

MODEL STRATEGIES FOR RECRUITING AND HIRING PEOPLE WITH DISABILITIES

On July 26, 2010, President Obama issued Executive Order (EO) 13548, which directs Executive departments and agencies (agencies) to improve their efforts to employ Federal workers with disabilities and targeted disabilities through increased recruitment, hiring, and retention of these individuals. OPM, in consultation with the White House, the Department of Labor (DOL), the Equal Employment Opportunity Commission (EEOC), and the Office of Management and Budget (OMB), has developed, as required by the EO, model recruitment and hiring strategies for agencies to use to increase their employment of people with disabilities.

Schedule A Appointing Authorities

Excepted service appointing authorities are critical tools for increasing employment opportunities for people with disabilities in the Federal Government. Two of these authorities are particularly relevant:

1. Schedule A, 5 CFR 213.3102(u), for hiring people with severe physical disabilities, psychiatric disabilities, and mental retardation.

This excepted authority is used to appoint persons with severe physical disabilities, psychiatric disabilities, and intellectual disabilities. Such individuals may qualify for conversion to permanent status after two years of satisfactory service. Severe physical disabilities include but are not limited to blindness, deafness, paralysis, missing limbs, epilepsy, dwarfism, and more.

2. Schedule A, 5 CFR 213.3102(11) for hiring readers, interpreters, and personal assistants. This excepted authority is used to appoint readers, interpreters, and personal assistants for employees with severe disabilities as reasonable accommodations.

OPM has developed Bite Size Training on "Using Schedule A to Hire People with Disabilities." It is available at <http://golearn.gov/HiringReform/index.htm>. This 5-minute training provides managers and HR staff with a helpful overview of what they need to know to hire people with disabilities using Schedule A.

Strategies To Increase Employment of People with Disabilities/Targeted Disabilities in the Federal Government

Agencies should employ each of the strategies and actions listed below to become a model employer of people with disabilities/targeted disabilities. The list of strategies and actions is not exhaustive and agencies are encouraged to add to it to their own approaches that will also

lead to increased recruitment, hiring, and retention of people with disabilities/targeted disabilities.

A. Develop a Solid Foundation

A solid foundation is necessary to accomplishing the goals set by the President in the Executive Order. The following strategies will help agencies to create the foundation upon which future results will be built.

- Have your agency specific plan for promoting employment opportunities for people with disabilities approved by and implemented under the direction, close supervision, and support of the senior-level agency official and other members of the leadership of the agency as designated by the agency head. Build organizational support for the plans by implementing them in collaboration and partnership with other relevant program offices, such as the Human Resources, EEO/Civil Rights, and Chief Information Officer's organizations.
- Conduct mandatory training for senior leadership, hiring managers, and HR staffing and employee relations specialists on the agency's plan to promote employment opportunities for people with disabilities, including use of the Schedule A authority for people with disabilities, other tools available to assist agencies in identifying qualified applicants with disabilities for open agency positions, and the agency's procedures for providing reasonable accommodation to job applicants and employees with disabilities.
- At the agency headquarters level, ensure that a full-time Selective Placement Coordinator is in place to recruit individuals with disabilities. This individual should be sufficiently senior (i.e., GS-13/14) to advise management on disability recruitment, hiring, advancement and retention. Ensure the Coordinator is trained in Schedule A for people with disabilities and other excepted hiring authorities, the Rehabilitation Act, Reasonable Accommodation requirements and responsibilities, how to conduct workforce representation analysis, developing recruitment strategies, and establishing contacts with external recruitment sources to reach individuals with disabilities. This training is currently offered by EEOC and DOD.
- Organize an agency disability recruitment task force made up of HR staff, EEO staff, current employees with disabilities, and managers who have hired people with disabilities. Among other things, the taskforce can help the agency establish a network of disability recruitment resources.
- Review and update all employment information and recruitment materials to ensure accessibility for people with disabilities. Ensure all information posted on the agency's Internet and Intranet sites, is reviewed for Section 508 compliance and, in particular,

screen-reader compatibility. Employment information also should be made available in alternate formats such as large print, Braille, and CD.

B. Evaluate Your Hiring Process

When conducting a job analysis, include review of the agency's eligibility criteria and any agency-specific qualification standards for positions. Identify and revise criteria and standards that are unnecessarily restrictive and potentially exclude people with disabilities. Examples of potentially problematic standards may include blanket rules requiring certain levels of unaided hearing or unaided vision.

- Consistent with the President's Hiring Reform initiative, draft clear, understandable job announcements that explain in plain language the required qualifications and the duties of the job. This is key to any successful recruiting effort, as the job announcement itself can be a barrier for any applicant, including applicants with disabilities, who are interested in Federal employment. In addition to being clear and understandable, every job announcement must communicate the agency's intent to make reasonable accommodations for qualified job applicants and employees with disabilities. All job announcements should also state that the agency is an equal opportunity employer and should encourage candidates with disabilities to apply.
- Proactively use Schedule A for people with disabilities, as well as other excepted service hiring authorities, to hire people with disabilities expeditiously. Make sure job announcements contain information explaining how to apply under Schedule A.

In accordance with EEOC Management Directive (MD)715 (<http://www.eeoc.gov/federal/directives/index.cfm>), work with your EEO/Civil Rights office to collect, maintain, and analyze applicant flow data and to examine existing recruitment programs and hiring practices to identify and eliminate any barriers to recruiting and hiring individuals with disabilities and, in particular, individuals with targeted disabilities.

C. Identify Qualified People with Disabilities Through Existing Resources

Agencies should make full use of existing resources to tap into the great potential of people with disabilities:

- Use OPM's Shared Register of Candidates with Disabilities. OPM, in collaboration with the Chief Human Capital Officer (CHCO) Council, established a contract to populate a shared register of individuals with disabilities who have an interest in working for Federal agencies and who satisfy the requirements of positions Federal agencies are frequently required to fill. On a monthly basis, the current vendor will recruit, screen, and direct a minimum of 50 individuals with disabilities to the shared register. This register is sent bi-weekly to the CHCO Council, Deputy CHCOs and agency-designated contacts. There is no charge for agencies to use the shared register.

Agencies that wish to access the register or have questions should contact their human capital office. In addition, agencies may contact John Benison or Michael LaRosa in the OPM Deputy Director's Office by e-mail at john.benison@opm.gov or michael.larosa@opm.gov.

- Partner with State Vocational Rehabilitation agencies and State Disability Service agencies to recruit potential applicants with disabilities. State Vocational Rehabilitation Agencies (SVRAs) provide counseling, evaluation, training and other services to individuals with disabilities. These agencies can assist with information regarding accommodations, effective retention strategies, legal compliance, and training for the agency's organizations. SVRAs are one of several sources candidates may use to obtain proof of disability and certification of job readiness required under the Schedule A appointing authority for people with disabilities. For more information, go to www2.ed.gov/about/offices/list/osers/rsa/. In addition, State Disability Service Agencies, such as State mental health agencies, frequently have employment training programs and can be a good recruitment resource.
- Consult, coordinate, and establish working partnerships with Ticket-to-Work Employment Networks and Employment One-Stop Career Centers. The Ticket-to-Work Program provides people receiving Social Security benefits (beneficiaries) choices for receiving employment services. Under this program, the Social Security Administration (SSA) issues tickets to eligible beneficiaries who may assign those tickets to an Employment Network (EN) of their choice to obtain employment services, vocational rehabilitation services, or other support services necessary to achieve a vocational (work) goal. One-Stop Career Centers (One-Stops) were established under the Federal Workforce Investment Act to provide a full range of job seeker assistance under one roof. One-Stops are located at a variety of locations in each state, with more than 3,200 centers across the country. The One-Stop system is required to be "universally accessible;" any member of the general public (including those with disabilities) can access the system and use the basic, or "core," One-Stop services. More information is available at www.yourtickettowork.com; www.socialsecurity.gov/work; and www.servicelocator.org.
- Consult with the Rehabilitation Services Administration (RSA), a component of the Department of Education that provides Federal funds in support of the Projects with Industry (PWI) program, the Centers for Independent Living (CIL) program, and the Migrant Seasonal Farm Workers (MSFW) program. Individuals receiving services from these programs are not always clients of state Vocational Rehabilitation Services programs. Often times, through the provision of independent living services, individuals with severe disabilities can reach a level of employment. Agencies should explore opportunities for outreach and collaboration with RSA-supported organizations, including rehabilitation programs for Native Americans, to develop additional recruiting resources to improve employment opportunities for persons with

disabilities. For this collaboration to be successful, agencies should ensure that RSA state agencies understand the types of jobs for which it is recruiting and that they receive timely information on job openings. Information on RSA can be found at www2.ed.gov/about/offices/list/osers/rsal.

- Use the Internet and social media such as Face Book and Twitter to help recruit individuals with disabilities and raise awareness of the agency as an employer.
- Develop an electronic mailing list of disability advocacy groups in the local geographic area. Remember to send regular email notices to these organizations with all job openings and include a description of the Schedule A authority for people with disabilities and basic instructions on how to apply for a Federal job using this Schedule A authority. The notice is a great opportunity to reinforce the agency's commitment to become a model employer of people with disabilities. The human resources offices in field facilities should establish similar links with local disability advocacy groups. Rely on the support of your Selective Placement Coordinator, Disability Program Manager, and other HR and EEO staff to help with developing the list.
- Seek collaborative recruiting relationships with community and governmental groups to improve outreach and access to employment opportunities for minority individuals with disabilities.

D. Focus on Student Programs

Agencies also should look to students as a viable source of qualified people with disabilities. Specifically, when recruiting for internship programs, ensure that you include students with disabilities. Effective outreach to students with disabilities is a great way to tap into the enormous potential offered by this segment of society. Here are some strategies to keep in mind to assist you in tapping into that resource.

- The Workforce Recruitment Program for College Students with Disabilities(WRP)is a source of candidates for Federal employment jointly managed by the Office of Disability Employment Policy and the Department of Defense. The program helps connect Federal agencies Nationwide with highly motivated post-secondary students and recent graduates with disabilities. The WRP seeks: (1) to provide college students with disabilities the opportunity to obtain summer employment that may lead to permanent employment in the Federal or private sector; and (2) to break down attitudinal barriers held by employers and co-workers by demonstrating that people with disabilities can work successfully in a variety of jobs. Agencies can employ summer interns through the WRP and also use WRP as a source of candidates for both temporary and permanent positions. Information on using the WRP as a recruitment resource can be found at www.dol.gov/odep/programs/workforc.htm. Agencies can also send job announcements via mass e-mails to students with disabilities who are listed in the WRP database.

- Improve outreach efforts through campus visits and partnerships both with the career placement offices and the campus organizations and other networks providing services to students with disabilities. Encourage staff members (particularly those with disabilities) to participate in campus visits to recruit students with disabilities through the WRP.
- Target professional organizations and publications directed to student with disabilities. Such organizations can be found by contacting disability student service offices at colleges and universities, and Vocational Rehabilitation Agencies.
- Use student internship programs (currently the Student Temporary Employment Program (STEP) and the Student Career Experience Program (SCEP) to offer employment opportunities to students with disabilities, including students from the WRP database, and to complement disability recruitment efforts. (Note: Improvements that are intended to consolidate and enhance the STEP and SCEP programs are expected in the near future.)
- Identify and participate in special college and university recruiting initiatives and other events. These are opportunities to recruit qualified candidates with disabilities who can be hired immediately using the Schedule A appointing authority.

E. Become A Model Employer of People with Targeted Disabilities

Getting people with disabilities to apply for jobs at your agency and selecting them if they are qualified is only a part of the overall goal. The bigger goal is for agencies to make the Federal Government the model employer of people with disabilities. By becoming a model employer, agencies will also improve their retention of people with disabilities. Currently, people with disabilities/targeted disabilities leave the Federal Government at three times the rate of those without a disability. Retention is essential to making the investment you are making to identify and hire qualified people with disabilities payoff. Agencies should use the strategies and actions listed in this section to create an accessible, positive, and welcoming environment for job applicants and employees with disabilities.

- Strive to make every aspect of the agency employment experience accessible to people with disabilities. This includes facilities, programs, technology, websites, and the benefits and privileges of employment. Set targets and measure progress in meeting them.
- Ensure employees with disabilities are provided training opportunities at the beginning and throughout their careers. Agencies must provide reasonable accommodations in a timely manner to ensure all training programs are accessible.

- Use and publicize workplace flexibility strategies such as telework, flexiplace, and flextime, including the availability of these flexibilities for people requiring reasonable accommodations, to enhance employment opportunities for individuals with disabilities.
- Agency leadership should encourage and participate in agency-wide events that publicize successful efforts to recruit and hire people with disabilities/targeted disabilities. Leaders should also promote the formation of an employee affinity group for employees with disabilities. Regular meetings with this group will provide leadership with the information they need to address issues impacting this community in the workplace. Both actions will demonstrate the agency's commitment to become a model employer of people with disabilities.
- Conduct exit interviews of any person with a disability leaving Federal employment to collect information and develop data necessary to determine and eliminate barriers to retention.
- As a means of helping injured and ill employees return to work, engage in an interactive process to determine the availability and appropriateness of reasonable accommodations. Such accommodations could include but are not limited to telework, temporary light duty assignments, and job reassignment.
- Conduct appropriate succession planning that includes a strategy to recruit and retain people with disabilities for positions and career paths in which they are interested. Where staff input is sought, provide entry-and mid-level employees with disabilities an opportunity to be included when planning for the agency's future management and leadership.
- Share successful approaches for recruitment and hiring of people with disabilities through the CHCO Council and EEO Director Meetings as well as other venues, so that other agencies may benefit from this information.

F. Use Innovative Approaches To Provide Reasonable Accommodations

Agencies have a legal obligation to provide reasonable accommodations for employees with disabilities. In order to meet these obligations, agencies should think creatively about ways to make their workplace more accessible and create an environment where their employees who have disabilities can thrive. Here are some suggestions that relate specifically to reasonable accommodation issues.

- Review your reasonable accommodation procedures and update them if necessary. Consistent with Executive Order 13164 (Requiring Federal Agencies to Establish Procedures to Facilitate the Provision of Reasonable Accommodations), agencies

should submit to the EEOC any modifications to their reasonable accommodation procedures at the time that those modifications are adopted. To view Executive Order 13164, go to http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=2000_register&docid=fr28jy00-140.pdf.

- Establish/continue partnership with DOD Computer/Electronic Accommodations Program (CAP), a program that provides technology-based accommodations to interns and employees with disabilities at no charge to the agency. Information on establishing partnerships with CAP can be found on the CAP website at www.tricare.mil/CAP/.
- Establish a centralized fund to cover accommodation costs for which the agency is financially responsible. Further, make clear to management and staff that the determination of whether the cost of a particular accommodation represents an undue hardship is based, as a matter of law, on the agencies' overall budget, not the specific budget of the program office where the accommodation is needed. Therefore, when making a determination on whether a reasonable accommodation can be provided, the decision-maker should not consider just the budget in the office where the employee works but consider the budget of the entire agency.

For this reason, denial of a reasonable accommodation request based on a financial undue hardship determination should be extremely rare.

- Consult with the Job Accommodation Network (JAN), a service offered through the Department of Labor's Office of Disability Employment Policy. JAN provides expert accommodation information before, during, and after the recruitment and hiring process. It is a confidential service that allows any manager, applicant or employee to receive individualized information on his or her accommodation issue. JAN may be reached at (800) 526-7234 or on-line at www.askjan.org.
- In addition, the EEOC recently issued updated procedures for processing reasonable accommodation requests at their agency. Other Federal agencies should use these procedures as a model when developing and updating their own reasonable accommodation procedures. EEOC updated procedures can be found at [http://www.eeoc.gov/eeoc/internal/reasonable accommodation.cfm](http://www.eeoc.gov/eeoc/internal/reasonable%20accommodation.cfm).

Conclusion

Executive Order 13548 demonstrates the President's strong commitment to making the Federal Government a welcoming place for people with disabilities where they can thrive and make the most of their talents and abilities. We must all make it a priority to do a better job of recruiting, selecting, accommodating, and retaining people with disabilities. These strategies are intended to get you started on that path. As new successful strategies come to light, we will communicate them to you so that the Federal Government leads the way on this

important issue. Questions about this guidance should be directed to john.benison@opm.gov or michael.larosa@opm.gov.