

## 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

The participation rate for PWD at the GS-11 to SES grade cluster is 9.45% in FY 2024, which falls below the 12% goal.

\*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

The participation rate of PWTD in the GS-11 to SES cluster was 1.75% in FY 2024, which falls slightly below the goal of 2%.

Grade Level Cluster(GS or Alternate Pay Plan)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-11 to SES					
Grades GS-1 to GS-10					

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

Treasury has communicated the overall disability goals with its bureaus through the quarterly HR Stat and HCAC meetings. Treasury's bureaus have communicated the disability goals through various methods to include new manager and supervisor training, newsletters, staff meetings, electronic bulletin boards, and bureau/organization specific dashboards.

### 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

Counsel appointed a new Reasonable Accommodation Coordinator (RAC) in May 2024. The RAC was re-aligned to the Labor and Employee Relations Division to maintain the necessary firewall between the EEO Director and RA Program.

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	
Special Emphasis Program for PWD and PWTD	2	0	0	Keona Hill EEO Director Keona.L.Hill@irscounsel.treas.gov
Processing applications from PWD and PWTD	14	0	0	Pamela Roberts HR Director Pamela.S.Roberts@irscounsel.treas.gov
Answering questions from the public about hiring authorities that take disability into account	14	0	0	Pamela Roberts HR Director Pamela.S.Roberts@irscounsel.treas.gov
Processing reasonable accommodation requests from applicants and employees	1	0	0	Kimberly Johnson RA Coordinator Kimberly.F.Johnson@irscounsel.treas.gov
Section 508 Compliance	2	0	0	Keona Hill EEO Director Keona.L.Hill@irscounsel.treas.gov
Architectural Barriers Act Compliance	2	0	0	Keona Hill EEO Director Keona.L.Hill@irscounsel.treas.gov

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

Answer Yes

Counsel’s RA Coordinator participated in the EEOC’s Virtual Training: All About Accommodations: Disability, Pregnancy and Religion, and the Federal Dispute Resolution (FDR) Conference 2024 (course topics included: where they received RA related training in ADA, Rehabilitation Act, RA Program Compliance, reasonable accommodations, and harassment prevention).

**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

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## Section III: Program Deficiencies In The Disability Program

## 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.

We use the Workforce Recruitment Program (WRP) and the various veterans’ placement programs as sources of applicants with disabilities. Counsel’s Human Resources Division and EEO Program Office attended the WRP Federal Employee Webinar(s) to learn about qualified applicants available through the WRP database. Counsel updated our Employees with Disabilities Fact Sheet to include information on the WRP.

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

Schedule A is available for use along with Veteran Appointment Authorities to non-competitively appoint PWD and PWTD and veterans with service-connected disability rating of 30% or more. When individuals apply utilizing the Schedule A Hiring Authority, their applications are reviewed by the servicing HR Specialist who confirms that the applicants meet the qualification requirements of the announced position and have provided required proof of disability. Applicants applying under the Schedule A Hiring Authority who are deemed qualified are referred to the hiring manager on a Schedule A certificate of eligibility with guidance on selection procedures including the application of veterans’ preference, when applicable. Managers have the option to interview and/or hire from the Schedule A certificate or to consider other candidates from other issued certificates (Merit Promotion, Non-Competitive, VRA, etc.).

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.

When individuals apply utilizing the Schedule A Hiring Authority, their applications are reviewed by the servicing HR Specialist who confirms that the applicants meet the qualification requirements of the announced position and have provided required documentation of disability. Applicants applying under the Schedule A Hiring Authority who are deemed qualified are referred to the hiring manager on a Schedule A certificate of eligibility with guidance on selection procedures including the application of veterans’ preference, when applicable. Managers have the option to interview and/or hire from the Schedule A certificate or to consider other candidates from other issued certificates (Merit Promotion, Non-Competitive, VRA, etc.).

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

Answer Yes

The Human Resources Division publicized fact sheets regarding special hiring authorities (including PWD, veterans, and disabled veterans) on a manager's only SharePoint website. The fact sheets defined the specific hiring authority, eligibility requirements for appointment, documentation required, benefits to the hiring manager, and links to additional information. Information regarding special hiring authorities is distributed periodically to Area Managers, Executives, Executive Assistants, and Administrative Officers via email along with a link to the SharePoint site.

**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.

Counsel is registered with the WRP, FEED, and established a disability cohort to address needs of PWD and PWTD.

**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 No

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

The participation rate for New Hires for PWTD is 1.54% in FY 2024, which falls slightly below the 2% goal.

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

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 No

b. New Hires for MCO (PWTD) Answer No

FY 2024 Hires PWD Hires PWTD Hires 0905 - 180 Hires: PWD: 12.22% PWTD: 2.78% 0950 - 25 Hires: PWD: 20% PWTD: 4% Counsel has two MCOs, 0905 (Attorney) and 0950 (Paralegal). In FY 2024, Counsel hired 180 Attorneys-0905s (22 PWD and 5 PWTD) and hired 25 Paralegals -0950s (5 PWD and 1 PWTD).

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%

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 | No  |
| b. Qualified Applicants for MCO (PWTD) | Answer | Yes |

FY 2024 Internal Hires PWD Internal Hires PWTD Internal Hires 0905 (0) Hires: PWD: 0% PWTD: 0% 0950 (6) Hires: PWD: 16.67% PWTD: 0% Counsel has two MCOs, 0905 (Attorney) and 0950 (Paralegal). In FY 2024, Counsel did not report any attorney internal hires and hired 6 Paralegals internal hires (6 PWD and 0 PWTD).

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 | No |
| b. Promotions for MCO (PWTD) | Answer | No |

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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.

All promotion opportunities are advertised on a Chief Counsel Sharepoint site and are available to current employees. Reasonable accommodations are made for all trainings. We also promote the use of IDPs, Counsel Career Networking Group, and the services of Counsel’s Career Advisor.

### B. CAREER DEVELOPMENT OPPORTUNITES

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

The Counsel Career Networking Group (CCNG) supports career growth and professional development by offering a variety of opportunities, forums to network, and educational resources to employees. CCNG assists employees with: • Building and expanding relationships within and across workgroups and management levels; • Accessing leadership opportunities and resume-enhancing activities; • Gaining insight and advice from others and being challenged in a safe, supportive environment; • Attending virtual events and programs focused on career, professional and personal development; and • Building a supportive network of peer resources. Counsel’s Attorney Recruitment and Retention Program manages the recruitment of law students and attorneys for our Honors and Summer Legal Programs and aids retention efforts by providing career development programs, resources and services, and individual career counseling to Counsel attorneys and managers. Resources for employees include career modules for attorneys and non-attorneys, fact sheet on soft skills and how to develop them, Scholars Program that provides graduate-level tax law training, tips for preparing and applying for GS-15 positions, Individual Development Plans (IDPs) to identify objectives and activities for employee career development, and Senior Lawyers Council of GS-15 and above attorneys who volunteer to serve as a resource for employees who may be interested in an attorney career path. Counsel also appointed a Career Advisor in January 2024 who provides professional development and career growth guidance to employees as requested. The Training and Communications

Division offers a variety of training and career development opportunities for attorneys, paralegals, administrative support staff, and managers. All training and development opportunities are advertised Counsel-wide. Reasonable accommodations are made for all training opportunities.

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	546	10	7%	0.18%	10%	0.4%
Detail Programs	33	10	3%	0%	3%	0%
Fellowship Programs						
Mentoring Programs						
Coaching Programs						
Training 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 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 %
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Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
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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

Quality step increases: Only 7 QSI's were awarded in FY 2024.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
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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

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## 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

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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
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ii. Internal Selections (PWTD)	Answer	No
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## b. Grade GS-15

i. Qualified Internal Applicants (PWTD)	Answer	No
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ii. Internal Selections (PWTD)	Answer	No
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## c. Grade GS-14

i. Qualified Internal Applicants (PWTD)	Answer	No
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ii. Internal Selections (PWTD)	Answer	No
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## d. Grade GS-13

i. Qualified Internal Applicants (PWTD)	Answer	No
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ii. Internal Selections (PWTD)	Answer	No
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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
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b. New Hires to GS-15 (PWD)	Answer	No
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c. New Hires to GS-14 (PWD)	Answer	No
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d. New Hires to GS-13 (PWD)	Answer	No
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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
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b. New Hires to GS-15 (PWTD)	Answer	No
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c. New Hires to GS-14 (PWTD)	Answer	No
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d. New Hires to GS-13 (PWTD)	Answer	No
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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

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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

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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

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 No
- c. New Hires for Supervisors (PWTD) Answer No

## 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 No

During the reporting period, Counsel had two employees who were eligible for conversion under Schedule A; however, they were not converted. One employee declined conversion and the other employee’s management did not want to convert at this time.

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

During the reporting period, four employees retired on disability.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
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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

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
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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.

When evaluating the types of voluntary separations, we noted that a total of 9 (11.39%) PWD separated from Counsel due to a reported mental disability and a total of 70 (88.61) employees separated from Counsel who did not identify a physical or mental disability.

## 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.

IRS-CC's public website is located at <https://www.jobs.irs.gov/counsel>.

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.

IRS-CC's public website is located at <https://www.jobs.irs.gov/counsel>.

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.

IRS-CC doesn't have any identifiable accessibility or technical issues that need to be addressed at this time.

## 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 for reasonable accommodations requested in FY 2024 was approximately 43 calendar days from the date of receipt of the initial request to the approval of the RA decision. \*This information is reflective from data from May 5, 2024 through September 30, 2024.

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.

IRS-CC is working to establish its effectiveness as a reasonable accommodation program, through updating its RA procedures, policies, and practices. Over the past FY we have reevaluated reasonable accommodation (RA) training for managers. A manager's understanding of their roles and responsibilities in the RA process will continue to contribute to the timely processing of requests. Counsel developed and conducted a comprehensive mandatory RA training for approximately 454 Counsel managers/employees. This training included sharing scenarios from EEOC Enforcement Guidance, integrated polling questions and providing handouts to all participants. RA training for managers was integrated into Fundamentals for New Manager Training. This training helped engage new managers in the first steps in awareness in how to be a Deciding Official. Counsel's RA Coordinator participated in the

EEOC's Virtual Training: All About Accommodations: Disability, Pregnancy and Religion, and the Federal Dispute Resolution (FDR) Conference 2024 (course topics included: where they received RA related training in ADA, Rehabilitation Act, RA Program Compliance, reasonable accommodations, and harassment prevention).

## 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.

Counsel has not received any PAS requests during FY 2024.

## Section VII: EEO Complaint and Findings Data

### A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer No

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

Answer 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.

N/A

### 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.

N/A

## 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?

Answer Yes

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?	Participation rate of both PWD and PWTD in the GS-11 to SES cluster falls below the goals of 12% for PWD and 2% for PWTD.				
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i> People with Disabilities People with Targeted Disabilities				
<b>Barrier Analysis Process Completed?:</b>	N				
<b>Barrier(s) Identified?:</b>	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> PWD and PWTD		<b>Description of Policy, Procedure, or Practice</b> A potential barrier may be our recruitment outreach and practices.		
<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>
12/20/2024	03/31/2025	Yes			Expand outreach to disability organizations.
<b>Responsible Official(s)</b>					
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>	
EEO Director		Keona Hill		Yes	
<b>Planned Activities Toward Completion of Objective</b>					
<b>Target Date</b>	<b>Planned Activities</b>			<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>
03/31/2025	Identify disability organizations.			Yes	
<b>Report of Accomplishments</b>					
<b>Fiscal Year</b>	<b>Accomplishment</b>				

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

NA

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

NA

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.

NA