NSA FY2023 Performance relative to FY2023 Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons With Disabilities

Table of Contents

Note: This report is a summary of input to the Management Directive-715 (MD-715) report and annual progress toward meeting Equal Employment Opportunity Commission (EEOC)-established goals for persons with disabilities in the federal workplace.

To capture agencies' affirmative action plans 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

Using the goal of 12% as the benchmark, the Agency does not have a trigger involving PWD by grade level cluster in the permanent workforce for Cluster GS-1 to GS-10 or for Cluster GS-11 to SES.

Using the goal of 2% as the benchmark, the Agency does not have a trigger involving PWTD by grade level cluster in the permanent workforce for Cluster GS-1 to GS-10 or for Cluster GS-11 to SES.

NSA's Talent Identification & Acquisition office presents and reviews the goals for the approaching fiscal year as part of the annual recruitment kick-off meeting that occurs in the third quarter of the hiring fiscal year. NSA identified various tradecraft tools that are used to build a diverse, expert workforce. The goals are also included in the weekly report to the NSA Director and listed on the online hiring dashboard. Agency leaders receive a quarterly update about the recruitment progress made regarding hiring PWD, including PWTD.

Section II: Model Disability Program

Pursuant to 29 CFR §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 AND COMPETENT STAFFING FOR THE DISABILITY PROGRAM

The Agency has designated sufficient qualified personnel to implement its disability program during the reporting period.

The Agency employs:

- Five full time employees and one collateral duty employee to process reasonable accommodation requests from applicants and employees.
- One full time employee and 11 collateral duty employees to oversee compliance with the Architectural Barriers Act.

- Four full time employees, four part time employees, and one collateral duty employee to oversee compliance with Section 508 of the Rehabilitation Act of 1973 as amended.
- One full time employee and one collateral duty employee to process applications from PWD and PWTD.
- One full time employee and one collateral duty employee to answer questions from the public about hiring authorities that take disability into account.
- One full time employee to oversee the Special Emphasis Program for PWD and PWTD.

NSA has provided the disability program staff with sufficient training the carry out their responsibilities during the reporting period.

Each Reasonable Accommodations Manager (RAM) received at least 20 hours of continuing education in the past year, including coursework through CDMS.org (Certified Disability Management Specialist), which focuses on disability management in the workplace. RAMs obtained additional training through the National Employment Law Institute, focusing on specific issues regarding legal aspects of workplace accommodations for individuals with disabilities. RAMs also completed specific training to maintain their certifications and licensure in the nursing, employee assistance, and social work fields.

The Sign Language Interpreters (SLI) gained, and enhanced, extra-linguistic knowledge of the environments in which they interpret through completion of courses and activities as part of the Job Quality Standard, and by acquiring Continuing Education Units (CEUs) to maintain their required professional certifications. The courses offered through the National Cryptologic University (NCU) are standard-issue, computer-based modules incorporated into an interpreting-centric curriculum. The Office of Reasonable Accommodations & Accessibility (ORAA) also provided a quarterly in-house training session for the SLI team, in addition to the leadership, customer service, and career development trainings that the SLIs attended individually through the NCU.

Agency captioners also completed required training to maintain their professional certifications.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

NSA has provided sufficient funding, and other resources, to successfully implement its disability program during the reporting period.

The need for Reasonable Accommodations (RA) resources has increased due to the rise in hiring PWD and PWTD, and expansion in services. NSA is proactively seeking ways

to bolster resources to meet this increased demand, including increased staffing for RAMs and Personal Assistance Services (PAS).

NSA is also taking steps to increase its SLI capacity to better meet the needs of the Agency's Deaf and Hard-of-Hearing (DHH) community. In FY23, ORAA partnered with the NCU to obtain access/accounts for uncleared SLI contractors on the Agency's at-home training platform in support of unclassified interpreting requests from DHH employees working, and attending training, from home. Additionally, the Agency added contract requirements to establish local, cleared contract SLIs at the Agency's Cryptologic Centers (CCs) across the country, reducing the need for travel between sites and resulting in more timely, efficient, and effective delivery of interpreting services to DHH employees at the CCs. This has led to a massive reduction in the need for staff interpreters to cover CC assignments. In FY23, the addition of local contract SLIs at just one of the CCs saved the staff SLIs 1,040 hours of interpreting (plus travel time), which was effectively redirected to other areas of SLI need.

Section III: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 CFR §1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. Identify outcomes of the agency's recruitment program plan for PWD and PWTD.

A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

NSA uses the Departments of Defense (DoD) and Labor's Workforce Recruitment Program (WRP) database to source candidates for the annual Disability Hiring Invitational. All persons seeking employment at NSA, including those with a disability, must apply online at www.IntelligenceCareers.gov.

In FY2023, the NSA External Recruitment Events and Marketing Team participated in numerous disability-focused recruitment events:

- Career Invitational for People with Disabilities
- Career Expo at Gallaudet University in Washington, D.C.
- Equal Opportunities Publications STEM Career Fair
- Careers & the disABLED Virtual Career Expo
- The National Federation of the Blind Career Expo

NSA was named the "Public Sector Employer of the Year" in 2021, by the magazine *CAREERS & the disABLED*, for our hiring efforts in the disabled community. In August of 2023, NSA won the DoD Award for achievements in employing individuals with disabilities.

NSA's External Recruitment and Hiring division executes our Diversity Recruitment Strategic Plan through community outreach and marketing events. The team researches and attends specific professional events knowing the attendees will include both people with targeted disabilities and people with non-targeted disabilities. The Agency closely tracks all external events by category to ensure inclusion of groups with differing abilities.

NSA uses the Schedule A Hiring Authority in an indirect capacity to source, recruit, and hire underrepresented talent into our permanent workforce. Through involvement with the WRP and the Careers and the disABLED Expo, we display our inclusive culture.

The External Recruitment and Hiring division also leverages our Employee Resource Groups (ERGs) at the grassroots level to engage with student organizations at colleges and universities throughout the U.S. NSA fosters relationships with both Disabilities Affairs and Veteran Affairs at Center for Academic Engagement (CAE) schools via the Campus Ambassador Program.

NSA's external hiring is under the authorization of the DoD Intelligence Community Defense Civilian Intelligence Personnel Systems, rather than the hiring authority of Schedule A. All positions are in the Excepted Service, therefore, NSA need not invoke Schedule A authority.

The Program Manager for Disability Recruitment sources candidates with a documented disability from a variety of channels. Applications are shared with the External Recruitment, Hiring Recruiters, and Staffing leads. Applicants who meet minimum qualifications, and are determined to be a qualified applicant, are forwarded to the appropriate hiring managers.

The Agency provides a fully accessible Disability Awareness training. Course completion is mandatory for all, and must be completed once every three years.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

NSA has contacts with professionals associated with Maryland Rehabilitation Services, the National Federation for the Blind, and the National Technical Institute for the Deaf.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, no triggers exist for PWD and/or PWTD among the new hires in NSA's permanent workforce.

Using the qualified applicant pool as the benchmark, no triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCOs).

Using the relevant applicant pool as the benchmark, we were unable to determine if triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the MCOs. Reportable data is not defined for feeder jobs by work role for this category of the MD-715.

Using the qualified applicant pool as the benchmark, we were unable to determine if triggers exist for PWD and/or PWTD among employees promoted to any of the MCOs. NSA does not promote to work roles. Therefore, data is not reported for this category of the MD-715.

Section IV: 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. Identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

A. ADVANCEMENT PROGRAM PLAN

NSA has a comprehensive, top-to-bottom approach to ensuring equal advancement opportunities for PWD/PWTD. In FY23, the Agency evolved systemic and grass-roots efforts that focused on mitigating potential barriers in career growth and advancement for PWD/ PWTD.

NSA's Job Enrichment Board (JEB) is a system through which all employees may apply for short-term assignments — including special projects, details outside of their organization, and shadowing opportunities — to enhance their career growth. In the second quarter of FY23, NSA's Equality team conducted a review of the JEB process and helped the JEB team implement practices to increase fairness for all employees, including the PWD/PWTD communities.

Additionally, in an affirmative effort to provide additional notice of available vacancy ads to underrepresented groups, including those with disabilities, NSA organizations send vacancy announcements to the ERGs, and share them on blogs and in newsletters to reach the widest pool of qualified applicants. The PWD ERG also partners with NSA's Career Guidance Center (CGC) to provide career-focused, skill-building and information sessions tailored specifically for the PWD community and ERG membership. NSA recognizes the PWD/PWTD community has unique needs related to promotion readiness and preparedness for the promotion process, which has the potential to impact career advancement.

At the grass-roots level, the PWD ERG leads by offering courses for PWD/PWTD to boost promotion readiness. While NSA offers standardized promotion readiness trainings, the courses offered by the PWD ERG focus on topics that have been of special interest to the PWD/ PWTD community — including promotion writing skills and a comprehensive session on the NSA promotion process. Additionally, the ERG organizes opportunities for employees to participate in promotion package review sessions geared specifically toward helping PWD/PWTD effectively communicate accomplishments and tying them to larger NSA initiatives and goals.

At the systemic level, the Mock Board team began conducting mock promotion board sessions specifically for the Deaf/Hard of Hearing (DHH) community in FY23. Mock board exercises enable employees to conduct effective board procedures with reliability, consistency, and accuracy, and offer an in-depth understanding of the process for individuals who may not have served as a board member in the past. Also at the systemic level, NSA's Affirmative Action Plan Council (AAPC) developed a guide to assist supervisors in fairly assessing employee job performance for those with and without reasonable accommodations.

B. CAREER DEVELOPMENT OPPORTUNITIES

NSA annually hosts formal and informal career development opportunities for employees. NSA's Mentoring and Shadowing Resource Center promotes and facilitates a variety of enterprise-wide mentoring activities.

The Director's Skills Enrichment Program is also open to all employees via application process. The purpose of the program is to develop diverse and effective prospective leaders in the workforce through experiential opportunities focused on skill development and mission exposure, as well as mentoring and networking.

The CGC is the primary resource to help all employees who want to take advantage of career planning activities including career exploration; self-assessments; internal job search assistance; interviewing enhancement; shadowing; and assistance with creating internal staffing documents. The CGC has been fostering a close collaboration with the PWD ERG to capitalize on the success of Career Empowerment Group sessions held in 2021/2022. A career advisor in the CGC attends PWD ERG meetings to solicit input on CGC services and to personally invite members to events and share information about upcoming career development opportunities.

Triggers do not exist for PWD or PWTD among the applicants and/or selectees for any of the career development programs. The absence of triggers is mostly due to the extremely small group sizes of applicants and selectees.

C. AWARDS

Using the inclusion rate of 12% for PWD and 2% for PWTD as the benchmark, NSA does have a trigger involving PWD and PWTD for some levels of time-off awards, bonuses, or other incentives.

Using the inclusion rate as the benchmark, NSA does not have a trigger involving PWD or PWTD for quality step increases or performance-based pay increases.

NSA does not have other types of employee recognition programs.

D. PROMOTIONS

NSA has a trigger involving PWD and PWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels.

There is no trigger for qualified internal PWD or PWTD applicants at the SES and Grades GS 13-15 levels.

There is no trigger for internal PWD selections at the SES, Grade GS-15, and Grade GS-13 levels.

A trigger exists for internal PWD selections at the GS-14 level.

There is no trigger for internal PWTD selections at the SES and Grade GS-15 levels.

A trigger exists for internal PWTD selections at the GS-13 and GS-14 levels. Fails to meet 4/5th rule: GG-13 and GG-14.

Using the qualified applicant pool as the benchmark, the Agency does not have a trigger involving PWD or PWTD among the new hires to the senior grade levels.

NSA does not have a trigger involving PWD and PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions. NSA is a rank in person Agency and there is no promotion associated with a change in position.

Using the qualified applicant pool as the benchmark, the Agency does not have a trigger involving PWD or PWTD among the selectees for new hires to supervisory positions. Applicants do not apply directly to a management or executive position, so the benchmarks of 12% (PWD) and 2% (PWTD) are used overall.

Section V: 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

NSA's external hiring is under the authorization of the DoD Intelligence Community Defense Civilian Intelligence Personnel Systems, rather than the hiring authority of Schedule A. All positions are in the Excepted Service; therefore, NSA need not involve Schedule A authority.

Using the inclusion rate as the benchmark, the percentage of PWD among voluntary and involuntary separations did not exceed that of persons without disabilities.

Using the inclusion rate as the benchmark, the percentage of PWTD among voluntary and involuntary separations did not exceed that of persons without targeted disabilities.

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.

The NSA notice explaining employees' and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint, is available at https://www.nsa.gov/nsa-accessibility/.

The NSA notice explaining employees' and applicants' rights under the Architectural Barriers Act (ABA), including a description of how to file a complaint, was revised in 2022 to ensure clarity and prominence on the website. It is available at https://www.nsa.gov/ABA/.

NSA leads the way with our integrated approach to facility and IT accessibility. We have built cross-functional teams, and trained accessibility experts and resources in our various organizations, to ensure accessibility is prioritized at the ground level of IT and facility projects.

One of our cross-functional teams is NSA's Enterprise Accessibility Council (EAC). Chartered in November 2021, the EAC executes a prioritized action list for accessibility advocacy and awareness across all agency organizations. The EAC consists of representatives from various organizations and is chaired by senior executives from Installations & Logistics (I&L) and the Deputy Chief Information Officer.

In FY2023, the EAC closed three of its top 12 priorities:

- Develop an education campaign to eliminate illegal parking in accessible spaces.
- Auto-captioning services in auditoriums.
- Recommend digital accessibility training for software developer work roles.

Looking ahead, the group will continue to pursue ongoing projects to progress accessibility efforts in the areas of parking, tools for meetings, and mission IT, as well as procedures for occupant and personnel notifications.

A working group under our AAPC partnered with the Well-Being Services Emergency Management Team to draft and finalize a guidance tool to better equip the workforce with information on evacuation procedures for individuals with disabilities impacting mobility. Enhancements included specific details regarding PWD emergency preparedness communicated via webpage content and mass messages to the workforce. Another group under our AAPC completed the foundational work necessary to begin a pilot for speech-to-text accessibility solutions. That group is collaborating with NSA's Capabilities Directorate to test platforms and evaluate technology for handheld speech-to-text solutions.

Outside of our various cross-functional teams and working groups, our I&L 10-year plan includes both continual review and building/exterior surveys to identify potential accessibility improvements. I&L surveyed four major buildings at NSA headquarters and one remote command site (three locations) in CY2023. Planning is underway for FY24 sites under the 10-year schedule stipulated in the Accessibility Sustainment Plan. For new construction and renovations, expert technical personnel perform design quality assurance and quality control to guide and verify ABA-compliant design products in partnership with DEIA.

In FY23, I&L continued leveraging experiential input from PWD ERG members on new facility features. Feedback was implemented to improve usability of the features beyond minimum compliance. Employees can report facility accessibility concerns to I&L and track how they are being handled via a notification system. Additionally, I&L developed and implemented two new training courses: ABA Standards Training (ALLY7301) and An Introduction to Universal Design (ALLY7302). Available to the entire workforce, the courses serve to increase awareness, technical understanding of compliance tactics, and

promote the mindset of accessibility as a base requirement for facilities, services, digital products, and processes. All new NSA buildings will now comply with ABA requirements to ensure physical accessibility, including our newest mission facility completed in FY23.

From an IT accessibility perspective, NSA's IT 508 Compliance and Accessibility team is located within the office of our Chief Information Officer. In FY23, NSA completed the second iteration of the IC Accessibility Program Maturity Model, an IT accessibility self-assessment tool through which an IC agency can better understand the maturity of its IT accessibility mission and processes. Using the tool, the agency self-assessed as "Emergent" with processes that are functional and promising.

The NSA 508 Compliance team has consistently made improvements in the auditing and rating of IT accessibility products and applications. The newest version of NSA's IT Accessibility scoresheet was released in December 2023 encompassing additional Web Content Accessibility Guidelines (WCAG) and Trusted Tester standards for increased clarity of IT accessibility requirements and usability functions in line with agency Policy 6-38: Information and Communication Technology Accessibility. The 508 Compliance team scored hundreds of products and tools on NSA's IT infrastructure, in addition to auditing and driving IC and IT initiatives and continuing to host Accessibility 101 sessions and integrated sessions into the First 2 Years Program for new employees.

Finally, in October of 2023, NSA supported the first IC-wide IT Accessibility Symposium, hosted at NGA, by leading panels and hosting sessions.

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.

Absent extenuating circumstances, requests for reasonable accommodations are processed (including providing the accommodation, if approved) as soon as possible, and no later than 30 business days from the date the request is made. This 30-day business period includes the five days in which ORAA must contact the requestor after a reasonable accommodations request is made.

Of note, NSA leadership signed the Agency's updated policy regarding reasonable accommodations in November 2023. NSA closely monitors and analyzes trends to understand the efficacy of our reasonable accommodations program, makes adjustments

to address gaps, engages the workforce to increase awareness, and seeks feedback from those who participate in the reasonable accommodations program.

The reasonable accommodations process provides guidance on how to request workplace accommodations, and is documented fully on NSA's internal and external webpages. The process, from request to implementation, takes approximately 7-30 days. Trends are monitored and adjustments are made in the reasonable accommodation implementation process when the team identifies a high frequency of requests or when specific high-frequency trends are identified for particular accommodations, implementation time, accommodation equipment, security requirements/limitations, or location of employees with disabilities.

Sign language interpreting statistics are reviewed on a quarterly basis to identify trends and implement solutions as needed. Those statistics are also reviewed by DEIA's senior leaders.

The administrative services contract continues to address the gap in administrative assistance services for employees with disabilities. The contract enables a wider range of performance of essential job functions by assisting employees with tasks such as note taking, physically assisting with office equipment, lifting and moving work-related items, and other work-related task assistance.

Disability Awareness Training was developed for employees, managers, recruiters, and hiring managers, and is required to be completed every three years. ORAA staff fulfill requests for tailored training on various disability topics on an ad-hoc basis. In recognition of the FY23 National Disability Employment Awareness Month, ORAA released a four-part article series highlighting specific reasonable accommodations solutions, and employees who use them, to increase the workforce's awareness of available options. To further raise the workforce's awareness of disability topics, ORAA released Agency-wide articles about the Workforce Recruitment Program and accessible fitness equipment in the Agency fitness centers, as well as a video highlighting Communication Access Real-time Translation (CART)/Captioning as a "Cool Career."

ORAA continues to monitor feedback mechanisms to better understand customers' experiences and make adjustments as necessary.

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.

By the end of FY23, NSA successfully transitioned management of the Personal Assistance Services (PAS) program from our Wellbeing Services organization to ORAA.

Both teams partnered closely to ensure a smooth transition of applicant and employee service requirements and care remained supportive and timely.

Now that the service has fully transitioned to ORAA, PAS intake forms are required for those inquiring to use the service. Intake forms are reviewed to ensure accommodations are within the scope of PAS, and new customers receive service agreements outlining all approved requests. All PAS customer service agreements are re-evaluated bi-annually to ensure accommodations are true to current needs.

Section VI: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

During the last fiscal year, the percentage of PWD who filed a formal EEO complaint alleging harassment was not higher than the government-wide average. During the last fiscal year, there were no complaints alleging harassment based on disability status to result in a finding of discrimination or a settlement agreement.

There were no findings of discrimination alleging harassment based on disability status during the last fiscal year.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

During the last fiscal year, the percentage of PWD who filed a formal EEO complaint alleging failure to provide a reasonable accommodation was not higher than the government-wide average. There were no findings of discrimination or settlement agreements involving the failure to provide a reasonable accommodation during the last fiscal year.

There were no findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year.

Section VII: 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.

The Agency has identified barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD.

The Agency has established a plan to correct the barrier(s) involving PWD and/or PWTD.

In 2018, the Agency completed a full barrier analysis. Promotion rates for persons with disabilities were lower in all grades when compared to employees without a disability. Final recommendations were made to eliminate the identified barriers.

As of FY23 submission of this report, only one planned recommendation remains open, which involves implementation of speech-to-text capabilities. In NSA's high-security environment, implementation of such a technology requires extensive testing and security infrastructure. This process is still in progress and NSA is pleased to have entered the first piloting phase. Employees are currently testing the capabilities and providing feedback.

Regarding the completed activities, there has been insufficient time to indicate their impact. NSA follows industry standard practices for statistical analyses and does not analyze trends or impacts until five years have elapsed since implementation.

NSA plans to begin re-examining the FY18 PWD Barrier Analysis study, in FY25, to determine the efficacy and impact of the corrective activities, and whether barriers identified in the previous study were addressed.