

# Applying MD-715 to Improve Participation of Employees with Targeted Disabilities

The following ideas are intended to assist agencies in applying the MD-715 framework to create an environment that will improve the hiring, advancement, and retention of people with targeted disabilities at all grade levels.

### **Demonstrated Commitment from Agency Leadership:**

- Annually issue a policy statement ensuring equal employment opportunity (EEO) for all applicants and employees, including those with targeted disabilities.
- Hire a full time Disability Program Manager; establish a diversity committee
  comprised of the Disability Program Manager, Selective Placement Coordinator,
  selected managers, and members of affinity groups to address the hiring,
  advancement, and retention of all EEO groups, including people with targeted
  disabilities.

# **Integration of EEO into Agency Strategic Mission**

- Establish a numerical goal for hiring people with targeted disabilities each fiscal year.
- Improve coordination between the Disability Program Manager and the Selective Placement Coordinators by including them in strategic planning, succession planning, and recruitment meetings.

# **Management and Program Accountability**

- Provide mandatory training on disability-related issues to all management officials, including facts to overcome stereotypes about people with targeted disabilities, detailed instructions on special hiring authorities and reasonable accommodations procedures.
- Require Disability Program Managers to issue a monthly report to management showing the agency's progress in the hiring, advancement, and retention of people with targeted disabilities.
- Include a diversity/EEO element in management officials' performance appraisals and rate their use of special hiring authorities.
- Implement effective reasonable accommodation procedures that comply with applicable executive orders, EEOC guidance, and other federal standards; ensure EEOC has reviewed procedures initially and after any modification.
- Be mindful of disability program obligations when negotiating collective bargaining agreements.
- Ensure effective coordination between the agency's EEO programs and related human resource programs, including the Federal Equal Opportunity Recruitment Program (FEORP), the Selective Placement Programs and the Disabled Veterans Affirmative Action Program (DVAAP).

#### **Proactive Prevention of Unlawful Discrimination**

- Use special hiring authorities
- Resurvey the workforce to ensure accurate disability information.
- Maintain a system that tracks applicant flow data.
- Evaluate vacancy announcements to ensure that they clearly and simply explain the essential functions of open positions.
- Provide all vacancy announcements to disability organizations (including student internship organizations) and state vocational rehabilitation services.
- Regularly produce and review the MD-715 B tables to discern any trends or triggers that would warrant a barrier analysis.

# **Efficiency**

• Use a complaint tracking and monitoring system that permits the agency to ensure that all EEO complaints are being timely handled regardless of the alleged issues and bases. Use this information to identify, monitor and report significant trends reflected in complaint processing activity: Analysis of data relating to the nature and disposition of EEO complaints can provide useful insight into the extent to which an agency is meeting its obligations under the Rehabilitation Act.

# **Responsiveness and Legal Compliance**

• Ensure agency is in compliance with EEOC regulations, orders and other written instructions; ensure management fully and timely complies with final EEOC orders for corrective action and relief in EEO matters.