



# DISABILITY EMPLOYMENT

## Hiring Has Increased but Actions Needed to Assess Retention, Training, and Reasonable Accommodation Efforts

Accessible Version

June 2020

# GAO Highlights

Highlights of [GAO-20-384](#), a report to the Committee on Oversight and Reform, House of Representatives

## Why GAO Did This Study

Federal agencies are required to provide equal opportunity to qualified individuals with disabilities in all aspects of federal employment.

GAO was asked to examine agencies' efforts to increase the employment of individuals with disabilities. Among other objectives, this report examines: (1) the extent to which agencies met the 2010 federal goal to hire an additional 100,000 individuals with disabilities by 2015, and the retention rates of those employees between 2011 and 2017; and (2) practices selected agencies used to increase hiring and retention of individuals with disabilities.

GAO analyzed data and documents from OPM and interviewed agency officials. GAO interviewed officials from DOJ, SBA, and SSA about their efforts to enhance employment opportunities for disabled persons. GAO selected these three agencies because they represent a range of agency size and relatively high or low percentages of total employees with disabilities.

## What GAO Recommends

GAO is making 6 recommendations: OPM should track and report retention data; DOJ, SBA, and SSA should assess training impacts; and DOJ and SBA should obtain employee feedback on reasonable accommodations. OPM and SSA concurred with GAO's recommendations; SBA concurred with one and partially concurred with one recommendation; DOJ did not agree or disagree with the recommendations. GAO continues to believe all recommendations are warranted.

View [GAO-20-384](#). For more information, contact Yvonne D. Jones at (202) 512-6806 or [jonesy@gao.gov](mailto:jonesy@gao.gov).

June 2020

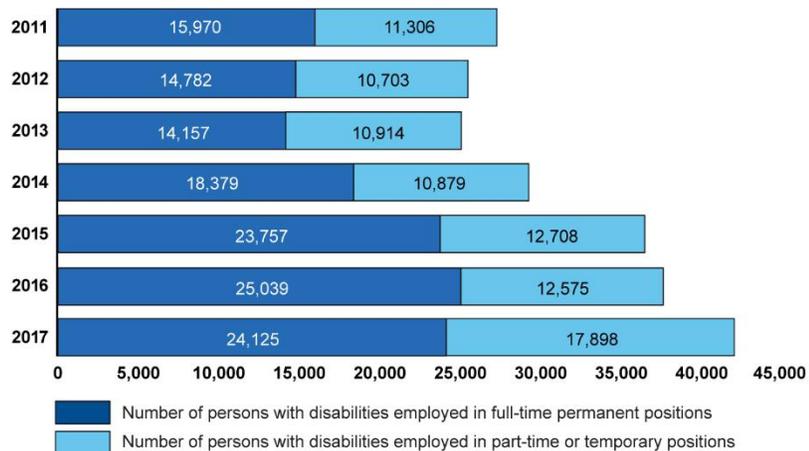
## DISABILITY EMPLOYMENT

### Hiring Has Increased but Actions Needed to Assess Retention, Training, and Reasonable Accommodation Efforts

## What GAO Found

Approximately 143,600 persons with disabilities were hired during 2011 through 2015—plus an additional 79,600 hires in 2016 and 2017—across the 24 Chief Financial Officers Act agencies, exceeding the stated goal of 100,000 by 2015.

**The Federal Government Generally Increased Hiring of Persons with Disabilities, Fiscal Years 2011 through 2017**



Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

About 39 percent of individuals with disabilities hired during 2011 through 2017 stayed less than 1 year and approximately 60 percent stayed less than 2 years. Of the total individuals without disabilities hired during that same time period, approximately 43 percent stayed less than 1 year and approximately 60 percent stayed less than 2 years.

Although targeted data tracking and analyses could help pinpoint root causes contributing to departure rates, the Office of Personnel Management (OPM) does not track or report retention data on disabled employees. Doing so, and making such data available to agencies would facilitate more comprehensive analyses of the retention of employees with disabilities and identify needed improvements.

Officials at three agencies GAO examined—Department of Justice (DOJ), Small Business Administration (SBA), and Social Security Administration (SSA)—used various practices to increase hiring, such as training staff on Schedule A—a commonly used hiring authority to employ individuals with disabilities. However, the agencies neither assess the impact of training nor how it relates to contributing to performance goals of increasing the number of disabled hires.

Agencies are expected to track performance related to providing reasonable accommodations. The selected agencies reported having processes in place for receiving reasonable accommodations requests, but only SSA has procedures for obtaining feedback from employees after an accommodation is provided. Without such feedback, DOJ and SBA are limited in their ability to assess the continued effectiveness of reasonable accommodations provided to employees.

---

# Contents

---

Letter	1
Background	5
Federal Agencies Exceeded the Hiring Goal Set Forth in the Executive Order, but OPM Does Not Track or Report Retention Data	10
Selected Agencies Used Various Practices to Increase Hiring but Opportunities Exist to Examine the Impact of Schedule A Hiring Authority and Enhance Reasonable Accommodation Programs	22
EEOC, OPM, and Labor Have Coordinated Roles to Assist Agencies	31
Conclusions	35
Recommendations for Executive Action	36
Agency Comments and Our Evaluation	38
<hr/>	
Appendix I: Hiring and Retention Data of Selected Agencies	41
Appendix II: Comments from the Office of Personnel Management	54
Appendix III: Comments from the Small Business Administration	56
Appendix IV: Comments from the Social Security Administration	60
Appendix V: GAO Staff Contact and Staff Acknowledgements	62
Appendix VI: Accessible Data	63
Data Tables	63
Agency Comment Letters	69
<hr/>	
Tables	
Table 1: Number of Persons with and without Disabilities Hired in the Federal Government, Fiscal Years 2011 through 2017	13
Table 2: Percentage of People with Disabilities and Targeted Disabilities Hired in Fiscal Years 2011, 2015, and 2017 by Agency	15

---

Table 3: Percent of Persons with Disabilities, Targeted Disabilities, and without Disabilities Hired in Fiscal Years 2011 through 2015 and Retained at Least 2 Years by Occupational Category	19
Table 4: Percent of Persons with Disabilities, Targeted Disabilities, and without Disabilities Hired in Fiscal Years 2011 through 2015 and Retained At Least 2 Years by GS Level	20
Table 5: Percent of Employees Hired by Selected Agencies with Reported Disabilities and Targeted Disabilities, Fiscal Years 2011, 2015 and 2017	22
Table 6: Percentage of Persons with Disabilities, Targeted Disabilities, and without Disabilities Hired in Fiscal Years 2011 through 2015 and Retained at Least 2 Years by Occupational Category at the Department of Justice	44
Table 7: Percentage of Persons with Disabilities, Targeted Disabilities, and without Disabilities Hired in Fiscal Years 2011 through 2015 and Retained at Least 2 Years by GS Level at the Department of Justice	45
Table 8: Percentage of Persons with Disabilities, Targeted Disabilities, and without Disabilities Hired in Fiscal Years 2011 through 2015 and Retained at Least 2 Years by Occupational Category at the Small Business Administration	48
Table 9: Percentage of Persons with Disabilities, Targeted Disabilities, and without Disabilities Hired in Fiscal Years 2011 through 2015 and Retained at Least 2 Years by GS Level at the Small Business Administration	49
Table 10: Percentage of Persons with Disabilities, Targeted Disabilities, and without Disabilities Hired in Fiscal Years 2011 through 2015 and Retained at Least 2 Years by Occupational Category at the Social Security Administration	52
Table 11: Percentage of Persons with Disabilities, Targeted Disabilities, and without Disabilities Hired in Fiscal Years 2011 through 2015 and Retained at Least 2 Years by GS Level at the Social Security Administration	53

---

Figures

Figure 1: The Federal Government Generally Increased Hiring of Persons with Disabilities, Fiscal Years 2011 through 2017	11
--	----

---

Figure 2: The Federal Government Generally Increased Hiring of Persons with Targeted Disabilities, Fiscal Years 2011 through 2017	12
Figure 3: Number of Persons without Disabilities Hired in the Federal Government, Fiscal Years 2011 through 2017	13
Figure 4: Nearly 60 Percent of Employees with Disabilities Hired from 2011 through 2017 Stayed for Less than 2 Years	16
Figure 5: More Than 60 Percent of Employees without Disabilities Hired from 2011 through 2017 Stayed for Less than 2 Years	17
Figure 6: Over 50 Percent of Employees with Disabilities Hired from 2011 through 2017 at Department of Justice Stayed Less than 2 Years	42
Figure 7: Almost 50 Percent of Employees without Disabilities Hired from 2011 through 2017 at Department of Justice Stayed Less than 2 Years	43
Figure 8: Approximately 65 Percent of Employees with Disabilities Hired from 2011 through 2017 at Small Business Administration Stayed Less than 1 Year	46
Figure 9: Over 55 Percent of Employees without Disabilities Hired from 2011 through 2017 at Small Business Administration Stayed Less than 1 Year	47
Figure 10: Over 30 Percent of Employees with Disabilities Hired from 2011 through 2017 at Social Security Administration Stayed Less than 1 Year	50
Figure 11: Over 25 Percent of Employees without Disabilities Hired from 2011 through 2017 at Social Security Administration Stayed Less than 1 Year	51
Accessible Data for The Federal Government Generally Increased Hiring of Persons with Disabilities, Fiscal Years 2011 through 2017	63
Accessible Data for Figure 1: The Federal Government Generally Increased Hiring of Persons with Disabilities, Fiscal Years 2011 through 2017	63
Accessible Data for Figure 2: The Federal Government Generally Increased Hiring of Persons with Targeted Disabilities, Fiscal Years 2011 through 2017	64
Accessible Data for Figure 3: Number of Persons without Disabilities Hired in the Federal Government, Fiscal Years 2011 through 2017	64
Accessible Data for Figure 4: Nearly 60 Percent of Employees with Disabilities Hired from 2011 through 2017 Stayed for Less than 2 Years	65

---

---

Accessible Data for Figure 5: More Than 60 Percent of Employees without Disabilities Hired from 2011 through 2017 Stayed for Less than 2 Years	65
Accessible Data for Figure 6: Over 50 Percent of Employees with Disabilities Hired from 2011 through 2017 at Department of Justice Stayed Less than 2 Years	66
Accessible Data for Figure 7: Almost 50 Percent of Employees without Disabilities Hired from 2011 through 2017 at Department of Justice Stayed Less than 2 Years	66
Accessible Data for Figure 8: Approximately 65 Percent of Employees with Disabilities Hired from 2011 through 2017 at Small Business Administration Stayed Less than 1 Year	67
Accessible Data for Figure 9: Over 55 Percent of Employees without Disabilities Hired from 2011 through 2017 at Small Business Administration Stayed Less than 1 Year	67
Accessible Data for Figure 10: Over 30 Percent of Employees with Disabilities Hired from 2011 through 2017 at Social Security Administration Stayed Less than 1 Year	68
Accessible Data for Figure 11: Over 25 Percent of Employees without Disabilities Hired from 2011 through 2017 at Social Security Administration Stayed Less than 1 Year	68

---

---

### Abbreviations

AGCPD	Attorney General's Advisory Committee for People with Disabilities
ASL	American Sign Language
CADS	Center for Accommodations and Disability Services
CFO Act	Chief Financial Officers Act
DOJ	Department of Justice
EARN	Employer Assistance and Resource Network on Disability Inclusion
EEO	equal employment opportunity
EEOC	Equal Employment Opportunity Commission
EHRI	Enterprise Human Resources Integration database
FEED	Federal Exchange on Employment and Disability
GS	general schedule
Labor	Department of Labor
MD 715	Management Directive 715
NACED	National Advisory Council of Employees with Disabilities
ODEP	Office of Disability Employment Policy
OMB	Office of Management and Budget
OPM	Office of Personnel Management
SBA	Small Business Administration
SF-256	Standard Form 256
SPPC	Selective Placement Program Coordinator
SSA	Social Security Administration

This is a work of the U.S. government and is not subject to copyright protection in the United States. The published product may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.



June 11, 2020

The Honorable Carolyn B. Maloney  
Chairwoman  
The Honorable Jim Jordan  
Ranking Member  
Committee on Oversight and Reform  
United States House of Representatives

Federal law, regulations, executive orders, and management directives include provisions aimed at improving federal employment opportunities for persons with disabilities. According to law, federal agencies are required to take steps to provide equal opportunity to qualified individuals with disabilities in all aspects of federal employment.<sup>1</sup> Specifically, agencies are required to develop affirmative action program plans for hiring, placement, and advancement of people with disabilities, and ensure employment nondiscrimination and the provision of reasonable accommodations.<sup>2</sup> In addition, Executive Order 13548 entitled, “Increasing Federal Employment of Individuals with Disabilities,” issued in July 2010 emphasized that as the nation’s largest employer, the federal government must become a model for the employment of individuals with disabilities.<sup>3</sup> The Executive Order called for an additional 100,000 individuals with disabilities to be employed in the federal government by 2015.

The Equal Employment Opportunity Commission’s (EEOC) 2017 regulations also require agencies to take specific steps to increase the

---

<sup>1</sup>Section 501 of the Rehabilitation Act of 1973, as amended, is codified at 29 U.S.C. § 791.

<sup>2</sup>For regulations implementing the nondiscrimination and reasonable accommodation obligations under section 501 of the Rehabilitation Act, see part 1630 of title 29 of the Code of Federal Regulations. For regulations implementing the affirmative action program plan requirements of section 501 of the Rehabilitation Act, see section 1614.203 of title 29 of the Code of Federal Regulations.

<sup>3</sup>Exec. Order No. 13548, *Increasing Federal Employment of Individuals with Disabilities*, 75 Fed. Reg. 45,039 (July 30, 2010).

employment of individuals with disabilities.<sup>4</sup> For example, agencies are expected to commit to the goal of having no less than 12 percent of their workforce comprised of employees with disabilities. This is also to include at least 2 percent of an agency's workforce to be comprised of employees with targeted disabilities, which include traumatic brain injuries, deafness, blindness, and partial or complete paralysis, among others. These goals apply at both higher and lower salary levels.<sup>5</sup>

You asked us to review actions the federal government took to implement Executive Order 13548 and to improve the employment of individuals with disabilities. Our objectives were to (1) examine the extent to which agencies met the goal outlined in Executive Order 13548 directing the federal government to hire an additional 100,000 individuals with disabilities by 2015, and examine retention rates for employees with disabilities between 2011 and 2017; (2) examine practices selected agencies have adopted to increase hiring and retention of individuals with disabilities, including reasonable accommodation provisions; and (3) describe the efforts the key leadership agencies took to provide guidance and assistance to agencies to increase the hiring and retention of individuals with disabilities.

To address the first objective, we analyzed personnel data captured in the Office of Personnel Management's (OPM) Enterprise Human Resources Integration (EHRI) database. We assessed the reliability of EHRI data through electronic testing to identify missing data, out of range values, and logical inconsistencies. We also reviewed our prior work assessing the reliability of these data. We interviewed OPM officials to understand how they collect, maintain, track, and use data on individuals with disabilities. We found the data to be sufficiently reliable for our purposes. We analyzed data across the 24 agencies cited under the Chief Financial Officers (CFO) Act to determine (1) the number of individuals with disabilities and targeted disabilities hired each year during 2011 through 2017, the last year for which data were available, (2) which agencies hired these individuals, (3) the types of hiring authorities used, and (4) General Schedule (GS) levels in which individuals with disabilities were

---

<sup>4</sup>Equal Employment Opportunity Commission, *Affirmative Action for Individuals with Disabilities in Federal Employment*, 82 Fed. Reg. 654 (Jan. 3, 2017), 29 C.F.R. § 1614.203.

<sup>5</sup>29 C.F.R. § 1614.203(d)(7). The 2 percent goal for targeted disabilities is a subset of, not in addition to, the 12 percent goal. Both goals apply to two separate pay groupings: GS-1 to GS-10 and GS-11 to SES.

---

placed and their position classifications.<sup>6</sup> There are slight discrepancies in the data used to examine retention rates, which were due to inconsistencies we found with hiring and/or separation dates recorded in OPM's EHRI data. We determined these discrepancies did not affect the reliability of the data for our purposes.

These data also allowed us to identify any patterns or changes in the hiring, placement, and retention of individuals with disabilities across years. Using the government-wide data, we identified whether people were hired as full-time permanent employees versus part-time or temporary employees. Of the individuals hired during 2011 through 2017, we identified the number of employees who left the federal government during that same time period.<sup>7</sup>

To address the second objective, we selected three agencies as case illustrations: the Department of Justice (DOJ), the Small Business Administration (SBA), and the Social Security Administration (SSA). Our selection was based on analysis of disability employment data for fiscal years 2011 through 2017 across the 24 CFO Act agencies. We sorted the agencies by their average percentage of total employees with reported disabilities and targeted disabilities from highest to lowest. We narrowed the scope to eight agencies that were categorized as having either the highest or lowest average percentages for the time period. Within that scope, we selected three agencies—one small, one medium, and one large—in terms of their total full-time employees to provide a range of

---

<sup>6</sup>For the purpose of this report, given that Executive Order 13548 was issued in July 2010—the last quarter of fiscal year 2010—we determined that fiscal year 2011 hiring data were an appropriate starting point for our analysis. Our calculations of hires are based on personnel actions as shown in OPM's EHRI database and may count the same individual more than once if he or she was hired more than once during the time period we reviewed. Position classifications refers to occupational categories recorded in OPM's EHRI data. These occupational categories are Professional, Administrative, Technical, Clerical, and Other. The "Other" category includes miscellaneous white-collar occupations that do not fall into the Professional, Administrative, Technical, or Clerical categories.

<sup>7</sup>For the purpose of this report, we focused on if and when employees left the federal government. Additional analysis to identify the specific type of personnel action (e.g., resignation, retirement, or reduction-in-force) and legal authority associated with each employee separation was beyond the scope of this report.

agency experiences.<sup>8</sup> Although these agencies do not represent the experiences of all agencies across government, they provide illustrative examples of experiences that agencies have with hiring and retaining individuals with disabilities and providing reasonable accommodation.

We reviewed selected agencies' policies, plans, and practices related to hiring and retaining individuals with disabilities and reasonable accommodation. This included a review of relevant sections of the selected agencies' annual reports to EEOC.<sup>9</sup> We evaluated agencies' policies, plans, and practices against criteria that included federal guidance, management directives, and regulations related to disability employment, as well as federal standards for internal control. We interviewed officials from the selected agencies about their efforts to hire and retain employees with disabilities and their experiences with providing reasonable accommodations.

For each of the three agencies, we also analyzed EHRI data elements similar to those outlined in our analysis for the first objective to describe hiring and retention of individuals with disabilities.<sup>10</sup> The detailed results of our analysis are presented in appendix I.

To address the third objective, we reviewed guidance documents from the four key leadership agencies named in EO 13548: OPM, EEOC, the Department of Labor (Labor), and the Office of Management and Budget

---

<sup>8</sup>For the purpose of this report, we categorized agencies as large if they had 70,000 or more employees; medium if they had 12,000 to 69,999 employees; and small if they had 11,999 employees or fewer. Given the relatively larger size and organizational structure of DOJ compared to the other two selected agencies, we also met with officials from the Bureau of Prisons within DOJ to obtain a subcomponent agency perspective.

<sup>9</sup>EEOC Management Directive 715 (MD 715) provides policy guidance and standards to federal agencies for establishing and maintaining effective programs of equal employment opportunity under section 717 of Title VII of the Civil Rights Act of 1964, as amended and effective affirmative action programs under section 501 of the Rehabilitation Act of 1973, as amended. See 42 U.S.C. § 2000e-16 and 29 U.S.C. § 791, respectively. The MD 715 includes a framework for agencies to determine whether barriers to equal employment opportunities exist and to identify and develop strategies to eliminate barriers to participation. Agencies are required to report the results of their analyses annually to EEOC.

<sup>10</sup>Agencies also report hiring data to EEOC via MD 715 and may have discrepancies compared to the data captured in OPM's EHRI database, in part due to agencies reporting at different points in time to OPM and EEOC and for different purposes. We used EHRI data to conduct our quantitative analysis of hiring and retention, and as noted earlier found these data to be sufficiently reliable for our purposes.

(OMB). We interviewed agency officials about their respective roles and responsibilities and the guidance and assistance they provided to agencies to support hiring and retention of employees with disabilities. We also obtained perspectives from the three selected agencies—DOJ, SBA, and SSA—about the guidance and technical assistance they received from the key leadership agencies both during and following the implementation period of EO 13548. For additional context on hiring and retaining individuals with disabilities, we interviewed multiple stakeholder groups to obtain perspectives from subject matter experts in the disability community and in the private sector.<sup>11</sup>

We conducted this performance audit from March 2018 to June 2020 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

---

## Background

Executive Order 13548 committed the federal government to similar goals stated in an executive order issued a decade earlier and required federal agencies to take additional actions.<sup>12</sup> Specifically, the prior Executive Order 13163 called for an increase in the hiring of individuals with disabilities across the federal government and for agencies to develop plans for increasing employment opportunities for individuals with disabilities. The additional actions stated in Executive Order 13548 specified that federal agencies were to implement strategies for retaining federal workers with disabilities in federal employment, to make increased use of Schedule A excepted hiring authority for persons with disabilities, and to designate a senior-level official to be accountable for meeting the goals of the order and developing and implementing the agency's plan.

---

<sup>11</sup>Stakeholder groups we met with included other federal entities such as the National Council on Disability and staff from the Department of Defense's Computer and Electronic Accommodations Program, as well as private sector and nonprofit organizations that specialize in disability issues.

<sup>12</sup>Exec. Order No. 13163, *Increasing the Opportunity for Individuals with Disabilities To Be Employed in the Federal Government*, 65 Fed. Reg. 46563 (July 26, 2000).

In January 2017, EEOC issued a final rule amending the regulations requiring federal agencies to engage in affirmative action for individuals with disabilities. The rule codified many of the requirements placed on agencies by management directives and past executive orders, among other things. Agencies were to begin following the rule in January 2018. The revised regulation requires that agencies take specific steps until they meet specific employment goals set by EEOC for individuals with disabilities and targeted disabilities, provide personal assistance services to certain employees who need them because of a targeted disability, and meet a number of other requirements designed to improve employment opportunities for individuals with disabilities in the federal workforce.<sup>13</sup>

OPM, EEOC, and Labor each have roles in advancing the hiring and retention of persons with disabilities in the federal government.

OPM is responsible for executing, administering, and enforcing the civil service laws, rules, and regulations.<sup>14</sup> This includes ensuring compliance with merit system principles that prohibit discrimination—including on the basis of disability—in all aspects of personnel management, among other things.<sup>15</sup> Additionally, OPM is responsible for monitoring federal agencies' implementation of affirmative action programs for disabled veterans, including providing technical assistance and reporting on progress made by agencies.<sup>16</sup>

EEOC, in the federal sector, is responsible for enforcing the employment discrimination prohibitions of anti-discrimination laws, including the Rehabilitation Act, which prohibits discrimination on the basis of disability.<sup>17</sup> EEOC is responsible for the annual review and approval of agencies' affirmative action program plans for the hiring, placement, and advancement of individuals with disabilities.<sup>18</sup> It is also responsible for

---

<sup>13</sup>29 C.F.R. § 1614.203.

<sup>14</sup>5 U.S.C. § 1103(a)(5).

<sup>15</sup>5 U.S.C. § 1104(b)(2). The merit system principles are set forth under section 2301 of title 5 of the United States Code.

<sup>16</sup>38 U.S.C. § 4214; 5 C.F.R. § 720.306.

<sup>17</sup>Responsibility for federal sector equal employment opportunity was originally with OPM's predecessor agency (Civil Service Commission) but was transferred to EEOC in 1978. Reorg. Plan No. 1 of 1978, 43 Fed. Reg. 19,807, reprinted in 92 Stat. 3781.

<sup>18</sup>29 U.S.C. § 791(b).

establishing procedures for handling federal employees' allegations of discrimination and for providing for the adjudication of complaints and hearing of appeals.<sup>19</sup>

Labor's Office of Disability Employment Policy (ODEP) is to provide national leadership in developing policy to eliminate barriers to the employment of individuals with disabilities in the public and private sectors.<sup>20</sup> ODEP works in collaboration with federal, state, and local agencies, private sector employers, and employer associations to develop and disseminate evidence-based policy strategies and effective practices. The office also assists agencies and employers with adopting such policies and practices. Additionally, Labor administers the Federal Employees' Compensation Act, which provides workers' compensation coverage to federal employees for employment-related injuries and occupational diseases.<sup>21</sup>

Under Executive Order 13548, each of these agencies were assigned roles and responsibilities often in consultation with each other. For example, OPM, in consultation with Labor and EEOC, was tasked to identify and assist agencies in implementing strategies for retaining federal employees with disabilities. Additionally, OPM was also to consult with Labor, EEOC, and OMB in designing model recruitment and hiring strategies for agencies and developing mandatory training on employment of the disabled. Labor was to consult with OPM in pursuing innovative re-employment strategies and develop policies that foster improved return-to-work of employees who were injured on the job.

OMB's initial role was to convene federal agencies and assist their start-up efforts to implement the Executive Order, according to staff in OMB's Office of Performance and Personnel Management. OMB staff told us the agency helped to establish a framework for coordination and collaboration among the key leadership agencies focused on making the federal government a model employer for persons with disabilities and to provide

---

<sup>19</sup>29 U.S.C. part 1614.

<sup>20</sup>Labor established ODEP pursuant to the requirement in its fiscal year 2001 appropriation to establish an office to provide leadership, develop policy and initiatives, and award grants furthering the objective of eliminating barriers to the training and employment of people with disabilities. Consolidated Appropriations Act, 2001, Pub. L. No. 106-554, 114 Stat. 2763, 2763A-10 (2000).

<sup>21</sup>5 U.S.C. § 8145.

support for regulatory and policy initiatives related to disability employment. In 2015, in furtherance of an executive order focused on improving diversity and inclusion in the federal workforce, OMB joined OPM and EEOC and issued a memorandum to all heads of executive departments and agencies announcing the establishment of the Diversity and Inclusion in Government Council.<sup>22</sup> The council initially operated under the direction of OPM, OMB, and EEOC and was formed to provide a forum for improving senior leadership engagement and collaboration on strategic and operational diversity and inclusion priorities. OMB's role has since diminished as it delegated much of the leadership responsibilities to the other key leadership agencies.

For reporting purposes, the federal government distinguishes between two major categories of disabilities: targeted and other disabilities. Targeted disabilities, generally considered to be more severe, include traumatic brain injuries, deafness, blindness, partial or complete paralysis, significant mobility impairments, and psychiatric disabilities, among others. Other disabilities include such conditions as gastrointestinal disorders, cardiovascular or heart disease, autoimmune disorders, pulmonary or respiratory conditions, and learning disabilities.

Federal statutes and regulations provide special hiring authorities for people with disabilities. These include Schedule A excepted service hiring authority—which permits the noncompetitive appointment of qualified individuals with intellectual, severe physical, or psychiatric disabilities<sup>23</sup> and appointments and noncompetitive conversion for veterans who are

---

<sup>22</sup>Exec. Order No. 13583, *Establishing a Coordinated Government-Wide Initiative to Promote Diversity and Inclusion in the Federal Workforce*, 76 Fed. Reg. 52,847 (Aug. 23, 2011). OMB Memorandum: *Establishment of a Diversity and Inclusion in Government Council*, M-15-07 (Mar. 6, 2015). The memorandum stated that the council will help to develop guidance to cultivate an organizational workplace culture that supports inclusion, collaboration, employee engagement, transparency, information sharing, cognitive diversity, and equity for all employees who will directly enable the federal government to achieve high-level organizational performance.

<sup>23</sup>An individual may receive a permanent, time-limited, or temporary appointment under this authority. A temporary appointment is appropriate when an agency determines it is necessary to observe the applicant on the job to determine whether the applicant is able or ready to perform the duties of the position. An agency may convert an individual under a temporary appointment to a permanent position if the agency determines the individual is able to perform the duties of the position. 5 C.F.R. § 213.3102(u)(5)(i).

---

30 percent or more disabled.<sup>24</sup> To qualify for a Schedule A appointment, an applicant must generally provide proof of disability. Proof of disability can come from a number of sources, including a licensed medical professional, or a state agency that issues or provides disability benefits.

The federal government gathers data on the number of individuals with disabilities in the workforce through OPM's Standard Form 256, *Self-Identification of Disability* (SF-256). Federal employees voluntarily complete this form to disclose their disability status, as defined by the Rehabilitation Act. Our past work highlighted concerns about the accuracy of data captured in the SF-256.<sup>25</sup> For example, we reported that agency officials and advocates for people with disabilities believe there is an undercount of employees with disabilities because some individuals may not disclose their disability status out of concern they will be discriminated against or precluded from advancement. In addition, employees may develop a disability during federal employment and may not know how to or why they should update their status. Disability status information is confidential and cannot be used to affect an employee in any way.

Given our previously reported concerns, we recommended that OPM assess the extent to which the SF-256 accurately measures progress toward the goal of Executive Order 13548 and to explore options for improving the accuracy of SF-256 reporting. To address our recommendation, OPM updated its 2012 Employee Feedback Survey to allow federal employees to confidentially self-disclose a disability and serve as a source of comparison through which OPM could assess the accuracy of the SF-256.

---

<sup>24</sup>U.S.C. § 3112 provides authority for the noncompetitive appointment and conversion to career employment of disabled veterans with compensable service-connected disabilities of 30 percent or more. See 5 C.F.R. §§ 316.302(b)(4) and 316.402(b)(4).

<sup>25</sup>GAO, *Disability Employment: Further Action Needed to Oversee Efforts to Meet Federal Government Hiring Goals*, [GAO-12-568](#) (Washington D.C.: May 2012).

---

## Federal Agencies Exceeded the Hiring Goal Set Forth in the Executive Order, but OPM Does Not Track or Report Retention Data

---

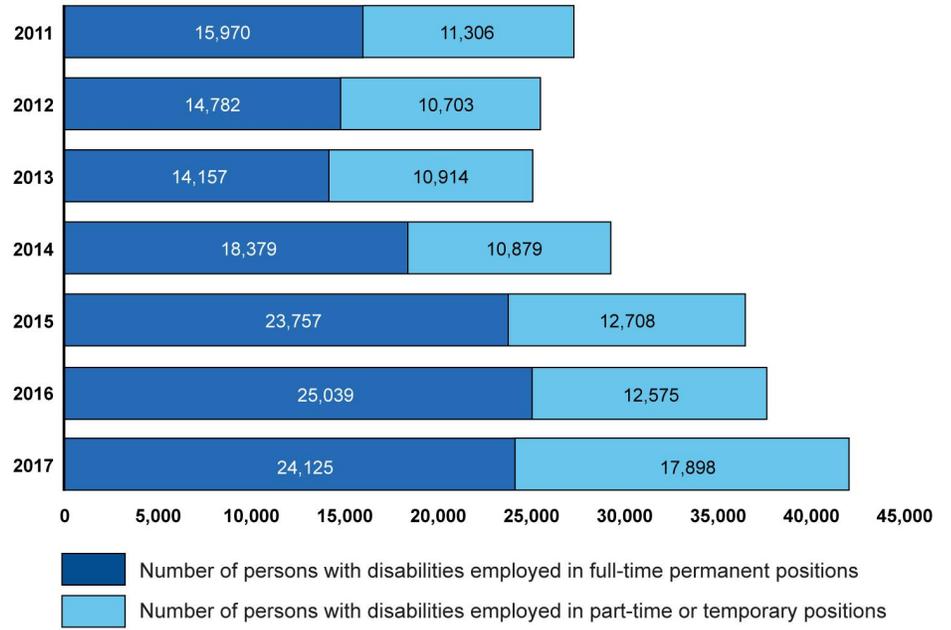
### An Additional 143,000 Persons with Disabilities Were Hired Government-wide between 2011 and 2015

Federal agencies exceeded the government-wide goal to hire an additional 100,000 persons with disabilities in the federal government by 2015, according to our analysis of OPM's EHRI data across the 24 CFO Act agencies. During fiscal years 2011 through 2015, a total of approximately 143,600 persons with disabilities were hired across all positions, which includes full-time permanent positions and part-time or temporary positions. Of those hires, approximately 87,000—61 percent—were hired into full-time permanent positions. Similar hiring continued to increase in 2016 and 2017 as the federal government hired approximately an additional 79,600 persons with disabilities during those 2 years across all positions, of which approximately 49,200—62 percent—were full-time permanent positions. Figures 1 and 2 show the total government-wide number of persons with disabilities and targeted disabilities hired in fiscal years 2011 through 2017.<sup>26</sup>

---

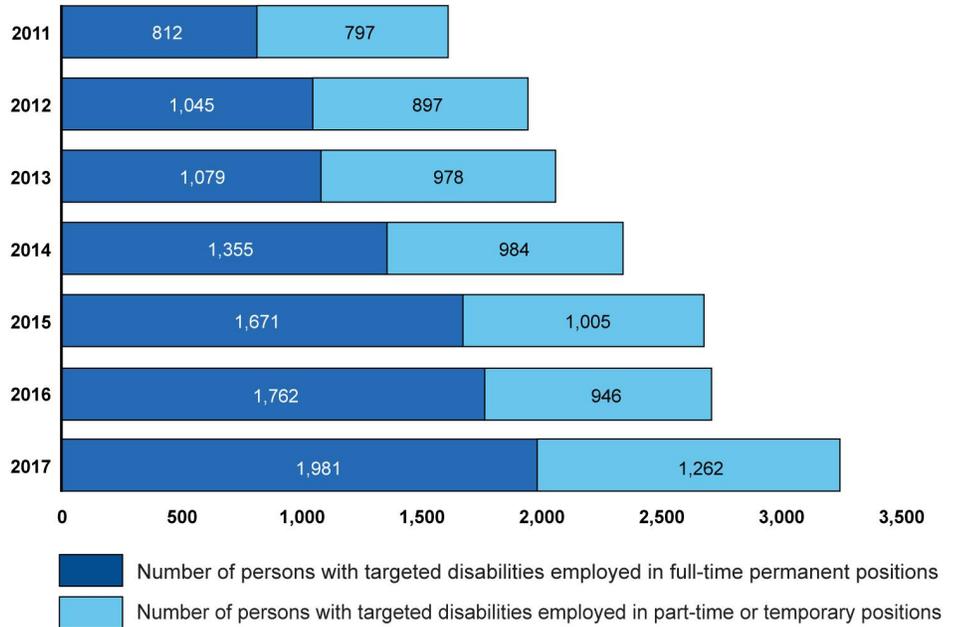
<sup>26</sup>The numbers shown in figure 1 include persons hired under Schedule A and/or identified as a disabled veteran, or as having a targeted or other self-identified disability.

**Figure 1: The Federal Government Generally Increased Hiring of Persons with Disabilities, Fiscal Years 2011 through 2017**



Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

**Figure 2: The Federal Government Generally Increased Hiring of Persons with Targeted Disabilities, Fiscal Years 2011 through 2017**



Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

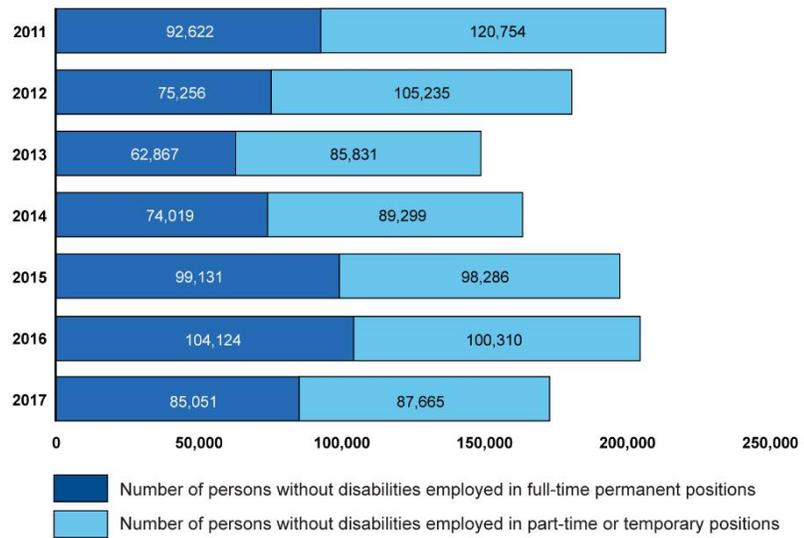
Our determinations of the number of new hires each year were consistently lower than the numbers OPM included in its executive branch reporting.<sup>27</sup> The discrepancy between our numbers and OPM’s reported counts is largely attributed to our exclusion of agency-to-agency transfers in our analysis. For the purpose of our analysis of government-wide hiring, we excluded transfers because we did not consider those to be new hires since those individuals remained employed in the federal government.

Figure 3 shows the total government-wide number of persons without disabilities hired during the same time period. According to our analysis, a total of approximately 903,000 persons without disabilities were hired across all positions between 2011 through 2015. Of those hires, approximately 403,900—45 percent—were hired into full-time permanent positions. Hiring continued to increase with an additional 377,150 in 2016

<sup>27</sup>OPM, *Report on the Employment of Individuals with Disabilities in the Federal Executive Branch*, Fiscal Year 2015 (October 2016).

and 2017 combined across all positions, of which approximately 189,200—50 percent—were full-time permanent positions.

**Figure 3: Number of Persons without Disabilities Hired in the Federal Government, Fiscal Years 2011 through 2017**



Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

The data shown in figures 1 and 3, and summarized in Table 1, show that from 2011 through 2017, the percent of hires with disabilities steadily increased from 11 percent to almost 20 percent.

**Table 1: Number of Persons with and without Disabilities Hired in the Federal Government, Fiscal Years 2011 through 2017**

Fiscal Year	Number of Persons with Disabilities Hired	Number of Persons without Disabilities Hired	Number of Persons Hired (with and without disabilities)	Percent of Persons with Disabilities Hired
2011	27,276	213,376	240,652	11.3
2012	25,485	180,491	205,976	12.4
2013	25,071	148,698	173,769	14.4
2014	29,258	163,318	192,576	15.2
2015	36,465	197,417	233,882	15.6
2016	37,614	204,434	242,048	15.5
2017	42,023	172,716	214,739	19.6

Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

Note: These numbers include full-time permanent hires and part-time or temporary hires.

Our analysis at the agency level shown in table 2 shows that all agencies increased the percentage of persons with disabilities hired from 2011

---

through 2017 and almost all agencies increased the percentage of persons with targeted disabilities hired over the same period.<sup>28</sup> Table 2 shows this information by agency for fiscal years 2011, 2015, and 2017. We chose to present these years of data to mark the first and last years of the 5-year period specified in Executive Order 13548 and to also show the most recent data available at the time of our review.

---

<sup>28</sup>The two agencies that did not increase the percentage of persons with targeted disabilities hired from 2011 through 2017 were the National Science Foundation and the Department of Labor.

**Table 2: Percentage of People with Disabilities and Targeted Disabilities Hired in Fiscal Years 2011, 2015, and 2017 by Agency**

na	All Disabilities			Targeted Disabilities		
Agency Name	2011	2015	2017	2011	2015	2017
Department of Agriculture	4.6	8.1	15.6	0.3	0.6	1.1
U.S. Agency for International Development	6.1	10.8	6.9	0.5	0.6	0.6
Department of Commerce	11.3	13.9	20.3	0.8	0.7	2.3
Department of Defense	13.1	14.7	19.1	0.4	0.4	1.0
Department of Justice	7.8	12.2	14.0	0.2	0.5	0.8
Department of Labor	16.9	21.9	23.0	2.4	2.0	1.8
Department of Energy	7.6	14.4	16.7	0.3	0.9	1.3
Department of Education	6.6	12.3	15.6	0.2	1.1	1.5
Environmental Protection Agency	7.0	12.4	18.6	0.1	1.1	2.4
General Services Administration	15.8	18.4	26.2	0.4	0.7	2.1
Department of Health and Human Services	8.2	10.0	11.2	1.0	0.9	1.2
Department of Homeland Security	7.9	11.2	23.5	0.3	0.4	1.2
Department of Housing and Urban Development	10.1	19.6	20.8	0.4	1.3	1.6
Department of Interior	8.0	10.4	21.7	0.5	0.7	1.5
National Science Foundation	7.1	9.4	11.0	0.9	1.1	0.8
National Aeronautics and Space Administration	10.2	15.2	16.5	1.2	0.7	1.7
Nuclear Regulatory Commission	6.8	15.3	21.1	1.1	0.0	2.9
Office of Personnel Management	20.5	14.8	27.1	1.4	0.8	2.2
Small Business Administration	11.6	21.8	26.8	0.5	1.0	2.2
Department of State	5.3	14.1	14.3	0.2	0.3	0.3
Social Security Administration	17.7	23.5	31.3	1.6	2.2	2.7
Department of Transportation	11.6	18.0	17.3	0.8	1.4	1.0
Department of the Treasury	9.9	13.6	13.8	1.0	1.5	1.6
Department of Veterans Affairs	18.0	25.1	22.9	1.8	3.2	2.9

Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

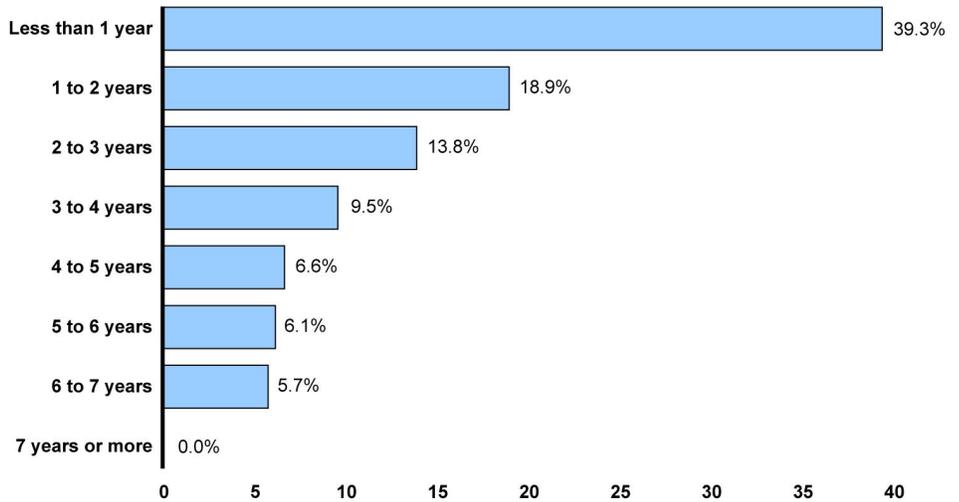
Note: These numbers include full-time permanent hires and part-time or temporary hires. For our analysis of individual agency-level hiring data, we included transfers in cases where employees transferred into an agency because we considered that to be a new hire at the individual agency level.

### Analyses of Retention Data Show Varied Results

As part of our analyses of individuals hired during the 2011 through 2017 time period, we analyzed employee retention in terms of the number of years an individual hired during that time period remained employed. Across the federal government, of the more than 223,000 persons with disabilities hired during the 2011 through 2017 time period, approximately

39 percent of them stayed in the federal government for less than 1 year and approximately 60 percent stayed for less than 2 years, as shown in figure 4.<sup>29</sup>

**Figure 4: Nearly 60 Percent of Employees with Disabilities Hired from 2011 through 2017 Stayed for Less than 2 Years**



Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

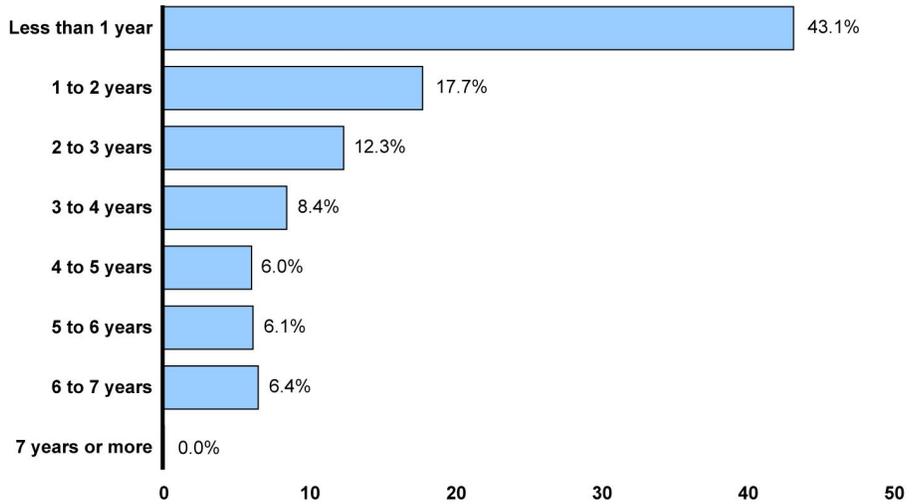
Note: These numbers show only employees hired between 2011 through 2017 and the duration they were retained during that time period. These numbers include full-time permanent hires and part-time or temporary hires.

These percentages are slightly better than the percentages of employees without disabilities who left within the same amount of time as shown in figure 5. Across the federal government, of the more than 1.28 million persons without disabilities hired during the 2011 through 2017 time period, approximately 43 percent of them stayed in the federal

<sup>29</sup>The total number of persons with disabilities hired during the 2011 through 2017 time period as shown in figure 1 was 223,192. However, the denominator used for figure 4 was 223,038, which is slightly lower. This discrepancy is due to inconsistencies we found with hiring and/or separation dates recorded in OPM's EHRI data. We determined these discrepancies did not affect the reliability of the data for our purposes.

government for less than 1 year and approximately 60 percent of them stayed for less than 2 years.<sup>30</sup>

**Figure 5: More Than 60 Percent of Employees without Disabilities Hired from 2011 through 2017 Stayed for Less than 2 Years**



Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

Note: These numbers show only employees hired between 2011 through 2017 and the duration they were retained during that time period. These numbers include full-time permanent hires and part-time or temporary hires.

The data shown in figures 4 and 5 taken in context together provide an aggregate overview of government-wide hiring and retention trends of individuals with disabilities in comparison to hiring and retention trends of individuals without disabilities. We found the trends to be generally consistent between the employee groups during this time period, with the largest percentage of hires staying less than 1 year. These departures may be explained, in part, by the proportion of employees hired into temporary positions who therefore were not necessarily expected to stay

<sup>30</sup>The total number of persons without disabilities hired during the 2011 through 2017 time period as shown in figure 3 was 1,280,450. However, the denominator used for figure 5 was 1,280,041, which is slightly lower. This discrepancy is due to inconsistencies we found with hiring and/or separation dates recorded in OPM's EHRI data. We determined these discrepancies did not affect the reliability of the data for our purposes.

on the job for a longer duration, or by employees who did not meet performance standards.<sup>31</sup>

To pinpoint the root causes behind these departure rates and to determine where appropriate improvements and potential solutions may be warranted, targeted data collection, tracking, and analysis is needed. Moreover, the loss of such a substantial percentage of new hires within their first 2 years of employment provides an opportunity for the federal government to examine why this occurs, identify any lessons learned, and better target its retention efforts as appropriate to potentially reduce such early departures. Further, these retention trends have implications related to agencies' ability to meet and sustain progress toward the federal goals of ensuring that at least 12 percent of their workforce is comprised of employees with disabilities including 2 percent comprised of employees with targeted disabilities.

In addition, we analyzed the number of persons with disabilities hired into each occupational category as identified in OPM's EHRI database for fiscal years 2011 through 2015. The categories are administrative, blue collar, clerical, professional, technical, and other. Within each category, we identified the number of employees who remained in those positions for at least 2 years.

Our analysis summarized in table 3 shows the highest retention rates for employees with disabilities and employees with targeted disabilities occurred in three categories: administrative, blue collar, and professional. For example, in the professional occupational category, the retention rates were approximately 48 and 43 percent for employees with disabilities and targeted disabilities, respectively—which were the highest levels of retention for persons with disabilities and targeted disabilities in any occupational category. However, the number of persons with disabilities hired into this category is considerably lower than that of non-disabled hires into the same category. Specifically, approximately 13 percent of persons with disabilities and approximately 11 percent of persons with targeted disabilities were hired into the professional occupational category. In contrast, as shown in table 3, 23 percent of

---

<sup>31</sup>Our past work examined opportunities for agencies to more effectively deal with poor performance through enhanced performance management. See *Federal Workforce: Improved Supervision and Better Use of Probationary Periods Are Needed to Address Substandard Employee Performance*, [GAO-15-191](#) (Washington, D.C.: Feb. 6, 2015) and *Federal Workforce: Human Capital Management Challenges and the Path to Reform*, [GAO-14-723T](#) (Washington, D.C.: July 15, 2014).

persons with no disability were hired into this same occupational category and retained at a similar rate.

**Table 3: Percent of Persons with Disabilities, Targeted Disabilities, and without Disabilities Hired in Fiscal Years 2011 through 2015 and Retained at Least 2 Years by Occupational Category**

Occupational Category	Persons with Disabilities Hired	Persons with Disabilities Retained	Persons with Targeted Disabilities Hired	Persons with Targeted Disabilities Retained	Persons without Disabilities Hired	Persons without Disabilities Retained
<b>Administrative</b>	29.7	48.1	19.2	42.1	20.6	49.2
<b>Blue Collar</b>	13.5	41.1	22.0	39.8	11.6	37.9
<b>Clerical</b>	18.4	33.4	22.1	33.2	14.5	30.0
<b>Other</b>	4.9	34.6	3.0	25.1	7.0	35.0
<b>Professional</b>	12.7	48.4	11.0	43.2	23.1	50.0
<b>Technical</b>	20.8	39.7	22.6	39.3	23.2	29.0

Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

Note: Hired percentages are calculated by how many of the total individuals with (1) a disability, (2) a targeted disability, or (3) no disability were hired into each occupational category. Retained percentages are calculated by how many employees hired in each occupational category remained in the federal government for at least 2 years. These numbers include full-time permanent hires and part-time or temporary hires. The "Other" category includes miscellaneous white-collar occupations that do not fall into the Professional, Administrative, Technical, or Clerical categories.

Our analysis by GS level in table 4 shows that retention rates increase with GS level, regardless of disability, with retention rates being slightly higher for persons without disabilities for the top three GS levels. Moreover, persons with disabilities and targeted disabilities were more likely to be hired at the lowest three GS levels, with one exception. Persons with disabilities fared equally or relatively well in GS-11 and above categories compared to persons without disabilities or with targeted disabilities.

**Table 4: Percent of Persons with Disabilities, Targeted Disabilities, and without Disabilities Hired in Fiscal Years 2011 through 2015 and Retained At Least 2 Years by GS Level**

GS Level	Persons with Disabilities Hired	Persons with Disabilities Retained	Persons with Targeted Disabilities Hired	Persons with Targeted Disabilities Retained	Persons without Disabilities Hired	Persons without Disabilities Retained
GS 1-GS 4	11.1	27.6	13.9	26.8	15.8	17.8
GS 5-GS 7	32.3	42.0	36.1	41.0	23.3	38.3
GS 8-GS 10	8.4	48.4	6.9	43.9	6.8	49.6
GS 11-GS 13	17.4	51.4	9.6	47.1	14.7	55.3
GS 14-GS 15	2.6	51.7	1.2	46.8	2.6	56.0
Other	28.2	39.9	32.2	37.3	36.7	41.3

Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

Note: Hired percentages are calculated by how many of the total Individuals with (1) a disability, (2) a targeted disability, or (3) no disability were hired into each GS level. Retained percentages are calculated by how many employees hired in each GS level category remained in the federal government for at least 2 years. These numbers include full-time permanent hires and part-time or temporary hires. The "Other" category includes non-GS pay plans such as the Senior Executive Service or those that are administratively determined.

## OPM Does Not Track Retention Data on Employees with Disabilities

OPM does not routinely track or report retention data on employees with disabilities, which could help inform both agency-specific and government-wide assessments of how the federal government is performing with retaining the employees it hires. OPM officials said OPM has the ability to track the retention of all employees in the federal government and can do so for any specific category of employees on an as needed basis or upon request. For example, in 2015, OPM started reporting new hire retention data on employees who are veterans by including this information in its annual report on the employment of veterans in the federal government. This report also includes hiring data on disabled veterans.<sup>32</sup> However, there is no similar OPM tracking or reporting of retention data for all individuals with disabilities including targeted disabilities.

The federal regulations, executive order and management directive discussed earlier in this report all include statements about the

<sup>32</sup>OPM, *Employment of Veterans in the Federal Executive Branch, Fiscal Year 2014* (July 2015). This report is produced annually by OPM to provide data on the employment of veterans within the federal executive branch.

importance of retaining individuals with disabilities in the federal government. For example, Executive Order 13548 stated that agencies must improve their efforts to employ workers with disabilities through increased recruitment, hiring, and retention of these individuals. Further, it stated that OPM, in consultation with Labor and EEOC, shall identify and assist agencies in implementing strategies for retaining federal workers with disabilities in federal employment.<sup>33</sup> Federal regulations state that agencies shall give full consideration to the retention of qualified individuals with disabilities in the federal workforce.<sup>34</sup> EEOC's MD 715 requires agencies to conduct an internal review and analysis of the effects of their current and proposed policies, practices, procedures and conditions that relate to the employment—including retention—of individuals with disabilities.

Making use of the agency-specific data OPM already gathers in its EHRI database complemented with the retention information agencies report in their annual MD 715 submissions would help to facilitate more comprehensive analyses of the retention of employees with disabilities across the federal government. Such analyses could provide a fuller picture of how the federal government is performing with retaining the employees it hires, help identify common agency experiences—both successes and challenges—and assist in pinpointing the root causes that contribute to retention rates of employees with disabilities in the federal workforce. Making retention data available to federal agencies for such use is also consistent with a federal internal control standard that states that management is to obtain relevant data from reliable internal and external sources in a timely manner so that they can be used for effective monitoring.<sup>35</sup>

Without routinely tracking and analyzing data on how long employees with disabilities remain employed in their agencies, federal managers are limited in their ability to assess the performance and effectiveness of the hiring and retention efforts put in place at their agencies. In addition, agencies are missing opportunities to leverage such information to help inform their own internal reviews and analysis of progress in meeting the goals included in federal regulations that at least 12 percent of their

---

<sup>33</sup>75 Fed. Reg. 45,039 (July 30, 2010)

<sup>34</sup>29 C.F.R. § 1614.203.

<sup>35</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington D.C.: Sept. 2014).

workforce be comprised of employees with disabilities including 2 percent comprised of employees with targeted disabilities.

## Selected Agencies Used Various Practices to Increase Hiring but Opportunities Exist to Examine the Impact of Schedule A Hiring Authority and Enhance Reasonable Accommodation Programs

The three agencies we selected as case illustrations generally experienced increases in the percentage of employees hired with disabilities and targeted disabilities. Table 5 shows the percentage of employees hired by each agency in fiscal years 2011, 2015, and 2017. We chose to present these years of data to mark the first and last years of the 5-year period specified in Executive Order 13548 and to also show the most recent data available at the time of our review. For our analysis of individual agency-level hiring data, we included transfers in cases where employees transferred into an agency because we considered that to be a new hire at the individual agency level.

**Table 5: Percent of Employees Hired by Selected Agencies with Reported Disabilities and Targeted Disabilities, Fiscal Years 2011, 2015 and 2017**

Agency Name	2011	2015	2017
<b>Department of Justice: Disabilities</b>	7.8	12.2	14.0
<b>Department of Justice: Targeted Disabilities</b>	0.2	0.5	0.8
<b>Small Business Administration: Disabilities</b>	11.6	21.8	26.8
<b>Small Business Administration: Targeted Disabilities</b>	0.5	1.0	2.2
<b>Social Security Administration: Disabilities</b>	17.7	23.5	31.3
<b>Social Security Administration: Targeted Disabilities</b>	1.6	2.2	2.7

Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

Note: Persons with targeted disabilities are also included in the broader disabilities category. These numbers include full-time permanent hires and part-time or temporary hires.

Similar to the government-wide retention analysis described earlier, we also examined retention data at DOJ, SBA, and SSA. Of the employees with disabilities hired at DOJ and SSA from 2011 through 2017, approximately 31 percent and 33 percent, respectively, stayed in the federal government for less than 1 year. Approximately 53 percent and 51 percent, respectively, stayed for less than 2 years. These retention rates

were slightly better than government-wide rates. In contrast, approximately 65 percent of employees with disabilities hired at SBA during that time period stayed for less than 1 year and approximately an additional 9 percent stayed for less than 2 years of employment.

These departures may be explained, in part, by the proportion of employees hired into temporary positions who therefore were not necessarily expected to stay on the job for a longer duration. For example, SBA staff said that, on average, 45 percent of SBA's workforce is comprised of temporary employees hired by the agency's Office of Disaster Assistance during a disaster. As such, SBA expects turnover among those hires, including employees with disabilities.

Similar to our analysis of government-wide retention rates by GS level and by occupational category, we identified the number of individuals hired at each of the three selected agencies during fiscal years 2011 through 2015 who stayed for at least 2 years. We found that generally across the three agencies, employees with disabilities were retained longer at the higher GS levels. As the GS levels increased, individuals without disabilities retained their jobs at a slightly higher rate than individuals with disabilities. Our analysis of occupational categories found that, in general, the three agencies each retained people with disabilities at lower rates than people without disabilities. More detailed hiring and retention data for each of the three agencies are included in appendix I.

---

### **Selected Agencies Collaborated and Shared Information to Aid Recruitment and Hiring of Individuals with Disabilities**

To aid recruitment and employment opportunities for individuals with disabilities, the three agencies we interviewed reported using (1) collaboration with other federal agencies for knowledge and information sharing and (2) coordination with employee resource and advisory groups. The following examples are illustrations of practices that selected agencies implemented. We did not assess the effectiveness or attempt to quantify the costs or benefits of the practices.

Two agencies provided examples of their collaboration with other federal agencies for knowledge and information sharing. For example, DOJ officials told us that staff from their agency's Criminal Division participated in an OPM effort using a "Resume Mining" feature in the USAJOBS Agency Talent Portal, in which the division's human resources specialists

searched through active resumes and filtered the searches based upon candidates who were eligible to be hired non-competitively under the Schedule A hiring authority.

According to SBA officials, they used the Workforce Recruitment Program—a resource managed through Labor to help federal hiring managers connect with qualified candidates with disabilities for all jobs. SBA also retains a repository of resumes for individuals with disabilities to share with hiring managers. In 2015, to assist hearing impaired candidates and in a joint effort with the Federal Communications Commission, SBA hired staff fluent in American Sign Language (ASL) to provide video relay services directly to the deaf and hard-of-hearing communities. As a result, SBA officials told us SBA's ASL customer support staff is able to communicate with and assist hearing-impaired job candidates. SBA also developed a National Strategic Recruitment Plan, which highlights Labor's Workforce Recruitment Program for College Students with Disabilities.<sup>36</sup> SBA officials said this plan has served as a successful tool for recruitment and hiring managers within their agency.

Two of the three selected agencies we reviewed, DOJ and SSA, have disability employee resource or advisory groups made up of employees and management. These groups are generally made up of a variety of representatives from across the agency, including human resources professionals, hiring managers, recruitment coordinators, and employees with disabilities. The purpose of these groups includes helping to identify policies and procedures that support a positive work environment for people with disabilities. For example, DOJ's Attorney General's Advisory Committee for People with Disabilities (AGCPD) meets quarterly and works with DOJ management on disability employment issues.

AGCPD advisory members told us one of their most significant contributions has been assisting with developing an agency-wide policy to help increase the use of the Schedule A hiring authority between 2010 and 2012. As a result, the number of individuals with disabilities hired at DOJ increased, according to AGCPD members. However, they said the agency has been unable to sustain those numbers in recent years. DOJ staff said this may also be attributed, in part, to a hiring freeze across DOJ at the time that affected all hires. AGCPD members also told us they

---

<sup>36</sup>The Workforce Recruitment Program for College Students with Disabilities is a recruitment and referral program administered by Labor that connects federal and private sector employers nationwide with college students and recent graduates with disabilities through summer or permanent jobs.

routinely review DOJ's disability hiring and retention percentages to monitor agency progress on this issue.

According to SSA officials, SSA's employee advisory group, the National Advisory Council of Employees with Disabilities (NACED), advises the agency regarding reasonable accommodations, recruiting, and creating pathways for promotions and retention of employees with disabilities. SSA's management was involved in establishing guidelines for the advisory group to operate within the agency. NACED has a senior executive service member who serves as the council's liaison with SSA senior management. NACED assisted in the creation of mandatory agency training for managers and employees at SSA on disability awareness and sensitivity. The group also assisted the agency in producing a video that features SSA employees with disabilities and is available on SSA's intranet website. In addition, the advisory group assisted the agency to ensure SSA's systems are compliant with assistive technology.

In addition, according to SSA officials, the agency has placed designated Selective Placement Program Coordinator (SPPC) points of contact in each of its regional offices to support disability recruitment and hiring efforts.<sup>37</sup> SSA officials told us the role of their SPPC has been instrumental in building coalitions and networks with their internal and external stakeholders, including connecting SSA's human resources, equal employment opportunity (EEO), and employee affinity groups. SSA officials said these essential connections enable their agency to acquire the information needed to make informed disability employment and general EEO program and policy decisions.

---

### Selected Agencies Provided Schedule A Training but Do Not Measure Its Impact

As noted earlier, federal statutes and regulations provide special hiring authorities for people with disabilities, which includes Schedule A hiring authority. Agencies are not required to use Schedule A authority and can choose to use the traditional competitive process to fill job vacancies. However, Executive Order 13548 called for increased utilization of the

---

<sup>37</sup>SPPCs help federal agencies recruit, hire, and accommodate people with disabilities. SPPCs may also provide support to potential employees through the application process and answer questions. Most federal agencies have an SPPC or equivalent role, such as a Special Emphasis Program Manager.

---

federal government's Schedule A excepted service hiring authority for persons with disabilities, as appropriate.

Consistent with federal emphasis on the use of Schedule A, all three selected agencies reported to us that they provide training on Schedule A hiring authority to their hiring managers and human resources professionals. For example:

- According to SBA officials, the agency provides supervisory training to all hiring managers and supervisors to emphasize Schedule A hiring authority, among other hiring flexibilities.
- SSA officials told us their agency holds annual mandatory training for managers and human resource specialists on special hiring authorities that apply to individuals with disabilities, including Schedule A, and reasonable accommodations. SSA also provides a manual to its managers focused specifically on recruitment, interviewing, and hiring related to Schedule A authority.
- DOJ officials told us their agency participated in ongoing training and other initiatives designed to increase the use and understanding of Schedule A.

Nevertheless, the agencies we spoke with reported that some hiring managers and human resources staff are unfamiliar with or unsure of how to use the Schedule A hiring authority. Consequently, the agencies have found that there is a continual need to increase hiring managers' awareness of Schedule A and to educate both managers and human resource personnel on the use of the hiring authority. For example:

- SBA officials said their managers often have questions about what Schedule A is and how to use it in the hiring process.
- SSA officials said they continue to receive questions about the hiring authority from their newer managers, which they address on a case-by-case basis.
- Similarly, the key leadership agencies underscored this as an issue they have seen government-wide in their experience. For example, EEOC staff said because hiring managers change frequently, information and the use of the Schedule A hiring authority may be a topic that was not part of their previous work experiences or portfolios. EEOC officials said that all managers could benefit from more training to understand how and when it is permissible to use the special authority to hire individuals with disabilities.

To help address issues around the use of Schedule A, officials from the key leadership agencies emphasized the importance of federal agencies having designated staff familiar with disability issues, such as an SPPC, in which a part of his or her job responsibilities is to help educate and train the workplace on disability issues such as the use and benefits of the Schedule A hiring authority. Consistent with this guidance, two of the three agencies use SPPCs to provide guidance and, in one case, provide training. For example:

- SBA's SPPCs frequently provide guidance on the option to utilize the Schedule A hiring authority prior to opening a competitive job announcement on USAJOBS.
- SSA has designated SPPCs in each of its regional offices. The SPPCs provided guidance and training to managers on the appointment of individuals with disabilities using the Schedule A appointment authority. As a result, in fiscal year 2019, SSA officials said these efforts contributed to their agency filling more than 250 positions using the Schedule A hiring authority.

Additional opportunities exist to further address issues around the use of Schedule A. We have previously reported that training at all staff levels, in particular training on hiring, reasonable accommodations, and diversity awareness can help disseminate leading practices throughout an agency and communicate expectations for implementation of policies and procedures related to improving employment of people with disabilities.<sup>38</sup>

In addition, our past work has underscored the importance of assessing and measuring the real impact of training to determine how it contributes to the accomplishment of agency goals and objectives.<sup>39</sup> Moreover, a leading training investment practice is to evaluate the benefits achieved through training, such as having a formal process for evaluating improvement in performance and tracking the impact of training on the agency's performance goals.<sup>40</sup>

---

<sup>38</sup>[GAO-12-568](#).

<sup>39</sup>GAO, *Human Capital: Agencies Should More Fully Evaluate the Costs and Benefits of Executive Training*, [GAO-14-132](#) (Washington, D.C.: Jan. 31, 2014). Also see GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, [GAO-04-546G](#) (Washington, D.C.: Mar. 1, 2004).

<sup>40</sup>*Federal Training Investments: Office of Personnel Management and Agencies Can Do More to Ensure Cost-Effective Decisions*, [GAO-12-878](#) (Washington, D.C.: Sept. 17, 2012).

While assessing training is important, the three selected agencies said they do not assess the impact of their training related to Schedule A. For example, according to SBA officials, their training covers a range of hiring flexibilities beyond Schedule A. As such, SBA officials said they are unable to evaluate the effect of the training to specifically measure an increased level of hiring managers' and human resources professionals' understanding of how and when to use Schedule A authority. SSA officials told us that while their agency does not evaluate their training, the agency is currently developing an evaluation module to allow employees and managers to provide feedback on the effectiveness of their Schedule A training. However, SSA did not provide a committed timeframe for completion of such a module. DOJ staff said training is provided by its various component agencies and is updated when appropriate. However, DOJ did not provide any further details to explain the frequency, content, or results of such evaluations.

Without evaluating the impacts of training to ensure that hiring managers understand how and when to use the Schedule A hiring authority, agencies may be missing opportunities to enhance awareness of and sensitivity to disability issues and opportunities to increase the number of employees with disabilities across the federal workforce.

---

### Reasonable Accommodations Were Often Low Cost; Feedback on Accommodations is Not Always Collected

Federal agencies are required to provide reasonable accommodation to qualified employees or applicants with disabilities, unless to do so would cause undue hardship. In general, a reasonable accommodation is a change in the work environment or in the way things are customarily done that would enable an individual with a disability to apply for a job, perform the duties of a job, or enjoy the benefits and privileges of employment.<sup>41</sup>

---

<sup>41</sup>29 C.F.R. § 1630.2(o). Federal regulations include three categories of reasonable accommodations: (1) modifications or adjustments to a job application process to enable a qualified applicant with a disability to be considered for the job such qualified applicant desires, such as providing application forms in alternative formats like large print or Braille; (2) modifications or adjustments to the work environment, or to the manner or circumstances under which the position is customarily performed, that enable a qualified individual with a disability to perform the essential functions of the job, such as providing sign language interpreters; and (3) modifications or adjustments that enable employees with disabilities to enjoy equal benefits and privileges of employment, as are enjoyed by similarly situated employees without disabilities, such as removing physical barriers in an office cafeteria or attending work events.

Officials from the three selected agencies indicated that many reasonable accommodation provisions are low- to no cost to their agencies, often involving minor changes to an employee's workspace or work schedule, or modifications to work-related technologies. For example, the most common reasonable accommodation requests cited by each of the agencies included:

- providing ergonomic adjustments or modifications to the layout of workspaces;
- adjusting work schedules to allow employees with chronic medical conditions to attend medical appointments and complete their work at alternate times or locations;
- providing sign language interpreters or closed captioning at meetings and events; and
- making materials available in braille or large print.

In addition, according to information posted on the Office of Disability Employment Policy website within Labor, examples of other job accommodations that are low cost and often involve minor changes to a person's work environment include:

- physical changes, such as installing a ramp or restroom modifications;
- accessible and assistive technologies such as providing screen reader software or using videophones to communicate with employees who have impaired hearing; and
- policy enhancements, such as allowing service animals in the workplace.

Federal agencies are required to post on their websites, and make available to all applicants and employees in written and accessible formats, procedures for reasonable accommodation.<sup>42</sup> Agencies are also required to collect specific information about each reasonable accommodation, including whether the accommodation was granted and the basis for any denial.<sup>43</sup> All three of the selected agencies indicated in

---

<sup>42</sup>29 C.F.R. §1614.203(d)(3). Initially, agencies were required to establish written reasonable accommodation procedures pursuant to Exec. Order No. 13164, *Requiring Federal Agencies to Establish Procedures to Facilitate the Provision of Reasonable Accommodation*, 65 Fed. Reg. 46,565 (July 26, 2000). This requirement was subsequently included in EEOC's MD 715 and more recently in EEOC's revised affirmative action regulations.

<sup>43</sup>29 C.F.R. § 1614.203(d)(8)(vi). Also see EEOC's Policy Guidance on Executive Order 13164: *Establishing Procedures to Facilitate the Provision of Reasonable Accommodation*.

their 2018 MD 715 reports to EEOC that their agencies have these established procedures in place and are in compliance with EEOC regulations and guidance.

While the three selected agencies reported they have processes in place for receiving reasonable accommodations requests, only SSA has procedures for obtaining employee feedback from employees after an accommodation is provided. According to agency officials, the agency offers employees who have requested job accommodations various opportunities to provide feedback to agency management about their reasonable accommodation experience. For example, SSA officials said their agency uses a dedicated email inbox and telephone number to receive inquiries and feedback from reasonable accommodations customers and stakeholders. Both of these are monitored daily by the agency's Center for Accommodations and Disability Services (CADS) to ensure emails and calls are logged and tracked. Additionally, according to agency officials, if an employee prefers to contact the reasonable accommodations office anonymously, employees can complete the anonymous Process Improvement Comments Survey to submit concerns, comments, or recommendations for reasonable accommodations process improvement.

To address issues and concerns received through any of these means, CADS staff reach out to the relevant managers, as appropriate, and only share information on a need-to-know basis, or as otherwise required by applicable law. According to SSA officials, SSA's policy also requires that managers or CADS staff confirm with the employee that a job accommodation was received and is effective prior to closing the request in the agency database. Finally, SSA's policy requires supervisors to continually engage in this interactive process to ensure the continued effectiveness of job accommodations.

In contrast, DOJ and SBA officials reported that their agencies do not have any specific procedures in place to solicit ongoing employee feedback from employees who request reasonable accommodations. Staff from both agencies said that communication between the supervisor and individual needing a reasonable accommodation is encouraged. In general, if an afforded accommodation is ineffective or needs modification, the employee and supervisor are responsible for contacting the appropriate disability employment program manager to address the issue.

Federal agencies are not explicitly required to obtain feedback from employees about the effectiveness of their job accommodations experience. However, EEOC policy guidance states that agencies should keep cumulative records for at least 3 years to track their performance with regard to providing reasonable accommodations to employees. Tracking performance over a 3-year period is critical to an agency's ability to assess whether it has adequately processed and provided reasonable accommodations, according to EEOC guidance. Agencies are encouraged to use this tracking information to evaluate whether and where they need to improve their handling of reasonable accommodation requests.<sup>44</sup> In addition, this type of monitoring is consistent with federal internal control standards. Specifically, the standard calls for ongoing monitoring to be built into the entity's operations, performed continually, and responsive to change.<sup>45</sup>

Without periodically soliciting, obtaining, and documenting employee feedback on agencies' reasonable accommodations efforts, management is missing opportunities to evaluate the effectiveness of their programs, identify potential risks, and identify any improvements that may be warranted. For example, such information could provide valuable insights about the timeliness of processing and fulfilling employees' requests and the ongoing effectiveness of an accommodation. In some cases, an accommodation may no longer be effective for an employee for various reasons such as if the employee's limitations change, workplace equipment changes, job responsibilities change, or the accommodation involves equipment or software that requires maintenance or updates.

---

## EEOC, OPM, and Labor Have Coordinated Roles to Assist Agencies

EEOC, OPM, and Labor took various actions during the course of the 5-year period specified under the executive order for meeting the government-wide hiring goal and have continued their efforts. For example, the agencies began to meet quarterly immediately after the executive order was signed to establish collaborative actions they could

---

<sup>44</sup>EEOC Policy Guidance On Executive Order 13164: *Establishing Procedures To Facilitate The Provision Of Reasonable Accommodation* (Oct. 20, 2000).

<sup>45</sup>[GAO-14-704G](#).

take to increase disability hiring and retention measures and to discuss best practices focused on hiring and retaining individuals with disabilities.

Officials from OPM, EEOC, and Labor continue to meet quarterly as participants in an interagency working group called the Federal Exchange on Employment and Disability (FEED). FEED meetings cover a broad range of federal disability topics, including sharing best practices and establishing collaborative partnerships designed to make the federal government a model employer of people with disabilities. For example, at one FEED meeting, OPM announced a new resource to help address some common questions OPM receives about Schedule A. At another FEED meeting, OPM and EEOC officials discussed possible strategies agencies can consider when they are planning to re-survey their agencies through the Standard Form 256, *Self-Identification of Disability (SF-256)*, such as initiating the re-survey campaign during Disability Awareness Month when there is increased attention on disability issues.

**OPM assisted agencies with disability hiring plans and authorities and compiled government-wide data.** Under EO 13548, OPM was required to implement a system for reporting regularly to the President, heads of agencies, and the public on agencies' progress in implementing their disability hiring plans and meeting the objectives of the executive order. In May 2012, we reported on OPM's progress in reviewing agencies' hiring plans and found that many plans had deficiencies that needed to be addressed.<sup>46</sup> For example, not all plans identified a senior-level official responsible for development and implementation of the plan. We recommended that OPM incorporate information about such deficiencies in its external reporting. OPM did so, and also worked with agencies to correct any plan deficiencies by November 2012.

In 2016, OPM issued its capping report announcing the success of the government's effort, which included a summary of the initiatives taken to improve agency coordination, education, and training accompanied by a series of tables showing the composition of disability hires across the federal workforce.<sup>47</sup> OPM also continues to collect government-wide

---

<sup>46</sup>GAO-12-568.

<sup>47</sup>Office of Personnel Management, *Report on the Employment of Individuals with Disabilities in the Federal Executive Branch* (October 2016).

---

disability data, which is available to agencies through the MAX.gov web portal, and provides assistance to agencies upon request.

In October 2018, the Director of OPM issued a joint memorandum with the Chair of EEOC to the Chief Human Capital Officers Council regarding updates to the SF-256 to reflect changes to terms used to describe targeted disabilities, serious health conditions, and other disabilities.<sup>48</sup> As discussed in an earlier section of this report, individuals use this form to voluntarily self-identify a disability, and OPM uses the information provided through this form for data collection purposes only. The revised form includes simplified condition descriptions and provides respondents with the option of identifying if they have a targeted disability, disability, or serious condition without specifying a diagnosis.

SF-256 continues to be the primary tool for measuring the workforce participation of persons with disabilities in the federal government. The joint memorandum reminded agencies that OPM and EEOC are available to assist agencies in their efforts to help employees self-identify as people with disabilities and people with targeted disabilities, as appropriate.

**EEOC collects information through MD 715, issued regulations, and provides technical assistance.** EEOC's ongoing data and information collection efforts under MD 715 require agencies to report annually on the status of their equal employment opportunity programs. This includes agency-specific self-assessments of the extent to which they are meeting their responsibilities to provide employment opportunities for qualified applicants and employees with disabilities and targeted disabilities. If agencies identify any barriers to the equal employment of persons with disabilities, they must work to eliminate the barrier.

EEOC's MD 715 annual reporting requirement included under Part J captures agencies' descriptions of how their affirmative action efforts improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. According to EEOC's guidance to agencies, Part J is to assist agencies in meeting the requirements for an affirmative action plan. Specifically, Part J requires agencies to examine employment trends and participation rates of persons with reported and targeted disabilities in agency programs.

---

<sup>48</sup>This joint memorandum titled, *Resources for Disability Self-Identification Efforts* was issued on October 23, 2018.

In 2017, Part J was revised and now solicits agency information about voluntary and involuntary separations of employees with disabilities. For example, agencies are to confirm whether voluntary and involuntary separations occurred at a rate exceeding that of employees without disabilities. Agencies are required to complete Part J and, for transparency purposes, post their affirmative action plans on their external websites. The importance of this type of information is underscored by the analysis summarized in an earlier section of this report showing that approximately 60 percent of persons with disabilities hired into the federal government during 2011 through 2017 stayed for less than 2 years of service. Also as noted earlier, opportunities exist to enhance collection and analysis of retention data and learn about what factors contribute to retention rates of employees with disabilities in the federal government.

EEOC provides various types of support to agencies to help them implement requirements of the revised regulations on affirmative action for individuals with disabilities. For example, EEOC officials said they visited all agencies to provide guidance and technical assistance with their hiring plans. EEOC continues to provide ongoing feedback to agencies, both formally and informally, and visits agencies on a 3-year rotation cycle. As part of EEOC's outreach, agency representatives provide presentations to, and participate in meetings with, federal employees and employers.

The agency's website also includes a list of outreach coordinator contacts for each of its field offices. EEOC's Training Institute provides a variety of training programs specialized for the federal sector, including courses on disability issues and MD 715 barrier analysis, as well as customized training throughout the year to meet particular agencies' needs. EEOC's federal training courses can be delivered on site or virtually.

**Labor provides tools, resources, education, and training to agency managers.** Labor has implemented and supported a number of initiatives aimed at enhancing the federal sector's performance on disability employment. For example, Labor's Office of Disability Employment Policy supports the Employer Assistance and Resource Network on Disability Inclusion (EARN), which is a federal resource that provides education, training, tools, and resources for managers on the hiring, retention, and advancement of persons with disabilities.

In 2018, EARN issued a federal framework—in partnership with EEOC and OPM—which outlined various employment strategies and practices

for agencies to consider and incorporate into their own efforts related to disability inclusion in the workforce. In addition, Labor leads an interagency working group known as the Federal Exchange on Employment and Disability, which is comprised of federal staff across government with roles in developing, implementing and managing disability employment programs to foster cross-agency collaboration and share best practices.

The agency also developed a toolkit for Federal Agencies on Hiring People with Disabilities outlining a five-step process and related resources to assist federal agencies in their efforts to increase the employment of people with disabilities. Another effort supported by Labor provides more targeted technical assistance and free consulting services on workplace accommodations through the Job Accommodations Network. To increase the recruitment of persons with disabilities, Labor also plays a lead role in the Workforce Recruitment Program for College Students with Disabilities, which is a recruitment, and referral program that connects federal and private sector employers nationwide with college students and recent graduates with disabilities for summer or permanent employment.<sup>49</sup> Labor has also developed and provided assistance on various trainings for federal hiring managers and human resources professionals, including an OPM course titled, "A Roadmap to Success: Hiring, Retaining and Including People with Disabilities."<sup>50</sup>

---

## Conclusions

In its effort to become a model employer, the federal government increased employment opportunities for persons with disabilities; provided specific direction and guidance to agencies through various executive orders, management directives, and regulations; and exceeded its goal to hire an additional 100,000 individuals with disabilities.

However, OPM does not routinely track or report retention data, which could help pinpoint the root causes behind disabled employee departure rates. Making use of the agency-specific data OPM already gathers in its

---

<sup>49</sup>The Workforce Recruitment Program is a collaborative effort with the Department of Defense.

<sup>50</sup>OPM announced this training course, which was a collaborative effort with the Department of Labor and EEOC, in a memorandum to all Chief Human Capital Officers on July 22, 2014.

EHRI database complemented with the retention information agencies report to EEOC would allow for more comprehensive retention analyses of employees with disabilities across the federal government. Such analyses would provide a fuller picture of how the federal government is performing with retaining the employees it hires and help to identify common agency experiences, both success and challenges. Without comprehensive analyses of retention data, the federal government is limited in its ability to assess the performance and results of the hiring and retention efforts for this segment of the workforce.

Selected agencies implemented a number of practices that helped bolster their recruitment and hiring of persons with disabilities, including collaborating with other federal agencies for knowledge and information sharing, coordinating efforts with employee resource or advisory groups, and providing additional training for hiring managers and human resources staff on using Schedule A hiring authority—one of the commonly used hiring flexibilities available to agencies to onboard qualified individuals with disabilities.

However, the selected agencies do not assess or measure the impact of their Schedule A training to determine how it contributes to the accomplishment of federal goals to increase the number of employees with disabilities across the federal workforce. In addition, opportunities exist to enhance the effectiveness of selected agencies' reasonable accommodations programs by obtaining employee feedback from employees about their job accommodations experience.

OPM, EEOC, and Labor have worked collaboratively to assist agencies with enhancing their recruitment and hiring efforts. They compiled government-wide data, issued guidance and regulations to clarify agencies' responsibilities and obligations to strengthening employment opportunities for disabled persons, and provided various resources, education, and training.

---

## Recommendations for Executive Action

We are making the following recommendation to OPM:

The Director of OPM should routinely track and report retention data for employees with disabilities and make such data available to federal agencies, including EEOC, through a centralized web portal—such as

MAX.gov. For example, OPM could track and report such data by General Schedule level pay groupings, which could help pinpoint root causes that contribute to retention rates, inform assessments of government-wide progress on employee retention, and identify needed improvements. (Recommendation 1)

We are making the following recommendations to DOJ:

The Attorney General of the United States should develop and implement policies and procedures for assessing the impact of training provided to agency hiring managers and human resources staff on Schedule A hiring authority. This includes assessing the impact of its training on agency performance goals related to increased hiring of individuals with disabilities and targeted disabilities. (Recommendation 2)

The Attorney General of the United States should develop and implement policies and procedures for obtaining employee feedback about the agency's reasonable accommodations efforts and use such information to evaluate the ongoing effectiveness of the program. This may include identifying any effects on employee retention, identifying potential risks, and determining any improvements that may be warranted. (Recommendation 3)

We are making the following recommendations to SBA:

The Administrator of SBA should develop and implement policies and procedures for assessing and tracking the impact of training provided to agency hiring managers and human resources staff on Schedule A hiring authority. This includes assessing the impact of its training on agency performance goals related to increased hiring of individuals with disabilities and targeted disabilities. (Recommendation 4)

The Administrator of SBA should develop and implement policies and procedures for obtaining employee feedback about the agency's reasonable accommodations efforts and use such information to evaluate the ongoing effectiveness of the program. This may include identifying any effects on employee retention, identifying potential risks, and determining any improvements that may be warranted. (Recommendation 5)

We are making the following recommendation to SSA:

---

The Commissioner of SSA should develop and implement policies and procedures for assessing and tracking the impact of training provided to agency hiring managers and human resources staff on Schedule A hiring authority. This includes assessing the impact of its training on agency performance goals related to increased hiring of individuals with disabilities and targeted disabilities. (Recommendation 6)

---

## Agency Comments and Our Evaluation

We provided a draft of the report to OPM, EEOC, Labor, OMB, DOJ, SBA, and SSA for review and comment. We received written comments from 3 agencies—OPM, SBA, and SSA—that are reprinted in appendices II through IV and summarized below. EEOC informed us that they had no comments. Labor and DOJ provided technical comments, which we incorporated as appropriate. OMB did not provide comments on the draft.

OPM concurred with our recommendation to routinely track and report retention data for employees with disabilities and make such data available to federal agencies. OPM stated that it already routinely tracks retention data for persons with disabilities by agency. In addition, OPM responded that retention data for employees with disabilities by agency and GS level pay groupings for fiscal years 2017 and 2018 can be obtained by federal agencies through the MAX.gov website. However, OPM did not provide any supporting documentary evidence or further details to explain its tracking efforts or which data are available to federal agencies.

SBA disagreed with the retention data we present in figure 8, showing that approximately 65 percent of employees with disabilities hired at SBA between 2011 through 2017 stayed less than one year. In its written comments, SBA stated that under hiring authorities it uses in responding to disasters, appointments are generally not to exceed one year. As indicated in our report, we acknowledge that each of our retention analyses include full-time permanent hires and part-time or temporary hires. We also include a specific statement regarding temporary hires at SBA's Office of Disaster Assistance.

SBA concurred with our recommendation to assess and track the impact of training provided to agency hiring managers and human resources staff on Schedule A hiring authority. SBA responded that it will formally

evaluate the impact of training to ensure hiring managers understand the use of Schedule A hiring authority and assess hiring trends and retention.

SBA partially concurred with our recommendation to obtain employee feedback about its reasonable accommodation efforts. SBA stated that its procedures require supervisors to contact the Disability Employment Program Manager with concerns about the effectiveness of a provided accommodation and work together to make any necessary adjustment. SBA further stated that the procedures have been revised and will include a requirement for completing a feedback survey aimed to determine the effectiveness of the reasonable accommodation program and make any adjustments required. SBA stated that it also established an internal mailbox for reasonable accommodation communications that is monitored daily. Effective implementation of SBA's plans, including administering a survey, would meet the intent of the recommendation.

SSA concurred with our recommendation to assess and track the impact of training provided to agency hiring managers and human resources staff on Schedule A hiring authority. SSA stated that it is revising its framework to include outcome-based evaluations for training related to the employment and support of individuals with disabilities, including Schedule A hiring.

DOJ did not agree or disagree with the recommendations.

---

We are sending copies of this report to the appropriate congressional committees, the Director of OPM, the Chair of EEOC, the Secretary of Labor, the Director of OMB, the Attorney General of DOJ, the Administrator of SBA, and the Commissioner of SSA. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-6806 or [JonesY@gao.gov](mailto:JonesY@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix V.



Yvonne D. Jones  
Director, Strategic Issues

# Appendix I: Hiring and Retention Data of Selected Agencies

As part of our review, we selected three agencies as case illustrations to examine practices they have adopted to increase hiring and retention of individuals with disabilities. The three selected agencies are the Department of Justice (DOJ), the Social Security Administration (SSA), and the Small Business Administration (SBA). Our selection was based on various factors including the agency's size in terms of total full-time employees and average percentage of total employees with reported disabilities or targeted disabilities during 2011 through 2017. For each of the three agencies, we analyzed personnel data captured in the Office of Personnel Management's (OPM) Enterprise Human Resources Integration (EHRI) database including the General Schedule (GS) levels in which individuals with disabilities were placed and their position classifications.<sup>1</sup> The following figures and tables summarize our analyses of hiring and retention rates of individuals with and without disabilities in the three selected agencies during fiscal years 2011 through 2017.

These analyses provide an aggregate overview of hiring and retention trends of individuals with disabilities at the three selected agencies as compared to hiring and retention trends of individuals without disabilities at these agencies. We found the trends to be generally consistent between the employee groups.

---

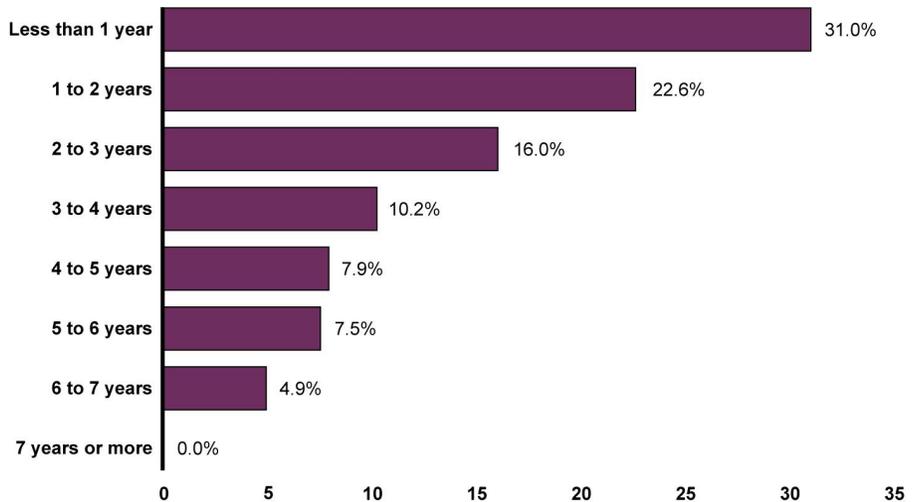
## Department of Justice

During the 2011 through 2017 time period we examined, 31 percent of the total number of persons with disabilities hired at DOJ during that time stayed in the federal government for less than 1 year and nearly 54 percent of them stayed for less than 2 years, as shown in figure 6.

---

<sup>1</sup>Position classifications refers to occupational categories recorded in OPM's EHRI data. We analyzed the PATCO occupational categories, which are Professional, Administrative, Technical, Clerical, and Other.

**Figure 6: Over 50 Percent of Employees with Disabilities Hired from 2011 through 2017 at Department of Justice Stayed Less than 2 Years**

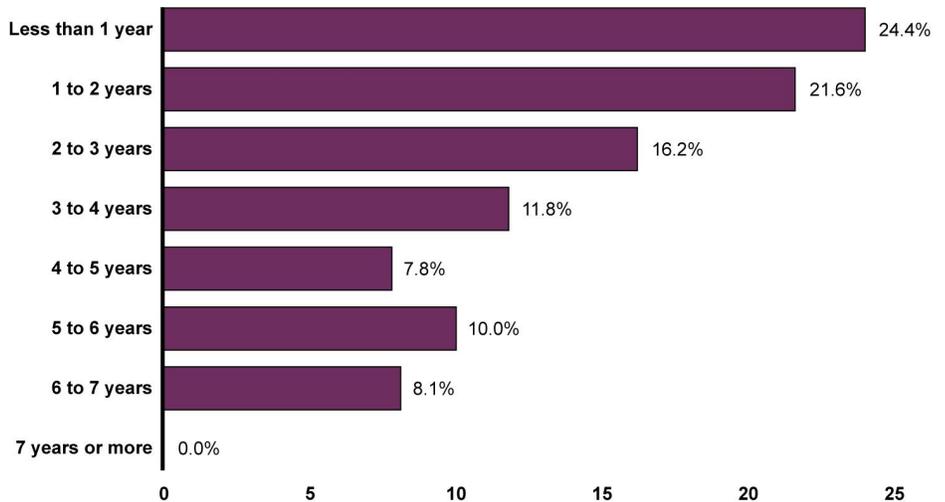


Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

Note: These numbers show only employees hired between 2011 through 2017 and the duration they were retained during that time period. These numbers include full-time permanent hires and part-time or temporary hires.

During that same time period, approximately 24 percent of the total number of persons without disabilities who were hired stayed for less than 1 year of service while approximately 46 percent of hires stayed for less than 2 years of service, as shown in figure 7.

**Figure 7: Almost 50 Percent of Employees without Disabilities Hired from 2011 through 2017 at Department of Justice Stayed Less than 2 Years**



Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

Note: These numbers show only employees hired between 2011 through 2017 and the duration they were retained during that time period. These numbers include full-time permanent hires and part-time or temporary hires.

The data shown in figures 6 and 7 taken in context together indicate that retention at DOJ during this time period was generally consistent for persons both with and without disabilities. These departures may be explained, in part, by the proportion of employees hired into temporary positions who therefore were not necessarily expected to stay on the job for a longer duration, or by employees who did not meet performance standards.

Tables 6 and 7 show the results of our analysis of employee retention at DOJ by occupational category and GS level for individuals hired in fiscal years 2011 through 2015 and stayed for at least 2 years.

**Appendix I: Hiring and Retention Data of Selected Agencies**

**Table 6: Percentage of Persons with Disabilities, Targeted Disabilities, and without Disabilities Hired in Fiscal Years 2011 through 2015 and Retained at Least 2 Years by Occupational Category at the Department of Justice**

<b>Occupational Category</b>	<b>Persons with Disabilities Hired</b>	<b>Persons with Disabilities Retained</b>	<b>Persons with Targeted Disabilities Hired</b>	<b>Persons with Targeted Disabilities Retained</b>	<b>Persons without Disabilities Hired</b>	<b>Persons without Disabilities Retained</b>
<b>Administrative</b>	26.7	43.5	30.6	40.2	27.7	55.5
<b>Blue Collar</b>	2.7	61.5	2.6	85.7	1.5	71.4
<b>Clerical</b>	10.2	33.8	12.7	23.5	9.4	39.2
<b>Other</b>	34.5	52.7	25.8	49.3	32.1	56.7
<b>Professional</b>	12.9	46.7	15.3	48.8	20.1	55.7
<b>Technical</b>	13.0	42.1	13.1	25.7	9.3	49.2

Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

Note: Hired percentages are calculated by how many of the total Individuals with (1) a disability, (2) a targeted disability, or (3) no disability were hired into each occupational category. Retained percentages are calculated by how many employees in each occupational category remained in their jobs for at least 2 years. These numbers include full-time permanent hires and part-time or temporary hires. The "Other" category includes miscellaneous white-collar occupations that do not fall into the Professional, Administrative, Technical, or Clerical categories.

**Appendix I: Hiring and Retention Data of Selected Agencies**

**Table 7: Percentage of Persons with Disabilities, Targeted Disabilities, and without Disabilities Hired in Fiscal Years 2011 through 2015 and Retained at Least 2 Years by GS Level at the Department of Justice**

<b>GS Level</b>	<b>Persons with Disabilities Hired</b>	<b>Persons with Disabilities Retained</b>	<b>Persons with Targeted Disabilities Hired</b>	<b>Persons with Targeted Disabilities Retained</b>	<b>Persons without Disabilities Hired</b>	<b>Persons without Disabilities Retained</b>
<b>GS 1-GS 4</b>	4.1	18.1	5.6	20.0	6.6	23.1
<b>GS 5-GS 7</b>	18.5	34.1	25.8	21.7	17.0	46.4
<b>GS 8-GS 10</b>	9.5	41.3	11.9	40.6	6.4	51.8
<b>GS 11-GS 13</b>	14.8	46.6	16.4	50.0	12.4	56.3
<b>GS 14-GS 15</b>	3.8	45.4	4.5	33.3	5.2	56.7
<b>Other</b>	49.3	54.4	35.8	55.2	52.4	59.9

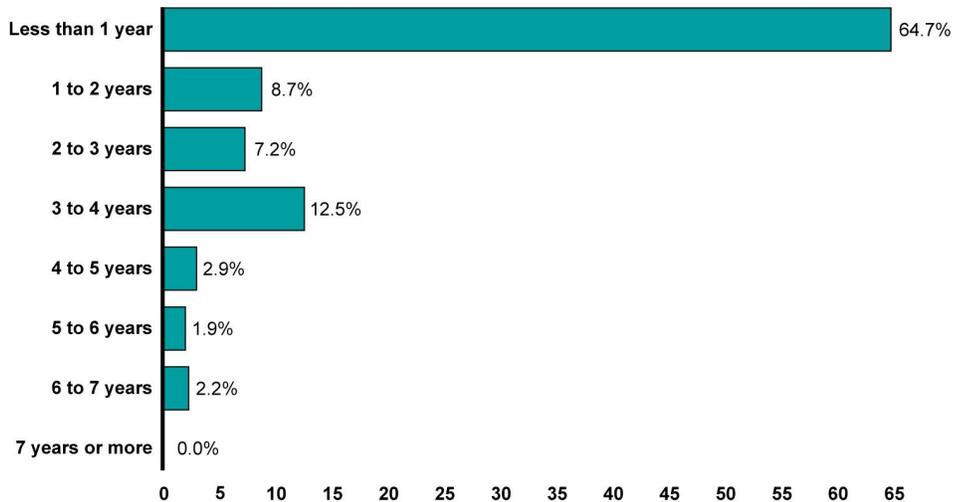
Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

Note: Hired percentages are calculated by how many of the total Individuals with (1) a disability, (2) a targeted disability, or (3) no disability were hired into each GS level. Retained percentages are calculated by how many employees in each GS level category remained in their jobs for at least 2 years. These numbers include full-time permanent hires and part-time or temporary hires. The "Other" category includes non-GS pay plans such as the Senior Executive Service or those that are administratively determined.

### Small Business Administration

During the 2011 through 2017 time period we examined, approximately 65 percent of the total number of persons with disabilities hired at SBA during that time stayed in the federal government for less than 1 year, as shown in figure 8.

**Figure 8: Approximately 65 Percent of Employees with Disabilities Hired from 2011 through 2017 at Small Business Administration Stayed Less than 1 Year**

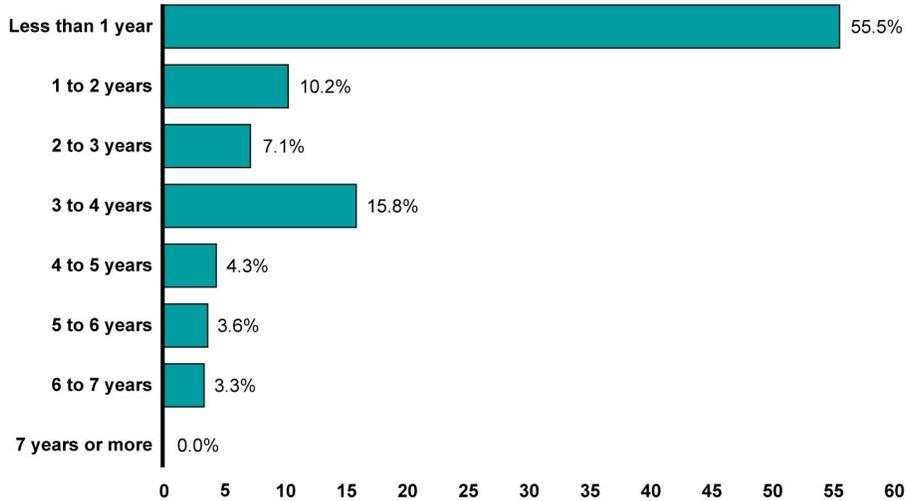


Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

Note: These numbers show only employees hired between 2011 through 2017 and the duration they were retained during that time period. These numbers include full-time permanent hires and part-time or temporary hires.

During that same time period, approximately 55 percent of the total number of persons without disabilities that were hired at SBA stayed for less than 1 year of service, as shown in figure 9.

**Figure 9: Over 55 Percent of Employees without Disabilities Hired from 2011 through 2017 at Small Business Administration Stayed Less than 1 Year**



Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

Note: These numbers show only employees hired between 2011 through 2017 and the duration they were retained during that time period. These numbers include full-time permanent hires and part-time or temporary hires.

The data shown in Figures 8 and 9 taken in context together indicate that retention at SBA during this time period was generally consistent for persons both with and without disabilities. These departures may be explained, in part, by the proportion of employees hired into temporary positions who therefore were not necessarily expected to stay on the job for a longer duration, or by employees who did not meet performance standards. For example, SBA staff said that on average, 45 percent of SBA's workforce is comprised of temporary employees hired by the agency's Office of Disaster Assistance during a disaster. As such, SBA expects turnover among those hires, including employees with disabilities.

Tables 8 and 9 show the results of our analysis of employee retention at SBA by occupational category and GS level for individuals hired in fiscal years 2011 through 2015 and stayed for at least 2 years.

**Appendix I: Hiring and Retention Data of Selected Agencies**

**Table 8: Percentage of Persons with Disabilities, Targeted Disabilities, and without Disabilities Hired in Fiscal Years 2011 through 2015 and Retained at Least 2 Years by Occupational Category at the Small Business Administration**

<b>Occupational Category</b>	<b>Persons with Disabilities Hired</b>	<b>Persons with Disabilities Retained</b>	<b>Persons with Targeted Disabilities Hired</b>	<b>Persons with Targeted Disabilities Retained</b>	<b>Persons without Disabilities Hired</b>	<b>Persons without Disabilities Retained</b>
<b>Administrative</b>	54.4	29.0	59.2	21.4	59.7	32.9
<b>Blue Collar</b>	0.2	50.0	na	na	na	na
<b>Clerical</b>	12.8	16.6	11.3	50.0	10.9	24.9
<b>Other</b>	0.2	33.3	na	na	0.3	33.3
<b>Professional</b>	4.4	13.0	1.4	0.0	5.6	14.8
<b>Technical</b>	28.0	28.2	28.1	25.0	23.4	46.6

Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

Note: Hired percentages are calculated by how many of the total Individuals with (1) a disability, (2) a targeted disability, or (3) no disability were hired into each occupational category. Retained percentages are calculated by how many employees in each occupational category remained in their jobs for at least 2 years. In cases where there is no percent shown in the table, this means there were no observations in the data for that particular group in this analysis. These numbers include full-time permanent hires and part-time or temporary hires. The "Other" category includes miscellaneous white-collar occupations that do not fall into the Professional, Administrative, Technical, or Clerical categories.

**Appendix I: Hiring and Retention Data of Selected Agencies**

**Table 9: Percentage of Persons with Disabilities, Targeted Disabilities, and without Disabilities Hired in Fiscal Years 2011 through 2015 and Retained at Least 2 Years by GS Level at the Small Business Administration**

<b>GS Level</b>	<b>Persons with Disabilities Hired</b>	<b>Persons with Disabilities Retained</b>	<b>Persons with Targeted Disabilities Hired</b>	<b>Persons with Targeted Disabilities Retained</b>	<b>Persons without Disabilities Hired</b>	<b>Persons without Disabilities Retained</b>
<b>GS 1-GS 4</b>	0.6	14.3	na	na	2.1	8.1
<b>GS 5-GS 7</b>	32.6	20.3	40.9	27.6	29.7	30.0
<b>GS 8-GS 10</b>	36.5	21.6	36.6	11.5	40.7	31.6
<b>GS 11-GS 13</b>	26.9	39.3	21.1	46.7	22.9	45.4
<b>GS 14-GS 15</b>	2.3	42.9	1.4	0.0	2.5	39.2
<b>Other</b>	1.0	41.7	na	na	2.1	41.1

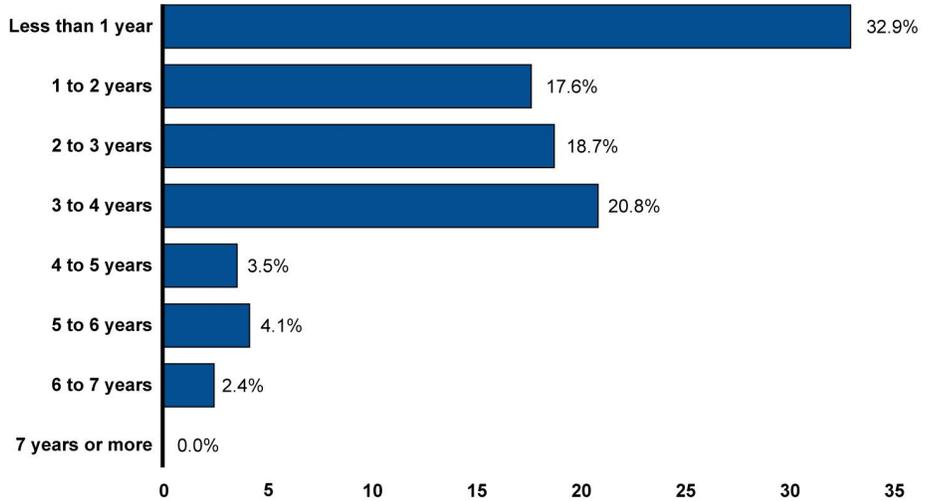
Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

Note: Hired percentages are calculated by how many of the total Individuals with (1) a disability, (2) a targeted disability, or (3) no disability were hired into each GS level. Retained percentages are calculated by how many employees in each GS level category remained in their jobs for at least 2 years. In cases where there is no percent shown in the table, this means there were no observations in the data for that particular group in this analysis. These numbers include full-time permanent hires and part-time or temporary hires. The "Other" category includes non-GS pay plans such as the Senior Executive Service or those that are administratively determined.

## Social Security Administration

During the 2011 through 2017 time period we examined, approximately 33 percent of the total number of persons with disabilities hired at SSA during that time stayed in the federal government for less than 1 year, as shown in figure 10.

**Figure 10: Over 30 Percent of Employees with Disabilities Hired from 2011 through 2017 at Social Security Administration Stayed Less than 1 Year**

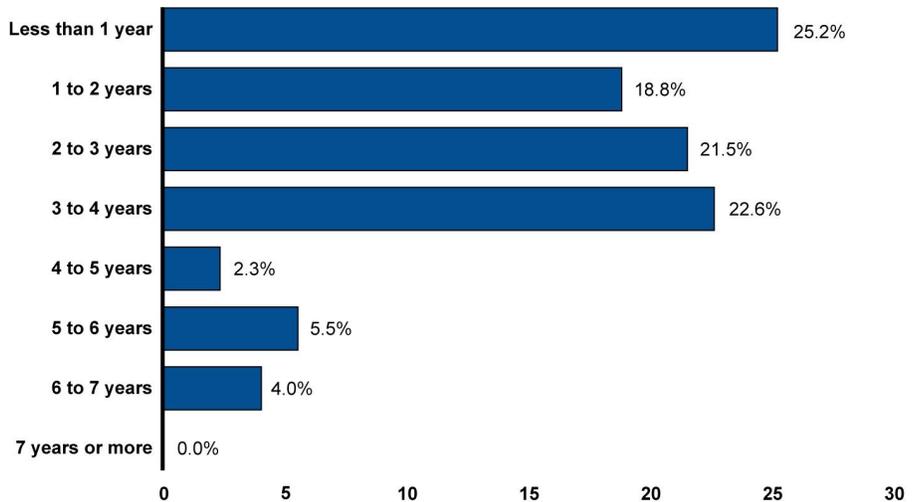


Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

Note: These numbers show only employees hired between 2011 through 2017 and the duration they were retained during that time period. These numbers include full-time permanent hires and part-time or temporary hires.

During that same time period, approximately 25 percent of the total number of persons without disabilities that were hired at SSA stayed for less than 1 year of service, as shown in figure 11.

**Figure 11: Over 25 Percent of Employees without Disabilities Hired from 2011 through 2017 at Social Security Administration Stayed Less than 1 Year**



Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

Note: These numbers show only employees hired between 2011 through 2017 and the duration they were retained during that time period. These numbers include full-time permanent hires and part-time or temporary hires.

The data shown in figures 10 and 11 taken in context together indicate that retention at SSA during this time period was generally consistent for persons both with and without disabilities. These departures may be explained, in part, by the proportion of employees hired into temporary positions who therefore were not necessarily expected to stay on the job for a longer duration, or by employees who did not meet performance standards.

Tables 10 and 11 show the results of our analysis of employee retention at SSA by occupational category and GS level for individuals hired in fiscal years 2011 through 2015 and stayed for at least 2 years.

**Appendix I: Hiring and Retention Data of Selected Agencies**

**Table 10: Percentage of Persons with Disabilities, Targeted Disabilities, and without Disabilities Hired in Fiscal Years 2011 through 2015 and Retained at Least 2 Years by Occupational Category at the Social Security Administration**

<b>Occupational Category</b>	<b>Persons with Disabilities Hired</b>	<b>Persons with Disabilities Retained</b>	<b>Persons with Targeted Disabilities Hired</b>	<b>Persons with Targeted Disabilities Retained</b>	<b>Persons without Disabilities Hired</b>	<b>Persons without Disabilities Retained</b>
<b>Administrative</b>	31.8	47.5	27.0	46.0	39.9	56.3
<b>Blue Collar</b>	0.3	61.1	0.2	100.0	0.4	52.4
<b>Clerical</b>	9.5	50.3	9.0	61.9	7.0	54.8
<b>Other</b>	0.3	26.7	0.4	0.0	1.3	12.2
<b>Professional</b>	3.5	40.1	4.3	35.0	14.9	60.3
<b>Technical</b>	54.5	51.2	59.1	49.3	36.5	55.5

Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

Note: Hired percentages are calculated by how many of the total Individuals with (1) a disability, (2) a targeted disability, or (3) no disability were hired into each occupational category. Retained percentages are calculated by how many employees in each occupational category remained in their jobs for at least 2 years. These numbers include full-time permanent hires and part-time or temporary hires. The "Other" category includes miscellaneous white-collar occupations that do not fall into the Professional, Administrative, Technical, or Clerical categories.

**Appendix I: Hiring and Retention Data of Selected Agencies**

**Table 11: Percentage of Persons with Disabilities, Targeted Disabilities, and without Disabilities Hired in Fiscal Years 2011 through 2015 and Retained at Least 2 Years by GS Level at the Social Security Administration**

<b>GS Level</b>	<b>Persons with Disabilities Hired</b>	<b>Persons with Disabilities Retained</b>	<b>Persons with Targeted Disabilities Hired</b>	<b>Persons with Targeted Disabilities Retained</b>	<b>Persons without Disabilities Hired</b>	<b>Persons without Disabilities Retained</b>
<b>GS 1-GS 4</b>	3.6	44.6	4.5	52.4	4.2	40.4
<b>GS 5-GS 7</b>	82.7	49.9	83.3	48.8	62.0	55.3
<b>GS 8-GS 10</b>	4.9	51.3	4.1	47.4	5.7	65.2
<b>GS 11-GS 13</b>	7.1	43.4	7.1	45.5	23.1	59.7
<b>GS 14-GS 15</b>	0.3	64.3	na	na	0.7	35.1
<b>Other</b>	1.5	56.3	1.1	60.0	4.3	51.5

Source: GAO analysis of Office of Personnel Management data. | GAO-20-384

Note: Hired percentages are calculated by how many of the total Individuals with (1) a disability, (2) a targeted disability, or (3) no disability were hired into each GS level. Retained percentages are calculated by how many employees in each GS level category remained in their jobs for at least 2 years. In cases where there is no percent shown in the table, this means there were no observations in the data for that particular group in this analysis. These numbers include full-time permanent hires and part-time or temporary hires. The "Other" category includes non-GS pay plans such as the Senior Executive Service or those that are administratively determined.

---

# Appendix II: Comments from the Office of Personnel Management

**Appendix II: Comments from the Office of  
Personnel Management**



**UNITED STATES OFFICE OF PERSONNEL MANAGEMENT**  
Washington, DC 20415

Employee Services

The Honorable Gene Dodaro  
Comptroller General  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Mr. Dodaro:

Thank you for providing us the opportunity to respond to the Government Accountability Office (GAO) draft report, Disability Employment: Hiring Has Increased but Actions Needed to Assess Retention, Training, and Reasonable Accommodation Efforts, GAO-20-384, GAO 102685. Our response to your recommendation relevant to the U.S. Office of Personnel Management (OPM) is provided below.

**Recommendation #1:** The Director of the Office of Personnel Management should routinely track and report retention data for employees with disabilities and make such data available to Federal agencies, including EEOC, through a centralized web portal—such as MAX.gov. For example, OPM could track and report such data by GS level pay groupings, which could help pinpoint root causes that contribute to retention rates, inform assessments of government-wide progress on employee retention, and identify needed improvements.

**We concur.** OPM already routinely tracks retention data for persons with disabilities by agency. Retention data for employees with disabilities by agency and GS level pay groupings for Fiscal Years 2017 and 2018 can currently be obtained by Federal agencies at <https://community.max.gov/x/QYz4UQ>.

I appreciate the opportunity to respond to this draft report. If you have any questions regarding our response, please contact Zina B. Sutch, Ph.D., Deputy Associate Director, Outreach, Diversity & Inclusion, (202) 606-2433, [Zina.Sutch@opm.gov](mailto:Zina.Sutch@opm.gov).

Sincerely,

**DENNIS  
KIRK**

Dennis Dean Kirk, Esq.  
Associate Director

Digitally signed by  
DENNIS KIRK  
Date: 2020.05.22  
18:19:31 -04'00'

---

# Appendix III: Comments from the Small Business Administration

---

**Appendix III: Comments from the Small  
Business Administration**



U.S. SMALL BUSINESS ADMINISTRATION  
WASHINGTON, DC 20416

May 22, 2020

Ms. Yvonne Jones  
Director  
Strategic Issues Team  
U.S. Government Accountability Office  
Washington, D.C. 20548

Dear Ms. Jones

Thank you for providing the U.S. Small Business Administration (SBA) with a copy of the Government Accountability Office (GAO) draft report titled, *“Disability Employment – Hiring Has Increased but Actions Needed to Assess Retention, Training and Reasonable Accommodation Efforts”*

The draft report analyzes SBA and other participating agencies’ efforts to increase the employment of individuals with disabilities. This action was driven, in part, as a follow up to Executive Order 13548 entitled, “Increasing Federal Employment of Individuals with Disabilities” calling for the federal government to become a model employer of individuals with disabilities by employing an additional 100,000 individuals with disabilities by 2015. SBA has the following comments on the draft report:

The draft report touches on the need to pinpoint the root causes behind the seemingly high departure rates of individuals with disabilities after the first two years of employment. The draft report proposes that a potential solution may lie in targeted data collection, tracking and analysis to determine, where appropriate, improvements and potential solutions.

SBA confirms this and agrees that it is important to have consistent and high-quality data; however, disagrees that the percentage (65 percent), as reflected in Figure 8, of employees with disabilities hired between 2011 through 2017 stayed less than one year, is accurate. There is a perception that the Temporary Hires, brought on board by SBA during a Disaster are hired under the Schedule A authority outlined in 5 CFR 213.3102(u). This specific authority uncompetitively appoints Individuals with Targeted Disabilities. This is different to the Schedule A authority used to hire temporary, time-limited, intermittent, or seasonal employees. In response to a disaster, the authority used is 5 CFR 213.102 and 213.104. Appointments are generally not to exceed one year. It is not disputed that there may be some cases, of individuals who were hired under this authority, who may in fact have had a targeted disability. These individuals may have not elected to disclose such in the application process or by voluntarily completing the Standard Form 256. However, it is noteworthy that very few of these individuals request a reasonable accommodation during their tenure (when there is ongoing disaster activity) before they are taken off the rolls for a lack of work.

The report cites a 26% 2-year retention rate, which includes SBA's large number of temporary hires. Due to the nature of the work performed by SBA, Office of Disaster Assistance, the majority of hiring actions involve temporary hires in which the maximum an employee can serve in such appointment is two years (1 year + 1 year extension), and many serve six-month appointments. Unless the employee gets one of these 1+1 appointments, temporary hires count against SBA's retention rate upon separation. It's particularly impactful to SBA that makes ample use of temp appointments.

SBA analyzed the data for permanent employees and, discovered the two-year retention rate for permanent employees with disabilities hired from FY 11 – FY 17 was 67%. This is significantly higher than the Governmentwide retention rate of 60%.

Responses to your recommendations are provided below:

**Recommendation:** *The Administrator of SBA should develop and implement policies and procedures for assessing and tracking the impact of training provided to agency hiring managers and human resources staff on Schedule A hiring authority. This includes the impact of its training on agency performance goals related to increased hiring of individuals with disabilities and targeted disabilities. (Recommendation 4)*

Concur. SBA's office of Human Resources Solutions has provided ongoing training to all hiring managers and supervisors related to special hiring authorities, particularly Schedule A hiring authority for persons with disabilities. Key emphasis is placed on Schedule A as an excepted service hiring authority available to hire or to promote individuals with disabilities without competing the job, thus bypassing the traditional, and sometimes prolonged, competitive hiring process.

Additionally, SBA has partnered with the Office of Personnel Management to provide Hiring Excellence to leadership and hiring officials to discuss the benefits of using authority such as Schedule A. Managers are often encouraged to work with the rehab centers to solicit resumes of persons with disabilities that would fall under the hiring authority criteria. Managers are also encouraged to utilize this authority prior to opening the competitive job announcement. As a result of the training, SBA has noticed an increase in the utilization of Schedule A authority, particularly in the field offices. SBA will formally evaluate the impact of training to ensure hiring managers understand the use of schedule a hiring authority and assess hiring trends and retention.

**Recommendation:** *The Administrator of SBA should develop and implement policies and procedures for obtaining employee feedback about the agency's reasonable accommodation efforts and use such information to evaluate the ongoing effectiveness of the program. This may include identifying any effects on employee retention, identifying potential risks, and determining any improvements that may be warranted. (Recommendation 5)*

---

**Appendix III: Comments from the Small  
Business Administration**

---

SBA partially agrees with this recommendation to SBA. The Office of Diversity, Inclusion & Civil Rights' (ODI&CR) procedures for reasonable accommodation currently requires that SBA supervisors reach out to the Disability Employment Program Manager with their concerns about the effectiveness of a provided accommodation, whether it is temporary or permanent, and work in concert to make any necessary adjustment. The procedures have been re-written and is under review by EEOC. The revision will include the requirement for completing a feedback survey aimed to determine the effectiveness of the reasonable accommodation program and make any adjustments required.

ODI&CR will create a survey that will be administered annually to employees who have a permanent reasonable accommodation in place. In addition, those employees who have been provided a temporary or interim accommodation will also have the opportunity to provide feedback. ODI&CR recently established an internal Reasonable Accommodation mailbox that is monitored daily by the Disability Employment Program Manager. Additionally, SBA recently revised the employee Exit Survey which, even though voluntary, solicits feedback from those employees departing the Agency, for any reason. The survey solicits information concerning efforts to improve the recruitment, hiring and advancement of individuals with disabilities. Additionally, separation data reviewed when completing the annual MD-715 report will be considered. All the above data will be analyzed to identify any potential risk and or improvements to the reasonable accommodation program.

Thank you for allowing SBA the opportunity to comment on GAO's draft report, "*Disability Employment – Hiring Has Increased but Actions Needed to Assess Retention, Training and Reasonable Accommodation Efforts*" and for taking SBA's views into consideration.

Sincerely,

ELIAS  
HERNANDEZ  
Elias Hernandez  
Chief Human Capital Officer



Digitally signed by ELIAS  
HERNANDEZ  
Date: 2020.05.22 14:02:53  
+04'00'

---

# Appendix IV: Comments from the Social Security Administration



**SOCIAL SECURITY**  
Office of the Commissioner

May 21, 2020

Yvonne D. Jones  
Director, Strategic Issues  
United States Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Director Jones:

Thank you for the opportunity to review the draft report, "DISABILITY EMPLOYMENT: Hiring Has Increased but Actions Needed to Assess Retention, Training, and Reasonable Accommodation Efforts" (GAO-20-384). We agree with the recommendation. We are revising our framework to include outcome-based evaluations for training related to the employment and support of individuals with disabilities, including Schedule A hiring. We will include the planned training and related assessment in our Human Capital Operating Plan to ensure accountability and alignment with our strategic and performance goals.

If you have any questions, please contact me at (410) 965-9704. Your staff may contact Trae Sommer, Director of the Audit Liaison Staff, at (410) 965-9102.

Sincerely,

A handwritten signature in blue ink that reads "Stephanie Hall".

Stephanie Hall  
Chief of Staff

SOCIAL SECURITY ADMINISTRATION BALTIMORE, MD 21235-0001

---

# Appendix V: GAO Staff Contact and Staff Acknowledgements

---

## GAO Contact

Yvonne D. Jones at (202) 512-6806 or [JonesY@gao.gov](mailto:JonesY@gao.gov).

---

## Staff Acknowledgments

In addition to the contact named above, Leah Querimit Nash (Assistant Director), Arpita Chattopadhyay, Anthony Patterson, and Erik Shive made key contributions to this report. In addition, Michael Bechetti, Elizabeth Curda, Karin Fangman, Rob Gebhart, Michele Grgich, Amalia Konstas, Serena Lo, Art Merriam, and Sharon Miller made contributions to this report.

# Appendix VI: Accessible Data

## Data Tables

**Accessible Data for The Federal Government Generally Increased Hiring of Persons with Disabilities, Fiscal Years 2011 through 2017**

<b>Fiscal year</b>	<b>Number of persons with disabilities employed full-time permanent positions</b>	<b>Number of persons with disabilities employed part-time or temporary positions</b>
2011	15,970	11,306
2012	14,782	10,703
2013	14,157	10,914
2014	18,379	10,879
2015	23,757	12,708
2016	25,039	12,575
2017	24,125	17,898

**Accessible Data for Figure 1: The Federal Government Generally Increased Hiring of Persons with Disabilities, Fiscal Years 2011 through 2017**

<b>Fiscal year</b>	<b>Number of persons with disabilities employed full-time permanent positions</b>	<b>Number of persons with disabilities employed part-time or temporary positions</b>
2011	15,970	11,306
2012	14,782	10,703
2013	14,157	10,914
2014	18,379	10,879
2015	23,757	12,708
2016	25,039	12,575
2017	24,125	17,898

**Accessible Data for Figure 2: The Federal Government Generally Increased Hiring of Persons with Targeted Disabilities, Fiscal Years 2011 through 2017**

<b>Fiscal year</b>	<b>Number of persons with targeted disabilities employed in full-time permanent positions</b>	<b>Number of persons with targeted disabilities employed in part-time or temporary positions</b>
2011	812	797
2012	1,045	897
2013	1,079	978
2014	1,355	984
2015	1,671	1,005
2016	1,762	946
2017	1,981	1,262

**Accessible Data for Figure 3: Number of Persons without Disabilities Hired in the Federal Government, Fiscal Years 2011 through 2017**

<b>Fiscal year</b>	<b>Number of persons without disabilities employed in full-time permanent positions</b>	<b>Number of persons without disabilities employed in part-time or temporary positions</b>
2011	92,622	120,754
2012	75,256	105,235
2013	62,867	85,831
2014	74,019	89,299
2015	99,131	98,286
2016	104,124	100,310
2017	85,051	87,665

**Accessible Data for Figure 4: Nearly 60 Percent of Employees with Disabilities Hired from 2011 through 2017 Stayed for Less than 2 Years**

Category	Percent of employees
Less than 1 year	39.3%
1 to 2 years	18.9%
2 to 3 years	13.8%
3 to 4 years	9.5%
4 to 5 years	6.6%
5 to 6 years	6.1%
6 to 7 years	5.7%
7 years or more	0.0%

**Accessible Data for Figure 5: More Than 60 Percent of Employees without Disabilities Hired from 2011 through 2017 Stayed for Less than 2 Years**

Category	Percent of employees
Less than 1 year	43.1%
1 to 2 years	17.7%
2 to 3 years	12.3%
3 to 4 years	8.4%
4 to 5 years	6.0%
5 to 6 years	6.1%
6 to 7 years	6.4%
7 years or more	0.0%

**Accessible Data for Figure 6: Over 50 Percent of Employees with Disabilities Hired from 2011 through 2017 at Department of Justice Stayed Less than 2 Years**

Category	Percent of employees
Less than 1 year	31.0%
1 to 2 years	22.6%
2 to 3 years	16.0%
3 to 4 years	10.2%
4 to 5 years	7.9%
5 to 6 years	7.5%
6 to 7 years	4.9%
7 years or more	0.0%

**Accessible Data for Figure 7: Almost 50 Percent of Employees without Disabilities Hired from 2011 through 2017 at Department of Justice Stayed Less than 2 Years**

Category	Percent of employees
Less than 1 year	24.0%
1 to 2 years	21.6%
2 to 3 years	16.2%
3 to 4 years	11.8%
4 to 5 years	7.8%
5 to 6 years	10.0%
6 to 7 years	8.1%
7 years or more	0.0%

**Accessible Data for Figure 8: Approximately 65 Percent of Employees with Disabilities Hired from 2011 through 2017 at Small Business Administration Stayed Less than 1 Year**

Category	Percent of employee
Less than 1 year	64.7%
1 to 2 years	8.7%
2 to 3 years	7.2%
3 to 4 years	12.5%
4 to 5 years	2.9%
5 to 6 years	1.9%
6 to 7 years	2.2%
7 years or more	0.0%

**Accessible Data for Figure 9: Over 55 Percent of Employees without Disabilities Hired from 2011 through 2017 at Small Business Administration Stayed Less than 1 Year**

Category	Percent of employees
Less than 1 year	55.5%
1 to 2 years	10.2%
2 to 3 years	7.1%
3 to 4 years	15.8%
4 to 5 years	4.3%
5 to 6 years	3.6%
6 to 7 years	3.3%
7 years or more	0.0%

**Accessible Data for Figure 10: Over 30 Percent of Employees with Disabilities Hired from 2011 through 2017 at Social Security Administration Stayed Less than 1 Year**

Category	Percent of employees
Less than 1 year	32.9%
1 to 2 years	17.6%
2 to 3 years	18.7%
3 to 4 years	20.8%
4 to 5 years	3.5%
5 to 6 years	4.1%
6 to 7 years	2.4%
7 years or more	0.0%

**Accessible Data for Figure 11: Over 25 Percent of Employees without Disabilities Hired from 2011 through 2017 at Social Security Administration Stayed Less than 1 Year**

Category	Percent of employees
Less than 1 year	25.2%
1 to 2 years	18.8%
2 to 3 years	21.5%
3 to 4 years	22.6%
4 to 5 years	2.3%
5 to 6 years	5.5%
6 to 7 years	4.0%
7 years or more	0.0%

---

## Agency Comment Letters

---

### Accessible Text for Appendix II Comments from the Office of Personnel Management

The Honorable Gene Dodaro

Comptroller General

U.S. Government Accountability Office

441 G Street, NW

Washington, DC 20548

Dear Mr. Dodaro:

Thank you for providing us the opportunity to respond to the Government Accountability Office (GAO) draft report, Disability Employment: Hiring Has Increased but Actions Needed to Assess Retention, Training, and Reasonable Accommodation Efforts, GAO-20-384, GAO 102685. Our response to your recommendation relevant to the U.S. Office of Personnel Management (OPM) is provided below.

Recommendation #1: The Director of the Office of Personnel Management should routinely track and report retention data for employees with disabilities and make such data available to Federal agencies, including EEOC, through a centralized web portal—such as MAX.gov. For example, OPM could track and report such data by GS level pay groupings, which could help pinpoint root causes that contribute to retention rates, inform assessments of government-wide progress on employee retention, and identify needed improvements.

We concur. OPM already routinely tracks retention data for persons with disabilities by agency. Retention data for employees with disabilities by agency and GS level pay groupings for Fiscal Years 2017 and 2018 can currently be obtained by Federal agencies at <https://community.max.gov/x/QYz4UQ>.

---

I appreciate the opportunity to respond to this draft report. If you have any questions regarding our response, please contact Zina B. Sutch, Ph.D., Deputy Associate Director, Outreach, Diversity & Inclusion, (202) 606-2433, Zina.Sutch@opm.gov.

Sincerely,

Dennis Dean Kirk, Esq.

Associate Director

---

## Accessible Text for Appendix III Comments from the Small Business Administration

### Page 1

May 22, 2020

Ms. Yvonne Jones

Director

Strategic Issues Team

U.S. Government Accountability Office

Washington, D.C. 20548

Dear Ms. Jones

Thank you for providing the U.S. Small Business Administration (SBA) with a copy of the Government Accountability Office (GAO) draft report titled, "Disability Employment – Hiring Has Increased but Actions Needed to Assess Retention, Training and Reasonable Accommodation Efforts"

The draft report analyzes SBA and other participating agencies' efforts to increase the employment of individuals with disabilities. This action was driven, in part, as a follow up to Executive Order 13548 entitled, "Increasing Federal Employment of Individuals with Disabilities" calling for the federal government to become a model employer of individuals with disabilities by employing an additional 100,000 individuals with disabilities by 2015. SBA has the following comments on the draft report:

The draft report touches on the need to pinpoint the root causes behind the seemingly high departure rates of individuals with disabilities after the first two years of employment. The draft report proposes that a potential solution may lie in targeted data collection, tracking and analysis to determine, where appropriate, improvements and potential solutions.

SBA confirms this and agrees that it is important to have consistent and high-quality data; however, disagrees that the percentage (65 percent), as reflected in Figure 8, of employees with disabilities hired between 2011 through 2017 stayed less than one year, is accurate. There is a perception that the Temporary Hires, brought on board by SBA during a Disaster are hired under the Schedule A authority outlined in 5 CFR 213.3102(u). This specific authority uncompetitively appoints Individuals with Targeted Disabilities. This is different to the Schedule A authority used to hire temporary, time-limited, intermittent, or seasonal employees. In response to a disaster, the authority used is 5 CFR 213.102 and 213.104. Appointments are generally not to exceed one year. It is not disputed that there may be some cases, of individuals who were hired under this authority, who may in fact have had a targeted disability. These individuals may have not elected to disclose such in the application process or by voluntarily completing the Standard Form 256. However, it is noteworthy that very few of these individuals request a reasonable accommodation during their tenure (when there is ongoing disaster activity) before they are taken off the rolls for a lack of work.

## Page 2

The report cites a 26% 2-year retention rate, which includes SBA's large number of temporary hires. Due to the nature of the work performed by SBA, Office of Disaster Assistance, the majority of hiring actions involve temporary hires in which the maximum an employee can serve in such appointment is two years (1 year + 1 year extension), and many serve six-month appointments. Unless the employee gets one of these 1+1 appointments, temporary hires count against SBA's retention rate upon separation. It's particularly impactful to SBA that makes ample use of temp appointments.

SBA analyzed the data for permanent employees and, discovered the two-year retention rate for permanent employees with disabilities hired from FY 11 – FY 17 was 67%. This is significantly higher than the Governmentwide retention rate of 60%.

Responses to your recommendations are provided below:

Recommendation: The Administrator of SBA should develop and implement policies and procedures for assessing and tracking the impact of training provided to agency hiring managers and human resources staff on Schedule A hiring authority. This includes the impact of its training on agency performance goals related to increased hiring of individuals with disabilities and targeted disabilities. (Recommendation 4)

Concur. SBA's office of Human Resources Solutions has provided ongoing training to all hiring managers and supervisors related to special hiring authorities, particularly Schedule A hiring authority for persons with disabilities. Key emphasis is placed on Schedule A as an excepted service hiring authority available to hire or to promote individuals with disabilities without competing the job, thus bypassing the traditional, and sometimes prolonged, competitive hiring process.

Additionally, SBA has partnered with the Office of Personnel Management to provide Hiring Excellence to leadership and hiring officials to discuss the benefits of using authority such as Schedule A. Managers are often encouraged to work with the rehab centers to solicit resumes of persons with disabilities that would fall under the hiring authority criteria. Managers are also encouraged to utilize this authority prior to opening the competitive job announcement. As a result of the training, SBA has noticed an increase in the utilization of Schedule A authority, particularly in the field offices. SBA will formally evaluate the impact of training to ensure hiring managers understand the use of schedule a hiring authority and assess hiring trends and retention.

Recommendation: The Administrator of SBA should develop and implement policies and procedures for obtaining employee feedback about the agency's reasonable accommodation efforts and use such information to evaluate the ongoing effectiveness of the program. This may include identifying any effects on employee retention, identifying potential risks, and determining any improvements that may be warranted. (Recommendation 5)

### Page 3

SBA partially agrees with this recommendation to SBA. The Office of Diversity, Inclusion & Civil Rights' (ODI&CR) procedures for reasonable accommodation currently requires that SBA supervisors reach out to the Disability Employment Program Manager with their concerns about the effectiveness of a provided accommodation, whether it is temporary or permanent, and work in concert to make any necessary adjustment. The

procedures have been re-written and is under review by EEOC. The revision will include the requirement for completing a feedback survey aimed to determine the effectiveness of the reasonable accommodation program and make any adjustments required.

ODI&CR will create a survey that will be administered annually to employees who have a permanent reasonable accommodation in place. In addition, those employees who have been provided a temporary or interim accommodation will also have the opportunity to provide feedback. ODI&CR recently established an internal Reasonable Accommodation mailbox that is monitored daily by the Disability Employment Program Manager. Additionally, SBA recently revised the employee Exit Survey which, even though voluntary, solicits feedback from those employees departing the Agency, for any reason. The survey solicits information concerning efforts to improve the recruitment, hiring and advancement of individuals with disabilities.

Additionally, separation data reviewed when completing the annual MD-715 report will be considered. All the above data will be analyzed to identify any potential risk and or improvements to the reasonable accommodation program.

Thank you for allowing SBA the opportunity to comment on GAO's draft report, "Disability Employment – Hiring Has Increased but Actions Needed to Assess Retention, Training and Reasonable Accommodation Efforts" and for taking SBA's views into consideration.

Sincerely,

Elias Hernandez

Chief Human Capital Officer

---

Accessible Text for Appendix IV Comments from the  
Social Security Administration

May 21, 2020

Yvonne D. Jones

Director, Strategic Issues

---

United States Government Accountability Office

441 G Street, NW

Washington, DC 20548

Dear Director Jones:

Thank you for the opportunity to review the draft report, "DISABILITY EMPLOYMENT: Hiring Has Increased but Actions Needed to Assess Retention, Training, and Reasonable Accommodation Efforts" (GAO-20-384). We agree with the recommendation. We are revising our framework to include outcome-based evaluations for training related to the employment and support of individuals with disabilities, including Schedule A hiring. We will include the planned training and related assessment in our Human Capital Operating Plan to ensure accountability and alignment with our strategic and performance goals.

If you have any questions, please contact me at (410) 965-9704. Your staff may contact Trae Sommer, Director of the Audit Liaison Staff, at (410) 965-9102.

Sincerely,

Stephanie Hall

Chief of Staff

---

---

## GAO's Mission

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

---

## Obtaining Copies of GAO Reports and Testimony

The fastest and easiest way to obtain copies of GAO documents at no cost is through our website. Each weekday afternoon, GAO posts on its [website](#) newly released reports, testimony, and correspondence. You can also [subscribe](#) to GAO's email updates to receive notification of newly posted products.

---

## Order by Phone

The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's website, <https://www.gao.gov/ordering.htm>.

Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.

Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.

---

## Connect with GAO

Connect with GAO on [Facebook](#), [Flickr](#), [Twitter](#), and [YouTube](#).  
Subscribe to our [RSS Feeds](#) or [Email Updates](#). Listen to our [Podcasts](#).  
Visit GAO on the web at <https://www.gao.gov>.

---

## To Report Fraud, Waste, and Abuse in Federal Programs

Contact FraudNet:

Website: <https://www.gao.gov/fraudnet/fraudnet.htm>

Automated answering system: (800) 424-5454 or (202) 512-7700

---

---

## Congressional Relations

Orice Williams Brown, Managing Director, [WilliamsO@gao.gov](mailto:WilliamsO@gao.gov), (202) 512-4400,  
U.S. Government Accountability Office, 441 G Street NW, Room 7125,  
Washington, DC 20548

---

## Public Affairs

Chuck Young, Managing Director, [youngc1@gao.gov](mailto:youngc1@gao.gov), (202) 512-4800  
U.S. Government Accountability Office, 441 G Street NW, Room 7149  
Washington, DC 20548

---

## Strategic Planning and External Liaison

James-Christian Blockwood, Managing Director, [spel@gao.gov](mailto:spel@gao.gov), (202) 512-4707  
U.S. Government Accountability Office, 441 G Street NW, Room 7814,  
Washington, DC 20548



**Please Print on Recycled Paper.**