

## 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 percentage of PWD in the GS-11 to SES cluster was 7% in FY 2020, which falls below the goal of 12%. The data is based on a small sample size (124 employees) Federal workforce only and not the Museum’s donated (i.e., Non-Federal) employees.

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

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

- |                                 |            |
|---------------------------------|------------|
| a. Cluster GS-1 to GS-10 (PWTD) | Answer Yes |
| b. Cluster GS-11 to SES (PWTD)  | Answer Yes |

In FY 2020, the percentage of PWTD in the GS-1 to GS-10 cluster was 0% and the GS-11 to SES cluster was 1%, which falls below the goal of 2%. The data is based on small sample size; (124 employee) Federal workforce only and not the Museum’s donated (i.e., Non-Federal)

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical Goal	--	12%		2%	
Grades GS-1 to GS-10	17	2	11.76	0	0.00
Grades GS-11 to SES	80	6	7.50	1	1.25

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

Our Museum-wide Diversity, Equity, Accessibility, and Inclusion (DEAI) initiative, launched in 2020, is a key institutional priority with three primary goals: • Help us diversify our workforce at all levels and will incorporate a disability equity lens • Create a workplace that is fair and inclusive, and • Hold ourselves accountable for living up to these important goals, recognizing this work is a key part of upholding our institutional values. The Museum’s DEAI Oversight group was established to facilitate, inform and advance Museum progress on DEAI assessment and action planning. The group’s participants are as follows: Museum Director,

Deputy Director and Chief Program Officer, Chief Museum Operations Officer, Deputy Chief Program Officer, Director of Planning, Chief Financial Officer, General Counsel, EEO Manager, and HR Director. As part of our focus on DEAI, staff at all levels were provided a variety of different avenues to share their feedback including:

- Listening session with staff -- Museum Director and other leaders held one-on-one meetings and small-group discussions
- Initial DEAI Survey -- conducted in July 2020 to gain a better understanding of the staff’s perspectives related to DEAI
- Follow-Up DEAI Survey -- conducted by the Museum’s external DEAI consultant in April 2021 to gather staff feedback on DEAI at the Museum
- Focus groups -- facilitated by the Museum’s external DEAI consultant in April 2021 to gather additional feedback on DEAI at the Museum
- DEAI Advisory Group -- a group is being assembled that will include diverse stakeholders from across the Museum to advise and help promote and advance the initiative
- Unconscious Bias Training - all staff were invited to participate in a new, voluntary, training program to raise awareness of unconscious bias. The consultant is assessing the Museum’s current policies, practices, and culture impacting DEAI and helping the Museum to develop a multi-year comprehensive DEAI strategy. The multi-year strategy will identify priority outcomes, create yearly roadmaps with milestones and metrics, and develop a training plan that addresses the unique needs of the Museum. The EEO Manager will work with Human Resources and the DEAI consultants to develop an outreach plan to ensure all of the hiring managers and recruiters are informed of the Museum’s commitment to the employment of persons with disabilities as part of the DEAI initiative.

## 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

N/A

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	0	0	1	Christine Sonnabend, Project Manager, Integrated Planning and Implementation, Csonnabend@ushmm.org
Processing applications from PWD and PWTD	2	0	0	Chanel Cabiness, Talent Acquisitions Lead, Human Resources, Ccabiness@ushmm.org YRCI (contractor)
Answering questions from the public about hiring authorities that take disability into account	2	0	0	Chanel Cabiness, Talent Acquisitions Lead, Human Resources, Ccabiness@ushmm.org YRCI (contractor)

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing reasonable accommodation requests from applicants and employees	0	0	1	Rachel Bell, Human Resources Business Partner (Reasonable Accommodation Coordinator), Human Resources, RBell@ushmm.org
Architectural Barriers Act Compliance	0	0	1	Kristy Brosius, Director of Operations, Kbrosius@ushmm.org
Section 508 Compliance	0	0	1	Sarah Lumbard, Senior Digital Curator, Museum Experience and Digital Media, Slumbard@ushmm

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

Museum staff who are responsible for carrying out the disability program have attended training in their respective fields or roles on an ongoing basis, staying abreast of best practices, laws and regulations. The EEO Manager will work with Human Resources Specialist to research and identify training resources for the staff to consider as needed.

**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

N/A

**Section III: Program Deficiencies In The Disability Program**

<b>Brief Description of Program Deficiency</b>	D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.		
<b>Objective</b>	To post the affirmative action plan for people with disabilities on the Museum's public website		
<b>Target Date</b>	Jun 19, 2020		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jun 19, 2021		Research best practices (including consulting with other agencies) Review and determine our agency requirement Propose a location to post the plan on the Museum's website, if the requirement is applicable Submit for approval Implement
	Jun 30, 2022		Update the affirmative action plan and align with the DEAI Initiative
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2020	Additional time is needed. The Museum strongly agrees with the principles of affirmative action regarding people with disabilities and is committed to advancing the plan in a meaningful and sustainable way for the long term.	

## 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.

The Museum uses Monster Government Solutions, a recruitment hiring system, which includes a voluntary questionnaire for job applicants to complete regarding disabilities. In addition, job applicants may submit applications via Schedule A. The Museum has partnered with St. Coletta of Greater Washington (serving children and adults with intellectual disabilities) for a Mentoring Day at the Museum as part of the disability Special Emphasis Program (SEP), promoting career development for up to 5 students/ mentees and job-seekers with disabilities through hands-on career exploration and ongoing mentoring relationships. The Disability SEP Committee has compiled recruitment resources as part of EEO action planning and will be sharing them with Human Resources in an upcoming meeting. The DEAI consultant is assessing the Museum’s current policies, practices, and culture impacting DEAI and helping the Museum to develop a multi-year comprehensive DEAI strategy to diversity our workforce including people 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

Schedule A hiring authority and Disabled Veterans Appointment

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority; and, (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

Schedule A: (1) A Human Resources(HR) Specialist (or HR Business Partner) reviews the required Schedule A documentation that provides the disability status to determine eligibility. Documentation of eligibility for employment under Schedule A can be a letter obtained from a licensed medical professional (e.g., a physician or other medical professional certified by a state, the District of Columbia, or a U.S. territory to practice medicine); a licensed vocational rehabilitation specialist (i.e., state or private); or any

Federal agency, state agency, or agency of the District of Columbia or a U.S. territory that issues or provides disability benefits. In addition, the letter should state that the applicant is able to perform the essential functions of the position. The Specialist also views the candidates resume to determine if they are eligible for a position. (2) The Hiring Official is provided a certificate of eligibles with names and resumes and a cover letter from Human Resources providing guidance on how and when a candidate can be appointed. Disabled Veteran Appointment: (1) A Human Resources(HR) Specialist (or HR Business Partner) reviews: resume with places and dates of employment, including month/year to month/year and number of hours worked per week (e.g. 40 hours, 32 hours, etc.), Copy of DD-214, Record of Military Service (member copy 4) to determine eligibility for veterans preference and honorable discharge and a Copy of SF-15 stating they have a 30% or more disability rating and are able to perform the duties of the position for which they are applying and Veterans Affairs Rating Letter that identifies the disability percentage for the applicant. (2) Once all requirements are met, the applicant is appropriately placed in ranking order on the competitive certificate. The Hiring Official is provided a certificate of eligibles with names and resumes and a cover letter from Human Resources providing guidance on the certificate of eligibles.

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 No

The DEAI consultant is assessing the Museum’s current policies, practices, and culture impacting DEAI and helping the Museum to develop a comprehensive DEAI strategy to diversify our workforce including people with disabilities. The multi-year strategy will identify priority outcomes, create yearly roadmaps with milestones and metrics, and develop a training plan that addresses the unique needs of the Museum. The EEO Manager will work with Human Resources and the DEAI consultants on the training of all hiring managers on the use of Schedule A which takes applicants' disability into account. In addition, EEO will research training options for the Human Resources Division to consider. The training will be implemented as part of the DEAI initiative.

**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.

As part of the disability program Special Emphasis Program (SEP), an action plan has been developed and will be finalized. The plan includes the following: (1) a list of recommended recruitment and internship sources -- some of the suggestions include: Ability Jobs, Recruiting Able Grads, Earn (2) Identify partnerships and establish open lines of communication with 3 to 4 external affinity organizations, both federal and private, for best practices to support diversity in the workplace -- some of the suggestions include: Office of Disability Employment Policy (ODEP), US Department of Labor American Association of People with Disabilities National Organization on Disability, and Mentoring Day -- the Museum has partnered with St. Coletta of Greater Washington to establish a Mentoring Day at the Museum promoting career development for up to 5 students/mentees and job-seekers with disabilities through hands-on career exploration and ongoing mentoring relationships.

**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 No

In FY 2020, among the new hires in the permanent workforce, triggers exist, 0% for both PWD and PWTD, which falls below the respective benchmark of 12% for PWD and 2% for PWTD. The data is based on a small sample size (1 new hire) Federal workforce only and not the Museum’s donated (i.e., Non-Federal) employees.

New Hires	Total	Reportable Disability	Targeted Disability
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	(#)	Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary 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 N/A
- b. New Hires for MCO (PWTD) Answer N/A

The Museum is determining mission critical positions. Once identified, the data will be provided.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	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 N/A
- b. Qualified Applicants for MCO (PWTD) Answer N/A

The Museum is determining mission critical positions. Once identified, the data will be provided.

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 N/A
- b. Promotions for MCO (PWTD) Answer N/A

The Museum is determining mission critical positions. Once identified, the data will be provided.

## 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.

In an effort to support advancement, all employees in collaboration with their supervisors are given the opportunity to establish individual developmental goals including success measures and resources required and also to identify strengths and areas of development as part of the performance appraisal process. An EEO action plan for the disability SEP has been developed and will be finalized. The plan includes the following: convene focus group(s) to determine concerns and obtain suggestions, advocate for diversity within the staff mentoring program once Human Resources reintroduces the program and propose cross training opportunities. The DEAI consultant is assessing the Museum’s current policies, practices, and culture impacting DEAI and helping the Museum to develop a multi-year comprehensive DEAI strategy to diversity our workforce including people with disabilities. The EEO Manager will work with Human Resources and the DEAI consultants on sufficient opportunities for advancement of people with disabilities as part of the DEAI initiative.

**B. CAREER DEVELOPMENT OPPORTUNITES**

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

Training is encouraged and available through a variety of sources to all employees. To enhance access to a wide range of training resources, the Museum has purchased a subscription to LinkedIn Learning, an online video library. As part of the subscription, all Museum employees have unlimited access to LinkedIn Learning. Other opportunities include: cross training opportunities - identified projects throughout the Museum, independent study program - continued development and education of Museum staff through a period of independent work study in any occupational field represented in the Museum workplace (on hold / updating the program), Coaching Mentoring (on hold / updating the program), Detail, and Individual Developmental Goal Setting as part of the performance appraisal process. The EEO Manager will work with Human Resources and the DEAI consultants on sufficient opportunities for career development of people with disabilities as part of the DEAI initiative. Mentoring (on hold / updating the program) Detail Individual Developmental Goal Setting as part of the performance appraisal process

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 (%)
Detail Programs	0	0	0	0	0	0
Other Career Development Programs	0	0	0	0	0	0
Internship Programs	0	0	0	0	0	0
Fellowship Programs	0	0	0	0	0	0
Mentoring Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	0	0
Training Programs	0	0	0	0	0	0

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

The EEO Manager will work with Human Resources and the DEAI consultants to capture the data as part of the DEAI initiative. The Museum workforce includes Federal and Donated (non-Federal) employees. The Donated personnel management system, pay scale and occupational structure differs from the Federal making it difficult to combine the data.

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

The EEO Manager will work with Human Resources and the DEAI consultants to capture the data as part of the DEAI initiative. The Museum workforce includes Federal and Donated (non-Federal) employees. The Donated personnel management system, pay scale and occupational structure differs from the Federal making it difficult to combine the data.

**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

In FY 2020, triggers exist for time-off awards 11% for PWD and 0% for PWTD, which falls below the respective benchmark of 12% for PWD and 2% for PWTD. The data is based on a small sample size (124 employees) Federal workforce only and not the Museum’s donated (i.e., Non-Federal) employees. This is not reflective of the Museum as a whole.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 1 - 10 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 1 - 10 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 11 - 20 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 21 - 30 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 31 - 40 Hours: Average Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0	0.00	0.00	0.00	0.00



Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 41 or more Hours: Average Hours	0	0.00	0.00	0.00	0.00

  

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$501 - \$999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$1000 - \$1999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$2000 - \$2999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$3000 - \$3999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$4000 - \$4999: Average Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Awards Given	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Total Amount	0	0.00	0.00	0.00	0.00
Cash Awards: \$5000 or more: Average Amount	0	0.00	0.00	0.00	0.00

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

a. Pay Increases (PWD) Answer Yes

b. Pay Increases (PWTD) Answer Yes

In FY 2020, triggers exist for quality step increases 0% for both PWD and PWTD, which falls below the respective benchmark of 12% for PWD and 2% for PWTD. The data is based on a small sample size (3 employees) who received QSI on the Federal workforce only and not the Museum’s donated (i.e., Non-Federal) employees. This does not reflect the Museum as a whole.

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

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

- a. Other Types of Recognition (PWD) Answer No
- b. Other Types of Recognition (PWTD) Answer Yes

In FY 2020, triggers exist for cash award .81% for PWTD, which falls below the respective benchmark of 2% for PWTD. The data is based on 124 person in the Federal workforce only and a total of 15 PWD receiving a cash awards, and 1 PWTD. This percentage does not reflect the Museum as a whole since our donated (non-Federal) are not included.

**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 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

The Museum does not have any SES positions.

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	No
c. Grade GS-14		
i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	No
d. Grade GS-13		
i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	No

The Museum does not have any SES positions.

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	No
c. New Hires to GS-14 (PWD)	Answer	No
d. New Hires to GS-13 (PWD)	Answer	No

The Museum does not have any SES positions.

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	No
c. New Hires to GS-14 (PWTD)	Answer	No
d. New Hires to GS-13 (PWTD)	Answer	No

The Museum does not have any SES positions.

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

N/A

6. Does your agency have a trigger involving PWTB 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 (PWTB) Answer No

ii. Internal Selections (PWTB) Answer No

b. Managers

i. Qualified Internal Applicants (PWTB) Answer No

ii. Internal Selections (PWTB) Answer No

c. Supervisors

i. Qualified Internal Applicants (PWTB) Answer No

ii. Internal Selections (PWTB) Answer No

N/A

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

N/A

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

N/A

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

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

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer N/A

There are no Schedule A appointments 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

N/A

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	0	0.00	0.00
Permanent Workforce: Resignation	0	0.00	0.00
Permanent Workforce: Retirement	0	0.00	0.00
Permanent Workforce: Other Separations	0	0.00	0.00
Permanent Workforce: Total Separations	0	0.00	0.00

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 No

b.Involuntary Separations (PWTD)

Answer No

N/A

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	0	0.00	0.00
Permanent Workforce: Resignation	0	0.00	0.00
Permanent Workforce: Retirement	0	0.00	0.00
Permanent Workforce: Other Separations	0	0.00	0.00
Permanent Workforce: Total Separations	0	0.00	0.00

- 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.

N/A

**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.

- 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.

Click “Accessibility” link on USHMM homepage, located at <https://www.ushmm.org>

- 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.

Click “Accessibility” link on USHMM homepage, located at <https://www.ushmm.org>

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

During the FY20 and FY21, the USHMM made numerous improvements to improve accessibility for visitors to the Museum. For example: • Designed all exhibitions using ADA and Universal Design constraints. • Continued to make improvements to the Permanent (Main) Exhibition by removing visual barriers in the form of glass and steel in front of exhibit areas. • Reviewed new technologies and surfaces to reduce glare and increase contrast. • Designed the Burma’s Path to Genocide exhibition with accessible text and image locations, safety features, audio interactives and video captioning. • Designed American Witnesses poster set with accessible color configurations, audio testimony via call-in and transcript access via QR codes. • Plans to lower the mounted height of some AV monitors to increase accessible viewing in the American Responses to the Holocaust display. • Continues close collaboration between staff in USHMM physical and digital design teams to ensure compliant and consistent accessibility standards within exhibition programs. During the FY20 and FY21, USHMM made dozens of improvements to online accessibility. For example, USHMM: • Added video captioning functionality to Holocaust Encyclopedia. • Made Alt tag improvements such as: o Alt tag training - Teaching content producers how to write proper alt text and how it differs from an image title or caption. This allows USHMM to best serve the needs of the visually impaired who are using screen readers. o Alt text on all images in the Burma’s Path to Genocide online exhibition • Began putting custom controls on looping video that plays longer than 5 seconds to allow the user to

pause the video. • Added live closed captioning to “Stay Connected” Facebook Live series that began in April 2020. (SubRip subtitle files (SRT files) are also uploaded along with all recorded video program.) • Continued to provide transcripts with all video content. • Provided screen reader improvements including: o Planning for improved functionality for content producers to update alt tags on images, which will include the ability to add translated alt tags for multilingual accessibility. o Began testing with screen readers. o Providing training for screen reader testing to internal team members. • Improved audio captioning for hearing impaired including through: o Implementing features and new template to provide transcripts/captioning of historical audio clips in the Holocaust Encyclopedia. o Implementing multilingual timed captioning on map animation content in the Holocaust Encyclopedia. o Identifying video content without timed captioning (all video content has transcripts) in English and 18 other languages and began to implement captioning. o Planning for incorporation of transcript and translated transcript fields for text on artifacts and documents • Provided staff training and investment to support accessibility including o a full walkthrough of WCAG 2.1 and all its success criteria to gain a deeper understanding of what each one means. o reviewing other testing tools. • Improving color contrast. • Planning for audio recordings of popular articles on the Holocaust Encyclopedia. Pilot planned for summer 2021. • Ongoing readability editing of text in the Holocaust Encyclopedia aiming at a 9th grade reading level. • Is in the process creating time-coded transcripts for oral testimonies which will allow us to add closed captioning/rolling transcripts for our audio and video collections material. USHMM hopes to have around 1000 hours available online by the end of FY21 and plans to make 2,000-3,000 more hours available in the future.

**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.)

8 to 25 days

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

The Museum recently revised and expanded its comprehensive Reasonable Accommodation (RA) program policy, procedure, and forms and made the expanded documents available to all staff. The Museum also hired a new Reasonable Accommodation Coordinator (RAC) who has provided individualized guidance and training to certain offices. Information about the Museum’s Reasonable Accommodation process is made available to all new employees and supervisors at orientation; to all employees and supervisors via the Museum’s internal website and to applicants via Human Resources and the External Website. The Museum’s new RAC has further streamlined RA processing and promptly processes requests and promptly provides approved accommodation guidance and provides regular guidance to employees and supervisors..

**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.

The Museum is using its new comprehensive RA Policy (discussed above) to provide PAS to employees who need them. The Museum has not received any PAS requests since issuing its new RA Policy but will continue to monitor trends. As part of the training being developed to accompany the Museum’s recently approved (June 2021) RA policy, procedures, and forms, the Museum intends to emphasize the availability of PAS and process for requesting PAS to employees and supervisors.

## 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.

### 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.

## Section VIII: Identification and Removal of Barriers

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

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

Answer No

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

Answer No

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

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

The DEAI consultant is assessing the Museum’s current policies, practices, and culture impacting DEAI and helping the Museum to develop a comprehensive DEAI strategy to diversify our workforce including people with disabilities. The multi-year strategy will identify priority outcomes, create yearly roadmaps with milestones and metrics, and develop a training plan that addresses the



unique needs of the Museum. The EEO Manager will work with Human Resources and the DEAI consultants on triggers and barriers.

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

Our Museum-wide Diversity, Equity, Accessibility, and Inclusion (DEAI) initiative, launched in 2020, is a key institutional priority with three primary goals: • Help us diversify our workforce at all levels and will incorporate a disability equity lens • Create a workplace that is fair and inclusive, and • Hold ourselves accountable for living up to these important goals, recognizing this work is a key part of upholding our institutional values. The Museum's DEAI Oversight group was established to facilitate, inform and advance Museum progress on DEAI assessment and action planning. The group's participants are as follows: Museum Director, Deputy Director and Chief Program Officer, Chief Museum Operations Officer, Deputy Chief Program Officer, Director of Planning, Chief Financial Officer, General Counsel, EEO Manager, and HR Director. As part of our focus on DEAI, staff at all levels were provided a variety of different avenues to share their feedback including: • Listening session with staff -- Museum Director and other leaders held one-on-one meetings and small-group discussions • Initial DEAI Survey -- conducted in July 2020 to gain a better understanding of the staff's perspectives related to DEAI • Follow-Up DEAI Survey -- conducted by the Museum's external DEAI consultant in April 2021 to gather staff feedback on DEAI at the Museum • Focus groups -- facilitated by the Museum's external DEAI consultant in April 2021 to gather additional feedback on DEAI at the Museum • DEAI Advisory Group -- a group is being assembled that will include diverse stakeholders from across the Museum to advise and help promote and advance the initiative • Unconscious Bias Training - all staff were invited to participate in a new, voluntary, training program to raise awareness of unconscious bias. The consultant is assessing the Museum's current policies, practices, and culture impacting DEAI and helping the Museum to develop a multi-year comprehensive DEAI strategy. The multi-year strategy will identify priority outcomes, create yearly roadmaps with milestones and metrics, and develop a training plan that addresses the unique needs of the Museum. The EEO Manager will work with Human Resources and the DEAI consultants to develop a plan to gauge the impact of those activities towards eliminating barriers for persons with disabilities as part of the DEAI Initiative.

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.

See response to #4.