

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

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

### Section I: Efforts to Reach Regulatory Goals

*EEOC regulations (29 CFR §1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with targeted disabilities in the federal government*

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

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

For four consecutive years the Department has not met the federal hiring goal of 12% for PWD in grades GS-11 to SES. In FY 2020, the total for this group was 8.4% (2,612), compared to 7.8% (2,407) in FY 2019, and 7.6% (2,365) in FY 2018. While this group remains lower than the federal hiring goal, there has been an increase of 0.8% over the last three years.

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

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

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

For four consecutive years the Department has not met the affirmative action hiring goal for employing people with targeted disabilities at grades GS-11 through SES. In FY 2020, the total for this group was 1.9% (583) compared to 1.7% (519) in FY 2019, and in FY 2018 1.6% (494). There were incremental increases from FY 2018 to FY 2020, however, the Department has not met the goal.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	15134	2038	13.47	519	3.43
Grades GS-11 to SES	32003	2649	8.28	586	1.83

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

In FY 2019, the hiring goals were established and disseminated in the workplace. In FY 2020, the Office of Human Capital (OHC) met regularly with Bureau HR Directors to account for the proactive steps taken to achieve the hiring goal. OHC dedicated a full-time equivalent (FTE) to oversee the Department's efforts for meeting the hiring goals. Each of the Bureaus designated an HR

practitioner to work along-side OHC’s program lead for disability employment. These individuals work closely with managers and supervisors to convey the Department’s targeted goals during the completion of the hiring action. The OHC’s program lead for disability employment conducted a podcast for managers and supervisors encouraging leaders to take a proactive role in aiding the Department in reaching its affirmative action goals. The podcast provided detailed information on the hiring authorities and goals. Targeted activities to educate recruiters are slated for FY 2021

## Section II: Model Disability Program

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

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

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

Answer No

A review of the FY 2020 EDI program revealed that the Office of the Secretary, OCR, and multiple Bureau EDI programs are without a Disability Program Manager. The Departmental OCR had frequent communication with the Principal Deputy Assistant Secretary for Policy, Management, and Budget regarding the lack of resources allocated to the Department-wide Equity, Diversity, and Inclusion EDI (EEO) program and the adverse effects that ensued. At the conclusion of the fiscal year, talks were ongoing regarding obtaining additional resources. In the interim, the Departmental OCR Lead MD-715 Program Manager is working closely with the Inter-Bureau Expert Team within OHC for the Affirmative Action hiring goals to ensure the line by line instructions from the EEOC are adhered to throughout the Department.

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Architectural Barriers Act Compliance	10	0	4	Sloan Farrell Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.
Section 508 Compliance	3	6	8	Siddhartha Sharma Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.
Processing applications from PWD and PWTD	50	24	0	Cynthia Piper Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Answering questions from the public about hiring authorities that take disability into account	53	24	0	Angela Lennartson Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.
Processing reasonable accommodation requests from applicants and employees	9	7	0	Mark Guberman and Devon Cummings Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.
Special Emphasis Program for PWD and PWTDD	4	7	1	There are no Disability Program Managers at the Departmental OCR or any Bureau within the DOI.

- Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If “yes”, describe the training that disability program staff have received. If “no”, describe the training planned for the upcoming year.

Answer No

There are no Disability Program Managers in the Departmental OCR or any Bureau within DOI. The Special Placement Coordinator in OHC assigned to ensure DOI hiring goals are achieved, conducted monthly trainings on disability recruitment and retention to standardize practitioner knowledge. In the absence of designated Disability Program Managers, employees assigned to special emphasis programs participated in the following training opportunities conducted in various Bureaus and Offices: • The Department and Bureaus conducted webinars and teleconferencing for the following training topics: Reasonable Accommodations, Civil Treatment for Leaders and Employees, Special Hiring Authorities, Disability Sensitivity, and Disability Awareness. • The Departmental Section 508 Program Manager hosted a series of webinars each month on various topics related to making web pages and files accessible on DOI websites. • The OHC provided a PEP-Talks Podcast to educate the workforce on the U.S. Department of Labor (DOL) Workforce Recruit Program (WRP). • DOI established the first Inter-Bureau Expert Team (I-BET) for the employment of PWD and conducted monthly meetings with Bureaus and Offices to inform, educate, and engage in all matters concerning PWD recruitment, retention, training, and inclusion. • Multiple Bureau and Office representatives participated in the Federal Exchange on Employment and Disability (FEED) meetings where participants learned about policies/guidelines, best practices for implementing effective disability programs, as well as the tools and tips for enhancing disability employment, and creating sustainable partnerships.

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

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

Answer No

The Department has appointed reasonable accommodation coordinators in each of the Bureau Human Capital Offices, however, it did not allocate Disability Program Managers to conduct barrier identification and elimination to ensure equal access for people with disabilities in the workplace. Plan - The Departmental OCR Director provides regular updates to Departmental Senior Executive Leadership regarding the need for sufficient resources to establish an effective EDI (EEO) program overall. In the interim the Affirmative Employment staff meet regularly with the Reasonable Accommodation coordinators throughout the Department to

ensure that they have the knowledge and leeway to provide timely accommodation solutions. The team also helps to facilitate from the Office of the Secretary level, accessibility to facilities, obtaining accessible technologies, and provide consultative services when required.

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

<b>Brief Description of Program Deficiency</b>	A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]		
<b>Objective</b>	Ensure new managers and supervisors throughout the Department understand their roles and responsibilities for providing reasonable accommodations		
<b>Target Date</b>	Apr 1, 2019		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Dec 31, 2020		Meet with stakeholders in the Office of the Secretary to discuss the deficiency and initiate a training plan for new managers and supervisors to understand their roles and responsibilities for providing reasonable Accommodations.
	Apr 30, 2021	June 30, 2020	Develop a consistent approach to ensuring all employees are notified of the complaint process.
	Jul 30, 2021		Draft Department-wide training plan and circulate to Offices and Bureaus for feedback.
	Jul 30, 2021		Draft Department-wide training plan and circulate to Offices and Bureaus for feedback. approach to ensuring all employees are notified of the complaint process.
	Sep 30, 2021		Finalize and execute the training plan Department-wide to ensure all new managers and supervisors receive reasonable accommodation training.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	No action taken.	
	2020	The Office of Strategic Employee and Organizational Development (OSEOD) developed an onboarding video to be used department-wide. Officials within the Office of Diversity, Inclusion and Civil Rights (ODICR) provided substantive feedback that incorporates employees' rights and responsibilities regarding EEO complaints within DOI. OSEOD subsequently accepted and incorporated the recommended language in its materials and implemented said onboarding materials across the department. In addition, representatives from the Adjudication, Compliance and Equity (ACE) Division of ODICR provides EEO updates to new employees during the OSEOD department-wide new supervisory training.	

<b>Brief Description of Program Deficiency</b>	A.2.c.3. Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.
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<b>Brief Description of Program Deficiency</b>	B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]
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<b>Brief Description of Program Deficiency</b>	B.4.a.4. to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.
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<b>Brief Description of Program Deficiency</b>	B.4.a.6. to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]
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<b>Brief Description of Program Deficiency</b>	B.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]
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<b>Brief Description of Program Deficiency</b>	C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC’s regulations and guidance? [see 29 CFR §1614.203(d)(3)]		
<b>Objective</b>	Establish a tracking mechanism to account for and ensure timely issuance of request for reasonable accommodations.		
<b>Target Date</b>	Dec 30, 2021		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2018	September 30, 20	Discuss issue at monthly Reasonable Accommodation Community of Practice meetings and ensure Reasonable Accommodation Annual reports monitor and track timeliness.
	Sep 30, 2018	September 30, 2019	Meet with Director, OCR and Director, Workforce Relations Division to discuss the necessity for a reasonable accommodation tracking system.
	Dec 30, 2018	September 22, 2019	Conduct market research on potential GSA vendor’s reasonable accommodation tracking and reporting systems.
	Dec 30, 2018	July 30, 2019	Provide justification to Director, Workforce Relations Division to secure reasonable accommodation tracking system.
	Dec 30, 2018		Secure a new automated reasonable accommodation tracking system to improve the processing of reasonable accommodations in accordance with the guidelines set forth in the Department’s Reasonable Accommodation policy and procedures.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	The Office of Human Capital requested funding to create a Department-wide reasonable accommodation tracking system. Once funding has been secured, the Office of Human Capital, in partnership with the Office of Civil Rights and Bureau representatives, will work with an established vendor to develop the system to meet both human resources and equal employment opportunity needs. In the absence of a Department-wide tracking system, DOI will issue data calls to the bureaus for this information.	

<b>Brief Description of Program Deficiency</b>	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.
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<b>Brief Description of Program Deficiency</b>	C.3.b.6. Provide disability accommodations when such accommodations do not cause an undue hardship? [ see 29 CFR §1614.102(a)(8)]
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<b>Brief Description of Program Deficiency</b>	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]		
<b>Objective</b>	Train managers and supervisors on the requirements of the Affirmative Action Plan for persons with disabilities. Ensure all Bureaus post the Affirmative Action Plan on external websites.		
<b>Target Date</b>	Sep 30, 2021		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 20		Establish joint discussions with the Departmental ODICR and OSEOD to collaborate on incorporating Disability Employment as a training block of instruction in the new supervisor course.
	Sep 30, 2020		OHC and ODICR to develop and implement continuous training for HR and EDI (EEO) practitioners to carry out their responsibilities effectively for the Affirmative Action Plan.
	Sep 30, 2020		Establish and implement a continual campaign to engage managers and supervisors in actively supporting the Affirmative Action Plan for persons with disabilities..
	Sep 30, 2021		Verify that disability-related questions from members of the public are answered promptly and correctly.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2020	Bureau HR Specialists provided multiple training sessions to managers and supervisors regarding the use of the special hiring authorities for hiring and placement of PWD and PWTD. Bureau HR Specialists provided deskside training to leaders as requests for reasonable accommodation arose throughout the year. OHC conducted podcasts to educate hiring managers on WRP and encouraged them to utilize the WRP to obtain qualified talent and reduce the time to hire by using non-competitive appointments.	
	2019	During the reporting year, the Directors of the Departmental ODICR and OHC issued joint messaging, on behalf of the Secretary of the Interior, instituting the affirmative action plan for advancing individuals with disabilities throughout the Department. The memorandum also provided resources, including the Workforce Recruitment Program. Some Bureaus enacted ongoing training to communicate the various hiring authorities available to employ people with disabilities. The OHC provided a webinar to HR practitioners and hiring managers on the specifics of using the Workforce Recruitment Program (WRP) to obtain qualified talent.	

<b>Brief Description of Program Deficiency</b>	D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.		
<b>Objective</b>	Post the Department Affirmation Action Plan to the public website.		
<b>Target Date</b>	Sep 30, 2021		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u><i>Target Date</i></u>	<u><i>Completion Date</i></u>	<u><i>Planned Activity</i></u>
	Mar 30, 2020	August 1, 2019	Develop Affirmative Action Plan (AAP).
	Jun 30, 2020	August 1, 2019	Review and approval of AAP.
	Dec 30, 2020	August 1, 2019	Post AAP on public website.
<b>Accomplishments</b>	<u><i>Fiscal Year</i></u>	<u><i>Accomplishment</i></u>	
	2019	The AAP for FY 2018 was posted on the public website.	
	2020	Bureau HR Specialists provided multiple training sessions to managers and supervisors regarding the use of the special hiring authorities for hiring and placement of PWD and PWTD. Bureau HR Specialists provided deskside training to leaders as requests for reasonable accommodation arose throughout the year. OHC conducted podcasts to educate hiring managers on WRP and encouraged them to utilize the WRP to obtain qualified talent and reduce the time to hire by using non-competitive appointments.	

<b>Brief Description of Program Deficiency</b>	D.4.b. Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR §1614.203(d)(1)(i)]		
<b>Objective</b>	Develop a Department-wide process and procedure to consider the impact on employees prior to implementing decisions, such as re-organizations and re-alignments.		
<b>Target Date</b>	Sep 30, 2025		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2020		Establish joint discussions with the Departmental ODICR and OSEOD to collaborate on incorporating Disability Employment as a training block of instruction in the new supervisor course.
	Sep 30, 2020		OHC and ODICR to develop and implement continuous training for HR and EDI (EEO) practitioners to carry out their responsibilities effectively for the Affirmative Action Plan.
	Sep 30, 2020		Establish and implement a continual campaign to engage managers and supervisors in actively supporting the Affirmative Action Plan for persons with disabilities.
	Sep 30, 2021		Verify that disability-related questions from members of the public are answered promptly and correctly.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	During the reporting year, the Directors of the Departmental ODICR and OHC issued joint messaging, on behalf of the Secretary of the Interior, instituting the affirmative action plan for advancing individuals with disabilities throughout the Department. The memorandum also provided resources, including the Workforce Recruitment Program. Some Bureaus enacted ongoing training to communicate the various hiring authorities available to employ people with disabilities. The OHC provided a webinar to HR practitioners and hiring managers on the specifics of using the Workforce Recruitment Program (WRP) to obtain qualified talent.	
	2020	Bureau HR Specialists provided multiple training sessions to managers and supervisors regarding the use of the special hiring authorities for hiring and placement of PWD and PWTD. Bureau HR Specialists provided deskside training to leaders as requests for reasonable accommodation arose throughout the year.	

<b>Brief Description of Program Deficiency</b>	D.4.d. Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR §1614.203(d)(7)(ii)]
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<b>Brief Description of Program Deficiency</b>	E.4.a.5. The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(4)]		
<b>Objective</b>	Establish a tracking mechanism to account for and ensure timely responses to requests for reasonable accommodation.		
<b>Target Date</b>	Dec 30, 2021		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Dec 30, 2018		Secure an automated tracking system to account for timely issuance of reasonable accommodation solutions Department-wide.
	Dec 30, 2020	September 30, 2020	Secure funding to develop a Department-wide reasonable accommodation tracking system.
	Sep 30, 2021		Secure vendor to design a comprehensive tracking system that accounts for the requirements of the Rehabilitation Act.
	Sep 30, 2021		Secure vendor to design a comprehensive tracking system that accounts for the requirements of the Rehabilitation Act.
	Dec 30, 2022		Establish a recurring reporting process to monitor timeframes for reasonable accommodations.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	OHC requested funding to create a Department-wide reasonable accommodation tracking system.	
	2020	In the absence of a Department-wide tracking system, the Departmental reasonable accommodation coordinator issued data calls to the Bureaus to provide updates on the number of timely issued RA solutions. This process revealed that there is not a systematic approach to account for reasonable accommodations. Multiple Bureaus did not track, some tracked certain aspects of the process that could not account for timeliness, and etc. Discussions were ongoing about the need for a standardized tracking system. At the close of the FY, OHC received funding to develop a Department-wide reasonable accommodation tracking system. No further action was taken.	

<b>Brief Description of Program Deficiency</b>	E.4.b. Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]
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<b>Objective</b>	Develop internal processes to obtain the receipt of exit interview data, climate assessment surveys, detail opportunities, grievance data, EEO ADR data and etc. from the OHC and CADR.		
<b>Target Date</b>	Sep 30, 2025		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2021 Sep 30, 2025		Review the data and determine barriers. Work with OHC and CADR on developing and implementing a process or mechanism to receive data on a reoccurring basis
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	The Departmental ODICR Director met with the Directors of CADR and ELLU to discuss the need for the Departmental ODICR to receive requisite data on employment matters addressed within CADR's area of responsibility. At the conclusion of the FY, discussions were ongoing to establish a recurring process to receive data. The OHC developed a new online exit interview survey to disseminate to departing employees. The Departmental ODICR's Affirmative Employment Program Division Director reviewed and provided substantive feedback on ensuring questions considered the viewpoints of protected groups and their employment experiences. At the conclusion of the FY, talks were ongoing regarding establishing a process for recurring receipt of exit survey information.	

<i>Fiscal Year</i>	<i>Accomplishment</i>
2020	<p>In February 2020, OHC revised the DOI Exit Survey to include specific questions relating to employee experiences. The survey was updated to include demographic information for disability, LGBTQ+, etc. In June 2020, OHC launched the new DOI Exit Survey System to centralize all exit survey data for the Department. In September 2020, OHC trained the entire MD 715 community on how to access the Exit Survey System to extract relevant data for barrier analysis. At the close of the FY, discussions were ongoing to grant access to all MD 715 Program Managers throughout DOI. OHC completed the move of all Bureaus to USAStaffing to centralize and standardize the Department with one recruitment and hiring system. In July 2020, OHC coordinated with the Office of Personnel Management to grant access to Applicant Flow Data and train DOI HR and EDI (EEO) practitioners on how to use the system to extract the data. A more detailed training for MD 715 practitioners is scheduled for second quarter FY 2021. The migration of all bureaus/offices to USAStaffing is to establish a single workflow system and to standardize processes that enable more efficient hiring (e.g., sharing job certificates) and consistent metrics (e.g., time-to-hire definition). Current Status is All Bureau staffing specialists, (600+ HR professionals,) will be using USAStaffing as the DOI’s single hiring system NLT June 15, 2020. During the COVID-19, rapidly responded and migrated to a virtual training environment. To Date over 300 users have been trained and all transitioning bureaus have begun using USA Staffing with their announcements as of April 30, 2020. My DOI Career, our world class career pathing system has increased from 25 occupations to 91 occupations encompassing over 86% of the workforce. In addition, despite significant challenges due to a bifurcated system within DOI, OHC developed the Department’s efforts to obtain full certification from the OPM for the SES, SL and ST performance system to prevent barriers in the senior executive ranks. OHC instituted a quality assurance program where all final SES, SL and ST transactions are reported to the HQ for review. This allows DOI to provide Executives pay at the EX-2 and compete for talent across the Government. Imitated the effort to provide HR staffing solutions to our customers (US Geological Survey, the Office of the Solicitor, and the Assistant Secretary for Indian Affairs) by working with each office to ensure no loss of service. Additionally, due to the high number (over 30 errors with the multiple handoffs of packages, processing and hiring actions), taking steps to recommend the centralization of Executive Resources aids the Department in more transparency, less hand offs and mistakes and enhances customer service. The pandemic also required a new/innovative solution to in person Executive Resources Board meetings. transitioned to, 1) bi-weekly ERB meetings to ensure timely review of bureau requests, and 2) to virtual meetings on Microsoft teams. 3) Electronic notebooks, reducing the paper notebooks and time to print, copy and develop these notebooks. This resulted in a highly professional “notebook but electronic” version of the ERB binders. The ERB members quickly not only adapted but responded favorably to this new version. Approaching eight months, we have saved over \$20,000 in paper and recycling costs, countless hours of personnel hours and increased productivity and responsiveness with the ERB notebooks.</p>

## Section IV: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency’s recruitment program plan for PWD and PWTDD

### A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

1. Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with

targeted disabilities.

The Department actively engaged in collaborative recruiting partnerships with academia, governmental, and non-profit organizations with access to candidates with disabilities. The following strategies were used to recruit individuals with disabilities in the permanent workforce: • My DOI Careers used Twitter to send vacancy announcements to disability advocacy groups such as the National Rights Network, the National Alliance on Mental Illness, the American Association of People with Disabilities, etc., to alert these organizations of available positions throughout the Department. • In FY 2020, Bureaus partnered with the State Vocational Rehabilitation Agencies, Disability Services Offices at colleges and universities, Employer Assistance Referral Network, Workforce Recruitment Program, and Veterans Administration (VA) Special Program offices to obtain candidates for vacancies throughout the Department. o These partnerships resulted in the following recruitment activities in FY 2020: § Workshops and one-on-one training sessions provided to applicants to help them understand the federal hiring process and how to write a resume using USAJobs. § Through an email List. SERV, over 300 Affinity Organizations, Academia, America Job Centers, State Vocational Rehabilitation Agencies, Centers for Independent Living, and Employment Network Service Providers received multiple vacancy announcements for mission critical occupations. § Affinity organizations (i.e. National Technical Institute for the Deaf, DoD Wounded Warrior Program, etc.) provided briefings to hiring managers about the intricacies on their respective programs, the type of candidates participating in the programs, and how to utilize their services to obtain quality candidates for vacant positions.

2. Pursuant to 29 C.F.R. §1614.203(a)(3), describe the agency's use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce

DOI used the Schedule A and 30% or more Disabled Veterans appointing authorities, to identify and hire qualified PWD and PWTD applicants for positions in the permanent workforce. All vacancy announcements included statements that encouraged Schedule A and 30% or more Disabled Veteran applicants to apply. As a result, in FY 2020, 3.6% of new hires were placed using the Schedule A hiring authority and 7.5% of the new hires used the 30% or more disabled veterans hiring authority. Additionally, there were five (5) PWD new hires selected at the GS-15 grade level, 15 PWD new hires selected at the GS-14 grade level, and 33 PWD new hires selected at the GS-13 grade level. PWTD had a similar story in that there were four (4) selected at the GS-14 grade level, and nine (9) at the GS-13 grade level

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

a. HR staffing specialists discuss all available hiring flexibilities with hiring managers at the onset of the recruitment request. Upon receipt of Schedule A applications, the HR Specialists verify that applicants submitted proof of disability documentation from either: i. A licensed medical professional; ii. A certified rehabilitation professional; or iii. Any Federal, state, District of Columbia, or US Territory agency that issues or provides disability benefits. b. Once it is determined that the applicant is qualified to use the hiring authority for disabilities, the HR Specialist verifies the applicant met the minimum qualifications for the position, once met, the applicant is placed on a non-competitive certificate and forwarded to the hiring manager for consideration.

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If "yes", describe the type(s) of training and frequency. If "no", describe the agency's plan to provide this training.

Answer No

At the close of FY 2020, the Department does not have a system in place to ensure all new supervisors, and newly promoted supervisors are made aware of hiring authorities for people with disabilities. To remedy this deficiency, the Departmental OCR, and the Office of Strategic Employee and Organizational Development (OSEOD) were engaged in ongoing discussions regarding establishing a training block of instruction in its new supervisor course that addresses all aspects of disability employment. In the absence on a systematic approach to reach new and newly appointed supervisors, the following activities occurred in FY 2020: i. The OHC provides training on the use of disability hiring authorities on an as-needed basis. This FY, the team conducted a podcast for managers that discussed the intricacies of the Schedule A hiring authority and through Hiring 101. ii. Multiple Bureau HR

Specialists provided desk side training to hiring managers at the onset of initiating a vacancy announcement. In addition, HR Specialists availed themselves when requested by specific offices (e.g. EEO, Diversity Change Agent, FEV working group, etc.) to provide guidance and direction to participants of a designated event.

**B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS**

Describe the agency’s efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

During FY 2020, the DOI maintained a database that contained partnerships with over 300 U.S. military installations, Veterans Employment Service, Academia, State Job Offices, and Veterans’ Assistance Centers nationwide. Participants of the List. SERV received e-mail notifications throughout the year of available job opportunities and free training events open to people with disabilities. Bureaus recruited at virtual career fairs during the year to identify qualified PWDs and PWTDs for employment. DOI’s participation at these events refreshed existing partnerships and expanded its capability of reaching new groups not previously identified. At the close of FY 2020, discussions were underway with the National Association with the School of the Deaf, Gallaudet University, MERS Goodwill, the VA Non-Paid Work Experience Program, Military Transition Programs, etc. to solidify partnership opportunities with these groups to expand DOI’s recruitment and outreach efforts for these untapped resources.

**C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)**

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If “yes”, please describe the triggers below.

- a. New Hires for Permanent Workforce (PWD) Answer No
- b. New Hires for Permanent Workforce (PWTD) Answer No

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	0				
% of Qualified Applicants	0				
% of New Hires	4799	1.90	3.94	0.44	0.81

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission- critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. New Hires for MCO (PWD) Answer Yes
- b. New Hires for MCO (PWTD) Answer Yes

Trigger - During FY 2020, for a large portion of the year, DOI did not have access to applicant flow data to determine if PWD and PWTD applied for mission critical positions. In July 2020, the OHC and EDI (EEO) communities received access to OPM’s USA-Staffing applicant flow system. In August 2020, the communities were trained in how to extract applicant flow data from the system. The data was not analyzed in this reporting period, however, all Bureaus are expected to conduct a thorough analysis of applicant flow data at the close of FY 2021. The data shows that PWD and PWTD were selected to fill vacant positions at every grade level throughout the Department, with the exception of SES where PWTD were not selected.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	
0025PARK RANGER	0	0.00	0.00	0.00	0.00
0028ENVIRONMEN PROTECTION	0	0.00	0.00	0.00	0.00
0080SECURITY ADMINISTRATION	0	0.00	0.00	0.00	0.00
0085SECURITY GUARD	0	0.00	0.00	0.00	0.00
0401GEN NATURAL RESOURCES MGMT & BIO SCIENCES	0	0.00	0.00	0.00	0.00
0455RANGE TECHNICIAN	0	0.00	0.00	0.00	0.00
0462FORESTRY TECHNICIAN	0	0.00	0.00	0.00	0.00
0802PETROLEUM ENGINEERING TECHNICIAN	0	0.00	0.00	0.00	0.00
0810CIVIL ENGINEERING	0	0.00	0.00	0.00	0.00
0881PETROLEUM ENGINEERING	0	0.00	0.00	0.00	0.00
1313GEOPHYSICS	0	0.00	0.00	0.00	0.00
1315HYDROLOGY	0	0.00	0.00	0.00	0.00
1350GEOLOGY	0	0.00	0.00	0.00	0.00
1801GEN INSPECT, INVESTIG, ENFORCE, & COMPL	0	0.00	0.00	0.00	0.00
1811CRIMINAL INVESTIGATING	0	0.00	0.00	0.00	0.00
2151DISPATCHING	0	0.00	0.00	0.00	0.00

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Qualified Applicants for MCO (PWD) Answer Yes
- b. Qualified Applicants for MCO (PWTD) Answer Yes

Trigger – During FY 2020, for a large portion of the year, DOI did not have access to applicant flow data to determine if PWD and PWTD were deemed qualified for internal mission critical occupations (MCO). As previously stated, the entire OHC and EDI (EEO) communities received access to OPM’s USA-Staffing applicant flow system in July with subsequent training in August

2020. The teams were unable to determine if triggers existed outside of access to the relevant data.

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission- critical occupations (MCO)? If “yes”, please describe the triggers below. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
  - a. Promotions for MCO (PWD) Answer Yes
  - b. Promotions for MCO (PWTD) Answer Yes

Trigger – The main trigger FY 2020 is DOI’s inability to access applicant flow data, and the late permissions granted to the OHC and EDI (EEO) communities for extracting said data from USA-Staffing. The employment data revealed that of the 16 MCOs, PWTD were selected in only five (5) out of 16 MCOs for promotional opportunities.

## Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

### A. ADVANCEMENT PROGRAM PLAN

Describe the agency’s plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

Trigger – DOI conducted numerous training and development activities throughout the year to ensure all employees, to include PWD and PWTD were fully aware and participated in the sponsored events. DOI lacks relevant tracking systems to account for the applicants and attendees of sponsored events. Trigger – DOI does not have a Department-wide mentoring program in place to ensure any of its employees engage in specialized development opportunities offered through an organized mentoring program. Both triggers are the subject of a Part H corrective action plan to ensure tracking and development is institutionalized throughout the DOI. In the absence of a plan, the following activities occurred in FY 2020: • The DOI initiated the preliminary phase of a Department-wide Interior Coaching Program in that it solicited, through a competitive hiring process, employees to serve as coaches in the department-wide program when launched. Selectees to serve as coaches, will undergo an extensive training to prepare individuals to be effective coaches. At the close of the FY, selectees included PWD and PWTD to serve as coaches. Due to the lack of tracking, it is unknown the exact number. • Multiple Bureaus and Offices established career ladder positions requiring on-the-job and classroom training and mentoring to ensure success and opportunity for advancement. • Multiple Bureaus and Offices provided developmental opportunities and mentorship/coaching for employees, including PWD and PWTD, to improve their skills and to increase their opportunities for advancement. National Park Service (NPS) o 33% of selectees into the Fellowship Programs were PWD o 66% of selectees into the Mentoring Program were PWD o 20% of selectees into the Aspiring Leader Program were PWD and 2% PWTD o 10% of selectees into other “Career Development” programs were PWD United States Geological Survey (USGS) o 10% of selectees into the USGS Mentoring Program were PWD o 5% of selectees into other “Career Development” programs were PWD and 1.3% were PWTD • The OHC and some of the Bureaus conducted podcasts to educate hiring managers on the benefits and ease of use of the WRP. Managers were encouraged to utilize the WRP to obtain qualified talent and reduce the time to fill vacancies using non-competitive appointments. • The DOI University (DOIU) Learning Centers provided 525 training courses opportunities throughout FY 2020. Approximately 6,800 DOI employees attended said trainings to receive a continuous learning and development experience throughout the year. DOI Talent does not track applicant data to ascertain the number of PWD and PWTD that engaged in this employment opportunity. • In June 2020, DOI deployed the DOI Career Connection, an online portal for offering short-term detail and lateral opportunities across the Department. Throughout the year, applicant tracking was not captured and therefore, unable to determine if PWD and PWTDs were among the employees engaging in these employment opportunities.

### B. CAREER DEVELOPMENT OPPORTUNITES

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



Response: a. Some of the Bureaus offered various leadership development opportunities for employees to further their career advancement goals. In FY 2020, the following leadership development opportunities were provided: • Bureau of Land Management (BLM) sponsored the National Leadership Academy. Applicant data was not captured. • BSEE sponsored the Emerging Leader Program (ELP) for all employees GS-11 to GS-13. Applicant data was not captured. • BOEM sponsored the Navigating Leadership Program, a mid-level development program designed for grades GS-14 and GS-15, and the Aspiring to Leadership Program, an entry-level leadership development program. Applicant data was not captured. • The NPS sponsored the Future Leaders Program that provides developmental opportunities for disabled veterans. Applicant data was not captured. • Reclamations sponsored two development programs in FY 2020: 1) Exploring Supervision at Reclamation (ESR), and 2) Reclamation Leadership Development Program (RLDP). ESR introduces non-supervisory employees with information on supervisory responsibilities. The training provides an overview of supervisory and human resource competencies that new supervisors need to master as they transition from an individual contributor role to a supervisor role in the Federal Government. Applicant data was not captured. b. DOIU offers Leadership and Development Programs to improve diversity management, and professional skill sets of DOI employees. The Program Opportunities included: Aspiring to Leadership – An Entry Level Leadership Program This 5-month program is designed for the employees at the GS 7-11 levels who want leadership roles. The program focuses on increasing awareness of personal leadership style, reinforcing strengths, and building practical leadership skills that will prepare participants for future leadership roles. Through assessments, lectures, and large and small group discussions, participants develop knowledge and expertise in the following competency areas: • Conflict Management • Interpersonal Skills • Oral Communication • Problem Solving and Decisiveness. Applicant data for FY 2020 is not available. Exploring Leadership – A Mid-Level Leadership Program This developmental program is designed for a mid-level employee at GS-11-12 and high performing GS-9s who have demonstrated leadership potential. The program focuses on the competencies critical to successfully leading in the challenging and complex Federal environment. The program is comprised of three core sessions, tailored to develop proficiency in Team Building, Accountability, Problem Solving, Decisiveness, and Influencing/Negotiating. Exploring Leadership uses a blended learning approach and includes assessment, instructor-led learning, large and small group discussion, case studies, mentoring, and webinars to give participants a challenging and enriching leadership development experience. Applicant data for FY 2020 is not available. Pathways to Leadership – Bureau of Indian Affairs Pathways to Leadership is a 4- month program designed explicitly for the Bureau of Indian Affairs developing leaders. The program prepares participants to lead the programs and responsibilities affecting Indian Affairs. Targeted to employees at the GS-13 and GS-14 levels, the program focuses on increasing competency proficiency in Conflict Management, Resilience, External Awareness, Political Savvy, Partnering, and Accountability. Participants explore the impact of personal values on ethical decision making; learn the importance of emotional intelligence and its effect on employee engagement and performance; build skills in leveraging diversity, political savvy, creating partnerships; and influencing/ negotiating. They also produce a leadership network through mentoring and presentations by BIA senior leaders. Applicant data for FY 2020 is not available. Senior Executive Service Candidate Development Program The Department of the Interior's Senior Executive Service Candidate Development Program (SESCDP) is an OPM certified program tailored to grow and develop a cadre of highly qualified leaders for senior executive positions. The SESCO focuses on developing the competencies in each of the Executive Core Qualifications (ECQs) to prepare candidates to lead at the executive level. The SESCO is a 12-month competitively selected program and includes formal classroom training, formal leadership assessments, executive-level developmental assignments, networking opportunities with other senior executives, exposure to government-wide leadership challenges, and mentoring. This program was not sponsored in FY 2020.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/ approval to participate.

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Training Programs	0	0	0	0	0	0
Other Career Development Programs	0	0	0	0	0	0
Internship Programs	0	0	0	0	0	0
Fellowship Programs	0	0	0	0	0	0
Mentoring Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	0	0
Detail Programs	0	0	0	0	0	0

3.

Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWD) Answer Yes
- b. Selections (PWD) Answer Yes

Trigger - The DOI Learning Management System (LMS) does not track applicant information. The lack of monitoring serves as a barrier to the DOI in understanding whether impediments exist for any group participating in career advancement programs. The lack of tracking systems is a corrective action plan within the MD 715 report. Critical stakeholders in OSEOD were made aware, and it is projected that LMS will have the capability to collect applicant data beginning in FY 2022.

4. Do triggers exist for PWTB among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWTB) Answer Yes
- b. Selections (PWTB) Answer Yes

Trigger - As stated above, the DOI Learning Management System (LMS) does not track applicant information. The lack of monitoring serves as a barrier to the DOI in understanding whether impediments exist for any group participating in career advancement programs. The lack of tracking systems is a corrective action plan within the MD 715 report. Critical stakeholders in OSEOD were made aware, and it is projected that LMS will have the capability to collect applicant data beginning in FY 2022.

**C. AWARDS**

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTB for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

- a. Awards, Bonuses, & Incentives (PWD) Answer No
- b. Awards, Bonuses, & Incentives (PWTB) Answer No

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	5398	10.91	10.00	11.24	10.81
Time-Off Awards 1 - 10 Hours: Total Hours	34762	68.79	64.77	71.87	67.86
Time-Off Awards 1 - 10 Hours: Average Hours	6.44	0.12	0.01	0.51	0.00
Time-Off Awards 11 - 20 hours: Awards Given	4304	7.22	8.00	7.01	7.28
Time-Off Awards 11 - 20 Hours: Total Hours	68396	121.58	126.79	119.36	122.25
Time-Off Awards 11 - 20 Hours: Average Hours	15.89	0.31	0.04	1.36	0.00
Time-Off Awards 21 - 30 hours: Awards Given	2928	6.10	5.42	6.61	5.95
Time-Off Awards 21 - 30 Hours: Total Hours	73274	152.47	135.84	166.77	148.13

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 21 - 30 Hours: Average Hours	25.03	0.46	0.06	2.01	-0.01
Time-Off Awards 31 - 40 hours: Awards Given	4388	8.03	8.30	8.21	7.98
Time-Off Awards 31 - 40 Hours: Total Hours	165080	303.62	312.01	310.76	301.45
Time-Off Awards 31 - 40 Hours: Average Hours	37.62	0.70	0.09	3.02	0.00
Time-Off Awards 41 or more Hours: Awards Given	24	0.04	0.05	0.00	0.05
Time-Off Awards 41 or more Hours: Total Hours	1404	1.78	2.97	0.00	2.32
Time-Off Awards 41 or more Hours: Average Hours	58.5	0.89	0.14	0.00	1.16

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	10423	21.91	19.22	23.19	21.52
Cash Awards: \$501 - \$999: Total Amount	7973918	16798.89	14703.15	17830.76	16485.71
Cash Awards: \$501 - \$999: Average Amount	765.03	14.22	1.74	61.27	-0.06
Cash Awards: \$1000 - \$1999: Awards Given	20749	34.90	39.80	33.31	35.38
Cash Awards: \$1000 - \$1999: Total Amount	28038588	46717.38	53897.91	44445.50	47406.92
Cash Awards: \$1000 - \$1999: Average Amount	1351.32	24.84	3.08	106.33	0.10
Cash Awards: \$2000 - \$2999: Awards Given	7686	11.69	15.12	11.24	11.83
Cash Awards: \$2000 - \$2999: Total Amount	17997916	27115.64	35424.06	26058.96	27436.35
Cash Awards: \$2000 - \$2999: Average Amount	2341.65	43.04	5.32	184.82	0.01
Cash Awards: \$3000 - \$3999: Awards Given	2576	3.62	5.13	2.79	3.87
Cash Awards: \$3000 - \$3999: Total Amount	8551630	12126.96	17011.06	9371.24	12963.34
Cash Awards: \$3000 - \$3999: Average Amount	3319.73	62.19	7.54	267.75	-0.20
Cash Awards: \$4000 - \$4999: Awards Given	871	1.15	1.75	0.64	1.31
Cash Awards: \$4000 - \$4999: Total Amount	3829620	5065.18	7678.25	2890.60	5725.18
Cash Awards: \$4000 - \$4999: Average Amount	4396.81	81.70	10.00	361.33	-3.17
Cash Awards: \$5000 or more: Awards Given	1109	1.30	2.26	1.75	1.16
Cash Awards: \$5000 or more: Total Amount	10537142	12530.78	21564.99	15802.07	11537.92
Cash Awards: \$5000 or more: Average Amount	9501.48	179.01	21.70	718.28	15.34

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

- a. Pay Increases (PWD) Answer Yes
- b. Pay Increases (PWTD) Answer Yes

Trigger - DOI did not conduct recognition programs in FY 2020. There is not an EDI (EEO) award listed in the agency convocation award program and is the subject of a corrective action plan listed in the existing MD 715 report.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	247	0.33	0.51	0.32	0.34

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

- a. Other Types of Recognition (PWD) Answer N/A
- b. Other Types of Recognition (PWTD) Answer N/A

Trigger - DOI did not conduct recognition programs in FY 2020. There is not an EDI (EEO) award listed in the agency convocation award program and is the subject of a corrective action plan listed in the existing MD 715 report.

#### D. PROMOTIONS

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. SES
  - i. Qualified Internal Applicants (PWD) Answer Yes
  - ii. Internal Selections (PWD) Answer Yes
- b. Grade GS-15
  - i. Qualified Internal Applicants (PWD) Answer Yes
  - ii. Internal Selections (PWD) Answer Yes
- c. Grade GS-14
  - i. Qualified Internal Applicants (PWD) Answer Yes
  - ii. Internal Selections (PWD) Answer Yes
- d. Grade GS-13
  - i. Qualified Internal Applicants (PWD) Answer Yes
  - ii. Internal Selections (PWD) Answer Yes

Trigger - DOI did not have access to applicant flow data until July 2020, the data for this FY was not analyzed to determine if impediments exists. As stated above, the OHC and EDI (EEO) communities were granted access to OPM’s USA-Staffing applicant flow system and are now able to retrieve applicant flow data. In August 2020, all Bureaus OHC and EDI (EEO) practitioners were

trained to extract data from the system with the expectation of a conduct an analysis of the data in FY 2021. The table below shows how internal selections are not meeting the federal goal of 12%. Promotions Qualified Internal Applicants Internal Selections Regulatory GS-13 Data not available 47 (8.8%) 12% GS-14 Data not available 14 (5.2%) 12% GS-15 Data not available 6 (6.7%) 12% SES Data not available 1 (3.7%) 12%

2. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. SES

- i. Qualified Internal Applicants (PWTD) Answer Yes
- ii. Internal Selections (PWTD) Answer Yes

b. Grade GS-15

- i. Qualified Internal Applicants (PWTD) Answer Yes
- ii. Internal Selections (PWTD) Answer Yes

c. Grade GS-14

- i. Qualified Internal Applicants (PWTD) Answer Yes
- ii. Internal Selections (PWTD) Answer Yes

d. Grade GS-13

- i. Qualified Internal Applicants (PWTD) Answer Yes
- ii. Internal Selections (PWTD) Answer Yes

Trigger: DOI was unable to analyze the data for the number of PWTD applying for internal selections. The number of selections of PWTDs fell below the federal standard of 2% for all senior graded positions. More work is required to meet the standards. The table below shows the internal selections made during FY 2020 for PWTD as compared to the federal goal of 2%. Promotions Qualified Internal Applicants Internal Selections Regulatory GS-13 Data not available 7 (1.2%) 2% GS-14 Data not available 2 (0.8%) 2% GS-15 Data not available 0 (0.0%) 2% SES Data not available 0 (0.0%) 2%

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

- a. New Hires to SES (PWD) Answer Yes
- b. New Hires to GS-15 (PWD) Answer Yes
- c. New Hires to GS-14 (PWD) Answer Yes
- d. New Hires to GS-13 (PWD) Answer Yes

Trigger: Applicant flow data is unavailable until late FY 2020. The second trigger revealed that the higher the grade level, the least number of PWDs were selected to fill senior level positions (E.g. 5-PWDs for GS-15, 15-PWDs for GS-14, 33-PWDs for GS-13, etc.).

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

- a. New Hires to SES (PWTD) Answer Yes
- b. New Hires to GS-15 (PWTD) Answer Yes
- c. New Hires to GS-14 (PWTD) Answer Yes
- d. New Hires to GS-13 (PWTD) Answer Yes

Trigger: Applicant flow data is unavailable until late FY 2020. The second trigger revealed that the higher the grade level, the least number of PWTDs were selected to fill senior level positions (E.g. 0-PWTDs for GS-15, 4-PWTDs for GS-14, 9-PWTDs for GS-13, etc.).

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

- a. Executives
  - i. Qualified Internal Applicants (PWD) Answer Yes
  - ii. Internal Selections (PWD) Answer Yes
- b. Managers
  - i. Qualified Internal Applicants (PWD) Answer Yes
  - ii. Internal Selections (PWD) Answer Yes
- c. Supervisors
  - i. Qualified Internal Applicants (PWD) Answer Yes
  - ii. Internal Selections (PWD) Answer Yes

Trigger: Applicant flow data is unavailable until late FY 2020. The second trigger revealed that the higher the grade level, the least number of PWDs were selected to fill senior level positions.

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

- a. Executives
  - i. Qualified Internal Applicants (PWTD) Answer Yes
  - ii. Internal Selections (PWTD) Answer Yes
- b. Managers
  - i. Qualified Internal Applicants (PWTD) Answer Yes

- ii. Internal Selections (PWTD) Answer Yes
- c. Supervisors
  - i. Qualified Internal Applicants (PWTD) Answer Yes
  - ii. Internal Selections (PWTD) Answer Yes

Trigger: The data was not analyzed for qualified internal applicants for this reporting period. The Department gained access to OPM’s USA-Staffing applicant flow system at the end of the FY and will conduct an analysis of qualified PWTD internal applicants for promotions to supervisory positions in FY 2021. The second trigger revealed that the higher the grade the least number of PWTD were selected for higher graded positions. The data revealed that PWTDs were selected at the GS-13 grade level, however, the number of selectees declined at the GS-14 grade level and were no selections of PWTDs at the GS-15 and SES grade levels.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
  - a. New Hires for Executives (PWD) Answer Yes
  - b. New Hires for Managers (PWD) Answer Yes
  - c. New Hires for Supervisors (PWD) Answer Yes

Trigger: DOI did not have access to applicant flow data until the end of the FY to ascertain whether PWTDs were among the qualified applicants for leadership positions. The second trigger revealed that PWTD were among the new hires, however, the majority were hired at the GS-13 level.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
  - a. New Hires for Executives (PWTD) Answer Yes
  - b. New Hires for Managers (PWTD) Answer Yes
  - c. New Hires for Supervisors (PWTD) Answer Yes

Trigger: DOI did not have access to applicant flow data until the end of the FY to ascertain whether PWD were among the qualified applicants for leadership positions. The second trigger revealed that PWD were among the new hires, however, the majority were hired at the GS-13 level.

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

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

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer No

Trigger: During the reporting year, the OHC did not collect relevant data to determine why Schedule A employees were timely converted after two years of satisfactory service. The lack of accountability for Schedule A conversion is a corrective action item in Part H of the MD 715 report.

2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.

a. Voluntary Separations (PWD) Answer Yes

b. Involuntary Separations (PWD) Answer Yes

Trigger: PWDs voluntarily separated from DOI at the same level in which the DOI onboarded this group to the workforce. This imbalance suggests a potential retention issue.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	3	0.02	0.00
Permanent Workforce: Removal	169	0.48	0.23
Permanent Workforce: Resignation	913	2.00	1.31
Permanent Workforce: Retirement	1906	3.22	2.83
Permanent Workforce: Other Separations	1180	2.37	1.71
Permanent Workforce: Total Separations	4171	8.08	6.09

3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If “yes”, describe the trigger below.

a. Voluntary Separations (PWTD) Answer Yes

b. Involuntary Separations (PWTD) Answer Yes

Trigger: PWTD voluntarily separated from DOI at the same level in which the DOI onboarded this group to the workforce. This imbalance suggests a potential retention issue.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	3	0.00	0.00
Permanent Workforce: Removal	169	0.63	0.25
Permanent Workforce: Resignation	913	1.82	1.36
Permanent Workforce: Retirement	1906	3.56	2.85
Permanent Workforce: Other Separations	1180	2.80	1.75
Permanent Workforce: Total Separations	4171	8.81	6.22

4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

Trigger: During the reporting year, the OHC did not have a consistent method for collecting Department-wide exit survey data. Therefore, the Departmental OCR could not obtain, and review said data to determine impediments for any group(s) in the DOI workforce. In June 2020, DOI launched a new exit survey tool to standardize and collect exit survey data Department-wide. The data is expected to be available during the second quarter of FY 2021.

**B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES**



Pursuant to 29 CFR §1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

U.S. Department of the Interior Section 508 Program website <https://www.doi.gov/ocio/section508> and 375 Departmental Manual (DM) 8 Section 508 Program and Responsibilities, and DOI's Accessibility Statement <https://www.doi.gov/accessibility>. How to file a complaint: Within 180 days of the date Complaints of discrimination filed against the DOI can be submitted by contacting the Office of Civil Rights, 1849 C Street NW, MS 4359 Washington DC 20240. <https://www.doi.gov/pmb/eo/Complaints-Processing>

2. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

How to File a Public Civil Rights Complaint: Within 180 days of the date of the alleged discrimination, a signed, written complaint should be filed with the Director, Office of Civil Rights, Department of the Interior, 1849 C Street, NW Mailstop 4359, Washington, DC, 20240. The complaint should include your name, address, zip code, and telephone number; the name and address of the alleged discriminatory official(s) and public entity; the nature of the complaint, the basis of the complaint (race, color, national origin, gender, age, sex, and disability), and the date the alleged discrimination occurred. If the alleged discrimination occurred outside DOI jurisdiction, DOI will forward the complaint to the State or Federal agency with jurisdiction. You can read more about the PCR complaint process in Civil Rights Directive 2011-01 <https://www.doi.gov/pmb/eo/Public-Civil-Rights>.

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

In FY 2020, the Department took a proactive approach to ensure managers and employees were aware of how to establish 508 compliant documents. During the FY, the Section 508 team conducted 28 training courses whereby Bureaus and Offices learned how to create compliant electronic documents for Excel, Adobe, Word, and other electronic documents. The Section 508 team also conducted 12 contracting, and acquisition courses hosted in the DOIU. The Department hosted "Inclusive Social Media: Making Images Accessible" virtual webinar which covered best practices and decisions that go into writing appropriate alternative text for images such as maps and infographics. Approximately 380 DOI employees attended the webinar. A recording of the presentation is currently available on DOI's Office of Communication website and is used by employees on a recurring basis. The Department hosted a DOI Digital Week Event, which included a segment that addressed Section 508 awareness. The event included presentations on various accessibility topics and demonstrations with accessibility tools to assist employees with disabilities. Approximately 4,674 employees attended the presentations. The recorded versions of the presentations are posted on the DOI Digital Event SharePoint site. The Departmental OCR, Public Civil Rights Division (PCR) initiated a collaborative effort in FY 2018 that continued into FY 2020. Whereby key senior executives at the Bureaus, the Departmental OCR, and OHC work collaboratively to improve access to public lands for people with disabilities. In FY 2020, the PCR Director worked closely with Bureaus to expand access for persons with disabilities to utilize Electric Bikes on public lands managed by DOI. During the FY, PCR worked closely with the Bureau of Indian Education (BIE) and Bureau of Indian Affairs (BIA) to better comply with the Department's obligations to implement Section 504 of the Rehabilitation Act of 1973 in BIE operated schools and colleges.

## C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

The average time frame for initial processing of requests for reasonable accommodations is unknown. DOI does not have a central tracking system in place to account for timely receipt and issuance of accommodation solutions. The lack of a centralized system is

a deficiency identified in Part H.

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

• Reoccurring Training throughout FY 2020 - Some Bureaus provided reasonable accommodation training to managers and supervisors. The training provided managers and supervisors insight into how to recognize a request for reasonable accommodation when plain language was used, to engage in the interactive process, to meet timelines, and to ensure proper documentation throughout the process. Reasonable accommodation training is also offered via the DOI Talent Management system. • Community of Practice – The HR Reasonable Accommodation Coordinators and EDI (EEO) communities met monthly to ascertain best practices, discuss sticking points for issuing accommodation solutions, and discussed ways in which to improve the employee experience for people with disabilities and targeted disabilities. The collaborative process improved the flow for getting results to accommodation solutions. • Inter-Bureau Expert Team (I-BET) - OHC established an I-BET for the Employment/Special Placement of Persons with Disabilities (PWD) in accordance with the Affirmative Action Plan for PWD and PWTD. The group met monthly to account for the Departments process towards achieving the hiring goals. The Bureaus and Offices engaged in best practices for recruitment, retention, and training. I

**D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE**

*Pursuant to 29 CFR §1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.*

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

The DOI implemented Personal Assistance Services (PAS) procedures with Personnel Bulletin (PB) No. 17-18, dated January 3, 2018. Multiple Bureaus incorporated PAS in reasonable accommodation training for onboarding employees, new managers, and supervisor training. At the close of the FY, there were no complaints of discrimination filed that alleged failure to provide PAS to employees, which denotes a process that is working as expected. A more thorough assessment of the effectiveness of the policies, procedures, and practices for PAS will occur in FY 2021 and beyond. More training is required, and additional resources allocated to the Civil Rights community is necessary to conduct a more thorough review. The lack of resources to ensure EDI (EEO) program effectiveness is noted as a deficiency in Part H.

**Section VII: EEO Complaint and Findings Data**

**A. EEO COMPLAINT DATA INVOLVING HARASSMENT**

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the governmentwide average?  
Answer Yes
2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?  
Answer Yes
3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

DOI received one finding of discrimination alleging disability harassment. A summary of the corrective measures taken in the

finding of discrimination were as follows: • Pay Complainant back pay. • Conduct four hours of EEO training. • Post a Notice to all employees located in the common work area. • Pay an award of \$50,000 in compensatory damages to the Complainant. In addition, during FY 2020, there 14 settlements where mental disability harassment was alleged, and 13 settlements where physical disability harassment was alleged. The corrective actions for settlements were as follows:

**B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION**

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?

Answer Yes

2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?

Answer Yes

3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

There was one finding of discrimination where physical disability, failure to accommodate was alleged. A summary of the corrective measures taken are as follows: • Pay complainant in the amount of \$95,000.00, within sixty days. • Compensate complainant for all back pay and any other losses • Post a Notice to all employees located in the common work area. • Conduct four hours of EEO training.

**Section VIII: Identification and Removal of Barriers**

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

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

Answer No

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

Answer No

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments

<b>Source of the Trigger:</b>	Workforce Data (if so identify the table)				
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B1				
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	The higher the grade level, the least number of PWD and PWTD were selected to fill senior level positions. PWD and PWTD received the least number of QSIs awarded during FY 2020. The number of settlements in complaints of discrimination alleging disability discrimination.				
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i> People with Disabilities				
<b>Barrier Analysis Process Completed?:</b>	N				
<b>Barrier(s) Identified?:</b>	N				
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b>		<b>Description of Policy, Procedure, or Practice</b>		
	None identified		None identified, a barrier analysis was not conducted due to the lack of sufficient resources allocated to the EDI (EEO) community throughout the Department.		
<b>Objective(s) and Dates for EEO Plan</b>					
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>
02/06/2018	12/30/2018	Yes	09/30/2022		Increase PWD and PWTD employees at senior grade levels in the DOI workforce.
09/30/2020	09/30/2021	Yes			Educate managers and supervisors on the intricacies of disability employment.
09/30/2020	09/30/2021	Yes			Educate managers and supervisors on the intricacies on providing reasonable accommodation solutions
<b>Responsible Official(s)</b>					
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>	
Director, Strategic Talent Programs Division		Landon Mock (or designee)		Yes	
Agency Special Employment Programs Manager		Angela Lennartson		Yes	
Departmental Lead MD-715 Program Manager		Julia Bumbaca		Yes	
Disability Selective Placement Program Coordinators		Various Bureaus		Yes	
Managers and Supervisors		Various Bureaus		No	

Responsible Official(s)				
Title	Name	Standards Address The Plan?		
Office of the Secretary, Special Emphasis Program Manager	Acquanetta Newson	Yes		
Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/01/2018	Office of Human Capital (OHC) and the Office of Diversity, Inclusion and Civil Rights (ODICR), to finalize and publish a Department-wide reasonable accommodation policy and procedure that aligns with the EEOC final rule.	Yes	09/30/2021	
12/01/2018	ODICR to partner with OSEOD to establish a systematic approach for ensuring managers and supervisors are aware of their obligations for reasonable accommodation.	No	09/30/2022	
12/01/2018	OHC to obtain funding to develop and implement a Department-wide tracking system for reasonable accommodations.	Yes		08/30/2020
06/01/2020	Obtain and analyze Applicant Flow Data for PWD and PWTB	No		07/30/2020
05/01/2021	OHC in partnership with Departmental ODICR to establish a plan to gradually increase the number of PWD and PWTB.	No		
09/30/2021	Develop and implement Department-wide campaign regarding disability employment.	Yes		
Report of Accomplishments				
Fiscal Year	Accomplishment			
2019	<p>During FY 2019:</p> <p>OHC requested funding to create a Department-wide reasonable accommodation tracking system.</p> <p>Department issued hiring goals to comply with the final rule for Section 504 of the Rehabilitation Act.</p> <p>The goals were broadly disseminated throughout the Department.</p> <p>OHC allocated an FTE, GS-14 equivalent to oversee the Affirmative Action employment goals for people with disabilities.</p> <p>At the close of the FY, the position was advertised and a selection pending.</p> <p>Two Employee Resource Groups were established for the further advancement of People with Disabilities and Targeted Disabilities within the DOI workforce. The Employees for the Advancement of People with Disabilities (EAPWD) and People with Special Abilities of Power (PSAP).</p> <p>At the close of the FY, 12.5 percent of new hires were PWDs, and 3.1 percent were PWTBs.</p> <p>DOI posted its reasonable accommodation and personal assistance services procedures to the public website.</p>			

<b>Report of Accomplishments</b>	
<b>Fiscal Year</b>	<b>Accomplishment</b>
2020	<p>The Departmental ODICR developed its DRAFT Diversity and Inclusion strategic plan that heavily addresses disability employment.</p> <p>The Departmental ODICR Director created and disseminated to key stakeholders, the DRAFT EDI (EEO) and Diversity Policy Statement.</p> <p>The Departmental ODICR hired a Lead MD-715 Program Manager to work closely with the Bureau EDI (EEO) and OHC communities to ensure compliance with the EEOC Affirmative Action Plan.</p> <p>OHC received funding for the Department-wide reasonable accommodation tracking system. A shell tracking system was created and exhibited to OHC and EDI (EEO) practitioners for feedback.</p> <p>The Departmental ODICR met with the Disability ERGs to ascertain sticking points for employment of people with disability throughout the DOI. The information contained is source of information used in the Department-wide campaign in the future.</p> <p>OHC selected a GS-14 action officer to oversee the Affirmative Action hiring of people with disabilities. Each Bureau designated officials to work closely with the OHC representative to account for disability hiring. The team establish a charter to government processes for disability hiring. Established goals for FY 2021 and beyond for meeting Affirmative Action goals.</p>

<b>Source of the Trigger:</b>	Workforce Data (if so identify the table)				
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B14				
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	PWD and PWTD voluntarily separated at the same level in which the DOI onboarded this group to the workforce. This imbalance suggests a potential retention issue.				
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i> People with Disabilities				
<b>Barrier Analysis Process Completed?:</b>	N				
<b>Barrier(s) Identified?:</b>	N				
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b>		<b>Description of Policy, Procedure, or Practice</b>		
	None identified.		A barrier analysis was not conducted due to the lack of sufficient resources allocated to the EDI (EEO) community throughout the Department.		
<b>Objective(s) and Dates for EEO Plan</b>					
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>
09/30/2020	09/30/2022	Yes			Improve employment experience for PWD and PWTD.
02/06/2018	12/30/2023	Yes			Increase retention rates of PWD and PWTD.
<b>Responsible Official(s)</b>					
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>	
Agency Special Employment Programs Manager		Angela Lennartson		Yes	
Office of the Secretary, Special Emphasis Program Manager		Acquanetta Newson		No	
Managers and Supervisors		Various Bureaus		No	
Departmental Lead MD-715 Program Manager		Julia Bumbaca		Yes	
Disability Selective Placement Program Coordinators		Various Bureaus		Yes	
Director, Strategic Talent Programs Division		Landon Mock (or designee)		Yes	

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/31/2021	Review and analyze exit surveys to identify barriers to retention.	No		
12/31/2021	Conduct study on reasonable accommodation requests. Identify trends in processing requests, delays, denials, etc. to ascertain correlations to separations.	No		
12/31/2021	Establish process to monitor separations on recurring basis by disability.	No		
09/30/2021	Utilize ERGs to improve employment experience for PWD and PWTD.	No		
Report of Accomplishments				
Fiscal Year	Accomplishment			
2020	In June 2020, DOI centralized the exit survey data in a Department-wide system and trained the Bureaus and Offices on how to download the data to identify barriers to retention.			
2019	DOI OHC convened an exit and retention survey working group to review the current DOI Exit Survey and Bureau Exit Survey and provided recommended changes to the senior leadership team. ODICR representatives will ensure consideration of disability-related questions are included in the final submission of established core questions.			

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

The Departmental ODICR and entire EDI (EEO) community throughout the DOI lack sufficient resources, staffing, and funding to provide the requisite attention needed to run an efficient disability employment program, to address barriers to employment, and improve the employment experience for PWD and PWTD

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

The implementation of hiring goals and the establishing of a designated POC for affirmative action hiring resulted in 1,212 (8.1 percent) PWD new hires, and 299 (2.0 percent) PWTD new hires. There were five (5) PWD new hires selected to fill GS-15 positions, 15 PWD new hires selected to fill GS-14 positions, 33 PWD new hires selected to fill GS-13 positions during the reporting year. Additionally, four (4) PWTD new hires selected to fill GS-14 positions, and nine (9) PWTD new hires selected to fill GS-13 positions. Year after year, DOI has steadily increased the number of PWD employed throughout the agency, increasing from 8.0 percent in FY 2013 to 12.7 percent in FY 2020. Likewise, DOI incrementally increased its hiring of PWTD, from 1.5 percent in FY 2013 to 2.0 percent in FY 2020. There is a steady increase in communication regarding employing people with disabilities through podcasts, tweets, training, and Department-wide publications (e.g. HR Monthly, Training Tuesday, and Connections Magazine, etc.). The Departmental ODICR developed an internal website to serve as a platform for managers and employees for all aspects of EDI (EEO), whereby, there is a strong emphasis on disability employment. The website is scheduled to launch during the third quarter of FY 2021.

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

The Departmental ODICR’s strategic focus is on developing and implementing a Department-wide campaign to educate the workforce on the intricacies of disability employment. The Departmental ODICR will establish a Department-wide barrier analysis team to incrementally address impediments in employment for PWD, PWTD, and other affected groups.