

## 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 Yes |

In FY22, 73.3% of the workforce positions required military service. Only 213 employees have no military service requirement which is 26.7% of the workforce. Those employees whose positions require military service must meet high mental and physical fitness standards in order to stay employed. Therefore, non-disclosure of a disability by these employees, who are also Service Members, is likely due to a perceived negative impact on their military career and full-time employment. However, of the remaining 26.7% of the workforce who do not have a military service requirement, the WING has met the 12% target for persons with a disability and the 2% target for persons with targeted disabilities. The WING has 13.15% and 3.29% respectively for these groups of employees.

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

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

- |                                 |            |
|---------------------------------|------------|
| a. Cluster GS-1 to GS-10 (PWTD) | Answer No  |
| b. Cluster GS-11 to SES (PWTD)  | Answer Yes |

In FY22, 73.3% of the workforce positions required military service. Only 213 employees have no military service requirement which is 26.7% of the workforce. Those employees whose positions require military service must meet high mental and physical fitness standards in order to stay employed. Therefore, non-disclosure of a disability by these employees, who are also Service Members, is likely due to a perceived negative impact on their military career and full-time employment. However, of the remaining 26.7% of the workforce who do not have a military service requirement, the WING has met the 12% target for persons with a disability and the 2% target for persons with targeted disabilities. The WING has 13.15% and 3.29% respectively for these groups of employees.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	148	14	9.46	4	2.70
Grades GS-11 to SES	238	13	5.46	4	1.68

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

All vacancy fill requests are initiated through the Federal Human Resources Office and posted to USA Jobs for all qualified applicants to apply regardless of disability. Hiring managers and recruiters are advised on how the vacancy will be posted and to what applicants the vacancy will be open. Managers and recruiters understand the qualified applicants will be referred and interview. Applicants are selected for the vacant position the basis of qualification skill sets regardless of any disability the applicant may have.

## 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

The Wisconsin National Guard uses a team comprised of the Disability Program Manager, Labor Relations Representative, and the Occupational Health Nurse to ensure sufficient support is given to the Disability Program and Reasonable Accommodation Requests.

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	0	1	0	Not met for FY2021
Answering questions from the public about hiring authorities that take disability into account	1	0	0	samantha.e.kotula.civ@arm
Processing reasonable accommodation requests from applicants and employees	0	1	0	kim.e.kimball.civ@army.m
Architectural Barriers Act Compliance	0	1	0	COL Eric Leckel Construction Facility and Management Officer
Special Emphasis Program for PWD and PWTB	0	1	0	danielle.m.lawrence.civ@ai
Processing applications from PWD and PWTB	3	0	0	samantha.e.kotula.civ@arm

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

Answer Yes

The Disability Program Manager (DPM) attended the DPM course provided by DEOMI.

**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>	A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]
--	---

<b>Brief Description of Program Deficiency</b>	A.2.b.3. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.
--	---

<b>Brief Description of Program Deficiency</b>	C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC’s regulations and guidance? [see 29 CFR §1614.203(d)(3)]
--	---

<b>Brief Description of Program Deficiency</b>	C.2.c. Has the agency established procedures for processing requests for personal assistance services that comply with EEOC’s regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR §1614.203(d)(6)]
--	---

<b>Brief Description of Program Deficiency</b>	C.2.c.1. Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR §1614.203(d)(5)(v)] If “yes”, please provide the internet address in the comments column.
<b>Objective</b>	1. Finalize and route the Reasonable Accommodation Procedures (which also includes procedures for Personal Assistance Services) for review and approval. 2. Expected approval and implementation is September 2022. 3. Post to the public DMA page.
<b>Target Date</b>	Dec 31, 2023
<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>

<b>Brief Description of Program Deficiency</b>	D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]
<b>Objective</b>	Implement the use of Exit Interviews to gather additional information to assist with improvement.
<b>Target Date</b>	Sep 30, 2023
<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>

## 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.

All position vacancies are posted on USA Jobs for all qualified applicants to apply regardless of their status as a PWD or PWTD. Additionally, the majority of our labor pool requires Military Service. As a result, those Service Members must meet specific mental and physical health requirements established by Congress.

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

All position vacancies are posted on USA Jobs for all qualified applicants to apply regardless of their status as a PWD or PWTD. However, the majority of our labor pool requires Military Service, which requires Service Members to meet specific mental and physical health requirements established by Congress.

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.

Schedule A is not a hiring authority used in our employment practices. All position vacancies are posted on USA Jobs and are open to all qualified applicants.

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If “yes”, describe the type(s) of training and frequency. If “no”, describe the agency’s plan to provide this training.

Answer N/A

Schedule A is not a hiring authority our organization uses.

### 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.

Wisconsin National Guard has a qualified Disability Program Manager who has been educating and encouraging employees to update their disability status in the personnel systems, this initiative has helped to increase self-reporting of disability status.

### 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

In FY22, 73.3% of the workforce positions required military service. Only 213 employees have no military service requirement which is 26.7% of the workforce. Those employees whose positions require military service must meet high mental and physical fitness standards in order to stay employed. Therefore, non-disclosure of a disability by these employees, who are also Service Members, is likely due to a perceived negative impact on their military career and full-time employment. However, of the remaining 26.7% of the workforce who do not have a military service requirement, the WING has met the 12% target for persons with a disability and the 2% target for persons with targeted disabilities. The WING has 13.15% and 3.29% respectively for these groups of employees.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	461	2.17	0.00	1.52	0.00
% of Qualified Applicants	365	1.37	0.00	0.55	0.00
% of New Hires	110	0.91	0.00	0.91	0.00

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

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

In FY22, 73.3% of the workforce positions required military service. Only 213 employees have no military service requirement which is 26.7% of the workforce. Those employees whose positions require military service must meet high mental and physical fitness standards in order to stay employed. Therefore, non-disclosure of a disability by these employees, who are also Service Members, is likely due to a perceived negative impact on their military career and full-time employment. However, of the remaining 26.7% of the workforce who do not have a military service requirement, the WING has met the 12% target for persons with a disability and the 2% target for persons with targeted disabilities. The WING has 13.15% and 3.29% respectively for these groups of employees.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
0201 HUMAN RESOURCES MANAGERS	13	0.00	0.00
0346 LOGISTICS MANAGEMENT	9	0.00	0.00
2210 COMPUTER AND INFORMATION SYSTEMS MANAGERS	28	3.57	3.57
5801 OTHER INSTALLATION, MAINTENANCE, AND REPAIR WORKERS	44	0.00	0.00
8852 VEHICLE AND MOBILE EQUIPMENT MECHANICS, INSTALLERS, AND REPAIRERS	16	0.00	0.00

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

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

b. Qualified Applicants for MCO (PWTD)

Answer Yes

In FY22, 73.3% of the workforce positions required military service. Only 213 employees have no military service requirement which is 26.7% of the workforce. Those employees whose positions require military service must meet high mental and physical fitness standards in order to stay employed. Therefore, non-disclosure of a disability by these employees, who are also Service Members, is likely due to a perceived negative impact on their military career and full-time employment. However, of the remaining 26.7% of the workforce who do not have a military service requirement, the WING has met the 12% target for persons with a disability and the 2% target for persons with targeted disabilities. The WING has 13.15% and 3.29% respectively for these groups of employees.

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

In FY22, 73.3% of the workforce positions required military service. Only 213 employees have no military service requirement which is 26.7% of the workforce. Those employees whose positions require military service must meet high mental and physical fitness standards in order to stay employed. Therefore, non-disclosure of a disability by these employees, who are also Service Members, is likely due to a perceived negative impact on their military career and full-time employment. However, of the remaining 26.7% of the workforce who do not have a military service requirement, the WING has met the 12% target for persons with a disability and the 2% target for persons with targeted disabilities. The WING has 13.15% and 3.29% respectively for these groups of employees.

## 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 Wisconsin National Guard will continue to provide specialized training and mentoring opportunities, career development opportunities, awards, and promotions based on merit. The current merit system in place includes PWD and PWTD. Additionally, Wisconsin National Guard works to ensure equal employment opportunities for PWD and PWTD through the initiatives of our special emphasis program and reasonable accommodation efforts.

### B. CAREER DEVELOPMENT OPPORTUNITES

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

The Wisconsin National Guard will continue to provide specialized training and mentoring opportunities, career development opportunities, awards, and promotions based on merit. The current merit system in place includes PWD and PWTD. Additionally, Wisconsin National Guard works to ensure equal employment opportunities for individuals with disabilities through the initiatives of our special emphasis program and reasonable accommodation efforts.

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 (%)
Mentoring Programs						
Internship Programs						
Detail Programs						
Coaching Programs						
Fellowship Programs						
Other Career Development Programs						
Training 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 No
- b. Selections (PWD) Answer No

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

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

**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 No
- b. Awards, Bonuses, & Incentives (PWTD) Answer No

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	327	22.58	51.64	12.50	26.09
Time-Off Awards 1 - 10 Hours: Total Hours	9352	729.03	1476.59	0.00	982.61
Time-Off Awards 1 - 10 Hours: Average Hours	28.6	104.16	4.92	0.00	140.39
Time-Off Awards 11 - 20 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 Hours: Total Hours	0	0.00	0.00	0.00	0.00

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 11 - 20 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	59	6.45	9.47	12.50	4.35
Cash Awards: \$501 - \$999: Total Amount	66250	9677.42	10628.23	0.00	13043.48
Cash Awards: \$501 - \$999: Average Amount	1122.88	4838.71	193.24	0.00	6521.74
Cash Awards: \$1000 - \$1999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Total Amount	0	0.00	0.00	0.00	0.00



Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$5000 or more: Average Amount	0	0.00	0.00	0.00	0.00

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 Yes

b. Pay Increases (PWTD) Answer Yes

There were no Quality Step Increases for PWDs or PWTDs, there were other awards provided but not QSIs.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	0	0.00	0.00	0.00	0.00

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

a. Other Types of Recognition (PWD) Answer N/A

b. Other Types of Recognition (PWTD) Answer N/A

Agency does not have any additional employee recognition programs.

**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 No

ii. Internal Selections (PWD) Answer No

b. Grade GS-15

i. Qualified Internal Applicants (PWD) Answer No

ii. Internal Selections (PWD) Answer No

c. Grade GS-14

i. Qualified Internal Applicants (PWD) Answer No

ii. Internal Selections (PWD) Answer No

d. Grade GS-13

i. Qualified Internal Applicants (PWD) Answer No

ii. Internal Selections (PWD) Answer No

No triggers identified at this time.

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

a. SES

i. Qualified Internal Applicants (PWTD) Answer No

ii. Internal Selections (PWTD) Answer No

b. Grade GS-15

i. Qualified Internal Applicants (PWTD) Answer No

ii. Internal Selections (PWTD) Answer No

c. Grade GS-14

i. Qualified Internal Applicants (PWTD) Answer No

ii. Internal Selections (PWTD) Answer No

d. Grade GS-13

i. Qualified Internal Applicants (PWTD) Answer Yes

ii. Internal Selections (PWTD) Answer Yes

In FY22, 73.3% of the workforce positions required military service. Only 213 employees have no military service requirement which is 26.7% of the workforce. Those employees whose positions require military service must meet high mental and physical fitness standards in order to stay employed. Therefore, non-disclosure of a disability by these employees, who are also Service Members, is likely due to a perceived negative impact on their military career and full-time employment. However, of the remaining 26.7% of the workforce who do not have a military service requirement, the WING has met the 12% target for persons with a disability and the 2% target for persons with targeted disabilities. The WING has 13.15% and 3.29% respectively for these groups of employees.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires to SES (PWD) Answer No

b. New Hires to GS-15 (PWD) Answer No

c. New Hires to GS-14 (PWD) Answer Yes

d. New Hires to GS-13 (PWD) Answer Yes

In FY22, 73.3% of the workforce positions required military service. Only 213 employees have no military service requirement which is 26.7% of the workforce. Those employees whose positions require military service must meet high mental and physical fitness standards in order to stay employed. Therefore, non-disclosure of a disability by these employees, who are also Service Members, is likely due to a perceived negative impact on their military career and full-time employment. However, of the

remaining 26.7% of the workforce who do not have a military service requirement, the WING has met the 12% target for persons with a disability and the 2% target for persons with targeted disabilities. The WING has 13.15% and 3.29% respectively for these groups of employees.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

In FY22, 73.3% of the workforce positions required military service. Only 213 employees have no military service requirement which is 26.7% of the workforce. Those employees whose positions require military service must meet high mental and physical fitness standards in order to stay employed. Therefore, non-disclosure of a disability by these employees, who are also Service Members, is likely due to a perceived negative impact on their military career and full-time employment. However, of the remaining 26.7% of the workforce who do not have a military service requirement, the WING has met the 12% target for persons with a disability and the 2% target for persons with targeted disabilities. The WING has 13.15% and 3.29% respectively for these groups of employees.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

No triggers identified at this time.

6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Executives

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

No triggers identified.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires for Executives (PWD)	Answer	No
b. New Hires for Managers (PWD)	Answer	No
c. New Hires for Supervisors (PWD)	Answer	No

No triggers identified at this time.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires for Executives (PWTD)	Answer	No
b. New Hires for Managers (PWTD)	Answer	Yes
c. New Hires for Supervisors (PWTD)	Answer	Yes

In FY22, 73.3% of the workforce positions required military service. Only 213 employees have no military service requirement which is 26.7% of the workforce. Those employees whose positions require military service must meet high mental and physical fitness standards in order to stay employed. Therefore, non-disclosure of a disability by these employees, who are also Service Members, is likely due to a perceived negative impact on their military career and full-time employment. However, of the remaining 26.7% of the workforce who do not have a military service requirement, the WING has met the 12% target for persons with a disability and the 2% target for persons with targeted disabilities. The WING has 13.15% and 3.29% respectively for these groups of employees.

## Section VI: Plan to Improve Retention of Persons with Disabilities

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

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1.

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

Answer N/A

Agency does not currently employ any Schedule A employees, it is not a program we use.

2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.

a. Voluntary Separations (PWD) Answer No

b. Involuntary Separations (PWD) Answer No

No triggers identified.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	44	8.33	5.38
Permanent Workforce: Resignation	79	11.11	9.84
Permanent Workforce: Retirement	6	0.00	0.79
Permanent Workforce: Other Separations	9	0.00	1.18
Permanent Workforce: Total Separations	138	19.44	17.19

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

No triggers identified.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	44	0.00	5.58
Permanent Workforce: Resignation	79	0.00	10.01
Permanent Workforce: Retirement	6	0.00	0.76
Permanent Workforce: Other Separations	9	0.00	1.14
Permanent Workforce: Total Separations	138	0.00	17.49

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

No triggers identified.

**B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES**

Pursuant to 29 CFR §1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency technology, and the Architectural

Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

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

<https://dma.wi.gov/resources/equal-opportunity-and-equal-employment-opportunity-eo-eeo/#section-508>; For information about filing a complaint under Section 508, contact the EEO Office. To file a complaint against another agency, contact that agency's Section 508 Coordinator found at [www.section508.gov/508-coordinator-listing](http://www.section508.gov/508-coordinator-listing). EEO Office contact information is on the page as well.

2. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

<https://dma.wi.gov/resources/equal-opportunity-and-equal-employment-opportunity-eo-eeo/#section-508>; For information about filing a complaint regarding ABA issues, contact the EEO Office. EEO Office contact information is on the page as well.

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

During FY2022, the WING building was under construction for remodeling. The remodeling of the building meets standards set by the ADA for accessibility for individuals with disabilities. The technology needs are being addressed on an as needed basis through the IT department. The WING continues to bring facilities into compliance at armories, and other facilities around the state.

### 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.)

Accommodation requests were processed in a timely manner in FY2022. The agency has drafted policy and procedures for reasonable accommodations to include requesting, approving, and tracking requests.

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

The WING did not have a formalized process for accommodation requests; however, accommodation requests were processed in a timely manner in FY2022. The agency is in the process of writing a policy to implement a formal reasonable accommodation program which will include procedures for requesting, approving, and tracking reasonable accommodation requests.

### 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.

During FY 2022, the WING did not employ an employee requesting PAS.

## Section VII: EEO Complaint and Findings Data

### A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the 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 No

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

Not applicable for FY 2022.

### 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 No

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.

Not applicable for FY 2022.

## Section VIII: Identification and Removal of Barriers

*Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.*

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Answer No

2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?

Answer N/A

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments

<b>Source of the Trigger:</b>	Workforce Data (if so identify the table)				
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B1				
<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?	The majority of our Federal Labor Force requires a component of military service and therefore are required by Congress to meet specific mental and physical health standards. As a result of these standards, we employ a limited number of person's with disabilities and targeted disability. When looking at only the T5 Civilian Employees, we meet the inclusion rates for both PWD and PWTD.				
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i> People with Disabilities				
<b>Barrier Analysis Process Completed?:</b>	Y				
<b>Barrier(s) Identified?:</b>	Y				
<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>		<b>Description of Policy, Procedure, or Practice</b>		
	12% and 2%		Standards established by Congress for individuals to medically meet retention standards from a physical and mental standpoint limit our agency from meeting the 12% and 2% goals for PWD and PWTD. Although we are unable to change the standards required, we highly encourage individuals with disabilities to apply for positions in which they qualify. In addition, the Agency strives to encourage all qualified applicants to apply for position vacancies.		
<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>
06/08/2022	12/31/2022	Yes	07/08/2022		Standards established by Congress for individuals to medically meet retention standards from a physical and mental standpoint limit our agency from meeting the 12% and 2% goals for PWD and PWTD. Although we are unable to change the standards required, we highly encourage persons with disabilities to apply for positions in which they qualify. In addition, the Agency strives to encourage all qualified applicants to apply for position vacancies.
<b>Responsible Official(s)</b>					
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>	
EEO Director		Michelle Johnson		No	



Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2022	Continue to meet with Human Resources Officer to ensure position vacancies are open to PWD and PWTD if there is no military service component required.	Yes		
Report of Accomplishments				
Fiscal Year	Accomplishment			

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

Not applicable for FY 2022

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

Not applicable for FY 2022

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 for FY 2022