CFR 315.604 for hiring disabled veterans enrolled in a VA training program.** This authority is used to hire veterans with disabilities who are eligible for training under the VA vocational rehabilitation program (38 U.S.C. Chapter 31), at an agency under the terms of an agreement between the agency and VA. Upon successful completion, the host agency and VA give the veterans Certificates of Training showing the occupational series and grade levels of the positions for which trained. The Certificates of Training allow any agency to appoint the veterans non-competitively under a status quo appointment that may be converted to permanent status at any time.
- **5 CFR 316.302(b) (4) and 5 CFR 316.402(b) (4) for hiring veterans who are 30 percent or more disabled.** These authorities are used to hire veterans who are 30 percent or more disabled under temporary appointments of more than 60 days, or term appointments. The veterans must have separated from active military service with a 30 percent or more disability rating, or be rated by the VA within the preceding year as having a compensable service-connected disability of 30 percent or more. They may be converted to permanent status at any time during the appointment.

## **Training**

The Disability Program Manager will develop training modules and conduct annual training for senior leadership, hiring managers and HR staffing on the Air Force plan to promote employment opportunities for individuals with disabilities including the use of Schedule A Hiring Authority, 5 CFR 213. 102(u).

## **Outreach**

Air Force will improve outreach efforts by establishing memoranda of understanding with educational institutions, including community colleges and universities, and other institutes of higher learning, including those that offer programs to those with specific disabilities, such as persons who are blind or deaf, or have learning disabilities. Additionally the Air Force seeks to enhance outreach efforts to include campus visits and target professional organizations and publications serving the interests of people with disabilities. Enterprise Recruiters in conjunction with career field teams will conduct campus recruiting at college campuses to meet Air Force diversity goals, including IwDs. Air Force will also invite staff members to participate in campus visits to recruit students with disabilities through the WRP.

We will reach out to disability groups and organizations by offering training on how potential applicants can apply for vacancies, including the use of Schedule A. Website information on career search and Schedule A hiring process will be marketed through specially designed factsheet/brochure for dissemination at career fairs and outreach events.

We will also develop an external communication and marketing plan targeted at individuals with disabilities along with job announcements that encourages applications by qualified individuals with disabilities.

Air Force will educate and train managers and supervisors on various hiring programs and resources available for recruiting, promoting, and retaining employees with disabilities. Air Force also offers a training module on reasonable accommodation and the employment of people with disabilities that confers credit toward the Air Force's managerial core curriculum training requirement. Other updates will be provided through HR Advisories and monthly/quarterly web newsletters.

## **EMPLOYMENT OPPORTUNITIES FOR STUDENTS**

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#### ***Goal 3. Provide opportunities for students with disabilities to participate in intern employment programs***

The Air Force will continue to employ students with disabilities through student employment programs and will ensure greater emphasis on employment strategies to recruit students with disabilities. Air Force will tap into college student candidate networks.

The Air Force will cultivate and strengthen relationships and partnerships with colleges and universities that place an emphasis on providing opportunities and accommodations for disabled students.



students.

## **Students with Disabilities**

- The Workforce Recruitment Program (WRP) is an internship program jointly sponsored by the Department of Defense (DoD) and the Department of Labor for students with disabilities. It has led to permanent employment for students with disabilities in many offices. Air Force will continue to participate in this program and will work to achieve its goal of hiring more students through this program over the next five years. Managers will be encouraged to use the WRP database to fill permanent positions as well as temporary positions, as many of the candidates are completing college or graduate degrees and are seeking permanent positions.
- The Pathways Internship Program replaced existing federal employment programs such as the PALACE Acquire (PAQ) and COPPER CAP intern programs, Student Temporary Employment Program (STEP) and Student Career Experience Program (SCEP) Programs. In addition, the Pathways Internship Program created a new program for employment of recent graduates, and modifies the Presidential Management Fellows (PMF) Program. Air Force will utilize this program to support disability employment initiatives.
- Air Force will take advantage of OPM's leadership role in identifying accredited schools and programs with a high concentration of students with disabilities, and will explore tailoring OPM master cooperative education agreements for use.
- Air Force will improve awareness of student employment programs to managers and supervisors as a mechanism to attract students with disabilities to the workforce. This will be accomplished by disseminating information using power point packages and the WRP Advisory to each installation WRP Administrator.

## **AIR FORCE WOUNDED WARRIOR PROGRAM (AFW2)**

***Goal 4. Develop specific targeted strategies for placing AFW2 eligible candidates into meaningful employment opportunities.***

***The Air Force Wounded Warrior Program (AFW2) is the Air Force response to Department of Defense Instruction (DoDI) 1300.24, Recovery Coordination Program, which, in part, was developed to ensure all seriously or very seriously wounded, ill, or injured service member receive information on entitlements, benefits, and follow-on assistance as they transition either back to military service or to civilian life.***

Air Force commits to recruiting widely for positions at all levels, including an emphasis on recruiting and placing Wounded Warriors enrolled in the AFW2 Program. As part of this effort, AFW2 Program currently collaborates with the Secretary of Defense's Office of Wounded Warrior Care & Transition Policy, DoD entities, and other federal, state and community agencies.

The Air Force will:

- Seek to fully utilize the AFPC program that creates temporary civil service positions for eligible Airmen with combat -related disability rating.
- Revitalize use of DoD priority placement program Defense Outplacement Referral

- Revitalize use of DoD priority placement program Defense Outplacement Referral System (DORS), to recruit Wounded Warriors into federal service.
- Coordinate and participate in a wide range of networking opportunities to expand resources in support of Wounded Warrior education and employment.
- Initiate discussions among DoD components to request creation of a PPP category requiring clearance by means of selecting official's mandatory consideration for Veteran's with combat-related disabilities.
- Explore the formation of an employee affinity group for disabled veterans in the workforce and/or for employees with disabilities.

## **RETENTION**

### ***Goal 5. Devise and implement strategies to improve the retention rate of individuals with disabilities and individuals with targeted disabilities***

At the same time, we are improving the recruitment efforts to employ more individuals with disabilities; we must also implement strategies for retaining employees with disabilities. We must insure the needs of our current employees are being met in order to retain institutional knowledge and reduce expenses related to staff turnover. The recently established Disabled Employees Resource Group will be one tool for helping the Air Force identify specific strategies for improving our retention numbers. Additional strategies, including the following will be explored and, where feasible implemented with support from the Air Force Disability Program Manager, the Equal Opportunity Policy Office, and the AF Barrier Analysis Working Group.

- Adopt a goal of reducing attrition by 1% per year for individuals with disabilities using the FY2012 rate as a baseline.
- Establish a work group made up of IwD, IwTD, human resources specialists, Disability Program Managers, and management officials to address the high separation rate of employees with disabilities and targeted disabilities.
- Implement an Air Force-wide civilian exit survey for completion by all employees separating and/or transferring from the agency, beginning in FY2014.
  - This exit survey will include specific questions targeted to IwD seeking to determine if any reason related to the person's disability led to his or her decision to leave the Air Force.
- Develop a retention plan based on results of the survey.
- Ensure that all developmental opportunities are open and accessible to employees with disabilities that the reasonable accommodation process is clear and easy to request when registering, and that managers of the professional development programs are trained in the reasonable accommodation obligation and process.
- Resurvey on a yearly basis, the civilian workforce for proper identification of individuals with disabilities using the revised SF 256.
- Educate the current workforce on the Air Force reasonable accommodation procedures through training, informational emails and education.
- Explore the expanded use of quality of life tools (e.g., telework, alternate work schedule)

- Educate the current workforce on the Air Force reasonable accommodation procedures through training, informational emails and education.
- Explore the expanded use of quality-of-life tools (e.g., telework, alternate work schedule).
- Enhance mentoring as a means to improve retention rates.
- Conduct on-site evaluations of Air Force facilities to ensure compliance with the accessibility requirements of the Rehabilitation Act.
- Ensure electronic and information technology is accessible to people with disabilities including the development, procurement, maintenance, or use of electronic and information technology products and services, including software applications and operating systems, web-based information systems, telecommunication products, video and multimedia products, self-contained products and desktop and portable computers.
- Conduct training via such electronic venues as webinars, Defense Connect Online (DCO), video teleconferences (VTCs) and conference calls to Disability Program Managers, and Civilian Personnel Sections as well as all Air Force employees on the Plan for Employment and Development of People with Disabilities and Reasonable Accommodation Procedures in the Department of the Air Force.

## **SUPERVISORY TRAINING**

***Goal 6. Provide mandatory training of appropriate personnel on managers' use of effective tools to recruit, hire and retain individuals with disabilities and assess the impact of such training***

Providing training on disability-related issues, including attitudinal barriers, to all Air Force personnel, particularly those involved in the recruitment, hiring, promotion and retention process will be a crucial part of our recruiting and retention strategy. Agency hiring managers and human

Providing training on disability-related issues, including attitudinal barriers, to all Air Force personnel, particularly those involved in the recruitment, hiring, promotion and retention process will be a crucial part of our recruiting and retention strategy. Agency hiring managers and human resource staff must improve their efforts to employ workers with disabilities through increased recruitment, hiring, and retention strategies. Training and information sharing are key to promote buy-in, awareness, and engagement in achieving our goal of becoming a model employer of people with disabilities. It is also crucial that Agency officials understand their obligations relating to accessibility and reasonable accommodation.

Air Force will provide training to two identified populations:

- New supervisors (approximately 4,000 per year)
- Current supervisors (approximately 27,000 per year)

Air Force will identify the appropriate platform to deliver training needs based on inputs from subject matter experts (e.g., Air Force Disability Program Manager, Wounded Warrior Program Manager, Associate General Counsel, etc.). Webinars, audio conferences, and live trainings will be provided to educate external stakeholders about how Schedule A-eligible individuals with disabilities may apply, non-competitively to opportunities and internships via USAJOBS.

- Current platforms:
  - Supervisory Resource Center (SRC)
  - New Employee Orientation (NEO) Program
  - Civilian Personnel Management Course
  - Virtual University (Initial Supervisory Training)

Training will be provided to managers to ensure they understand both the commitment of the Air Force to employ individuals with disabilities and the availability of special programs to recruit and appoint qualified individuals with disabilities.

Training will also be provided to managers on the responsibility to provide reasonable accommodations, how to process requests for reasonable accommodation, and how to provide appropriate accommodations.

Air Force will also seek to incorporate into commanders' courses an element addressing the value to the Air Force of hiring and retaining qualified individuals with disabilities. The training program manager will work with representatives of the Air Force Personnel Center and Air Force Personnel Operating (AFPO) Agency to track completed training.

In FY13 educational materials were routinely disseminated to the workforce through Public Affairs articles, via direct e-mail, and through Human Resources (HR) advisories. Furthermore, beginning in FY14, the Office of Equal Opportunity will develop training and educational materials to educate managers, DPMs, EO and HR professionals on employment of individuals with disabilities and targeted disabilities. This training will coincide with the implementation of a new Air Force Instruction on Affirmative Employment Program (AEP), Special Emphasis Programs (SEPs) and Reasonable Accommodation Policy (AFI 36-205). **INCREASING RETURN-TO-WORK OUTCOMES**

***Goal 7. Develop retention and return-to-work strategies for civilians with a compensable disability separated from employment due to an injury or illness incurred on the job***

We will improve our return-to-work outcomes and coordinate with the Department of Labor's Office of Workers Compensation Programs (OWCP) to increase the return-to-work success of injured workers. Air Force had established a goal to improve its return-to-work outcomes by 1% in FY 2011 and by an additional 2% in the following three years, using FY 2011 as a baseline.

The Air Force Disability Program Manager will collaborate with the Air Force Workers

injured workers. Air Force had established a goal to improve its return-to-work outcomes by 1% in FY 2011 and by an additional 2% in the following three years, using FY 2011 as a baseline. The Air Force Disability Program Manager will collaborate with the Air Force Workers Compensation representative to identify injured workers who would benefit from reasonable accommodation such as light duty assignments, modified work schedules, telework, temporary light duty assignments, or reassignment to vacant positions, consistent with the Rehabilitation Act.

In addition, we will develop strategies to implement the Presidential POWER Initiative: Protecting Our Workers and Ensuring Reemployment, including:

- Improving the return to work rates in cases of serious injury or illness;
- Reducing the rates of lost production days due to workplace illness or injury;
- Identify injured employees as defined under the Federal Employees Compensation Act (FECA), who would benefit from reasonable accommodation and/or reassignment' consistent with the Rehabilitation Act;
- Monitor, on a quarterly basis, the return to work status of these employees.

In FY13 the Disability Program Manger collaborated with the Air Force Chief, Injury Compensation to use the Reemployment Priority List as a possible tool to track disabled/injured employees capable of performing work who would benefit from reassignment. Implementation of AFI 36-205 will provide the necessary framework and guidance regarding reassignment as a form of reasonable accommodation to fully implement this initiative in FY15.

In addition to these efforts, the Air Force will ensure the creation and availability of communications and training materials about:

- The DoD Computer/Electronic Accommodations Program (CAP) and;
- The Job Accommodation Network (JAN), which has resources regarding accommodating injured employees returning to work (as well as for new hires).

The Air Force will ensure communications and training materials include identification of the DoD Pipeline Program as a useful tool for returning injured employees back to work. Under this program, DoD funds Full Time Equivalents (FTEs) for one year while the organization finds a vacant FTE to use for the permanent fill.

### **Self-Identification Form**

Air Force Injury Compensation Program Administrators (ICPAs) will request that injured employees, who have sustained a permanent disability as a result of an on-the-job injury or illness, voluntarily complete and submit a new SF 256.

## **BARRIER ANALYSIS**

### ***Goal 8. Identifying and, as appropriate, modify or eliminate policies, procedures or practices that limit the employment opportunities for individuals with disabilities***

Improving the representation of IwD and IwTD is an objective that goes hand-in-hand with the task of identifying and addressing problem areas that affect the development and retention of IwD and IwTD within the Air Force.

### **Barrier Analysis**

Barrier analysis is an investigation of triggers (“red flags”) found in workplace policies, procedures, and practices that limit or tend to limit employment opportunities for individuals, in this case, based on disability. Once identified, the root causes of those triggers are identified and, if appropriate, eliminated.

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## **Barriers**

A barrier is a policy, principle, practice, or condition that limits or tends to limit employment opportunities for individuals based, in this case, on an individual's disability. Barriers may be found in recruitment, hiring, competitive, and career-ladder promotions, training and development, awards and incentive programs, disciplinary actions, and separations. Examples of barriers include stereotypical attitudes on the part of those who serve on selection panels, inadequately enforced anti-harassment policies, and excessive reliance on a computerized or electronic application process.

## **Triggers**

A trigger is a trend, disparity, anomaly, or "red flag" that suggests the need for further inquiry into a particular employment policy, practice, procedure, or condition. A trigger can be identified through a number of mechanisms, including statistics, complaint data, results of surveys (including focus groups and exit interviews), and reports by outside organizations. Examples of triggers are high separation rate of IwTD, an unusually large number of complaints by IwD that raised non-selection as an issue, or results of exit interviews indicating that a significant percentage of IwD identify limited career development opportunities as a reason for leaving.

## **Barrier Analysis in the Air Force**

The Air Force-wide Barrier Analysis Working Group (AFBAWG), led by AF/A1Q was chartered in August of 2010, to identify and, if appropriate, propose elimination of barriers to equal employment opportunity in the Air Force. There are over 30 AFBAWG members from HAF, MAJCOM, AFPC, and local base levels. Members of the Equal Opportunity (EO), Human Resource (HR), diversity, and legal communities of the Air Force are represented on the AFBAWG.

The AFBAWG is composed of five teams, one of which is the Disability Program Analysis Team. Each team has a designated team leader and is composed of subject matter experts (SMEs). The teams are responsible for reviewing, analyzing, and identifying barriers as well as recommending an action plan to eliminate them. The Disability Program Analysis Team is focusing on the issues of low participation rates of IwTD, low participation rates of IwD at the senior levels, and high rates of separation of IwTD.

In addition, the Air Force is considering a requirement for each installation to establish a barrier analysis working group made up of representatives of the Equal Opportunity, Diversity, and HR communities, along with other appropriate personnel as designated by the Installation Commander (or equivalent). Unlike the task of removing barriers, the responsibilities of identifying, analyzing, and reporting barriers must be performed by *all* levels of the Air Force.

Barrier removal, however, will be accomplished at the level of authority responsible for the creation of the barrier. Overall responsibility for barrier removal in the Air Force currently rests at the HAF level.

## **Conducting Barrier Analysis**

The barrier analysis process is based on Management Directive 715 (MD-715), which was issued by the Equal Employment Opportunity Commission on October 1, 2003. A detailed explanation of the barrier analysis process is located in MD-715

(<http://www.eeoc.gov/federal/directives/md715.cfm>) and in Section II of the Instructions to Federal Agencies for MD-715.

Barrier Analysis consists of four main steps: (1) Identify the triggers, (2) Investigate potential barriers, (3) Devise an action plan, and (4) Assess the results through follow-ups. The analysis

Barrier Analysis consists of four main steps: (1) Identify the triggers, (2) Investigate potential barriers, (3) Devise an action plan, and (4) Assess the results through follow-ups. The analysis and interpretation of workforce statistics are the starting point in the self-assessment process. However, it must be noted that the statistical analysis is only one part of barrier analysis.

Per MD-715, “statistics are only a starting point and alone rarely serve to provide a complete picture of the existence of workplace barriers. Agencies must look at statistics in the context of the totality of the circumstances. A statistical snapshot may be useful as an initial diagnostic tool, but conclusions concerning the existence of workplace barriers cannot be drawn from gross numerical assessments. Rather, the identification of workplace barriers will require a thorough examination of all of the circumstances.”

Since FY 2011 Air Force has accomplished many of the objectives identified by barrier analysis, including improving communication to supervisors and hiring officials to combat the lack of knowledge of the special appointing authority for individuals with disabilities, as well as implementing education and training to increase the knowledge of reasonable accommodation obligations by managers. We have also initiated procedures to improve processing of Schedule A applications and this process is detailed in all vacancy announcements. Additional accomplishments include:

- July 2011, the Air Force Disability Program Manager began working with the Air Force Public Affairs Office to develop a Disability Communication Plan designed to provide a “strategic approach” to addressing the lack of communication barrier. This communication plan was approved in August of 2011.
- November 2011, the Air Force expanded the area of consideration for external candidates to include Schedule A applicants.
- March 2012, the Air Force established an HAF Employees with Disabilities Employee Resource Group.
- July 2012, the Air Force hired a full-time Disability Program Manager (DPM) in a partnership agreement with DoD.
- September 2012, an agreement with Air Force Auditing Agency was finalized to perform samplings of current/former employees to analyze reasons for the decrease of the participation rate of individuals with targeted disabilities in senior grades.
- October 2012, Air Force dispatched an email requesting all Air Force civilian employees to verify and update their disability codes in MyBiz.
- October 2012, the Air Force hired 82 WRP students for FY2012, seven of these students were hired in permanent positions.

## **MONITORING AND EVALUATING PROGRESS**

### ***Goal 9. Monitor success in increasing the applicant pool of individuals with disabilities in the Air Force’s recruitment efforts***

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The Department of the Air Force realizes that effective efforts to change workforce demographics require valid data, data-driven decisions, leadership, and management accountability. The Air Force Equal Opportunity Office (AF/A1Q), regularly monitors applicable data concerning workforce composition, as set forth in EEOC Management Directives.

A full-time Disability Program Manager (DPM) assigned to A1Q will work with an analyst in the Air Force Diversity Operations Office (AF/A1DV) to conduct long-term tracking of employment

A full-time Disability Program Manager (DPM) assigned to A1Q will work with an analyst in the Air Force Diversity Operations Office (AF/A1DV) to conduct long-term tracking of employment data and trends. Periodic review of this data will determine if Air Force is making progress toward achieving the stated numerical goals set out in this plan.

A representative of the Air Force Personnel Center will maintain contact with the DPM to ensure Air Force recruiting and retention strategies are developed in response to actual workforce diversity data. Senior Officers will be advised periodically of the progress within their respective offices.

## **REASONABLE ACCOMMODATION**

### ***Goal 10. Provide reasonable accommodations for qualified applicants and employees with disabilities, consistent with guidance promulgated by the Equal Employment Opportunity Commission***

The availability of reasonable accommodation is both a legal requirement and a lynchpin to attracting and retaining qualified individuals with a disability. A reasonable accommodation is an adjustment or alteration that enables a qualified person with a disability to apply for a job, perform job duties, or enjoy equal benefits and privileges of employment. In accordance with applicable law, regulation, Executive Orders, and Equal Employment Opportunity Commission directives, the Air Force will continue to make reasonable accommodations for qualified persons with disabilities, unless doing so would impose an undue hardship on the Agency.

In February 2011, the Air Force reissued reasonable accommodation procedures (RAP), contained in the updated Air Force Plan for Employment and Advancement of People with Disabilities and Reasonable Accommodation Procedures. (See: <http://www.af.mil/shared/media/document/AED-110209-053.pdf>) In addition, the implementation of a new Air Force Instruction on Affirmative Employment Program (AEP), Special Emphasis Programs (SEPs) and Reasonable Accommodation Policy (AFI 36-205) will afford specific procedures and guidance to managers and supervisors on the Air Force's requirements to provide reasonable accommodations to qualified individuals with disabilities.

Training on reasonable accommodation, including AFI 32-205, will be provided to Disability Program managers, hiring managers, HR staffing and employee relations specialists, EO professionals, and the legal community. Further, all training for senior leaders on disability will include the Air Force's procedures for providing reasonable accommodation to job applicants and



Program managers, hiring managers, HR staffing and employee relations specialists, EO professionals, and the legal community. Further, all training for senior leaders on disability will include the Air Force's procedures for providing reasonable accommodation to job applicants and employees with disabilities.

A training module on RAP has been included in supervisor orientation/new employee orientation and a RAP guidance article has been provided in the HR Advisory to Civilian Personnel Squadrons/Offices for use and distribution. However, several recent events have indicated a need for a better understanding of RAP within the Air Force. Possible new approaches to enhance the effectiveness of the provision of reasonable accommodation include the following:

- Develop a short, easy-to-read pamphlet and/or fact sheet on RAP for supervisors.
  
- Institute mandatory RAP training for all personnel who may have reason to deal with IwD issues, including case studies.
  
- Develop detailed training on reasonable accommodation for all disability program managers.
- Include in the training that undue hardship based on cost is assessed on the Air Force's overall budget, not the budget of a particular program office.
  
- Develop a DVD for commanders' calls and for general reference.
  
- Issue periodic guidance to all personnel who may have a reason to deal with IwD issues, to include scenarios, case studies, and lessons learned.
  
- Expand awareness of and work with DoD's Computer/Electronic Accommodations Program (CAP).
  
- Expand awareness of and work with the Labor Department-sponsored Job Accommodation Network (JAN), which provides expert accommodation information.
  
- Develop a centralized reasonable accommodation fund to support a broad range of services, including but not limited to the types of accommodations not currently provided through the partnership with the Department of Defense's Computer/Electronic Accommodation Program (CAP). Examples may include sign language interpreting, personal assistance services, readers, and other related supports.
  
- Create an online system for tracking accommodations to document and evaluate their use.

Additionally, the AF Disability Program Manager established a manual Air Force-wide Reasonable Accommodation Tracker. Local or base Disability Program Managers meet periodically to discuss their reasonable accommodation issues.

The Air Force is committed to providing access to its activities for all. Providing reasonable accommodation is an important part of this commitment.

# **ACCOUNTABILITY**

## ***Goal 11. Ensure accountability***

The Department of the Air Force has chosen Mr. John T Park, Deputy Director of Force Management Policy, to serve as the senior official overseeing the Plan's implementation to insure the recruitment, employment, advancement, and retention of qualified individuals with disabilities.

We will enlist the aid and support of our senior managers to model the behavior and actions that we expect from the organization as a whole. The Air Force will explore ways in which supervisors and managers can be evaluated on their efforts to promote the recruitment, hiring, advancement, and retention of individuals with disabilities.