

# Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

**Federal Election Commission - FY 2025**

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: No |

To ensure FEC EEO Program alignment with the current Administration’s policies and EEOC goals, the MD-715 analysis methodology involving:

- “triggers” to identify “barriers” or “underrepresentation”
- “benchmarking” that targets specific applicant pools, or
- "inclusion" and determination of an “inclusion rate”

was not utilized on FY’25 data. We await specific guidance from the EEOC, after its quorum has been regained, on how/whether to resume these types of analyses and the business case(s) they are intended to support.

\* 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.

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|---------------------------------|------------|
| a. Cluster GS-1 to GS-10 (PWTD) | Answer: No |
| b. Cluster GS-11 to SES (PWTD)  | Answer: No |

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- “triggers” to identify “barriers” or “underrepresentation”
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| Grade Level Cluster<br>(GS or Alternate Pay Planb) | Total | Reportable<br>Disability Total | Reportable Disability<br>Percentage<br>(Numerical Goal<br>12 Percent) | Targeted Disability Total | Targeted Disability<br>Percentage<br>(Numerical Goal<br>2 Percent) |
|--|-------|--------------------------------|---|---------------------------|--|
| Grades GS-11 to SES                                | 228   | 21                             | 9.21  | 5                         | 2.19   |
| Grades GS-1 to GS-10                               | 24    | 6                              | 25.00   | 2                         | 8.33   |

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

Historically, the FEC’s workforce outreach efforts have consisted of posting on USAJOBS, LinkedIn, Traverse Jobs, and GovDelivery subscription service to new vacancy announcements on the FEC website. For hard-to-fill or specialized vacancies, other targeted recruitment methods may also have been used, as appropriate. Previous EEOC target goals of 12 Percent PWD and 2 Percent PWTD were

not communicated to FEC staff in FY'25. The Agency's workforce resurvey efforts were suspended to ensure program alignment with Administration goals, in addition to the hiring freeze that was in place for the vast majority of the fiscal year.

## Section II: Model Disability Program

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

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

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

Answer: Yes

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

| Disability Program Task  | Total Full Time | Total Part Time | Total Collateral Duty | Responsible Official (Name, Title, Office Email)   |
|--|-----------------|-----------------|-----------------------|--|
| Section 508 Compliance   | 1               | 0               | 0                     | Patcharee Phongsvirajati<br>Web Manager & Section 508 Coordinator<br>508coordinator@fec.gov              |
| Answering questions from the public about hiring authorities that take disability into account | 1               | 0               | 0                     | OPM HR Solutions staff<br>San Antonio Services Branch<br>816-541-8101                                    |
| Processing reasonable accommodation requests from applicants and employees                     | 1               | 0               | 0                     | Kevin Salley<br>Interim Contact for the Accommodation Program<br>(due to staff retirement/hiring freeze) |
| Special Emphasis Program for PWD and PWTD  | 1               | 0               | 0                     | Vacant for FY'25<br>SEPs suspended per Administration  |
| Architectural Barriers Act Compliance  | 1               | 0               | 0                     | India Robinson<br>Physical Security Officer & Admin. Services Mgr.                                       |
| Processing applications from PWD and PWTD  | 1               | 0               | 0                     | OPM HR Solutions staff<br>San Antonio Services Branch<br>816-541-8101                                    |

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

The Agency's disability program staff remained current on disability-related law and federal sector training through connections with the EEOC, interagency partners and/or applicable training when available and budgetarily feasible. Agency staff maintained active membership in the Federal Exchange on Employment & Disability (FEED) group and participated in other disability-related networks (e.g. Job Accommodation Network [JAN]; Employer Assistance and Resource Network [EARN]).

### B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If "no", describe the agency's plan to ensure all aspects of the disability program have sufficient funding and other resources.

Answer: Yes

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

## 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.

Currently, the agency advertises positions under the USAJOBS label "individuals with disabilities" which may attract Schedule A candidates, individuals with veterans' preference and other applicants (as appropriate) to apply for positions in the permanent workforce. Applicants may self-identify as PWD or PWTD by requesting accommodation during the early stages (e.g., application, interview) of the hiring process. The HR and EEO Offices work together to support those identified during the process, as they are onboarded, and thereafter.

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.

As mentioned previously, the agency advertises positions under the USAJOBS label "individuals with disabilities" which may attract Schedule A candidates, individuals with veterans' preference and other applicants (as appropriate) to apply for positions in the permanent workforce. Additionally, OHR continues to develop operating procedures and training for hiring managers to advise them regarding any rules and flexibilities available with special hiring authorities, as resources permit.

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.

In general, the agency focuses on merit promotion process, rather than direct hiring from a list of Schedule A applicants. During minimum qualification review, vacancy announcement requirements are examined to ensure necessary documentation is present for applicants who qualify for status based on Schedule A or another special hiring authority. Those applicants are presented with other qualified applicants simultaneously to hiring managers and/or other decision makers as appropriate.

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 Agency provides real-time training to active hiring managers and hiring panels throughout the year, including providing information regarding hiring authorities and paths that take disability into account.

### 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.

Informational contacts are maintained with key members of the disability community via: the Office of Disability Employment Policy (ODEP), the Computer/Electronics Accommodations Program (CAP), the Jobs Accommodations Network (JAN), Employer Assistance and Resource Network on Disability (EARN), and Federal Exchange on Employment & Disability (FEED etc.), in order to provide collaborative assistance to OHR staff, hiring managers and other decision makers when vacancies need to be filled.

### 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", describe the trigger(s) below.

a. New Hires for Permanent Workforce (PWD)

Answer: No

b. New Hires for Permanent Workforce (PWTD)

Answer: No

To ensure FEC EEO Program alignment with the current Administration's policies and EEOC goals, the MD-715 analysis methodology involving:

- "triggers" to identify "barriers" or "underrepresentation"

• “benchmarking” that targets specific applicant pools, or  
 • “inclusion” and determination of an “inclusion rate”  
 was not utilized on FY’25 data. We await specific guidance from the EEOC, after its quorum has been regained, on how/whether to resume these types of analyses and the business case(s) they are intended to support.

| New Hires                 | Total (Number) | Reportable Disability Permanent Workforce (Percentage) | Reportable Disability Temporary Workforce (Percentage) | Targeted Disability Permanent Workforce (Percentage) | Targeted Disability Temporary Workforce (Percentage) |
|---------------------------|----------------|--|--|--|--|
| % 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

To ensure FEC EEO Program alignment with the current Administration’s policies and EEOC goals, the MD-715 analysis methodology involving:  
 • “triggers” to identify “barriers” or “underrepresentation”  
 • “benchmarking” that targets specific applicant pools, or  
 • “inclusion” and determination of an “inclusion rate”  
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| New Hires to Mission-Critical Occupations | Total (Number) | Reportable Disability New Hires (Percentage) | Targetable Disability New Hires (Percentage) |
|---|----------------|--|--|
| 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: No

To ensure FEC EEO Program alignment with the current Administration’s policies and EEOC goals, the MD-715 analysis methodology involving:  
 • “triggers” to identify “barriers” or “underrepresentation”  
 • “benchmarking” that targets specific applicant pools, or  
 • “inclusion” and determination of an “inclusion rate”  
 was not utilized on FY’25 data. We await specific guidance from the EEOC, after its quorum has been regained, on how/whether to resume these types of analyses and the business case(s) they are intended to support.

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

To ensure FEC EEO Program alignment with the current Administration’s policies and EEOC goals, the MD-715 analysis methodology involving:

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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.

An Advancement Program plan has not been developed that targets PWD/PWTD to ensure sufficient opportunities for advancement. However, the Agency continues to identify, promote and offer mission-related professional development opportunities for all Agency staff as they become available, in accordance with budget constraints.

### B. CAREER DEVELOPMENT OPPORTUNITIES

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

Each agency office maintains a training budget for its staff. Position-specific and related professional development training needs are assessed and offered at the office level. OHR recommends additional training to satisfy OPM requirements enhance professional development (as appropriate) and assist with identifying vendors to address specific staff needs, when requested. Supervisors receive mandatory training every three (3) years in the core competencies as required by OPM regulations.

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 Applicants (Percentage) | Total Participants Selectees (Percentage) | PWD Applicants (Percentage) | PWD Selectees (Percentage) | PWTD Applicants (Percentage) | PWTD Selectees (Percentage) |
|-----------------------------------|--|---|-----------------------------|----------------------------|------------------------------|-----------------------------|
| 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                           |
| Detail Programs                   | 0  | 0   | 0                           | 0                          | 0                            | 0                           |
| Other Career Development 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

N/A -To ensure FEC EEO Program alignment with the current Administration’s policies and EEOC goals, the MD-715 analysis methodology involving:

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was not utilized on FY’25 data. We await specific guidance from the EEOC, after its quorum has been regained, on how/whether to resume these types of analyses and the business case(s) they are intended to support.

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

N/A -To ensure FEC EEO Program alignment with the current Administration's policies and EEOC goals, the MD-715 analysis methodology involving:

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- "inclusion" and determination of an "inclusion rate"

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## 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

N/A – To ensure FEC EEO Program alignment with the current Administration's policies and EEOC goals, the MD-715 analysis methodology involving:

- "triggers" to identify "barriers" or "underrepresentation"
- "benchmarking" that targets specific applicant pools, or
- "inclusion" and determination of an "inclusion rate"

was not utilized on FY'25 data. We await specific guidance from the EEOC, after its quorum has been regained, on how/whether to resume these types of analyses and the business case(s) they are intended to support.

| <b>Time-Off Awards</b>                          | <b>Total<br/>(Number)</b> | <b>Reportable<br/>Disability<br/>(Percentage)</b> | <b>Without<br/>Reportable<br/>Disability<br/>(Percentage)</b> | <b>Targeted Disability<br/>(Percentage)</b> | <b>Without Targeted<br/>Disability<br/>(Percentage)</b> |
|---|---------------------------|---|---|---|---|
| Time-Off Awards 1 - 10 hours: Awards Given      | 88.00                     | 12.50   | 87.50   | 1.14  | 98.86   |
| Time-Off Awards 1 - 10 Hours: Total Hours       | 829.00                    | 11.58   | 88.42   | 1.93  | 98.07   |
| Time-Off Awards 1 - 10 Hours: Average Hours     | 9.42                      | 8.73  | 9.52  | 16.00                                       | 9.34  |
| Time-Off Awards 11 - 20 hours: Awards Given     | 17.00                     | 5.88  | 94.12   | 0.00  | 100.00  |
| Time-Off Awards 11 - 20 Hours: Total Hours      | 324.00                    | 6.17  | 93.83   | 0.00  | 100.00  |
| Time-Off Awards 11 - 20 Hours: Average Hours    | 19.06                     | 20.00   | 19.00   | 0.00  | 19.06   |
| Time-Off Awards 21 - 30 hours: Awards Given     | 4.00                      | 0.00  | 100.00  | 0.00  | 100.00  |
| Time-Off Awards 21 - 30 Hours: Total Hours      | 120.00                    | 0.00  | 100.00  | 0.00  | 100.00  |
| Time-Off Awards 21 - 30 Hours: Average Hours    | 30.00                     | 0.00  | 30.00   | 0.00  | 30.00   |
| Time-Off Awards 31 - 40 hours: Awards Given     | 8.00                      | 25.00   | 75.00   | 0.00  | 100.00  |
| Time-Off Awards 31 - 40 Hours: Total Hours      | 344.00                    | 34.88   | 65.12   | 0.00  | 100.00  |
| Time-Off Awards 31 - 40 Hours: Average Hours    | 43.00                     | 60.00   | 37.33   | 0.00  | 43.00   |
| Time-Off Awards 41 or more Hours: Awards Given  | 0.00                      | 0.00  | 0.00  | 0.00  | 0.00  |
| Time-Off Awards 41 or more Hours: Total Hours   | 0.00                      | 0.00  | 0.00  | 0.00  | 0.00  |
| Time-Off Awards 41 or more Hours: Average Hours | 0.00                      | 0.00  | 0.00  | 0.00  | 0.00  |

| Cash Awards                                     | Total<br>(Number) | Reportable<br>Disability<br>(Percentage) | Without<br>Reportable<br>Disability<br>(Percentage) | Targeted Disability<br>(Percentage) | Without Targeted<br>Disability<br>(Percentage) |
|---|-------------------|--|---|-------------------------------------|--|
| Cash Awards \$500 and Under:<br>Awards Given    | 0.00              | 0.00                                     | 0.00  | 0.00                                | 0.00   |
| Cash Awards \$500 and Under: Total<br>Amount    | 0.00              | 0.00                                     | 0.00  | 0.00                                | 0.00   |
| Cash Awards \$500 and Under:<br>Average Amount  | 0.00              | 0.00                                     | 0.00  | 0.00                                | 0.00   |
| Cash Awards: \$501 - \$999: Awards<br>Given     | 23.00             | 17.39                                    | 82.61   | 4.35                                | 95.65  |
| Cash Awards: \$501 - \$999: Total<br>Amount     | 19480.00          | 15.63                                    | 84.37   | 4.42                                | 95.58  |
| Cash Awards: \$501 - \$999: Average<br>Amount   | 846.96            | 761.25                                   | 865.00  | 861.00                              | 846.32   |
| Cash Awards: \$1000 - \$1999:<br>Awards Given   | 43.00             | 11.63                                    | 88.37   | 4.65                                | 95.35  |
| Cash Awards: \$1000 - \$1999: Total<br>Amount   | 61565.00          | 12.51                                    | 87.49   | 5.23                                | 94.77  |
| Cash Awards: \$1000 - \$1999:<br>Average Amount | 1431.74           | 1540.20                                  | 1417.47   | 1609.50                             | 1423.07  |
| Cash Awards: \$2000 - \$2999:<br>Awards Given   | 53.00             | 13.21                                    | 86.79   | 0.00                                | 100.00   |
| Cash Awards: \$2000 - \$2999: Total<br>Amount   | 128717.00         | 12.82                                    | 87.18   | 0.00                                | 100.00   |
| Cash Awards: \$2000 - \$2999:<br>Average Amount | 2428.62           | 2357.14                                  | 2439.50   | 0.00                                | 2428.62  |
| Cash Awards: \$3000 - \$3999:<br>Awards Given   | 62.00             | 9.68                                     | 90.32   | 4.84                                | 95.16  |
| Cash Awards: \$3000 - \$3999: Total<br>Amount   | 218318.00         | 9.93                                     | 90.07   | 4.89                                | 95.11  |
| Cash Awards: \$3000 - \$3999:<br>Average Amount | 3521.26           | 3613.17                                  | 3511.41   | 3558.67                             | 3519.36  |
| Cash Awards: \$4000 - \$4999:<br>Awards Given   | 46.00             | 10.87                                    | 89.13   | 0.00                                | 100.00   |
| Cash Awards: \$4000 - \$4999: Total<br>Amount   | 203777.00         | 10.89                                    | 89.11   | 0.00                                | 100.00   |
| Cash Awards: \$4000 - \$4999:<br>Average Amount | 4429.93           | 4440.00                                  | 4428.71   | 0.00                                | 4429.93  |
| Cash Awards: \$5000 or more:<br>Awards Given    | 36.00             | 5.56                                     | 94.44   | 0.00                                | 100.00   |
| Cash Awards: \$5000 or more: Total<br>Amount    | 190149.00         | 5.49                                     | 94.51   | 0.00                                | 100.00   |
| Cash Awards: \$5000 or more:<br>Average Amount  | 5281.92           | 5223.00                                  | 5285.38   | 0.00                                | 5281.92  |

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

a. Awards, Bonuses, & Incentives (PWTB)

Answer: No

b. Pay Increases (PWTB)

Answer: No

N/A – To ensure FEC EEO Program alignment with the current Administration’s policies and EEOC goals, the MD-715 analysis methodology involving:

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- “inclusion” and determination of an “inclusion rate”

was not utilized on FY’25 data. We await specific guidance from the EEOC, after its quorum has been regained, on how/whether to resume these types of analyses and the business case(s) they are intended to support.

| Other Awards | Total (Number) | Reportable Disability (Percentage) | Without Reportable Disability (Percentage) | Targeted Disability (Percentage) | Without Targeted Disability (Percentage) |
|--------------|----------------|------------------------------------|--|----------------------------------|--|
|--------------|----------------|------------------------------------|--|----------------------------------|--|

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

N/A – To ensure FEC EEO Program alignment with the current Administration’s policies and EEOC goals, the MD-715 analysis methodology involving:

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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 (PWTD) Answer: N/A
  - ii. Internal Selections (PWTD) Answer: N/A
- b. Grade GS-15
  - i. Qualified Internal Applicants (PWTD) Answer: N/A
  - ii. Internal Selections (PWTD) Answer: N/A
- c. Grade GS-14
  - i. Qualified Internal Applicants (PWTD) Answer: N/A
  - ii. Internal Selections (PWTD) Answer: N/A
- d. Grade GS-13
  - i. Qualified Internal Applicants (PWTD) Answer: N/A
  - ii. Internal Selections (PWTD) Answer: N/A

N/A -To ensure FEC EEO Program alignment with the current Administration’s policies and EEOC goals, the MD-715 analysis methodology involving:

- “triggers” to identify “barriers” or “underrepresentation”
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- “inclusion” and determination of an “inclusion rate”

was not utilized on FY'25 data. We await specific guidance from the EEOC, after its quorum has been regained, on how/whether to resume these types of analyses and the business case(s) they are intended to support.

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: N/A |
| ii. Internal Selections (PWTD)          | Answer: N/A |

c. Grade GS-14

- |   |             |
|---|-------------|
| i. Qualified Internal Applicants (PWTD) | Answer: N/A |
| ii. Internal Selections (PWTD)          | Answer: N/A |

d. Grade GS-13

- |   |             |
|---|-------------|
| i. Qualified Internal Applicants (PWTD) | Answer: N/A |
| ii. Internal Selections (PWTD)          | Answer: N/A |

N/A - To ensure FEC EEO Program alignment with the current Administration's policies and EEOC goals, the MD-715 analysis methodology involving:

- "triggers" to identify "barriers" or "underrepresentation"
- "benchmarking" that targets specific applicant pools, or
- "inclusion" and determination of an "inclusion rate"

was not utilized on FY'25 data. We await specific guidance from the EEOC, after its quorum has been regained, on how/whether to resume these types of analyses and the business case(s) they are intended to support.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- |                             |             |
|-----------------------------|-------------|
| a. New Hires to SES (PWD)   | Answer: N/A |
| b. New Hires to GS-15 (PWD) | Answer: N/A |
| c. New Hires to GS-14 (PWD) | Answer: N/A |
| d. New Hires to GS-13 (PWD) | Answer: N/A |

N/A - To ensure FEC EEO Program alignment with the current Administration's policies and EEOC goals, the MD-715 analysis methodology involving:

- "triggers" to identify "barriers" or "underrepresentation"
- "benchmarking" that targets specific applicant pools, or
- "inclusion" and determination of an "inclusion rate"

was not utilized on FY'25 data. We await specific guidance from the EEOC, after its quorum has been regained, on how/whether to resume these types of analyses and the business case(s) they are intended to support.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- |                              |             |
|------------------------------|-------------|
| a. New Hires to SES (PWTD)   | Answer: N/A |
| b. New Hires to GS-15 (PWTD) | Answer: N/A |
| c. New Hires to GS-14 (PWTD) | Answer: N/A |

## d. New Hires to GS-13 (PWTD)

Answer: N/A

To ensure FEC EEO Program alignment with the current Administration's policies and EEOC goals, the MD-715 analysis methodology involving:

- "triggers" to identify "barriers" or "underrepresentation"
- "benchmarking" that targets specific applicant pools, or
- "inclusion" and determination of an "inclusion rate"

was not utilized on FY'24 data. We await specific guidance from the EEOC, after its quorum has been regained, on how/whether to resume these types of analyses.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

## a. Executives

## i. Qualified Internal Applicants (PWD)

Answer: N/A

## ii. Internal Selections (PWD)

Answer: N/A

## b. Managers

## i. Qualified Internal Applicants (PWD)

Answer: N/A

## ii. Internal Selections (PWD)

Answer: N/A

## c. Supervisors

## i. Qualified Internal Applicants (PWD)

Answer: N/A

## ii. Internal Selections (PWD)

Answer: N/A

N/A - To ensure FEC EEO Program alignment with the current Administration's policies and EEOC goals, the MD-715 analysis methodology involving:

- "triggers" to identify "barriers" or "underrepresentation"
- "benchmarking" that targets specific applicant pools, or
- "inclusion" and determination of an "inclusion rate"

was not utilized on FY'25 data. We await specific guidance from the EEOC, after its quorum has been regained, on how/whether to resume these types of analyses and the business case(s) they are intended to support.

6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

## a. Executives

## i. Qualified Internal Applicants (PWTD)

Answer: N/A

## ii. Internal Selections (PWTD)

Answer: N/A

## b. Managers

## i. Qualified Internal Applicants (PWTD)

Answer: N/A

## ii. Internal Selections (PWTD)

Answer: N/A

## c. Supervisors

## i. Qualified Internal Applicants (PWTD)

Answer: N/A

## ii. Internal Selections (PWTD)

Answer: N/A

N/A - To ensure FEC EEO Program alignment with the current Administration's policies and EEOC goals, the MD-715 analysis methodology involving:

- "triggers" to identify "barriers" or "underrepresentation"
- "benchmarking" that targets specific applicant pools, or

• "inclusion" and determination of an "inclusion rate" was not utilized on FY'25 data. We await specific guidance from the EEOC, after its quorum has been regained, on how/whether to resume these types of analyses and the business case(s) they are intended to support.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- |                                    |             |
|------------------------------------|-------------|
| a. New Hires for Executives (PWD)  | Answer: N/A |
| b. New Hires for Managers (PWD)    | Answer: N/A |
| c. New Hires for Supervisors (PWD) | Answer: N/A |

N/A - To ensure FEC EEO Program alignment with the current Administration's policies and EEOC goals, the MD-715 analysis methodology involving:

- "triggers" to identify "barriers" or "underrepresentation"
  - "benchmarking" that targets specific applicant pools, or
  - "inclusion" and determination of an "inclusion rate"
- was not utilized on FY'24 data. We await specific guidance from the EEOC, after its quorum has been regained, on how/whether to resume these types of analyses.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

N/A - To ensure FEC EEO Program alignment with the current Administration's policies and EEOC goals, the MD-715 analysis methodology involving:

- "triggers" to identify "barriers" or "underrepresentation"
  - "benchmarking" that targets specific applicant pools, or
  - "inclusion" and determination of an "inclusion rate"
- was not utilized on FY'25 data. We await specific guidance from the EEOC, after its quorum has been regained, on how/whether to resume these types of analyses and the business case(s) they are intended to support.

## 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

The agency did not have any employees that were hired specifically under Schedule A authority and/or were eligible for conversion to the competitive service. All positions at the FEC are within the excepted service.

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

To ensure FEC EEO Program alignment with the current Administration’s policies and EEOC goals, the MD-715 analysis methodology involving:

- “triggers” to identify “barriers” or “underrepresentation”
- “benchmarking” that targets specific applicant pools, or
- "inclusion" and determination of an “inclusion rate”

was not utilized on FY’25 data. We await specific guidance from the EEOC, after its quorum has been regained, on how/whether to resume these types of analyses and the business case(s) they are intended to support.

| Separations                             | Total<br>(Number) | Reportable<br>Disabilities<br>(Percentage) | Without Reportable<br>Disabilities<br>(Percentage) |
|---|-------------------|--|--|
| Permanent Workforce: Reduction in Force | 0                 | 0.00                                       | 0.00   |
| Permanent Workforce: Removal            | 0                 | 0.00                                       | 0.00   |
| Permanent Workforce: Resignation        | 3                 | 3.70                                       | 0.85   |
| Permanent Workforce: Retirement         | 23                | 11.11                                      | 8.51   |
| Permanent Workforce: Other Separations  | 2                 | 0.00                                       | 0.85   |
| Permanent Workforce: Total Separations  | 28                | 14.81                                      | 10.21  |

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(s) in the text box.

a. Voluntary Separations (PWTD)

Answer: No

b. Involuntary Separations (PWTD)

Answer: No

To ensure FEC EEO Program alignment with the current Administration’s policies and EEOC goals, the MD-715 analysis methodology involving:

- “triggers” to identify “barriers” or “underrepresentation”
- “benchmarking” that targets specific applicant pools, or
- "inclusion" and determination of an “inclusion rate”

was not utilized on FY’25 data. We await specific guidance from the EEOC, after its quorum has been regained, on how/whether to resume these types of analyses and the business case(s) they are intended to support.

| Separations                             | Total<br>(Number) | Targeted<br>Disabilities<br>(Percentage) | Without<br>Targeted Disabilities<br>(Percentage) |
|---|-------------------|--|--|
| Permanent Workforce: Reduction in Force | 0                 | 0.00                                     | 0.00   |
| Permanent Workforce: Removal            | 0                 | 0.00                                     | 0.00   |
| Permanent Workforce: Resignation        | 3                 | 0.00                                     | 1.18   |
| Permanent Workforce: Retirement         | 23                | 0.00                                     | 9.02   |
| Permanent Workforce: Other Separations  | 2                 | 0.00                                     | 0.78   |
| Permanent Workforce: Total Separations  | 28                | 0.00                                     | 10.98  |

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.

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.

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.

<https://www.fec.gov/accessibility-statement/>  
<https://www.fec.gov/about/equal-employment-opportunity/#accessibility>

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.

<https://www.fec.gov/accessibility-statement/>  
<https://www.fec.gov/about/equal-employment-opportunity/#accessibility>

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.

The Office of the Chief Information Officer has initiated an ongoing agency-wide program to train staff to make documents 508 compliant for staff and members of the public. This was also done to help the agency comply with federal laws requiring that all content posted on the agency website be accessible, especially to those using assistive technology.

## 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.)

Within two (2) business 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 FEC has maintained an effective accommodation program that processes accommodation requests and facilitates accommodation plan development in a timely manner. Disability awareness and accommodation-related training are available on an ongoing basis throughout the year; mandatory review of the Accommodation Policy is required of all staff biennially and new staff receive training during onboarding.

**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.

1. 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.

At its inception, the PAS notice was posted timely and the procedures for PAS were incorporated in the agency's Accommodation Policy. To date, no employee or applicant has requested PAS.

## 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.

The agency had zero (0) findings of discrimination alleging harassment based on disability status during the last fiscal year.

### 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.

The agency had zero (0) findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year.

## 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: N/A

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. Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.

N/A

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

N/A

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.

N/A