**TITLE: EMPLOYEE CAREER DEVELOPMENT**

1. **PURPOSE.**

This policy sets forth the U.S. AbilityOne Commission’s (Commission) expectations for Nonprofit Agencies (NPAs) regarding the provision of employee career development to participating employees in the AbilityOne Program (Program).

# APPLICABILITY.

This policy applies to the Commission, its designated Central Nonprofit Agencies (CNAs), and NPAs in the Program.

# AUTHORITY.

1. 41 U.S.C. §§ 8501-8506, Javits-Wagner-O’Day (JWOD) Act
2. 41 C.F.R. Chapter 51, Committee for Purchase From People Who Are Blind or Severely Disabled

**4. DEFINITIONS.**

Definitions, abbreviations, and acronyms frequently used throughout this policy system are provided in Commission Policy 51.102, Definitions. Terms unique to a specific subject matter are defined below.

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| Term | Definition |
| Employee Career Development (ECD) | A three-part system of: (1) job assessment, (2) employee career planning, and (3) if desired by the employee, job development and advancement that align with actions identified in the employee’s career plan. |
| Informed Choice | An individual fully understands the details of a career development program, including its goals, potential benefits, risks, and any commitments required, before voluntarily agreeing to participate, ensuring they have the necessary information to make an informed decision about their career development path. The individual can withdraw participation at any time. |
| Lateral Mobility | Employment progression within the NPA system that is not a promotion but is movement into a new direct labor hour job position that uses different skills that are consistent with the employee’s stated career goals. |
| Outward Mobility | Employment progression to a position that is outside the NPA (e.g., a position in a for-profit company; in a federal, state or local government agency; or in a nonprofit organization that is not an AbilityOne contract holder) that is in alignment with the employee’s stated career goals. |
| Participating Employee | An individual who is blind or has a significant disability, is working on a contract procured through the AbilityOne Program, and is performing work that is counted towards the mandated annual Direct Labor Hour ratio required for participation in the Program. |
| Upward Mobility | Employment progression within an NPA (e.g., a more advanced position within an AbilityOne contract that counts toward the Direct Labor Hour ratio, a supervisory or other position in the contract that is considered indirect labor, or another position in the NPA) that is in alignment with the employee’s stated career goals and offers a higher wage. |

**5.** **RESPONSIBILITIES.**

1. The Commission:
2. Establishes standards for NPAs’ provision of employee career development to participating employees.
3. Ensures that the NPAs meet the Commission’s standards for employee career development to participating employees.
4. Determines appropriate extensions of time for NPAs to provide employee career development to participating employees.
5. Oversees the compliance activities of the CNAs with regard to the NPAs’ employee career development, consistent with this policy, Policy 51.400, and Policy 51.407.
6. The CNA:
   1. Uses qualified personnel verified by the Commission to assess the readiness of an NPA to provide employee career development and recommends to the Commission an extension for an NPA to provide such activities, if the CNA determines that the NPA requires such an extension.
   2. Educates NPAs regarding the requirements of employee career development, as set forth in this policy.
   3. Educates NPAs on any available federal, state, local, community, and CNA resources for employee career development and assists the NPAs in obtaining such resources.
   4. Beginning in FY 2026, uses qualified professionals verified by the Commission to implement this policy, including through conducting qualification assessments of NPAs, providing technical assistance to NPAs, and, as appropriate, providing financial resources to NPAs.
   5. Shares with the Commission the evaluations of NPAs derived from CNA compliance visits. This information shall be provided in an accessible electronic format that the Commission can directly and fully access, without providing any individually identifiable information regarding participating employees.
7. An NPA:
   1. Beginning in FY 2026, provides employee career development to participating employees consistent with this policy and in accordance with any extension of time approved by the Commission.
   2. Certifies that it has met the standards set forth by the Commission;
   3. Provides information as required for the CNA to perform a qualification assessment of the NPA’s employee career development.

**6.** **POLICY**

1. **In General** 
   1. The goal of the Commission is to identify, publicize, and increase the good jobs the AbilityOne Program provides to participating employees. A good job means a job that provides competitive wages and benefits; in which participating employees are treated the same as employees without disabilities, as required under Policy 51.406; and in which participating employees are provided employee career development.
   2. Employee career development is the implementation of a required ongoing placement program prescribed by 41 CFR 51-4.3(b)(8). An NPA must provide employee career development for participating employees.
   3. Employee career development for participating employees ensures that each participating employee’s career is driven by the employee; is shaped by the employee’s goals, skills, interests, and abilities; and reflects the employee’s informed choice. Employee career development prepares employees to explore diverse roles, strengthen current skills or acquire new skills, and familiarize themselves with necessary workplace accommodations.
   4. Employee career development is not vocational rehabilitation. Participating employees are employees in all aspects (see Policy 51.406), while NPAs are employers and should not be considered providers of vocational rehabilitation services with respect to their employment of participating employees. Jobs on an AbilityOne contract are not rehabilitative in nature, even if some services for employees are paid for by vocational rehabilitation programs or other government services.
   5. Employee career planning may result in lateral, upward, or outward mobility for a participating employee, or may result in an employee remaining in an employment position that meets the employee’s stated career goals.
   6. Employee career development is a three-part system of: (1) job assessment, (2) career planning, and (3) if desired by the employee, job development and advancement that aligns with action steps identified in the employee’s career plan.
   7. The three components of employee career development establish a tailored approach that values personal growth and supports career aspirations in a structured, ongoing, and practical manner.
2. **Employee Career Development**
   1. Job Assessments
   2. A job assessment consists of: (1) an evaluation of the participating employee’s capacities, interests, and goals to ensure that the employee will be working in a job consistent with those capacities, interests, and goals; (2) identification of the reasonable accommodations and/or significant job supports necessary for the participating employee to perform a job; and (3) in subsequent job assessments that occur as part of the annual career planning once a participating employee has been performing a job, an evaluation of the employee’s satisfaction with the job, including the job’s compensation.
   3. Starting in FY 2026, every participating employee that onboards must receive a job assessment within 30 days of onboarding. An initial job assessment as part of onboarding may be done by an NPA employee rather than a qualified professional as defined in section 6(c) below.
   4. Identification of a participating employee’s capacities, interests, and goals, as well as reasonable accommodations and/or significant job supports that are necessary, may occur during the interview process. However, some accommodations and/or job supports might be identified only after the participating employee has been in a job position for a period of time, including beyond the onboarding period.
   5. **Employee Career Planning**
   6. Employee career planning is an employee-driven process that is performed in concert with a qualified professional.
   7. A participating employee is required to attend a career planning session that takes place on an annual basis.
   8. A participating employee must be informed, at least one week prior to the career planning session, about the purpose of the session and what will be discussed at the session. This information must be conveyed to the participating employee in a manner that can be understood by the employee.
   9. Employee career planning consists of the following required components:
3. A job assessment;
4. A discussion with the participating employee to identify whether the employee wants to acquire additional skills, and if so, a list of relevant skills training;
5. A discussion of whether the participating employee is interested in remaining in their current job position, or is interested in pursuing lateral, upward, or outward mobility, consistent with the employee’s interests and abilities;
6. An agreed-upon career goal that reflects the discussion with the participating employee;
7. A list of action steps to enable the participating employee to achieve the agreed-upon career goal (if the career goal is lateral, upward, or outward mobility); and
8. Financial and benefits counseling, including information regarding Achieving a Better Life Experience (ABLE) accounts.
   1. If a participating employee’s agreed-upon career goal is to remain in their current job position, the employee may choose not to continue a conversation regarding lateral, upward, or outward mobility.
   2. The career planning session must take place within 180 days of a participating employee’s onboarding. However, career planning may occur later in the first year after onboarding if a qualified professional determines that additional time is necessary to engage in effective planning with the participating employee.
   3. An employee career plan must be a written document that is signed (either on paper or digitally) by the participating employee. There is no mandated career plan form that an NPA must use.
   4. The career plan must be accessible to a participating employee, preferably through an electronic system.
   5. For a participating employee who already has a career plan when beginning work with the NPA (for example, a career plan developed by a vocational rehabilitation specialist), that plan may be used for the first year the individual is employed by the NPA, even if the career planning meeting that resulted in the plan did not meet every component set forth in this policy. Subsequent career planning must take place on an annual basis and satisfy the requirements set forth in this policy.
   6. Employee career planning must be conducted while the employee is clocked in and in their normal pay status.
   7. While this policy describes the minimum requirements of an employee career plan, at the discretion of the NPA, a career plan may include elements in addition to those established in this policy.
   8. **Job Development and Advancement**
   9. Job development and advancement are actions taken pursuant to the list of action steps developed by the qualified professional in the participating employee’s career plan.
   10. An NPA should have procedures to facilitate the action steps in a participating employee’s career plan, but the NPA is not responsible for ensuring that the action steps in such a plan are achieved.
   11. If a participating employee’s career plan lists ideas for lateral or upward mobility, the NPA should take steps to determine if opportunities for lateral or upward mobility currently exist or may arise in the coming year.
   12. If the career plan lists action steps for outward mobility, the NPA should use partnerships with community groups and employers to facilitate efforts by the participating employee to find and apply for outward employment opportunities.
   13. Participating employees are not required to meet the career goals set forth in their plans.
   14. An NPA is not responsible for the employee achieving their career goals.
9. **Qualified Professionals** 
   1. An NPA is required to have a qualified professional to perform employee career planning, as described in this policy. This individual may be an employee of the NPA, on contract with the NPA, or provided by the CNA. NPAs may combine resources to gain access to a qualified professional.
      1. This policy describes this qualified professional as a “Career Navigator” for purposes of establishing qualifications for such an individual. An NPA is not required to use the specific term “Career Navigator.”
   2. The Career Navigator must have sufficient independence from the NPA to ensure that career planning for the participating employee serves the interests of the participating employee and does not create an actual or perceived conflict of interest with the NPA.
      1. For purposes of such independence, the Career Navigator may not be in the direct supervisory chain of the participating employee or involved in the administration or management of a contract from which the participating employee is earning wages.
      2. If the Career Navigator is an employee of the NPA, the independence of the Career Navigator must be particularly clear and scrupulously observed. For example, the Career Navigator must be independent from human resources personnel, even if the individual’s job position is situated in the HR department as an organizational matter.
   3. A Career Navigator must possess a minimum of three years’ experience in providing employee career development as defined in this policy.
   4. The Career Navigator should preferably have lived experience as a person with a disability.
   5. Based on the size and/or available resources of the NPA, the NPA may also choose to employ or contract for additional qualified professionals (termed Career Facilitators in this policy) who would be supervised by the Career Navigator. An NPA is not required to use the specific term “Career Facilitator.”
   6. The Career Facilitator must also have sufficient independence to ensure that the career planning serves the interests of the participating employee and does not create an actual or perceived conflict of interest with the NPA.
      1. The Career Facilitator may not be in the direct supervisory chain of the participating employee or involved in the administration or management of a contract from which the participating employee is earning wages.
   7. A Career Facilitator must possess a minimum of one year’s experience in providing employee career development as defined in this policy.
   8. The Career Facilitator should preferably have lived experience as a person with a disability.
   9. For either the Career Navigator or Career Facilitator, certifications from training programs specific to career planning and supports are desired but do not substitute for the required years of experience in the field.
10. **NPA Certifications**
    1. An NPA must certify that the following components of the provision of employee career development to a participating employee have been met:
    2. The participating employee has attended a career planning meeting (in the calendar year covered by the planning).
    3. The career planning meeting was held with a qualified professional, as defined in this policy.
    4. The participating employee was informed, prior to the meeting, about the purpose of the meeting and what would be discussed at the meeting. This information was conveyed to the participating employee in an accessible manner.
    5. During the meeting, a discussion took place with the participating employee, and (if relevant) actions were taken, in the following areas:
11. Whether the participating employee was satisfied with their current position, including their compensation, and the effectiveness of their accommodations and job supports;
12. Whether the participating employee wanted to acquire additional skills, and if so, relevant skills training was listed by the qualified professional;
13. Whether the participating employee was interested in remaining in their job position or was interested in lateral, upward, or outward mobility, and, if mobility was of interest, a career goal was agreed upon as a result of that discussion;
14. The qualified professional listed action steps to enable the participating employee to achieve career goals, if such goals were for lateral, upward, and/or outward mobility;
15. If the career goal was outward mobility, the qualified professional listed resources or opportunities that the participating employee could access, either within or outside the NPA; and,
16. Financial and benefits counseling.
    1. The new or updated career plan was signed and dated by the participating employee.
    2. The plan was accessible to the participating employee.
    3. If the qualified professional listed action steps in the career plan, the NPA certification will include a description by the NPA of how it facilitated those action steps, if it chose to do so.

**7.** **PROCEDURES.**

None.

**8. EXCEPTIONS.**

None.

**9.** **SUPERSESSION.**

None.

APPROVED: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Kimberly M. Zeich

Executive Director