# 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 FY 2018, there were 395 employees (10.79%) with disabilities in the GS-11 to SES cluster. This is 1.21% below the 12% benchmark.

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

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

   a. Cluster GS-1 to GS-10 (PWTD)                         Answer     No

   b. Cluster GS-11 to SES (PWTD)                          Answer     No

| Grade Level Cluster(GS or Alternate Pay Planb) | Total | Reportable Disability | | Targeted Disability | |
|---|---|---|---|---|---|
| | # | # | % | # | % |
| Numarical Goal | -- | 12% | | 2% | |
| Grades GS-1 to GS-10 | 1866 | 266 | 14.26 | 68 | 3.64 |
| Grades GS-11 to SES | 3662 | 395 | 10.79 | 120 | 3.28 |

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

Human Resources (HR) and the Office of Civil Rights, Diversity, and Inclusion (OCRDI) has established a direct line of communication through our HR/OCRDI monthly meetings. The goals are communicated by OCRDI to HR staff, and HR includes the fiscal year's goals in the annual Outreach and Recruitment Plan. The Recruitment Plan is used to declare outreach and recruitment intentions for each special emphasis group. It is given to all hiring managers and recruiters, so that they are aware of APHIS' annual goals.

## Section II: Model Disability Program

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

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

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

Answer    Yes

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

| Disability Program Task | # of FTE Staff By Employment Status | | | Responsible Official (Name, Title, Office Email) |
|---|---|---|---|---|
| | Full Time | Part Time | Collateral Duty | |
| Processing applications from PWD and PWTD | 3 | 0 | 0 | nancy.c.varichak@usda.gov |
| Answering questions from the public about hiring authorities that take disability into account | 1 | 0 | 1 | adrienne.m.burch@usda.go |
| Processing reasonable accommodation requests from applicants and employees | 3 | 0 | 0 | David Walton RA Coordinator david.walton@usda.gov |
| Section 508 Compliance | 0 | 0 | 0 | Vacant |
| Architectural Barriers Act Compliance | 1 | 0 | 0 | GSA |
| Special Emphasis Program for PWD and PWTD | 1 | 0 | 15 | adrienne.m.burch@usda.go |

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

APHIS' AgLearn training system provides Accessibility and Section 508 Awareness training and Disability Legislation & Reasonable Accommodation (A Practical Guide) training, Hidden Talent: How Leading Companies Hire, Retain, and Benefit from People with Disabilities, Selective Placement Program Coordinator (SPPC) training, AbilityOne Program training, Perfectly Able: How to Attract and Hire Talented People with Disabilities, etc. Special Emphasis Program Managers (SEPMs) Training is mandatory for all SEPMs, including Disability Employment Program Managers.

## 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

| Brief Description of Program Deficiency | 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. | | |
|---|---|---|---|
| Objective | Finalize & display Reasonable Accommodations and Personal Assistance Services policies and procedures. | | |
| Target Date | Mar 21, 2019 | | |
| Completion Date | | | |
| **Planned Activities** | *Target Date* | *Completion Date* | *Planned Activity* |
| | Mar 31, 2010 | | Finalize RA and PAS procedures. Receive approval from the Director of Human Resources. |
| | Oct 31, 2018 | September 18, 2018 | Meet with EEOC representatives and receive official feedback on RA and PAS procedures. |
| | Mar 31, 2019 | | Upload RA and PAS procedures to external website |
| Accomplishments | *Fiscal Year* | *Accomplishment* | |

| Brief Description of Program Deficiency | 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)] | | |
|---|---|---|---|
| Objective | Finalize & display Reasonable Accommodations and Personal Assistance Services policies and procedures. | | |
| Target Date | Mar 31, 2019 | | |
| Completion Date | | | |
| **Planned Activities** | *Target Date* | *Completion Date* | *Planned Activity* |
| | Mar 31, 2018 | | Finalize RA and PAS procedures. Receive approval from Director of Human Resources |
| | Oct 31, 2018 | September 18, 2018 | Meet with EEOC representatives and received official feedback on RA and PAS procedures. |
| Accomplishments | *Fiscal Year* | *Accomplishment* | |

# 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.

APHIS collaborates with Association of People Supporting Employment First (APSE) in order to perform outreach and recruitment efforts. We also use the Job Accommodation Network (JAN) database in order to recruit applicants with disabilities.

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

Many of the merit promotion announcements that the Animal and Plant Health Inspection Service (APHIS) posts state that applications will be accepted from individuals eligible for noncompetitive appointment. Targeted recruitment outside of USDAJOBS is also conducted to contact applicants with disabilities. APHIS uses Schedule A 213.3102 (u) to hire individuals with physical, psychiatric, and/or intellectual disabilities. In addition, the authorities to make noncompetitive appointments of veterans with service-connected disabilities of 30 percent or more with the prospect of conversion to a permanent appointment are also frequently utilized to appoint persons with disabilities. A wide variety of positions at all grade levels in both the General Schedule and Federal Wage System are filled using these authorities.

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.

If a Schedule A applicant applies to a vacancy announcement, an HR Staffing Specialist/Assistant reviews the PWD's application materials to determine qualifications and eligibility. If the applicant is deemed qualified and eligible via Schedule A, he/she is forwarded to the selecting official via a non-competitive list (certificate). If the Schedule A applicant is selected, the servicing HR specialist provides guidance to the selecting official on the Schedule A appointment process.

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

Answer   Yes

Newly selected hiring managers, as a part of their training process, attend Fundamentals of Human Resource Management (FHRM) training. During FHRM training, special hiring authorities like Schedule A are discussed as a major topic area. FHRM training occurs six times a year. We also provide selecting officials with ad hoc trainings on topics like Schedule A and OPM's Bender List.

## 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.

In FY 2018, APHIS collaborated with organizations such as Lighthouse for the Blind, Association of People Supporting Employment First, Employer Assistance and Resource Network on Disability Inclusion (EARN), etc. APHIS developed a process to procure a sign language interpreter and closed captioning for our special observances, and plans to use this process for events in FY 2019. We maintain connections not only for employment reasons, but to teach basic communication skills to APHIS employees that will assist with communicating with other employees who may be vision or hearing impaired.

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

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

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

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

In FY 2018, there were 777 new hires. 44 were PWD (5.66%) and 7 were PWTD (0.90%). Both are below the benchmark goals.

| New Hires | Total | Reportable Disability | | Targeted Disability | |
|---|---|---|---|---|---|
| | | Permanent | Temporary | Permanent | Temporary |

| | (#) | Workforce (%) | Workforce (%) | Workforce (%) | Workforce (%) |
|---|---|---|---|---|---|
| % of Total Applicants | 0 | | | | |
| % of Qualified Applicants | 0 | | | | |
| % of New Hires | 0 | | | | |

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

Qualified applicant pool data was not provided with Table B7; therefore, we are unable to use qualified applicant pool data as a benchmark. A plan has been put in place to address this issue.

| New Hires to Mission-Critical Occupations | Total (#) | Reportable Disability | | Targetable Disability | |
|---|---|---|---|---|---|
| | | Qualified Applicants (%) | New Hires (%) | Qualified Applicants (%) | New Hires (%) |
| Numerical Goal | -- | 12% | | 2% | |
| 0201HUMAN RESOURCES SPECIALISTS | 678 | 0.00 | 0.00 | 0.00 | 0.00 |
| 0401GENERAL BIOLOGICAL SCIENCE | 3021 | 0.00 | 0.00 | 0.00 | 0.00 |
| 0403MICROBIOLO( | 123 | 0.00 | 0.00 | 0.00 | 0.00 |
| 0404BIOLOGICAL SCIENCE TECHNICIAN | 723 | 0.00 | 0.00 | 0.00 | 0.00 |
| 0421PLAN PROTECTION TECHNICIAN | 274 | 0.00 | 0.00 | 0.00 | 0.00 |
| 0486WILDLIFE BIOLOGY | 1227 | 0.00 | 0.00 | 0.00 | 0.00 |
| 0701VETERINARY MEDICAL SCIENCE | 1083 | 0.00 | 0.00 | 0.00 | 0.00 |
| 0704ANIMAL HEALTH TECHNICIAN | 326 | 0.00 | 0.00 | 0.00 | 0.00 |
| 2210INFORMATIOI TECHNOLOGY MANAGEMENT | 476 | 0.00 | 0.00 | 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

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0704 – Animal Health Technician 7.65% of the relevant applicant pool are PWD, however, only 3.95% of the total applications received were PWD. 2210 – Information Technology 19.60% of the relevant applicant pool are PWD, however only 10.77% of the total applications received were PWD. 5.20% of the relevant applicant pool are PWTD, however, only 4.62% of the total applications received were PWTD.

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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

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0401 – General Biological Science PWD were 9.92% of those who qualified, however only 7.14% of those selected were PWD. PWTD were 4.96% of those who qualified, however none were selected. 0403 – Microbiology PWD were 28.57% of those who qualified, however none were selected. PWTD were 14.29% of those who qualified, however none were selected. 0404 – Biological Science Technician PWD were 14.29% of those who qualified, however none were selected. PWTD were 7.14% of those who qualified, however none were selected. 0486 – Wildlife Biology PWD were 9.65% of those who qualified, however none were selected. PWTD were 3.95% of those who qualified, however none were selected. 0701 – Veterinary Medical Science PWD were 5.51% of those who qualified, however none were selected. PWTD were 1.97% of those who qualified, however none were selected. 0704 – Animal Health Technician PWD and PWTD were both 4% of those who qualified, however none were selected. 2210 – Information Technology Management PWD were 10.82% of those who qualified, however none were selected. PWTD were 4.64% of those who qualified, however none were selected.

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# 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.

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PWD and PWTD are given the same opportunities to participate in career development programs that are afforded to all APHIS employees. APHIS will continue to provide individuals with disabilities assistive technology to utilize throughout the career development programs, as well as for day-to-day duties. A plan has been put in place to address the collection of PWD/PWTD data for career development programs.

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## B. CAREER DEVELOPMENT OPPORTUNITES

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

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The Agency offers the following targeted leadership development programs: The Foundational Leadership Development Program (FLDP, formerly Basic LDP) targets employees at GS 4 – 6 levels to prepare participants with the essential knowledge, skills and abilities to meet the agency's succession planning needs and to achieve excellence, regardless of position or grade level. This program is a blended learning program that supports two separate weeks of classroom sessions and weekly web-based courses in between. The Intermediate Leadership Development Program (ILDP) targets employees at the GS 7 – 11 grade levels and consists

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of a blended learning curriculum, shadow assignments, and learning team projects. The Leadership Development for Project/ Program Managers (LDPM) targets employees at GS 12 – 14 levels and consists of development of project and program management skills for those who lead teams. The Advanced Leadership Development Program (ALDP) targets employees at GS 12 – 14 levels and consists of helping participants perform successfully in advanced supervisory and managerial level positions. The ALDP is filled via a competitive process open to fulltime GS 12 -14 employees in supervisory or managerial positions. The ALDP was re-launched in the summer of 2018, after taking a year hiatus to evaluate and redesign. The Federal Executive Institute (FEI) – Leadership for a Democratic Society targets employees at the GS 15 level and Senior Executive Service level. APHIS contracts with the Brookings Institute to deliver leadership development training for a diverse group of the agency's high performing GS 14 level employees, under the Brookings Executive Education (BEE) Program. Brookings offers a nine-month interagency cohort-based learning opportunity. The program highlights include an SES Application Package workshop to provide insights into the Executive hiring process. Program completion yields a Certificate of Public Leadership and an option to transfer program credit towards a Master's of Science in Leadership degree granted by Olin Business School at Washington University in St. Louis, MO. In addition to the Brookings program, high performing GS 14 level employees participated in the Harvard Kennedy School-Senior Executive Fellow Program; a four-week residential program that takes place on the University's Cambridge, MA campus. Participants received valuable training and practice in making decisions about real world challenges and scenarios. The program's curriculum included: Authentic Leadership, Decision Lab, Lexington Concord Leadership Tour, a Classroom Demo from an executive chef on the importance of healthy eating and wellness, and a lunch and learning opportunity with visiting Diplomats and Dignitaries. Participants received a Certificate of Completion from Harvard and invitations to future alumni events.

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

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

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

        a. Applicants (PWD)                         Answer   N/A

        b. Selections (PWD)                        Answer   N/A

Data is not available. Action plan will be in place to collect this data in FY 2019.

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

        a. Applicants (PWTD)                      Answer   N/A

        b. Selections (PWTD)                     Answer   N/A

Data is not available. Action plan will be in place to collect this data in FY 2019.

## C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If "yes", please describe the trigger(s) in the text box.

    a. Awards, Bonuses, & Incentives (PWD)                     Answer     Yes

    b. Awards, Bonuses, & Incentives (PWTD)                    Answer     Yes

A trigger is present in the Cash Award $500+ category for PWD and PWTD. The inclusion rate for PWD is 83.65%, in comparison to PWOD inclusion rate of 91.78%. The inclusion rate for PWTD is 83.51%, in comparison to PWOTD inclusion rate of 91.06%.

| Time-Off Awards | Total (#) | Reportable Disability % | Without Reportable Disability % | Targeted Disability % | Without Targeted Disability % |
|---|---|---|---|---|---|
| Time-Off Awards: 1-9 hours : Total Time-Off Awards Given | 240 | 14.58 | 82.08 | 5.00 | 9.58 |
| Time-Off Awards: 9+ hours : Total Time-Off Awards Given | 462 | 13.20 | 82.25 | 4.55 | 8.66 |

| Cash Awards | Total (#) | Reportable Disability % | Without Reportable Disability % | Targeted Disability % | Without Targeted Disability % |
|---|---|---|---|---|---|
| Cash Awards: $100 - $500: Total Cash Awards Given | 1296 | 13.58 | 86.42 | 3.55 | 10.03 |
| Cash Awards: $501+: Total Cash Awards Given | 5134 | 11.06 | 88.94 | 3.16 | 7.91 |

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance- based pay increases? If "yes", please describe the trigger(s) in the text box.

    a. Pay Increases (PWD)                                     Answer     No

    b. Pay Increases (PWTD)                                    Answer     No

| Other Awards | Total (#) | Reportable Disability % | Without Reportable Disability % | Targeted Disability % | Without Targeted Disability % |
|---|---|---|---|---|---|
| Quality Step Increases (QSI): Total QSIs Awarded | 216 | 12.50 | 87.50 | 3.70 | 8.80 |
| Performance Based Pay Increase | 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

Not applicable. APHIS does not have other types of 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    N/A

            ii. Internal Selections (PWD)                                Answer    N/A

      b. Grade GS-15

            i. Qualified Internal Applicants (PWD)                      Answer    No

            ii. Internal Selections (PWD)                                Answer    Yes

      c. Grade GS-14

            i. Qualified Internal Applicants (PWD)                      Answer    No

            ii. Internal Selections (PWD)                                Answer    Yes

      d. Grade GS-13

            i. Qualified Internal Applicants (PWD)                      Answer    Yes

            ii. Internal Selections (PWD)                                Answer    Yes

> SES applicant flow data is collected on a departmental level, therefore we do not have access to SES applicant flow data for FY 2018. In GS 13 to GS 15 grade levels, qualified PWD applicants are applying for these positions, however they are not being selected. In the GS-13 grade level, PWD were 12.57% of the relevant applicant pool, however PWD were only 10.34% of those who applied.

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    N/A

            ii. Internal Selections (PWTD)                             Answer    N/A

      b. Grade GS-15

             i. Qualified Internal Applicants (PWTD)                     Answer    No

            ii. Internal Selections (PWTD)                             Answer    Yes

      c. Grade GS-14

             i. Qualified Internal Applicants (PWTD)                     Answer    No

            ii. Internal Selections (PWTD)                             Answer    Yes

      d. Grade GS-13

        i. Qualified Internal Applicants (PWTD)         Answer  No

        ii. Internal Selections (PWTD)         Answer  Yes

> SES applicant flow data is collected on a departmental level, therefore we do not have access to SES applicant flow data for FY 2018. In GS 13 to GS 15 grade levels, qualified PWTD applicants are applying for these positions, however they are not being selected.

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  N/A

        b. New Hires to GS-15 (PWD)         Answer  N/A

        c. New Hires to GS-14 (PWD)         Answer  N/A

        d. New Hires to GS-13 (PWD)         Answer  N/A

> APHIS does not have data that specifies the GS level for new hire positions (Please see Table B7 in the Appendix). However, outside of Schedule A applicants, only 4.75% of new hires to permanent positions were PWD.

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  N/A

        b. New Hires to GS-15 (PWTD)         Answer  N/A

        c. New Hires to GS-14 (PWTD)         Answer  N/A

        d. New Hires to GS-13 (PWTD)         Answer  N/A

> APHIS does not have data that specifies the GS level for new hire positions (Please see Table B7 in the Appendix). However, outside of Schedule A applicants, only 1.58% of new hires to permanent positions were PWTD.

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  N/A

           ii. Internal Selections (PWD)         Answer  N/A

        b. Managers

           i. Qualified Internal Applicants (PWD)         Answer  N/A

           ii. Internal Selections (PWD)         Answer  N/A

    c. Supervisors

        i. Qualified Internal Applicants (PWD)              Answer   N/A

        ii. Internal Selections (PWD)                   Answer   N/A

APHIS does not have data that specifies the supervisory status of positions in which internal applicants are selected for promotions. However, in regards to GS 13, GS 14, and GS 15 grade levels, please see below: GS Level: GS 13 Rel App Pool: 12.57 PWD Qualified: 10.40 PWD Selected: 0 GS Level: GS 13 Rel App Pool: 3.71 PWTD Qualified: .4.30 PWTD Selected: 0 GS Level: GS 14 Rel App Pool: 12.61 PWD Qualified: 12.12 PWD Selected: 3.13 GS Level: GS 14 Rel App Pool: 3.75 PWTD Qualified: 4.46 PWTD Selected: 0 GS Level: GS 15 Rel App Pool: 6.49 PWD Qualified: 14.38 PWD Selected: 0 GS Level: GS 15 Rel App Pool: 2.22 PWTD Qualified: 9.8 PWTD Selected: 0

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   N/A

        ii. Internal Selections (PWTD)               Answer   N/A

    b. Managers

        i. Qualified Internal Applicants (PWTD)           Answer   N/A

        ii. Internal Selections (PWTD)               Answer   N/A

    c. Supervisors

        i. Qualified Internal Applicants (PWTD)           Answer   N/A

        ii. Internal Selections (PWTD)               Answer   N/A

APHIS does not have data that specifies the supervisory status of positions in which internal applicants are selected for promotions. However, in regards to GS 13, GS 14, and GS 15 grade levels, please see the table below: GS Level: GS 13 Rel App Pool: 12.57 PWD Qualified: 10.40 PWD Selected: 0 GS Level: GS 13 Rel App Pool: 3.71 PWTD Qualified: .4.30 PWTD Selected: 0 GS Level: GS 14 Rel App Pool: 12.61 PWD Qualified: 12.12 PWD Selected: 3.13 GS Level: GS 14 Rel App Pool: 3.75 PWTD Qualified: 4.46 PWTD Selected: 0 GS Level: GS 15 Rel App Pool: 6.49 PWD Qualified: 14.38 PWD Selected: 0 GS Level: GS 15 Rel App Pool: 2.22 PWTD Qualified: 9.8 PWTD Selected: 0

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   N/A

        b. New Hires for Managers (PWD)              Answer   N/A

        c. New Hires for Supervisors (PWD)            Answer   N/A

APHIS does not have data that specifies the supervisory status of positions for new hires nor qualified applicant pool data. However, in Table B3-1, APHIS is able to review data for occupational categories distributed by disability. Executive/Senior Level (GS 15 and above) All: 112 PWD: 10 (8.93%) - Trigger PWTD: 7 (6.25%) Mid-Level (GS 13 - 14) All: 486 PWD: 40 (8.23%) - Trigger PWTD: 14 (2.88%) First Level (GS 12 and below) All: 326 PWD: 26 (7.98%) - Trigger PWTD: 9 (2.76%) Other Officials

All: 794 PWD: 121 (15.24%) PWTD: 36 (4.53%) TOTAL All: 1718 PWD: 197 (11.47%) PWTD: 66 (3.84%)

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 | N/A |
|---|---|---|
| b. New Hires for Managers (PWTD) | Answer | N/A |
| c. New Hires for Supervisors (PWTD) | Answer | N/A |

APHIS does not have data that specifies the supervisory status of positions for new hires nor qualified applicant pool data. However, in Table B3-1, APHIS is able to review data for occupational categories distributed by disability. Executive/Senior Level (GS 15 and above) All: 112 PWD: 10 (8.93%) - Trigger PWTD: 7 (6.25%) Mid-Level (GS 13 - 14) All: 486 PWD: 40 (8.23%) - Trigger PWTD: 14 (2.88%) First Level (GS 12 and below) All: 326 PWD: 26 (7.98%) - Trigger PWTD: 9 (2.76%) Other Officials All: 794 PWD: 121 (15.24%) PWTD: 36 (4.53%) TOTAL All: 1718 PWD: 197 (11.47%) PWTD: 66 (3.84%)

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

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

## A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer    Yes

There are four employees who have not been converted. APHIS plans to alert each employee's program, and also establish a procedure to ensure that Schedule A employees are converted within a timely fashion.

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

| a. Voluntary Separations (PWD) | Answer | Yes |
|---|---|---|
| b. Involuntary Separations (PWD) | Answer | Yes |

Total Separations W/O: 7.18 PWD: 9.28 - Trigger Voluntary Separations W/O: 6.85 PWD: 8.69 - Trigger Involuntary Separations W/O: 0.32 PWD: 0.59 - Trigger

| Seperations | Total # | Reportable Disabilities % | Without Reportable Disabilities % |
|---|---|---|---|
| Permenant Workforce | 5654 | 12.01 | 87.99 |
| Total Separations | 420 | 15.00 | 85.00 |
| Voluntary Separations | 400 | 14.75 | 85.25 |
| Involuntary Separations | 20 | 20.00 | 80.00 |

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    Yes

    b.Involuntary Separations (PWTD)                      Answer    No

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Total Separations W/O: 7.44 PWTD: 7.22 Voluntary Separations W/O: 7.07 PWTD: 7.22 - Trigger Involuntary Separations W/O: 0.37 PWD: 0

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| Seperations | Total # | Targeted Disabilities % | Without Targeted Disabilities % |
|---|---|---|---|
| Permenant Workforce | 5654 | 3.43 | 96.57 |
| Total Separations | 420 | 3.33 | 96.67 |
| Voluntary Separations | 400 | 3.50 | 96.50 |
| Involuntary Separations | 20 | 0.00 | 100.00 |

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.

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Will review exit interview results during the barrier analysis process in FY 2019.

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## 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.

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APHIS' website is 508 compliant. Although APHIS does not have a web page dedicated to 508 compliance, its website includes links to USDA's 508 website: https://www.aphis.usda.gov/aphis/ourfocus/business-services/Information_Technology https://www.usda.gov/accessibility-statement

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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.

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APHIS' facilities are General Services Administration (GSA) owned or leased facilities; therefore, compliance with the Architectural Barriers Act is the responsibility of GSA. APHIS continues to collaborate with GSA to ensure that our facilities meet the requirements.

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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.

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APHIS plans to fill the vacant 508 program manager collateral duty position. To support the 508 compliance program, APHIS plans to: • Begin program training staff to ensure 508 compliance is understood. The suggestion has been made to create an Aglearn training program and require it annually. • Train all IT support staff to support users using assistive technology. • Perform a health check on our public and internal websites to determine compliance with applicable laws. • Collaborate with enterprise software manufactures to obtain understanding and training in 508 compliance with their software. For example: Contact Microsoft to obtain training and user guides for Word, Excel, etc., for 508 compliance.

## 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.)

The average processing time is approximately 25 days. It's important to understand that the processing timeframe depends upon how quickly the employee or requester provides the requested medical information.

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.

APHIS manages a comprehensive Reasonable Accommodation (RA) program and maintains an informative website: https://www.aphis.usda.gov/aphis/ourfocus/business-services/HRD/Reasonable_Accommodations_Program The site includes a link to the MRP Directive for the Reasonable Accommodation Program, the Departmental Directive, as well as other information and resources. The agency has a full-time Reasonable Accommodation Program Coordinator and 2 full-time Reasonable Accommodation Specialists for handling accommodation requests. The RA staff delivered 11 presentations/webinars detailing the accommodation process, focusing on telework as an accommodation. The RA staff trained 50 members of the Safety and Health Committee on January 31, and 40 members of the PPQ management team during 3 training sessions on January 30, March 22, and September 3. In partnership with OCRDI, the RA staff presented 5 RA overview sessions as part of the Federal Human Resources Management (FHRM) Training on March 1, April 18, June 25, July 23, and August 22. The RA staff also developed a customized Reasonable Accommodation case study scenario and participated in training 50 experienced supervisors as part of the Experienced Supervisor Pilot Training Program. The training program was developed by the HR Training and Development Staff and required supervisors to engage in a role-play, providing them the opportunity for skills-based practice. The trainings were held on May 17 and July 12. Reasonable accommodations and Work Life Wellness (WLW) information is available to disabled veteran applicants during the recruitment process. Through WLW, veterans have access to WorkLife4You, an agency-paid benefit which offers counseling. APHIS ensures reasonable accommodations are being made to qualified individuals with disabilities in accordance to applicable laws and departmental regulations. All requests for reasonable accommodations are forwarded to the agency Reasonable Accommodations staff for review and processing in accordance with applicable laws and departmental regulations. The Reasonable Accommodations staff and the TARGET Center often work together to coordinate accommodations solutions. The staff collaborates with ITD to obtain the support needed for the assistant technology and assistant software used as reasonable accommodations. The MRP Reasonable Accommodation policy is administered as appropriate to process requests for reassignments as a reasonable accommodation. In FY 2018, the Reasonable Accommodation Program opened 513 cases. Of that number 425 were closed within the fiscal year. (See table for breakdown of accommodations by program area.) In FY17, RA opened 188 cases. This is a 165% increase. The increase is due to the change in the Departmental telework policy, effective January 4, 2018. As a result of the telework policy change, the RA staff provided numerous presentations to senior leaders and management teams regarding the RA process and telework as a RA, developing FAQs to address general questions. In FY 2018, there were 87 requests for technology items and/or equipment through the centralized funds for reasonable accommodations. Purchases included assistive technology (e.g., dragon software, read/write gold software) and ergonomic equipment. The total cost for funding these requests was $23,215. The cost of providing interpreting services for 4 APHIS hearing impaired employees was $ 112,222. APHIS Reasonable Accommodation Program has the resources to fund the cost of interpreting reduces a significant barrier to employment for deaf employees who work in APHIS. Total Cases: 513 Type of Accommodations Requested Telework: 275 Change in Official Duty Station: 12 Modify Job Duties: 28 Office Equipment: 78 Special Software: 9 Total: 402

## 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.

APHIS has revised Directive MRP 4300.2, Reasonable Accommodations Program, and developed a new HR Desk Guide subchapter, to include PAS information. Requests for PAS will following reasonable accommodations procedures and the funding process can be discussed with the Reasonable Accommodations Specialist. The draft directive and HR desk guide subchapter are currently being reviewed by the agency's EEOC representative to ensure compliance prior to finalizing the documents. In addition, APHIS has developed a new Reasonable Accommodations Brochure to include PAS information that will be posted on the external and internal websites.

# Section VII: EEO Complaint and Findings Data

## A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the governmentwide average?

   Answer   Yes

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

   Answer   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.

In FY 2018, there were 40 formal complaints total, and of the 40, 12 of the cases cited disability and harassment as the basis (30%). This is above the government-wide average of 14.23%. APHIS did not find any discrimination based on disability status in FY 2018.

## 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   Yes

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.

In FY 2018, there were 40 formal complaints total, and of the 40, 6 cases cited failure to provide a reasonable accommodation as the basis (15%). This is above the government-wide average of 9.74%. APHIS did not find any discrimination involving the failure to provide a reasonable accommodation during FY 2018.

# 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   Yes

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

<div align="center">Answer    Yes</div>

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

| STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:<br><br>Provide a brief narrative describing the condition at issue.<br><br>How was the condition recognized as a potential barrier? | In FY 2018, the EEOC conducted a review of APHIS data and found that barriers may exist for Persons with Disabilities (PWD) and Persons with Targeted Disabilities (PWTD). EEOC noted the follow triggers in APHIS' FY 2017 data: APHIS fell below 12% for PWD in the GS-11 to SES cluster; Participation rates for PWD fell below 12% in MCOs; Lack of PWD qualified applicants for internal competitive promotions to the 0704 series and GS-14/GS-15 grades; Lack of PWD selectees for promotions in the 0401, 0404, 0486, and 0701 series and GS-15 grade; High separation rate of PWD & PWTD; High percentage of PWD filing formal complaints alleging reasonable accommodation; Participation rate fell below 12% in grades GS-14 to SES; and Participation rate fell below 12% among first-level, mid-level and executive level managers. Using FY 2018 data, APHIS noted the following triggers: Lack of 508 Compliance Manager; Participation rate is below 12% for PWD in the GS-11 to SES cluster; Failure to meet the goal of 12% for PWD and 2% for PWTD with new hires; Participation rate is below 12% for PWD in 7 out of 9 MCOs; Participation rate is below 2% for PWTD in 3 out of 9 MCOs; Lack of recruiting qualified PWD applicants for the 0704 series and 2210 series; Lack of recruiting qualified PWTD applicants for the 2210 series; Lack of PWD and PWTD selectees for promotions in 7 out of 9 MCOs; and GS-13 to GS-15 grade levels; New hires for PWD and PWTD were below 12% and 2% respectively; Participation rate is below 12% among first-level, mid-level and executive level managers; Lack of conversion of Schedule A employees; High separation rate of PWD & PWTD; and High percentage of PWD filing formal complaints alleging harassment and/or reasonable accommodation. |
|---|---|
| STATEMENT OF BARRIER GROUPS: | *Barrier Group* |
| | People with Disabilities |
| | People with Targeted Disabilities |

| BARRIER ANALYSIS:<br><br>Provide a description of the steps taken and data analyzed to determine cause of the condition. | |
|---|---|
| STATEMENT OF IDENTIFIED BARRIER:<br><br>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition. | After completing a workforce climate assessment survey, it was discovered that APHIS employees have reservations about self-identifying/self-reporting. APHIS employees fear that self-reporting will cause retaliation from management, harassment from colleagues and/or supervisor, and will prevent upward mobility. This may be due to a perceived cultural climate of the workplace (field employees), but it is also due to the lack of knowledge/education on the self-identification process, who has access to this information, and why it is important for employees to report and update their disability status. More research to find additional barriers will be completed in FY 2019. |

| Objective | Recruitment, retention, promotion, and self-identification efforts for PWD and PWTD. |
|---|---|
| Date Objective Initiated | Oct 1, 2018 |
| Target Date For Completion Of Objective | Sep 30, 2020 |
| Responsible Officials | Patrick Johnson  Diversity & Inclusion Specialist |
| | Shayla Spann  Diversity & Inclusion Specialist |
| | La Shon Cole  Deputy Director, Office of Civil Rights |

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Staffing & Funding (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|---|---|---|---|---|
| 09/30/2019 | Inform Human Resources on the issue with collecting complete and accurate data, and collaborate with HR to make sure our new data tables system is able to report all needed information. Table B7 should reflect occupational series and qualified percentages. Table B12 should reflect career development participation of PWD/PWTD. | Yes | | |
| 03/31/2019 | Inform hiring managers of the hiring goals and encourage them to utilize disability status as a positive factor in hiring, promotion, and/or assignment decisions. Continue outreach and recruitment efforts for PWD and PWTD in MCOs and their senior grade levels. | Yes | | |
| 03/31/2019 | Host Brown Bag Luncheons in collaboration with the Reasonable Accommodation Staff to promote the use of the reasonable accommodation process and self-reporting. Reassure the workforce that self-reporting and RA are two separate entities, and self-reporting will not cause harm to one's career. | Yes | | |
| 03/31/2019 | Retention – Promote training, internship, and mentoring programs for PWD and PWTD. Quarterly conduct a climate assessment survey to understand if retention efforts are succeeding. | Yes | | |
| 06/30/2019 | As suggested by the EEOC, "implement a process that monitors the status of employees with disabilities who are hired under Schedule A, to ensure that they are converted to the competitive service after two years of satisfactory performance." | Yes | | |
| 06/30/2019 | Host focus groups, review exit interviews, and analyze FEVS to understand why PWD/PWTD are separating from APHIS. Research the demographics of PWDs who separated by grade level, occupation, office, etc. Conduct an analysis of career development programs to see if there is an issue with upward mobility. This will be completed by the Disability Employment Program Managers. | Yes | | |
| **Fiscal Year** | **Accomplishments** | | | |

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

Currently, the United States Department of Agriculture is moving towards a new data workforce data system. It is our hope that the transition to the new system will allow us to collect complete and accurate data for FY 2019.

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

APHIS will continue to host the activities we completed in FY 2018, to see if the data supports a significant impact when we review the data quarterly in FY 2019.

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.

APHIS will continue to host the activities we completed in FY 2018, to see if the data supports a significant impact when we review the data quarterly in FY 2019.