U.S. DEPARTMENT OF THE INTERIOR (DOI)
FISCAL YEAR 2019
MD-715 ANNUAL REPORT

TABLE OF CONTENTS

APPENDICES

PARTS A THROUGH D

PART A – DEPARTMENTAL OR AGENCY IDENTIFYING INFORMATION

Agency	Second Level Component	Address	City	State	Zip Code	Agency Code	FIPS Code
U.S. Department of the Interior (DOI)	None	1849 C Street, NW	Washington	DC	20240	IN01	

PART B – TOTAL EMPLOYMENT

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	53,111	13,282	66,393

PART C.1 HEAD OF AGENCY AND HEAD OF AGENCY DESIGNEE

Agency Leadership	Name	Title
Head of Agency	David Bernhardt	Secretary of the Interior
Head of Agency Designee	Rachael Taylor[1]	Senior Advisor to the Secretary, Exercising the Delegated Authority of the Assistant Secretary for Policy, Management, and Budget

PART C.2 – AGENCY OFFICIAL(S) RESPONSIBLE FOR OVERSIGHT OF EEO PROGRAM(S)

EEO Program Staff	Name	Title	Occupational Series	Pay Plan and Grade	Phone Number	Email Address

---

[1] The Secretary of the Interior and the Assistant Secretary for Policy, Management and Budget departed the Agency without signing and releasing the FY 2019 report to the EEOC. Rachael Taylor, Senior Advisor to the Secretary, Exercising the Delegated Authority of the Assistant Secretary Policy, Management and Budget assumed responsibility for the program and report on January 21, 2021.

Principal EEO Director/Official	Erica D. White-Dunston	Director and Chief Diversity Officer	0340	ES	202-208-5693	erica_white-dunston@ios.doi.gov
Deputy EEO Director	Tanisha M. Edmonds	Deputy Director and Deputy Chief Diversity Officer	0340	GS-15	202-208-5693	tanisha_edmonds@ios.doi.gov
Affirmative Employment Program Manager	Tyvonia Ward	Director, Affirmative Employment Program Division	0260	GS-15	202-208-4759	tyvonia_Ward@ios.doi.gov
Complaints Processing and Adjudication Manager	Thomas Ziehnert	Acting Director, Employment Complaints & Adjudication Division	0260	GS-15	202-208-2890	thomas_p_ziehnert@ios.doi.gov
Public Civil Rights Manager	Sloan Farrell	Director, Public Civil Rights Division	0360	GS-15	202-208-3455	sloan_farrell@ios.doi.gov
Compliance Program Manager	Alvin Dillings	Senior EEO Specialist	0260	GS-15	202-208-4752	alvin_dillings@ios.doi.gov
Office of the Secretary EEO Complaints Processing Manager	Melba Vaughn	Office of the Secretary, Complaints Manager	0260	GS-14	202-208-6112	melba_vaughn@ios.doi.gov
Hispanic Employment Program Manager	Vacant					
Federal Women's Program Manager	Acquanetta Newson	EEO Specialist (SEPM)	0260	GS-13	202-208-7101	acquanetta_newson@ios.doi.gov
Disability Employment Program Manager	Vacant					
Special Placement Program Coordinator	Akia West-Butler	Human Resource Specialist	0201	GS-13	202-208-6754	akia_west-butler@ios.doi.gov
Reasonable Accommodation Program Manager	Deborah Pfaff	Human Resource Specialist (Program Manager)	0201	GS-15	202-208-7271	deborah_pfaff@ios.doi.gov

Anti-Harassment Program Manager	Tammy Duchesne	Workplace Culture Transformation Advisor	0201	GS-15	202-208-2690	tammy_duchesne@ios.doi.gov
EEO Alternative Dispute Resolution Manager	William E. Hall	Director, Office of Collaborative Action and Dispute Resolution	0301	SL-00	703-235-3791	william_e_hall@ios.doi.gov
Principal MD-715 Preparer	Kimberly Ly	Social Science Research Analyst	0101	GS-14	202-208-1459	kimberly_ly@ios.doi.gov

PART D.1 – LIST OF SUBORDINATE COMPONENTS COVERED IN THIS ANNUAL REPORT

Subordinate Component	City	State	Country	Agency Code	FIPS Code
Office of the Secretary	Washington	DC		IN	01
Bureau of Land Management	Washington	DC		IN	05
Bureau of Indian Affairs	Washington	DC		IN	06
Bureau of Indian Education	Washington	DC		IN	06
Bureau of Reclamation	Lakewood	CO		IN	07
U.S. Geological Survey	Reston	VA		IN	08
National Park Service	Washington	DC		IN	10
Fish and Wildlife Service	Arlington	VA		IN	15
Office of Surface Mining Reclamation and Enforcement	Washington	DC		IN	22
Bureau of Safety and Environmental Enforcement	Washington	DC		IN	26
Bureau of Ocean Energy Management	Washington	DC		IN	27

PART D.2 – MANDATORY AND OPTIONAL DOCUMENTS FOR THIS ANNUAL REPORT

Did the Department of the Interior submit the following mandatory documents?	Please Respond Yes or No	Comment
Organizational Chart	Yes	
EDI Policy Statement	Yes	

Strategic Plan	Yes	
Anti-Harassment Policy and Procedures	Yes	
Reasonable Accommodation Procedures	Yes	
Personal Assistance Services Procedures	Yes	
Alternative Dispute Resolution Procedures	Yes	
Did the Department of the Interior submit the following optional documents?	**Please Respond Yes or No**	**Comment**
Federal Equal Opportunity Recruitment Program (FEORP) Annual report	Yes	
Disabled Veterans Affirmative Action Program (DVAAP) Annual report	Yes	
Operational Plan for Increasing Employment of Individuals with Disabilities Under Executive Order 13548	Yes	
Diversity and Inclusion Plan Under Executive Order 13583	Yes	
Diversity Policy Statement	No	
Human Capital Strategic Plan	No	
EEO Strategic Plan	No	
Results from Most Recent Federal Viewpoint Survey or Annual Employee Survey	Yes	

6

PART E. EXECUTIVE SUMMARY: DEPARTMENT OF THE INTERIOR MISSION

U.S. Department of the Interior

The Department of the Interior (DOI or Department) conserves and manages the Nation's natural resources and cultural heritage for the benefit and enjoyment of the American people. It provides scientific and other information about natural resources and natural hazards to address societal challenges and create opportunities for the American people and honors the Nation's trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated island communities to help them prosper.

The Department is the steward of 20 percent of the Nation's lands, including national parks, national wildlife refuges, and other public lands and waters. It manages resources providing approximately 20 percent of the Nation's energy; delivers and manages water in the 17 western states and supplies 15 percent of the Nation's hydropower energy; and upholds federal trust responsibilities to 573 federally recognized Indian Tribes, Alaska Native communities, and insular areas.

The Department also partners with states to manage wildlife, promote healthy forests and suppress fires, manage energy resource development (oil, gas, coal, hydro, geothermal, wind, and solar) on its lands and offshore areas, promote outdoor recreation (including hunting, fishing, bird watching, boating, hiking, and biking), and provide mapping, geological, hydrological, and biological science for the Nation.

The Department's mission is carried out by 66,393 dedicated and skilled employees in 2,184 locations throughout the United States. Over 300,000 volunteers annually contribute their time in support of bureau and office missions, bringing unique local knowledge to park operations, assisting in recovery from natural disasters, and participating in environmental education, among other activities. Achieving the Department's mission requires talented individuals invested in the organization's purpose and who can succeed in the sometimes remote or strenuous outdoor work

environments where we accomplish much of our DOI mission. DOI succeeds because of the talented individuals we hire to perform our mission.

The ten bureaus and many offices that fall under the Office of the Secretary (OS); Assistant Secretary for Insular and International Affairs (IIA); Assistant Secretary for Policy, Management, and Budget (PMB); Office of the Solicitor (SOL); and Office of Inspector General (OIG), collectively known as the Departmental Offices (DOs), each have unique but equally important work and missions that come together to serve the broader DOI mission. This structure represents Equity, Diversity and Inclusion (EDI) in its broadest sense and the benefits that can be accrued if EDI are a priority. Given present and future complexities, EDI is not simply concerned with compliance. EDI encompasses full workplace utilization of all employees, maximizing productivity and effectiveness, and increased authority and credibility as a Department by being a model EDI employer. When consistently incorporated, EDI benefits and increases the effectiveness and performance of the Department.

The purpose of the Management Directive 715 (MD-715) Annual Program Status Report is to demonstrate the proactive measures DOI instituted throughout Fiscal Year (FY) 2019 to actualize the tenets of EDI in the fulfillment of its mission objectives. When comparing DOI's FY 2019 activities to the Equal Employment Opportunity Commission's (EEOC) Key Performance Indicators (KPIs) of: (1) Demonstrated Commitment of DOI Leadership for Ensuring EDI; (2) Integration of EDI into DOI's Overall Strategic Mission; (3) Management and Program Accountability for EDI; (4) Proactive Prevention Measures to effectuate EDI in DOI; (5) EDI Program Efficiency; and (6) Legal Compliance with statutory requirements for EDI in the workplace, there are successes and areas for improvement that contribute to establishing DOI as a "Model EDI Employer."

To ensure DOI's EDI Program supports its overall mission objectives, the activities of this annual report are aligned with the FY 2018 - 2022 Department Strategic Plan (DSP) and Department Annual Performance Plan (DAPP), per Title 5 of the Code of Federal Regulation (CFR) Part 250 and the Government Performance Results Act- Modernization, Act, 2010, P.L. 111-352 (GPRA-

MA). The strategies, milestones, performance measures, and metrics in this annual report directly and indirectly support the mission and goals outlined within the DSP and DAPP. More specifically, the EDI efforts in this annual report align with the FY 2018–2022 DSP *Mission Area 6: Modernizing Our Organization and Infrastructure for the Next 100 Years, Goal #1: Align DOI Organizational Structure to Improve Partnership Engagement and Mission Delivery, Strategy #2: Improve strategic hiring, placement and retention efforts to ensure mission-critical service delivery through data driven processes and increased employee engagement efforts.* As such, the accomplishments identified in this annual report measure: 1) DOI's progress in promoting workplace practices that create and enhance opportunities for all employees to achieve their fullest potential in the workplace; and 2) DOI's effectiveness in using EDI to successfully address the scale and complexity of the conservation challenges in managing 20 percent of the Nation's lands, including national parks, national wildlife refuges, and public lands.

During FY 2019, some bureau leadership demonstrated its commitment to affirming DOI as a "Model EDI Employer" and its belief that EDI is everyone's responsibility. Throughout the year employees at all levels were held accountable for maintaining a professional atmosphere by: (1) fostering an environment where everyone is respected; (2) ensuring individuals were promoted, trained, and retained on the basis of their experience, knowledge, skills, and abilities; (3) rewarding employees for their performance; and (4) creating a workplace culture that attracts, develops, and retains outstanding individuals who are coached, counseled, and motivated to reach their fullest potential.

This annual report outlines the strategies designed by the Office of Civil Rights (OCR), Office of Human Capital (OHC), and other key stakeholder offices to support the Department in its continued commitment to its EDI program responsibilities under 29 C.F.R. § 1614.102. The annual report also highlights activities undertaken by each of the bureaus to actualize results that reveal DOI as a model EDI employer in all employee lifecycle phases. Lastly, this annual report identifies DOI's strengths, vulnerabilities, and projected plans to eliminate EDI program deficiencies in areas that failed to meet the EEOC's expected performance outcomes for every federal agency.

Notable Highlights

While a comprehensive review and analysis of the Department's overall EDI program ensues, listed below are notable FY 2019 EDI highlights:

- The Department continued to take steps toward understanding and addressing the issue of harassment across the workforce. It did so by focusing on preventing harassing conduct and ensuring all DOI employees felt safe and respected. In March 2019, the Department established the Workplace Culture Transformation Advisory Council (WCTAC), composed of Assistant Secretaries/Deputy Assistant Secretaries and/or bureau Directors/Deputy Directors who are tasked with identifying specific programming, organizational behaviors, and best practices focused on eliminating harassment and ways to improve the workplace culture. As a result, in the DOI's FY 2019 Federal Employee Viewpoint Survey (FEVS) results, there was a decrease in the number of employees who reported experiencing or witnessing harassing conduct in the workplace.

- The Department worked closely with the Office of Personnel Management (OPM) to include harassment specific questions for the first time in the FY 2019 FEVS to ascertain the effectiveness of the Department's efforts in eliminating harassing conduct and workplace behaviors that interfere with an employee's ability to fully engage in the workplace. The FY 2019 FEVS results for the DOI's harassment specific questions showed the Department achieved incremental improvement in reducing harassing behaviors, an encouraging sign.

- The OS, OCR, and OHC partnered to ensure joint messaging and knowledge sharing with the Department's Civil Rights and Human Capital communities to ensure consistency of effort for providing reasonable accommodations and actualizing disability employment initiatives within the Department. These efforts resulted in the Department issuing hiring goals for employing people with disabilities in line with Section 501 of the Rehabilitation Act. OHC designated a full-time employee to ensure the Department's compliance with

disability hiring.   Before FY 2019, the EEOC deemed the Department's disability hiring efforts non-compliant.

Each of the bureaus implemented some form of training, educational and awareness opportunities, and outreach initiatives to improve EDI in the workplace. These efforts resulted in managers and supervisors proactively seeking advice and consultation from subject matter experts in OCR and OHC on a myriad of disability-related questions. More specifically, both OCR and OHC provided advice and consultation on providing reasonable accommodations to employees with disabilities and enhancing the Department's ability to respond to requests for reasonable accommodations by engaging in an interactive process with the requesting employee. This is an improvement from previous years where managers had fewer resources or less access to OCR and OHC subject matter experts on how to handle requests for reasonable accommodation, resulting in failure to accommodate findings of discrimination from the EEOC for accommodations delayed or denied.

- The Department increased the number of women occupying Senior Executive Service positions in its mission-critical occupations, positions that, over the years, had been previously occupied by men. Specifically:

  o The Department appointed an African American woman to serve as Director of the United States Fish and Wildlife Service (FWS), the first time in the Department's history that an African American was nominated and confirmed as FWS Director— the position responsible for developing and implementing policies and management operations designed to conserve, protect, and enhance America's fish, wildlife, plants and habitats for the continuing benefit of our Nation.

  o The Department selected a woman to serve as Deputy Assistant Secretary for Public Safety, Resource Protection, and Emergency Services (DAS-PRE), the position responsible for providing program direction and oversight on law enforcement policy, border security, drug enforcement, training, internal affairs, program compliance and inspections; oversight of the Department's physical, personnel, and

national security programs; and the protection of critical infrastructure such as dams and national monuments and icons.

o   The Department selected an African American woman to serve as Deputy Assistant Secretary for Administrative Services (DAS-AS), the position responsible for providing program direction and oversight over a variety of business and professional services (independent, impartial administrative adjudications, conflict management and collaborative process support, and mineral and land valuation services) for the Department's bureaus and offices. The DAS-AS also provides shared services including facilities management for the Office of the Secretary and human capital, acquisition and financial management services for bureaus and offices within the Department and other external federal agencies.

o   The Department selected an African American woman to serve as the Director of the Office of Civil Rights[2] and the Chief Diversity Officer, the position responsible for designing, developing, and recommending Department-wide EDI strategies, policies and programs that align with and contribute directly to the Department's mission and strategic goals while ensuring compliance with all federal laws and orders. Additionally, the Chief Diversity Officer/Director is responsible for substantiating that each bureau complies with both the EEOC and DOI program objectives with respect to EDI program goals.

o   The Department selected a woman to serve as the Deputy Chief Human Capital Officer who is responsible for human resource strategic planning efforts by providing policies, solutions, oversight, and guidance to further the Department's overall mission to hire the best talent to carry out its mission objectives.

•   DOI maintains more than 1,200 collateral duty diversity partners to help further its EDI message. Collateral duty diversity partners are comprised of Diversity Change Agents

---

[2] As of January 2021, the Departmental Office of Civil Rights was renamed the Office of Diversity, Inclusion and Civil Rights.

(DCA), Employee Resource Groups (ERG), and Special Emphasis Program (SEP) committees. During FY 2019, OCR hosted a series of discussions and facilitated trainings to unite and standardize the diversity partners to achieve intentional results which align with the EEOC's KPIs.

- The Department installed an internal tracking system to monitor allegations of harassing conduct. This tracking system also tracks disciplinary actions taken against supervisors or employees for conduct that contributed to or resulted in harassing conduct. It is important to note that each bureau has its own unique internal tracking system.[3]

Summarization of Self-Assessment Results

Each fiscal year, the EEOC provides a series of questions to federal agencies in an attempt to allow each organization the opportunity to assess its EDI program to determine if deficiencies exist to actualizing a "Model EDI" program. Where deficiencies are noted, federal agencies are expected to take proactive steps to address and correct known challenges and submit a corrective action plan to the EEOC at the close of each fiscal year.

DOI's FY 2019 self-assessment results indicated that the Department has material deficiencies in three Key Performance Indicators (KPIs) of a "Model EDI" program. The deficiencies exist in the areas of: ***Integration of EDI into DOI's Overall Strategic Mission***; ***Management and Program Accountability for EDI***; ***Proactive Prevention Measures to effectuate EDI*** *in DOI*. Moreover, the self-assessment results revealed two additional KPIs, ***Demonstrated Commitment from Agency Leadership for Ensuring EDI***, and ***EDI Program Efficiency,*** are declining such that they will become material deficiencies if intentional actions are not immediately taken. A comprehensive review of the Department's EDI efforts can be found on pages 17-89 of this report.

---

[3] DOI harassment complaint data is centrally tracked for all complaints that rise to the level of an investigation. Complaints that do not rise to the level of an investigation are not centrally tracked at this time.

SIX ESSENTIAL ELEMENTS

Key Performance Indicators (KPIs) of a "Model EDI Program"

E.2 – Executive Summary: Assessment of Six Essential Elements

Harnessing the power of EDI creates advantages. Ensuring equality of opportunity for all employees, valuing differences within the workforce, and creating a workplace in which difference is used as a strategic advantage can enhance DOI's effectiveness and impact. As the Nation continues to change and increase in complexity, recognition of EDI as a vital component of the Department's ability to attract and retain talent and achieve mission success becomes more relevant and necessary. The business imperative for EDI at the Department includes:

- **Full workforce utilization to maximize productivity and effectiveness** – When there are gaps and inconsistencies in employee experience, an organization suffers. Often, the focus of EDI efforts is on avoiding harm to employees, which is the right thing to do. What is not regularly discussed is the harm that is being done to the organization. The Department and its bureaus fail to harness the expertise of its workforce and U.S.— taxpayers fail to receive a return on their investment--when groups of employees are not receiving opportunities commensurate with their knowledge, skills, and abilities. When there are imbalances or gaps in engagement, or when there are significant differences in training opportunities, teams, and ultimately organizations, are operating at less than full performance. In short, inequitable employee experiences can negatively impact DOI's ability to achieve mission success.

- **Better Outcomes** – Best practice organizations leverage EDI to enhance performance outcomes. For example, use of the EEOC's KPIs to develop data-driven EDI strategies and solutions for DOI can not only result in better DOI performance outcomes, but can also increase every employee's opportunity and ability to have an impact on DOI's mission (i.e., being fully utilized). EDI is a win-win strategy.

- **Increased authority and credibility** – Being a model EDI employer requires demonstrating competence in the areas in which an organization evaluates itself and its employees. Effective EDI implementation requires leaders and organizations willing to innovate, lead change and create environments in which all employees feel valued and

15

respected for their unique perspective and contributions, positioning them to achieve excellence and drive mission success. Advancing EDI positions the Department to continue to uphold the DOI values of respect, teamwork, honesty, and fairness.

- **Enhanced problem solving and decision making** –Recent research makes it increasingly clear that organizations with more diverse workforces perform better financially.[4] Diversity is also shown to improve the way organizations approach problem-solving and decision-making.[5] When applied, EDI principles create winning opportunities for DOI to excel in achieving its objectives and mission.

To that end, the EEOC established the Six Essential Elements of a Model EDI Employer as key performance indicators (KPI) to determine the effectiveness of the DOI's proactive preventative measures to demonstrate its commitment to be a model employer for EDI in the federal workplace. The KPIs measure the Department's efficacy in establishing and adhering to policies, practices, and business operations that create a discrimination-free workplace and comport to the requirements set forth by Title VII of the Civil Rights Act and the Rehabilitation Act to identify and eliminate employment barriers to full inclusion.

---

[4] https://www.mckinsey.com/business-functions/organization/our-insights/why-diversity-matters
[5] https://www.nytimes.com/2015/12/09/opinion/diversity-makes-you-brighter.html

DOI ORGANIZATIONAL ACTIVITIES COMPARED TO EEOC KEY PERFORMANCE INDICATORS

KEY PERFORMANCE INDICATORS	DESCRIPTION OF KEY PERFORMANCE INDICATORS	STATE OF DOI PROGRAM COMPLIANCE IN FY 2018	STATE OF DOI PROGRAM COMPLIANCE IN FY 2019
ELEMENT A: Demonstrated Commitment from Agency Leadership	Requires an agency head and other senior management officials to demonstrate a firm commitment to equal employment opportunity, diversity, and inclusion.	Needs improvement in 2 major areas to meet baseline standards	Needs improvement in 6 major areas to meet baseline standards
ELEMENT B: Integration of EDI into the Agency's Strategic Mission	Requires an agency's EDI programs be organized and structured to maintain a workplace that is free from discrimination and supports the agency's strategic mission.	Needs improvement in 10 major areas to meet baseline standards	Needs improvement in 19 major areas to meet baseline standards
ELEMENT C: Management and Program Accountability	Requires an agency to hold all managers and supervisors responsible for the effective implementation of the EDI program and the consistent application of personnel policies.	Needs improvement in 16 major areas to meet baseline standards	Needs improvement in 12 major areas to meet baseline standards
ELEMENT D: Proactive Prevention	Requires an agency to identify and eliminate barriers to equal employment opportunity in the workplace, develop anti-harassment policies and provide reasonable accommodation to people with disabilities.	Needs improvement in 4 major areas to meet baseline standards	Needs improvement in 9 major areas to meet baseline standards
ELEMENT E: Efficiency	Requires an agency to ensure there are effective systems in place for evaluating the impact and effectiveness of the EDI Program as well as an efficient and fair dispute resolution process for complaints processing.	Needs improvement in 4 major areas to meet baseline standards	Needs improvement in 2 major areas to meet baseline standards
ELEMENT F: Responsiveness and Legal Compliance	Requires an agency to be in full compliance with statutes and EEOC regulations, policies, guidance, and other written instructions.	Accomplished all major requirements	Accomplished all major requirements

■ Denotes compliance with all performance measures   ■ Denotes non-compliance with 1 to 6 performance measures   ■ Denotes non-compliance with 7 or more performance measures

ESSENTIAL ELEMENT A:
DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP

The KPI *Demonstrated Commitment from DOI Leadership for ensuring EDI* contains 14 measures that examines a range of factors that considers the Department's effectiveness in actively maintaining a discriminatory-free workplace. The measures include, but are not limited to, the Secretary of the Interior (or designee) issuing written policy statements annually to declare the Department's position against discrimination and harassment, and its support of Department-wide workplace inclusion. The broad dissemination of such policy statements ensures all employees, volunteers, and contractors are informed and adhere to the principles of EDI as a fundamental characteristic of DOI culture. In addition, issuing such policy statements sets expectations and communicates organizational behaviors that conflict with the Department's support of EDI for all of its employees. A detailed list of requirements for this KPI can be found in the appendices of this report.[6]

An assessment of the overall FY 2019 program performance for this KPI revealed that DOI regressed in meeting the established standards. The Bureaus of BSEE and BOEM did not comply with six or more KPIs. Most importantly, the Secretary of the Interior (or designee), did not issue a written policy statement regarding EDI and anti-harassment for nine consecutive years.

Bureau	Met Measures FY 2018	Met Measures FY 2019	Unmet Measures FY 2018	Unmet Measures FY 2019
BIA	14	14	0	0
BOEM	13	8	1	6
BOR	14	14	0	0
BSEE	13	8	1	6
FWS	14	14	0	0
NPS	14	14	0	0
OSMRE	13	14	1	0
USGS	14	14	0	0
OS	13	13	1	1

Special Note: Due to the lack of staff in the Office of Civil Rights at the Bureau of Land Management (BLM), in FY 2019 BLM did not complete an annual MD-715 annual report or a

---

[6] EEOC Part G Self-Assessment Check List

program self-assessment as of the completion of this annual report. BLM is therefore not included in this annual report.

The Department's senior leaders have taken steps to affirm the Department's leadership commitment to EDI. Throughout FY 2019, across the Department, senior leaders implemented a number of initiatives to ensure internal accountability, improve work-life balance, instill professionalism, and increase the early resolution of workplace conflicts, all of which have served to enhance DOI's overall performance.

Successes:

- The Department issued specific goals to hire, develop, and advance people with disabilities and targeted disabilities in DOI's workforce.

- In the spring of FY 2019, the Assistant Secretary for Policy, Management and Budget invited all employees to participate in an anonymous, four-question values survey to learn about the workplace culture DOI employees envisioned. Employees were asked to share the words they would use to describe the current DOI culture, their ideal DOI work environment, and suggestions for improvement. An impressive 10,094 employees responded; the high response rate sent a clear message that employees want to be heard and want to help shape DOI's workplace culture. Because almost 90 percent of the respondents chose respect, teamwork, honesty, and fairness as words to describe their ideal workplace, the Department has adopted these characteristics as its Core Values.

- In the spring of FY 2019, the Assistant Secretary for Policy, Management and Budget, established the Departmental Workplace Culture Transformation Advisory Council (WCTAC). The WCTAC is comprised of Senior Executive Service leaders from the bureaus and the Office of the Secretary. The WCTAC convenes regularly to address the Department's progress towards eliminating harassment across DOI, improving employee engagement, maintaining high ethical standards, and promoting recruitment and retention efforts to support the Department's aim to become one of the best places to work in the federal government. The WCTAC is accountable for advancing workplace culture change efforts across the Department.

The leaders who comprise the WCTAC establish the vision and direction for Department-wide programmatic actions carried out across DOI to ensure positive changes occur continually with data driven metrics to assess the effectiveness of their efforts.

- In October 2019, DOI launched a WCTAC website to keep employees informed about the progress of actions taken to prevent and respond to harassing conduct and improve DOI's workplace culture.

- In the Office of Inspector General (OIG) Evaluation Annual report 2018-WR-006: "*Opportunities Exist to Improve the U.S. Department of the Interior's Efforts to Address Sexual Harassment*" issued on July 31, 2019, one of the recommendations was to ensure that all employees received training that is consistent in quality and content. To implement this recommendation, DOI launched 72 in-person training sessions on *Bystander Intervention and Intergenerational Sensitivity* to provide employees with a variety of strategies to stop unwelcome, inappropriate, and unprofessional behavior. Based on the feedback from training participants, the Department intends to expand this training in FY 2020 to specifically address the roles, rights, and expectations for employees to prevent and eliminate harassing conduct.

- The Office of Collaborative Action and Dispute Resolution (CADR) provided leadership, guidance, and assistance to employees utilizing a wide variety of collaborative and alternative dispute resolution processes. CADR supported intra-organizational collaboration, dispute resolution, and engagement with external stakeholders on natural resources, public lands, and tribal issues. CADR serves as an independent, impartial, informal, and confidential resource for employees. In FY 2091, CADR ensured that employees had immediate access to an OMBUDS to provide a safe, confidential space to discuss concerns, explore options and possible solutions to any work-related issue, and help employees at all levels address conflict or other situations they may be experiencing. s to explore to employees for the resolution of individual and systemic issues employees faced in the organization.

Areas Requiring Improvement:

The element of Demonstrated Commitment of Agency Leadership is one of the three KPIs of a Model EDI Program that pose the greatest risk for the Department, in that more than 57 percent of the required measures within this KPI were not fulfilled during the reporting year. The impact of these unmet measures was evidenced in the frequency in which retaliation and harassment were the basis and issue alleged in complaints of discrimination filed against DOI for five consecutive years. In FY 2019, approximately 800 formal complaints of discrimination were filed against the Department. Of the 800 formal complaints, 151 involved allegations of harassment and 151 involved allegations of retaliation. In FY 2018, 197 formal complaints alleged retaliation and 188 formal complaints alleged harassment. In FY 2017, 269 formal complaints alleged retaliation, and 165 formal complaints alleged harassment.

The Secretary of the Interior (or designee) can correct this deficiency by establishing and disseminating a departmental EDI policy statement and enacting proactive measures to hold DOI's leaders accountable for promoting and implementing EDI in their organizations.

Recommendations for Improvement:

1. Develop and issue comprehensive policy statements for Equity, Diversity, and Inclusion and ensure broad dissemination and accountability.

2. Acknowledge and reward organizational leaders and offices that exhibit the behaviors that foster EDI in the workplace. Prominently highlight on multiple DOI platforms those leaders and employees that exemplify DOI as a "Model EDI Employer".

3. Make promoting and implementation of EDI a factor for bonuses, promotions, key assignments, and the like.

ESSENTIAL ELEMENT B:

INTEGRATION OF EDI INTO DOI'S OVERALL STRATEGIC MISSION

The KPI *Integration of EDI into DOI's Overall Strategic Mission* requires DOI and its leaders to view EDI as an integral part of its strategic plan and operate from the perspective that the success of transforming the workplace culture, increasing employee engagement, and achieving optimal employee performance rests in DOI's embrace and utilization of EDI as a foundational ingredient for mission success. Additionally, success in this KPI is enhanced if the Department organizes and structures its EDI programs to serve as a catalyst and conduit for maintaining inclusivity, a workplace free from discrimination, and as a resource for employee preparedness to support the Department's top priorities.

An assessment of the overall DOI program against this KPI reveals that a combination of deficiencies exists in this element that raises a reasonable possibility that the operational controls for integrating EDI as a strategic focus in DOI may be ineffective. In FY 2019, the OCR sent an audit team to each bureau to conduct a line-by-line assessment of its EDI program. The audit revealed several programmatic deficiencies for this KPI. The annual report for seven out of the ten bureau identifies program deficiencies for this KPI. One bureau, the Bureau of Land Management (BLM), did not provide a self-assessment, nor availed itself of an internal Audit from the OCR during 2019. In addition, OCR does not have sufficient staff to dedicate to OS to ensure the OS is aware of and regularly complies with the measures in this KPI. Only one bureau, the Fish and Wildlife Service (FWS), met all measures for this KPI.

It is also important to note that in years past, with OCR not having management control over the bureau EDI programs, each of the bureaus had autonomy for monitoring its own EDI program performance and self-annual reporting to both the EEOC and DOI regarding its performance in each of the KPIs.

Bureau	Met Measures FY 2018	Met Measures FY 2019	Unmet Measures FY 2018	Unmet Measures FY 2019
BIA	39	32	0	7
BOEM	35	31	4	8
BOR	34	31	5	8
BSEE	35	31	4	8
FWS	39	39	0	0
NPS	38	34	1	5
OSMRE	38	36	1	3
USGS	35	34	4	5

Special Note: Due to the lack of staff in the Office of Civil Rights at the Bureau of Land Management (BLM), in FY 2019 BLM did not complete an annual MD-715 annual report or a program self-assessment as of the completion of this annual report. BLM is therefore not included in this annual report.

The EEO Director serves as a direct report to the bureau head in six out of ten bureaus within the Department. Of the six, not all Directors are included in discussions with their bureau's senior leadership, SOL, or HR regarding decisions that impact recruitment, training, career development, succession planning, field office closures and any other significant change occurring within their respective bureaus. The lack of inclusion of EEO staff in critical organizational discussions places the Department in the position to fail to understand the full impact its decisions have on the entire workforce population, resulting in an adverse impact on employees in the workforce. Additionally, neither the Departmental OCR nor bureau EEO offices are consulted for an impact analysis/es or strategy recommendation(s) to mitigate risks prior to major decisions occurring in the workforce that can impact employees.

Successes:
- Multiple bureau EEO staff conducted reviews of bureau-level policies, programs, and practices to assess for employment barriers.
- The EEO Directors in each of the bureaus continue to maintain control over the full operation and execution of program responsibility for their EDI portfolios. The budget

and funds for: development and execution of a comprehensive complaints management program, travel to ensure efficient field office operations, staff training and development, materials, supplies, and overall program responsibility is within the EEO Director's command and control.

- The Department's FY 2018 to 2022 Strategic Plan established goals, objectives, and performance measures to ensure DOI attracts, develops, and retains a talented and diverse workforce to protect and manage the natural resources and cultural heritage over which the Agency has stewardship. The strategic plan also holds leadership accountable for guiding efforts to ensure a workplace environment within the Department that is safe, fair, and conducive to employee productivity.

- Managers and supervisors support employee engagement as a resource to gain more context about employee perspectives and ideas to improve the workplace environment. DOI gathers employee opinions through tools including the OPM Federal Employee Viewpoint Survey (FEVS), and other documents that annually report employee engagement, such as the Partnership for Public Service Best Places to Work in the Federal Government rankings. The Department utilized an internal website to provide employees access to survey results.

- The U.S. Fish and Wildlife Service (FWS) Executive Diversity Committee (EDC) provides oversight and guidance for the planned activities in the FWS Five-Year Strategic Diversity and Inclusion Implementation Plan (DIIP) FY 2020 - FY 2024. The FWS FY 2020 – FY 2024 DIIP has a strong focus on accountability. The FWS DIIP sets forth strategic objectives to engage employees at all levels of the organization and to communicate the roles and responsibilities each employee has in ensuring a diverse and inclusive workforce.

- The Bureau of Land Management (BLM) Inspire Program (an affiliate of the OPM Pathways Student and Recent Graduate Program) assisted in the recruitment of BLM

mission-critical occupations, including Science, Technology, Engineering, and Math (STEM) career fields.

- The DOI Office of the Secretary (OS), Office of Civil Rights was realigned to report directly to the Principal Deputy Assistant Secretary for Policy, Management and Budget. This realignment was previously reported to the EEOC during the prior two EEOC technical assistance visits.

- The OCR Director/Chief Diversity Officer conducts monthly meetings with bureau EEO Directors to provide regular updates, including data on compliance statistics for each of their respective programs, to strategize and standardize EDI efforts, and other EEO-related functions.

- The OCR Director/Chief Diversity Officer and the Deputy Chief Human Capital Officer (DCHCO) established bi- weekly meetings to discuss and collaborate on pertinent plans, policies, and practices to determine its impact on employees.

- The OCR Affirmative Employment Programs Division conducts monthly meetings with diversity partners throughout the Department to unify and standardize EDI efforts.

Areas Requiring Improvement:

As previously stated, the essential element of Integration of EDI into DOI's Overall Strategic Plan has a series of program deficiencies that reasonably suggest that the operational controls for this element are lagging or non-existent. More than 51 percent of the required measures for this KPI were not met in seven out of ten bureaus.

Seven out of ten bureau EEO offices and the Departmental OCR lacked sufficient staffing and funding to ensure the efficient and successful operation of the Department's overall EDI program. With the exception of FWS and USGS, none of the bureaus' EEO offices had sufficient staff or budgets to conduct a thorough barrier analysis to proactively identify barriers to equal employment opportunity and institute measures to foster inclusion and avert discriminatory practices. For

instance, eight out of ten bureaus and the Departmental OCR did not have a designated Disability Program Manager or other Special Emphasis Program Managers with oversight by or annual reporting to the Departmental OCR to ensure teams fulfilled statutory requirements for EDI in the workplace.

For five or more consecutive years, the EDI program in the Departmental OCR and multiple bureau EEO offices were relegated to "reactive complaints management." Eighty percent or more of the staff and funding allocated to the Departmental OCR and bureau EEO offices goes toward processing complaints of discrimination and reacting to findings of discrimination by oversight and adjudicatory agencies including the EEOC, the Merit Systems Protection Board, and the Office of Special Counsel. Insufficient staff and funding meant that the Departmental OCR and multiple bureau EEO offices were unable to focus on proactive prevention measures to minimize risks, reduce waste, eliminate abuse, and help the Department establish a culture that fosters inclusion and employee preparedness.

The inability of the Departmental OCR and bureau EEO offices to focus staffing and resources on proactive prevention, diversity and inclusion, and outreach is evidenced by the low overall number of employees participating in the OPM FEVS administered each year, exit survey data obtained from departing employees, and the sharp decline in the diversity of the workforce based on the population of diverse employees separating from the workforce year after year[7]. For example, Hispanic/Latino employees, and employees with disabilities, are leaving at an equal or greater rate than DOI is onboarding these groups.

Recommendations for Improvement:
1. Standardize the reporting structure for the Departmental OCR Director/Chief Diversity Officer and bureau EEO Directors to ensure each leader is appropriately aligned as a direct report to the Department/Bureau head and/or the same Executive designee as other mission-related programmatic offices report.

---

[7] A detailed listing of workforce demographics (Workforce Data Tables) are located in the Appendices of this report.

2. Establish an Executive Council to oversee and maintain leadership focus on EDI throughout the Department.

3. Establish an internal process that gives the Departmental OCR Director/Chief Diversity Officer responsibility for providing performance input and/or performance feedback to bureau heads regarding each bureau's EEO office to ensure standardized implementation of EDI strategic priorities and statutory/regulatory requirements throughout the Department.

4. Provide sufficient staffing and funding to the Departmental OCR and each bureau EEO office to ensure adequate resources are available to carry out EDI strategic priorities and statutory/regulatory requirements.

5. Appoint full-time Disability Program Managers and other Special Emphasis Program Managers to the Departmental OCR and each bureau EEO office. Realign the Department's Employee Resource Groups' operational activities under the OCR and bureau EEO offices to ensure consistency of utilization of ERGs aligned with the Department's strategic goals.

6. Standardize internal policy and processes to ensure senior managers are accountable for demonstrating a high level of commitment to the Merit System Principles; Standards of Ethical Conduct for Federal Employees; equal employment opportunity; whistleblower protection; and anti-discrimination and anti-harassment laws, regulations and policies. In addition, standardize internal policy and processes to ensure senior managers have a significant positive impact on fostering an inclusive, safe and fair work environment; strengthening diversity and inclusion; and improving employee engagement. Incorporate this responsibility specifically into the performance plans for every manager and supervisor in the Department.

7. Establish a mechanism to track, process and ensure timely response to requests for reasonable accommodation.

8. Implement Department-wide measures that track senior manager's progress in establishing and implementing EEO and Diversity and Inclusion (D&I) strategic priorities.

ESSENTIAL ELEMENT C:

MANAGEMENT AND PROGRAM ACCOUNTABILITY FOR EDI

The KPI *Management and Program Accountability for EDI* requires the Secretary of the Interior and each bureau head to hold all managers, supervisors, and program officials responsible for the effective implementation of DOI's EDI Program and Plan. More specifically, the measures in this KPI focus on an agency's efforts to ensure managers and supervisors are equipped and held accountable for resolving workplace issues and addressing conflicts; have the appropriate soft skills, e.g. interpersonal and communication skills and emotional intelligence, to effectively manage and optimize the performance of diverse employees; have the skills and ability to promptly provide reasonable accommodation solutions and remove barriers to employment of people with disabilities; and where appropriate, take disciplinary action to promptly address and correct behaviors that operate contrary to the tenets of a model employer.

An assessment of this KPI revealed a combination of deficiencies that raises a reasonable possibility that the operational controls for Management and Program Accountability for EDI can be improved. Below is a breakout by bureau and office of the total measures met and unmet in this KPI during FY 2018 and FY 2019.

Bureau	Met Measures FY 2018	Met Measures FY 2019	Unmet Measures FY 2018	Unmet Measures FY 2019
BIA	38	39	5	5
BOEM	37	39	6	5
BOR	40	41	3	3
BSEE	37	39	6	5
FWS	43	44	0	0
NPS	40	43	3	1
OSMRE	43	44	0	0
USGS	41	43	2	1

Special Note: Due to the lack of staff in the Office of Civil Rights at the bureau of Land Management (BLM), in FY 2019 BLM did not complete an annual MD-715 annual report or a program self-assessment as of the completion of this annual report. BLM is therefore not included in this annual report.

Successes:

- Towards the end of FY 2018, OHC conducted an internal assessment of the HR operations function across the Department to identify strategic and organizational approaches and opportunities to better engage as strategic partners with the operational HR offices within the bureaus and OS to better service the employees. During the third quarter of FY 2019, OHC utilized an external vendor to analyze and assess HR functions across the Department. At the conclusion of the assessment, senior leaders from across the Department were invited to discuss and clarify the findings of the HR assessment. The OCR leaders were among the leadership team that collaborated with the OHC and the HR operations leaders to provide feedback on the results and projected next steps in the process.

- The Department instituted measures to comply with Section 501 of the Rehabilitation Act to ensure Affirmative Action measures were established for the Recruitment, Hiring, and Advancement of Individuals with Disabilities throughout the Department. In support of this endeavor, OCR and OHC collaborated and issued joint messaging to the workforce regarding DOI-wide numerical goals (2 percent for persons with targeted disabilities and 12 percent for persons with disabilities). As a result of this partnership, 12.5 percent of new hires at the end of FY 2019 were people with disabilities (PWDs), and 3.1 percent were people with targeted disabilities (PWTDs). Additionally, during this same time, Schedule A hires constituted 4.3 percent of all new hires, exceeding the steady 2.9 percent of Schedule A hires by the Department in previous years.

- All supervisors and managers have obligations to prevent discrimination and harassment embedded in the mandatory managerial/supervisory critical element in supervisory performance standards. Supervisors and managers are evaluated on their compliance with these standards. The Departmental OCR Director/Chief Diversity Officer is evaluated in part on the Department's compliance with anti-harassment and anti-discrimination obligations.

- In FY 2019, the Departmental OCR assessed the majority of the bureau EDI Programs to ascertain shortfalls and deficiencies. As noted above, due to the scarcity of staffing at the BLM

OCR following BLM's relocation, the BLM EDI program was not assessed during this reporting year.

- bureau employees across the Department were provided ongoing coaching, counseling, and training and meaningful distinctions were made among employees based on their performance and their contributions to the organization, regardless of their protected EEO group distinction. Effective reasonable accommodation procedures were made available on web pages as well as in-person by the bureau Reasonable Accommodation Coordinator or designee. Leaders had frequent contact with OHC when engaging in the reasonable accommodation process to ensure that DOI continuously reviewed requests and made decisions to act on requests for accommodations consistent with DOI policy and procedures. OCR partnered with OHC to provide consistent messaging on the reasonable accommodation process and to provide guidance and direction to managers and supervisors during the reasonable accommodation process.

- The OHC Workforce Relations Division leads the Reasonable Accommodation Community of Practice (CoP) monthly discussions. The Reasonable Accommodation CoP convenes to share standardized knowledge and a unified approach to providing reasonable accommodation guidance and solutions. Staff members from the Departmental OCR AEP Division are active participants in the discussions and often provide key guidance to the group.

- bureau EDI program officials provide advice, guidance, feedback, and technical assistance to bureau leadership in making informed decisions regarding recruitment and retention of each bureau's diverse workforce population. Some bureaus provide recurring demographic updates to organizational leaders throughout the year regarding the bureau's diversity management and inclusion objectives. Management officials strive to complete all mandatory training requirements and ensure subordinate staff complete training requirements within the specified timeframes.

- DOI consistently acts promptly to comply with all EEOC orders and other orders issued by the Merit Systems Protection Board (MSPB) containing findings regarding harassment or discrimination.

- OCR ensured practitioners across the Department received appropriate training to fulfill program objectives. During the reporting year, practitioners received Refresher Counselor, Basic MD-715, and Barrier Analysis training; training on the internal workforce database system – Oracle Business Intelligence Enterprise Edition (OBIEE); and Micro Inequities – Unconscious Bias training.

- DOI created specific questions and collected and analyzed data related to employee's experiences with harassing conduct on the FY 2019 Federal Employee Viewpoint Survey (FEVS). Highlights include:

  o 18.4 percent of respondents indicated having experienced harassing conduct, down from 38 percent of respondents in a similarly worded question from the Department's internal FY 2017 Work Environment Survey.

  o 93.7 percent of respondents know where to report harassing conduct they may experience or witness.

  o 90 percent of respondents understand there are multiple resources available for seeking assistance about harassment-related concerns.

  o 83 percent of supervisor respondents indicated that they received appropriate training and tools to promptly address allegations of harassing conduct brought to their attention.

- The FEVS Inclusion Quotient (IQ) data is made up of 20 questions that relate to the five habits of an inclusive workplace environment: Fair, Open, Cooperative, Supportive, and Empowered. Inclusion is defined by the Office of Personnel Management (OPM) as intentional, deliberate and proactive acts that increase work group intelligence by making people feel they "belong"

and are "uniquely" valued. The habits of an inclusive workplace environment represent both organizational and employee behaviors. DOI's FY 2019 FEVS IQ score was 61 percent, which is low when compared to other federal agencies similar in size to DOI. For two consecutive years, DOI's rating in the FEVS scores measuring its support for diversity was below other federal agencies of similar size. In FY 2020 and beyond, DOI does not intend to continue using the IQ to measure its effectiveness in EDI; instead, it will evaluate employee responses to the "Support for Diversity" questions in the FEVS.

Federal Employee Viewpoint Survey: Diversity & Inclusion – The New IQ Index
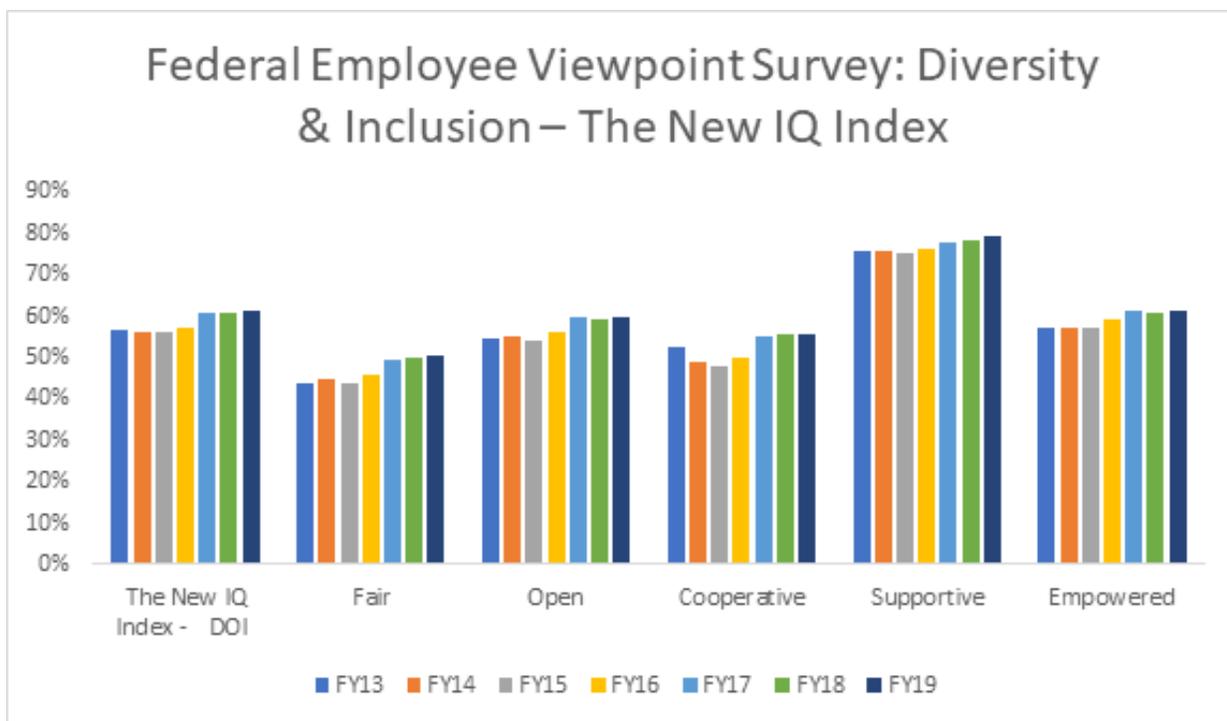
- The U.S. Geological Survey (USGS) conducted barrier analysis with "The Roadmap to Inclusion (TRI)" effort, which examined policies, programs, and practices within USGS offices to assess whether program deficiencies exist and the effectiveness of their efforts to remove barriers to equal employment opportunity.

- OHC published and disseminated its "InHR" Quarterly Newsletter, which covers various topics relating to EDI. Each InHR edition reports trending issues, hot topics, workplace

concerns, upcoming training, and events. The newsletter continues to receive positive feedback for its content and usefulness to the civil rights and HR communities.

- For the third year, the U.S. Fish and Wildlife Service (FWS) established an organization wide FWS Barrier Analysis Team to help identify and eliminate barriers to equal employment opportunity within FWS. The team conducts an in-depth examination of barriers pertaining to the recruitment, hiring, and retention of women, minorities, and persons with disabilities.

Areas Requiring Improvement:

1. Standardization and the consistent use of business rules and processes throughout the Department regarding when and how to use special hiring authorities.

2. Standardization of competencies for the same mission-critical positions within bureaus and across the Department.

3. Standardized announcements and utilization of detail opportunities and notifications to employees of career advancement opportunities. At present, the variations in processes, procedures, and policies for training, development, and career advancement in bureaus and the OS serves as an impediment for full inclusion and maximized performance for all DOI employees.

Recommendations for Improvement:

1. Establish procedures to ensure personnel policies regarding Schedule A Hiring for people with disabilities are clear and consistently applied throughout the Department.

2. Develop processes and procedures to ensure OS and all bureaus regularly assess their organizations, including regional and field offices for possible program shortfalls and deficiencies.

3. Ensure senior managers and supervisors actively partner with OCR and OHC to identify and remove barriers to equal employment opportunity.

4. Implement a tracking system and review process to ensure all requests for reasonable accommodations are processed within the established timeframes in the Department's policy and procedures for reasonable accommodation.

5. Establish recurring annual reporting on the percentage of requests for reasonable accommodation that are processed in a timely manner and conduct a root cause analysis to identify and remove impediments to providing reasonable accommodation solutions.

6. Revise the existing reasonable accommodation policy and procedure to comply with Section 501 of the Rehabilitation Act's final rule. Compliance includes but is not limited to the following factors: a) uniformity in requesting and issuing accommodation solutions across the Department, b) the expedient deliverance of accommodation solutions, c) a transparent appeal process when requests for reasonable accommodations are denied, d). an effective means of training newly appointed supervisors on their roles and responsibilities in the workplace, and e). establishing and utilizing a Department wide tracking system.

7. Establish a Department-wide tracking system to account for the timely issuance of reasonable accommodation solutions.

8. The bureau of Reclamation should establish internal procedures to ensure all of its State EEO Managers have access to the head of their respective organizations or Executive designees to recommend improvements and corrections, including remedial or disciplinary actions for substantiated findings of discrimination by managers and supervisors who have failed in responsibilities to prevent discrimination and/or harassment in the workplace.

9. Develop internal processes for dissemination of and review/analysis of exit interviews, workplace climate assessment surveys, and grievance data from OHC and CADR.

10. Train managers and supervisors on the requirements of the Department's affirmative employment responsibilities for people with disabilities.

11. Actively involve managers and supervisors in removing employment barriers for people with disabilities.

12. Establish consistent procedures throughout the Department to discipline managers and employees who have engaged in substantiated discriminatory conduct.

13. Develop internal policy and procedures to ensure all employees, managers, and supervisors are aware of the penalties for engaging in discriminatory behavior or engaging in prohibited personnel actions.

14. Establish partnerships and timetables to review OS and bureau policies, practices and procedures for merit promotion, employee recognition and award programs, and employee development and training for systemic barriers that may impede full utilization of development and career advancement opportunities by all employees.

15. Establish internal procedures to ensure all bureau EEO Directors and HR Directors meet regularly to assess whether personnel programs, policies, and procedures conform to employment laws and regulations.

ESSENTIAL ELEMENT D:
PROACTIVE PREVENTION MEASURES TO EFFECTUATE EDI IN DOI

The KPI *Proactive Prevention Measures to Effectuate EDI in DOI* requires the Secretary of the Interior or designee to make early efforts to prevent discriminatory actions and eliminate barriers that impede free and open competition in the workplace. This element seeks to ensure that the Department proactively assesses its internal processes, policies, and procedures on a recurring basis to determine where impediments may operate to exclude any group and develop strategic plans to eliminate identified barriers.

An assessment of the overall DOI program revealed that a combination of deficiencies exists in this KPI that raises a reasonable possibility that the operational controls for Proactive Prevention efforts across the Department need improvement. The ineffectiveness of the Department's progress in this KPI is in large part due to the lack of staffing and funding in the Departmental OCR and bureau EEO offices. This lack of staffing and funding means that the Departmental OCR and bureau EEO offices cannot effectively develop and execute proactive prevention measures to get to the root cause of anomalies found in the data or lead Departmental efforts to effectuate climate change. In the absence of appropriate staffing in the Departmental OCR and bureau EEO offices, employees without the legal authority, training, or subject matter expertise on EEO-related matters conducted meetings and provided consultation services, training, guidance and direction to organizations, managers/supervisors and senior leaders regarding EDI.

In addition, there is considerable confusion surrounding the implementation of Personnel Bulletin 18-01 (PB 18-01). Because of the confusion, incidents of harassment may not be accurately tracked and or annually reported either within the PB 18-01 process or to the Departmental OCR. Moreover, because of this confusion, employees have also reported they were unaware of the ability to dual track concerns by timely initiating the discrimination complaint process while simultaneously raising concerns regarding harassment as part of the PB 18-01 process.

Below is a breakout by bureau and office of the total measures met and unmet in this KPI during FY 2018 and FY 2019.

Bureau	Met Measures FY 2018	Met Measures FY 2019	Unmet Measures FY 2018	Unmet Measures FY 2019
BIA	13	9	1	5
BOEM	13	7	1	7
BOR	13	7	1	7
BSEE	13	7	1	7
FWS	14	14	0	0
NPS	14	12	0	2
OSMRE	13	12	1	2
USGS	13	11	1	3

Special Note: Due to the lack of staff in the Office of Civil Rights at the Bureau of Land Management (BLM), in FY 2019 BLM did not complete an annual MD-715 annual report or a program self-assessment as of the completion of this annual report. BLM is therefore not included in this annual report.

DOI has a diverse and competitive workforce, with employees serving in a variety of mission-critical occupations as Scientists, Park Rangers, Ranger Technicians, Hydrologists, Engineers, Geologists, Foresters, Geophysicists, Criminal Investigators, Compliance Officers, and Environmental Specialists. As DOI worked towards attracting and developing an even more diverse talent pool, some groups were exiting the workforce at an equal or greater rate than they were onboarded, which thwarted the Department's recruitment efforts.

Successes:

- The Department's Affirmative Action Plan for Individuals with Disabilities was posted to DOI's public website.

- DOI instituted a zero-tolerance standard for discrimination, retaliation, unlawful harassment or harassing conduct, and misconduct that may fall short of violating the Department's policy against harassing conduct (PB 18-01) or constituting illegal harassment but that nevertheless contributes to unsafe, unwelcoming workplace

environments in DOI. The Department continues to be vigilant in taking prompt and immediate steps to address all allegations of discrimination, retaliation, and harassment.

- Complaint processing and reasonable accommodation information are made available to employees and applicants for employment on DOI's website.

- Employees are encouraged to utilize CORE PLUS, a coordinated system approach to conflict management within DOI that focuses on maximizing the use of early conflict management tools. These tools range from informal options, such as open-door policies for supervisors, training, team building, and open dialogue, to mediation or facilitation, or working with an OMBUDS to improve interpersonal communications between and among employees and supervisors and to preserve relationships between and among employees and supervisors rather than advancing adversarial positions and win-lose outcomes.

- DOI continues its proactive approach to accommodating individuals with short-term impairments through its Mobility Program. The Program is an assistive service that provides individuals who have temporary impairments with accommodations such as motorized scooters. The Mobility Program is ideal for individuals recovering from surgery, illnesses, or injuries. These mobility accommodations allow individuals to return to work earlier than would otherwise be possible, and to have equal access to DOI facilities. Since its inception in July 2012, the Mobility Program has provided temporary devices to DOI employees, applicants, and visitors.

- The Selective Placement Program Coordinators (SPPC) throughout the DOI help managers and supervisors recruit, hire, and accommodate individuals with disabilities. In FY 2019, OHC hired a senior SPPC to oversee departmental actions towards achieving the affirmative action hiring goals set forth by the EEOC. Throughout the reporting year, the OS SPPC worked collaboratively with each of the designated bureau SPPCs to expand its efforts to appropriately align the program to respond to job seekers requiring assistance. In addition, OPM updated its federal agency-wide SPPC Directory to include DOI SPPCs.

- During the first quarter of FY 2019, the Department launched its highly anticipated paperless performance management system, which brings better clarity, transparency, and organization to the documentation requirements of the performance management program. With this launch, most DOI employees will use DOI Talent to create performance plans and conduct mid-year evaluations and year end performance evaluations, formerly completed on the paper DI -3100 and DI-3100S employee and supervisor appraisal forms. Also, with the launch of the automated performance plans, DOI Talent became the Department's first enterprise-wide talent management system.

Areas Requiring Improvement:

A review of DOI's FY 2019 performance against the measures for this KPI revealed that more than 69 percent of the required actions in this element were not met throughout the Department at the close of the FY. The area of Proactive Prevention is the element that poses the greatest risk for DOI because the lack of success in this element impedes employee productivity and the retention of quality employees, it weakens morale for our diverse staffs, increases legal expenses, and diminishes the Department's ability to build a reputation for being a model EDI employer. Consequently, creating an organizational culture and environment for employees that encourages equity, diversity, and inclusion and dissuades discrimination in any form is critical for continued organizational and mission success.

Recommendations for Improvement:

1. Develop strategic plans to track and analyze recruitment processes and procedures to identify potential barriers.

2. Establish internal processes to ensure consistency in utilizing all available data, to identify triggers to potential barriers to equal opportunity and the ability to sustain respectful and safe workplaces across the Department.

3. Develop guidance for use by leaders at all levels across the Department to consider the impact that human resource decisions such as re-organizations and realignments have on

groups of employees and develop remedies to mitigate impact prior to finalizing such organizational objectives.

ESSENTIAL ELEMENT E

EDI PROGRAM EFFICIENCY

The KPI *EDI Program Efficiency* requires the Secretary of the Interior or designee to ensure there are effective systems in place for evaluating the impact and effectiveness of the Department's complaints management program and to establish an efficient and fair dispute resolution process.

This KPI consists of 32 measures to determine the Department's compliance with establishing an efficient EDI program. Below is a breakout by bureaus of the measures met and unmet in this KPI in FY 2018 and FY 2019. Overall, the Department was very successful, even improving on its strong FY 2018 performance of this particular KPI.

Bureau	Met Measures FY 2018	Met Measures FY 2019	Unmet Measures FY 2018	Unmet Measures FY 2019
BIA	31	32	1	0
BOEM	31	31	1	1
BOR	29	32	2	0
BSEE	31	31	1	1
FWS	31	32	1	0
NPS	31	32	1	0
OSMRE	31	31	1	1
USGS	31	31	1	1

Special Note: Due to the lack of staff in the Office of Civil Rights at the Bureau of Land Management (BLM), in FY 2019 BLM did not complete an annual MD-715 annual report or a program self-assessment as of the completion of this annual report. BLM is therefore not included in this annual report.

DOI maintains an effective complaints management program that ensures complaints of discrimination are fairly and thoroughly investigated and final actions are taken in a timely manner. The Departmental OCR and bureau EEO offices implemented several proactive initiatives to ensure the Department is meeting the EEOC's statutory and regulatory requirements for timely processing complaints. These initiatives ensured the Department consistently processed pre-complaints and formal complaints well within the regulatory complaints processing timeframes. The Departmental OCR ensures that its complaint processing function remains neutral

and is kept separate from the Department's legal defense arm. The Departmental OCR continues to evaluate its complaint processes to improve early resolution of complaints and analyze complaints processing data to develop solutions for continuously enhancing processing at all stages of the complaints process from the initial counseling stage through resolution.

DOI EEO counselors conducted intake on 508 new pre-complaints in FY 2019, down 20 percent from FY 2018. This translates to 0.9 percent of DOI's workforce who initiated the EEO process, better than the federal sector average of 1.1 percent. Regarding formal complaints, in FY 2019 DOI EEO practitioners processed 294 new formal complaints filed, a decrease of 22 percent from FY 2018. This translates to 0.5 percent of the workforce who filed formal complaints in FY 2018, consistent with the federal sector average of 0.5 percent. The Departmental OCR, Employment Complaints & Adjudication Division (ECAD) provides policy guidance and technical assistance to bureau EEO offices regarding consistent application of EEO complaints processing timeframes and standards at every stage of the EEO process, including EEO counseling, acceptance/dismissal, and EEO investigations.

Areas Requiring Improvement:

At the close of FY 2019, there were only two deficiencies identified for this KPI. Both deficiencies are being actively addressed by the Department's Office of Human Resources, in collaboration with the Departmental OCR and bureau EEO offices, with expected full resolution before the end of FY 2020. The two deficiencies are: (1) obtaining and providing full access to applicant flow data; and (2) establishing a comprehensive tracking system for reasonable accommodations.

Recommendations for Improvement:

1. Establish a system to capture applicant flow data to collect demographic information on candidates applying for positions at the Department. Applicant flow data will help the Department analyze the effectiveness of the Department's recruitment efforts to attract diverse candidates when vacancies arise, the percentage of candidates from particular demographic groups in an applicant pool, if there are trends in candidates who were

deemed qualified, and the selection rate of candidates from particular demographic groups for particular vacancies.

2. Establish a centralized exit survey data collection system to gather information from employees separating from the Department. Collecting exit survey data in a data collection system will allow the Department to track exit interview data, analyze the results, and identify any trends.

3. Establish a centralized reasonable accommodation tracking system. A reasonable accommodation tracking system will help the Department gather data regarding the efficiency and effectiveness of the Department's ability to provide reasonable accommodations solutions in a timely manner pursuant to the EEOC's regulations and the Department's policy.

4. Provide adequate staffing levels and authority for the Departmental OCR and each bureau EEO office to ensure their successful operation and ensure that reasonable efforts are made to identify and remove workplace practices, policies, or procedures that impede maximum utilization of employee with disabilities.

Complaint Activity

Findings of Discrimination

In FY 2019, there were four findings of discrimination issued against the Department by an EEOC Administrative Judge (AJ). The four findings had different case numbers but stemmed from two formal complaints.

The first finding of discrimination held that the Department subjected the complainant to reprisal, and age and sex-based harassment. The second finding against the Department held that the Department subjected the complainant to a hostile work environment based upon sex. Both decisions were fully implemented by the Department.

Efficiency of Complaints Processing

- 93.7 percent of DOI's 556 pre-complaints were counseled in a timely manner, slightly below the federal sector average of 94.4 percent;

- DOI had a merit FAD timeliness rate of 72.5 percent. DOI significantly outperformed the federal sector average timeliness rate of 60.8 percent; and

- 83.1 percent of investigations were timely completed, well above the federal sector average of 73 percent.

Formal Complaints

Regarding formal complaints, reprisal was the most frequently alleged basis, followed by age, sex, and disability. Harassment was by far the most frequently alleged issue, followed by assignment of duties, terms/conditions of employment, appointment/hire, and reasonable accommodation.
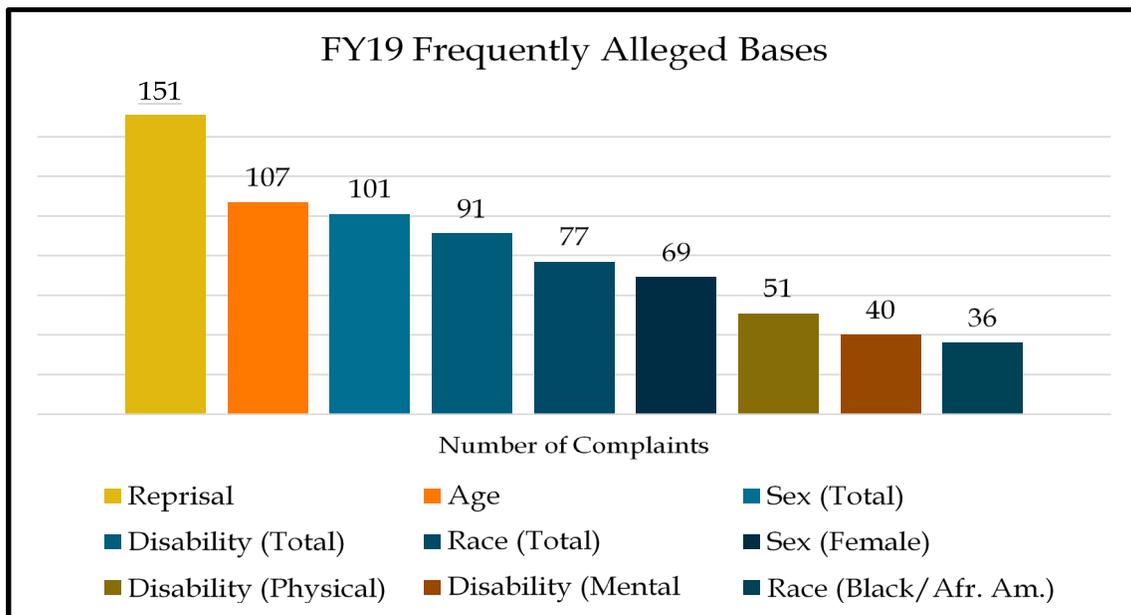
FY19 Frequently Alleged Bases

Number of Complaints

- ■ Reprisal — 151
- ■ Age — 107
- ■ Sex (Total) — 101
- ■ Disability (Total) — 91
- ■ Race (Total) — 77
- ■ Sex (Female) — 69
- ■ Disability (Physical) — 51
- ■ Disability (Mental) — 40
- ■ Race (Black/Afr. Am.) — 36

FY19 Frequently Alleged Issues

Harassment	151
Assignment of Duties	42
Terms/Conditions	37
Appointment/Hire	34
Reasonable Accommodation	20

Number of Complaints

- Harassment
- Assignment of Duties
- Terms/Conditions
- Appointment/Hire
- Reasonable Accommodation
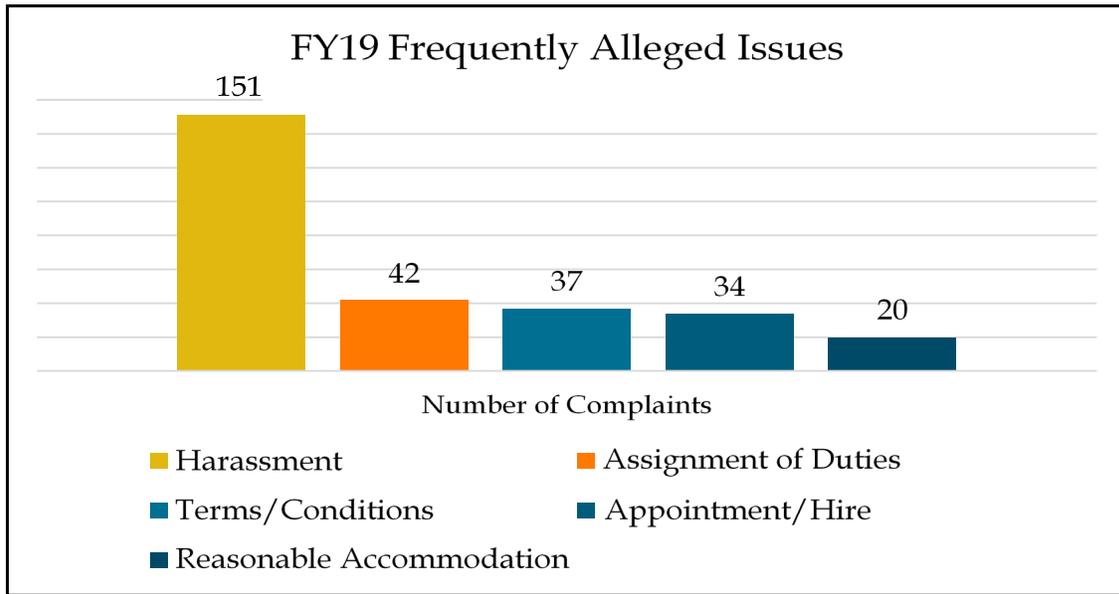
Interior Regions One and Seven had the most formal complaint activity from FY 2016 to FY 2019. These are also the two regions with the greatest number of DOI employees. Moreover, OCR was able to identify several areas throughout the Department where complaint activity is prevalent and should be considered "hotspots" due to the high volume. The FY 2019 hotspots are the U.S. Park Police, Gateway National Recreational Area, the Grand Coulee Power Office, and the DOI Interior Business Center.

FY19 EEO Complaints By Unified Region

Region	Complaints
1 - North Atlantic-...	68
2 - South Alantic-Gulf	26
3 - Great Lakes	6
4 - Mississippi Basin	15
5 - Missouri Basin	21
6 - Arkansas Rio-...	14
7 - Upper Colorado Basin	58
8 - Lower Colorado Basin	12
9 - Columbia Pacific...	18
10 - California Great...	40
11 - Alaska	3
12 - Pacific Islands	1
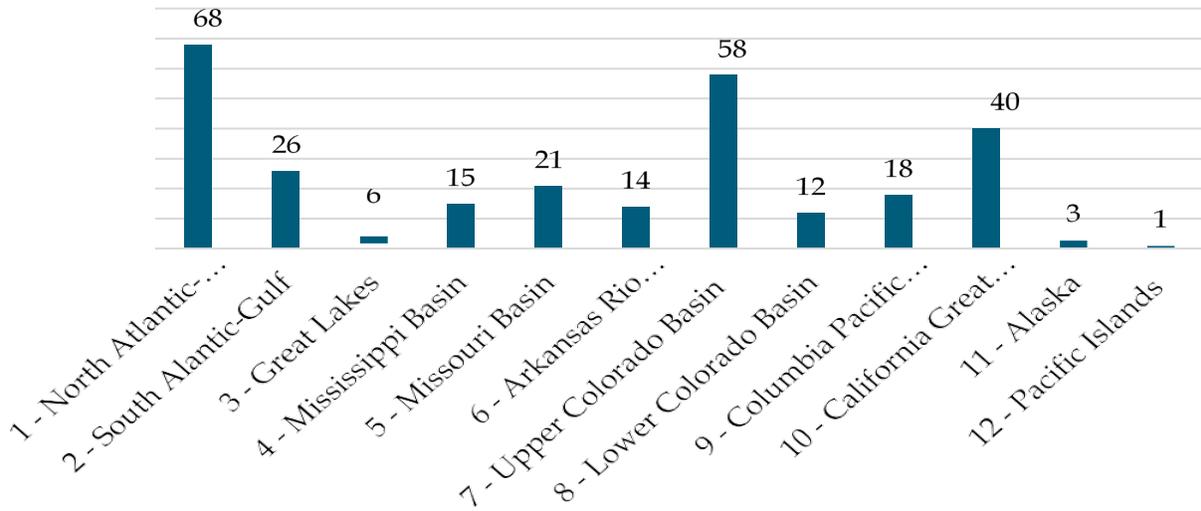
12 Interior Region Names Based on Watersheds

U.S. Department of the Interior, U.S. Geological Survey
Map date: October 18, 2019

47

FY16-19 EEO Complaints by Unified Region
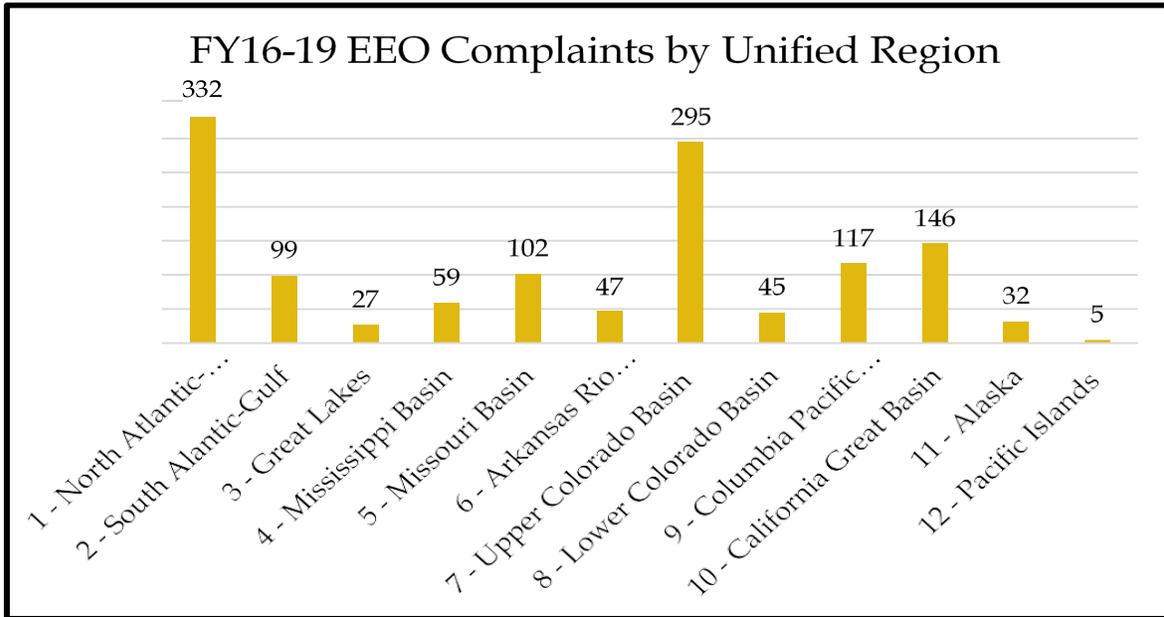
In FY 2019, DOI paid out $2,097,161 in monetary settlements during the formal complaint stage. When adding investigation costs and the monetary benefits paid during the pre-complaint stage, the total becomes $3,039,141. OCR estimates that DOI paid $10,848,273 in monetary benefits for substantiated harassment findings and settlements between FY 2016 and FY 2019. Monetary benefits include, but are not limited to, actual cash benefits such as restored pay, compensatory damages, punitive and liquidated damages, attorney's fees, fringe benefits, training or tuition costs, and promotions.

Almost seven percent of all formal complaints filed against DOI alleged failure to accommodate a disability. From FY 2016 to FY 2019, OCR estimates that the Department paid $1,500,000 in monetary benefits to settle formal complaints alleging failure to provide a reasonable accommodation. Given the Department's potential for liability, OCR has determined that education and training regarding reasonable accommodation is a strategic priority for FY 2020.

Anti-Harassment

The NPS and BLM had the largest number of formal complaints of discrimination alleging harassment, whereas BSEE and OSMRE had the largest percentage of formal complaints alleging harassment adjusted by bureau size.

Closures

In FY 2019, 364 complaints were closed. This represents an eight percent increase over FY 2018 and accounts for 13 withdrawals during the formal stage, 81 settlement during the formal stage and Final Agency Actions, including 166 Final Agency Decisions (FADs) without an Administrative Judge (AJ) Decision (which includes FAD procedural dismissals) and 104 Final Agency Orders with an AJ Decision. There were no FAD findings of discrimination and four findings of discrimination with an AJ Decision. The four AJ Decision findings had different case numbers but stemmed from two formal complaints. In the first Decision, the AJ held that the Agency subjected the complainant to reprisal, and age and sex-based harassment. In the second Decision, the AJ held that the Agency subjected the complainant to a hostile work environment based upon sex. Both decisions were fully implemented by the Agency. Only two percent of all DOI Final Agency Actions were remanded by the EEOC Office of Federal Operations.

FY19 Closures

13
104
81
166

■ Withdrawals ■ Settlements ■ FADs ■ Final Orders
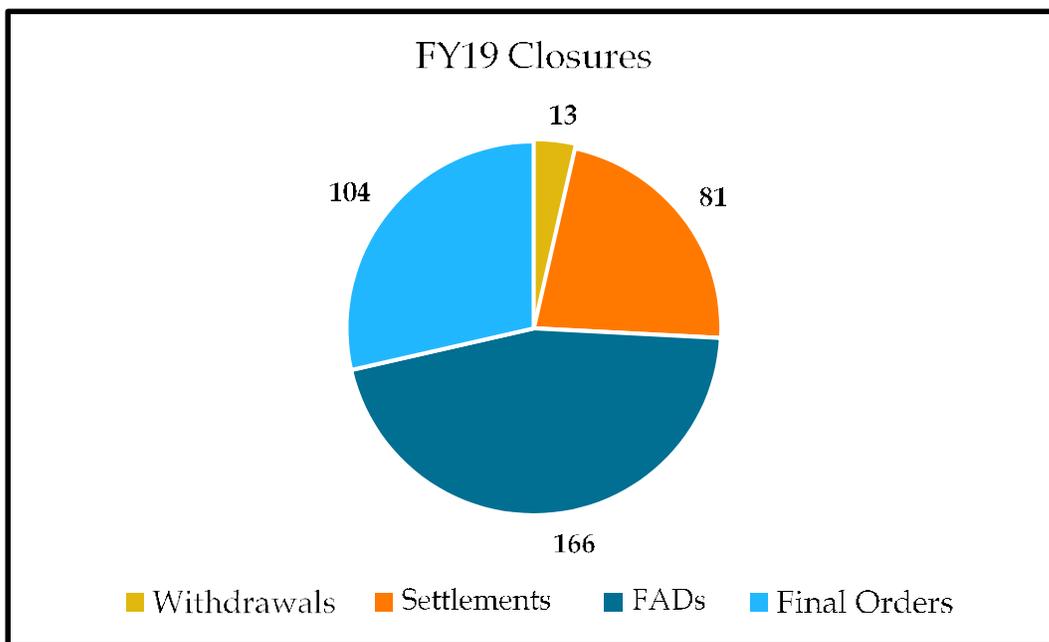
Resolution

DOI had a 45.3 percent ADR resolution rate in the pre-complaint stage, which increased 5 percent from FY 2018 but was still well below the federal sector average of 64.4 percent. Five percent of

pre-complaints were settled (in ADR and outside of ADR) during the pre-complaint stage. This is also well below the federal sector average of 14.6 percent. During the pre-complaint stage, DOI had an ADR offer rate of 94.8 percent, well above the federal sector rate of 86.8 percent. However, DOI had an ADR acceptance rate of 36.1 percent, well below the federal sector rate of 53 percent.

During the formal stage, DOI had an ADR acceptance rate of 21.6 percent. DOI significantly outperforms the federal sector average of 9.3 percent in this regard. However, DOI had an ADR resolution rate of 23.3 percent in the formal stage, well below the federal sector average of 54.6 percent. In FY 2019, 179 pre-complaints were counseled with ADR during the pre-complaint stage. Of those 179 pre-complaints, 81 (45.3 percent) were resolved in ADR, either through a settlement with benefits or because no formal complaint was filed.

ADR Resolution Rate (Pre-Complaint)

FY17	FY18	FY19	Fed Sector Average
45	41	45.3	64.4
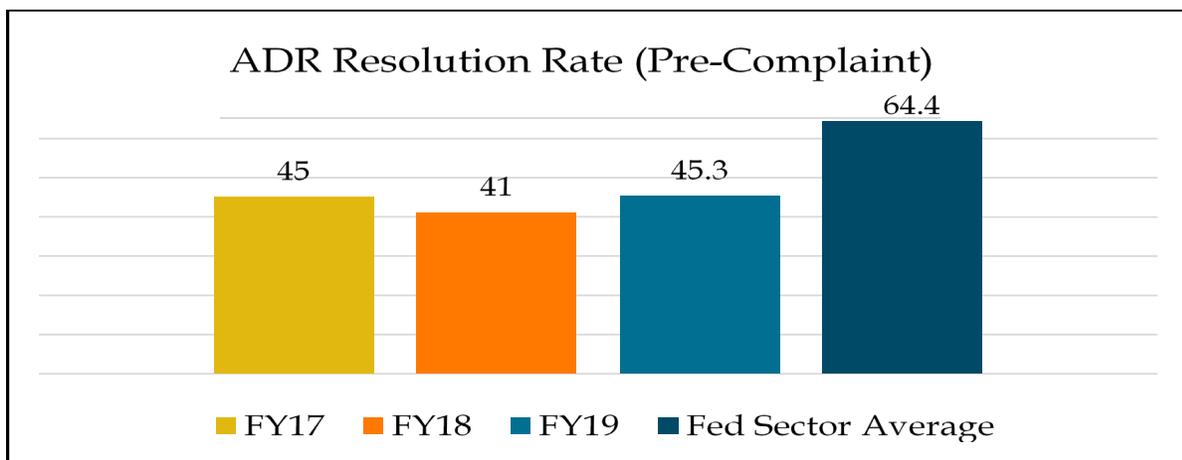
In FY 2019, 43 formal complaints were counseled with ADR during the formal stage. Of those 43 formal complaints, ten of those formal complaints (23.3 percent) were resolved in ADR, either through a settlement with benefits or because no formal complaint was filed.

ADR Resolution Rate (Formal)

FY17	FY18	FY19	Fed Sector Average
38.6	28.3	23.3	54.6
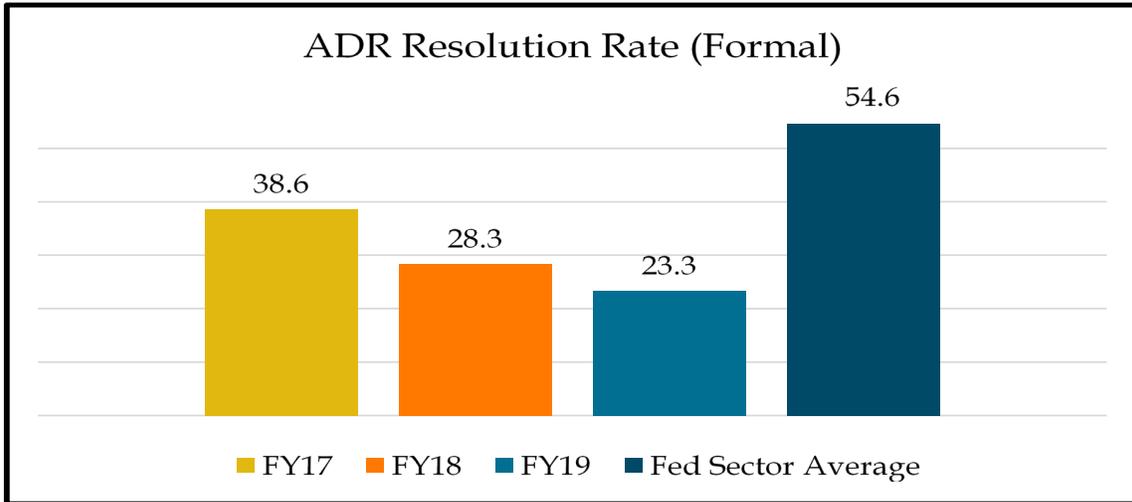
ESSENTIAL ELEMENT F:

LEGAL COMPLIANCE WITH STATUTORY REQUIREMENTS FOR EDI IN THE WORKPLACE

The essential element *Legal Compliance with Statutory Requirements for EDI in the Workplace* requires that federal agencies have processes in place to ensure timely and full compliance with EEOC orders and settlement agreements; that agencies comply with the law, including EEOC regulations, management directives, orders and other written instructions; and that agencies annually reports to EEOC its program efforts and accomplishments.

Successes:

- DOI maintains a system of management controls to ensure timely, accurate compliance with resolutions/settlement agreements.

- The Department's annual end-of-year reporting requirements were developed and submitted on time and in accordance with EEOC guidelines. Timely annual reports included:

    o Annual Federal EEOC Statistical Report of Discrimination Complaints (EEOC Form 462) – submitted with no errors or resubmissions.

    o "No FEAR" Annual report – submitted with no errors or resubmissions.

    o Age Discrimination Act of 1975 Annual Report – submitted with no errors or resubmissions.

- Compliance with EEOC orders is included in the performance standards of EEO practitioners. In addition, an established partnership between the Departmental OCR and the Office of Solicitor ensures that DOI consistently complies with all orders issued by the EEOC, the MSPB and/or OSC.

- DOI timely posted quarterly statistical complaint data on its website in compliance with the No FEAR Act requirements.

- DOI ECAD created a Departmental Complaints Processing Handbook to standardize complaints processing across the Department. The Handbook includes standard form template letters, policy and procedures for the timely and accurate processing of complaints of discrimination in accordance with EEOC regulations and guidance.

- DOI ECAD conducted training to bureaus offices on the informal and formal EEO process, including the roles and responsibilities of complainants, managers/supervisors, and Counselors and Mediators in the EEO process.

- DOI ECAD increased the Department's timely issuance of FADs, resulting in 72% timely issuances in FY 2019.

Areas Requiring Improvement:

- The Departmental OCR continues to analyze its internal processing standards and timeframes to increase its timeliness rate on the issuance of FADs. Establish additional quality control measures within the Departmental OCR to strengthen the quality of FADs while improving the timely issuance rate of FADs.

- Increase the number of employees utilizing Alternative Dispute Resolution (ADR) to resolve both pre-complaints and formal complaints of discrimination filed against the Department.

E.3 – Executive Summary: Workforce Analyses

The workforce profile data, retrieved from the Federal Personnel/Payroll System (FPPS), represents the demographics of the DOI workforce by race, sex, and disability. The DOI workforce decreased by 1.2 percent (822) at the end of FY 2019 with a total of 66,393 employees, compared to 67,215 in FY 2018. There were 53,111 permanent and 13,282 temporary employees in the DOI workforce.

DOI uses the federal benchmark or standard, the National and Occupational Civilian Labor Force (CLF) from the 2010 Census, to analyze its workforce. There were noteworthy changes to the permanent workforce for ten of the 18 CLF groups that are highlighted below:

1. Persons with Disabilities (PWD) occupied 12.4 percent (total 1,990) of all GS-1 to GS-10 permanent positions in the Department's workforce in FY 2019, compared to the EEOC goal of 12 percent. The percentage of PWD employed by the Department increased by 0.7 percent since the last annual reporting period which brings DOI into compliance with the EEOC's hiring goal for PWD of 12 percent of an agency's entire workforce.

2. Persons with Disabilities (PWD) occupied 7.6 percent (total 2,407) of GS-11 to SES permanent positions in the Department's workforce in FY 2019, compared to the EEOC goal of 12 percent. This group did not change since the last annual reporting period and remains out of compliance with the Affirmative Action goals for all federal agencies to ensure PWD occupy 12 percent of all GS-11 to SES positions within the workforce.

3. Persons with Targeted Disabilities (PWTD) occupied 3.9 percent (total 496) of all GS-1 to GS-10 positions in the Department's workforce in FY 2019, exceeding the EEOC's hiring goal for PWTD of two percent of an agency's entire workforce.

4. Persons with Targeted Disabilities (PWTD) occupied 1.9 percent (total 519) of all GS-11 to SES positions in FY 2019, compared to the EEOC's goal of two percent. The percentage of PWTD in the Department's workforce did not change since the last annual reporting period and remains marginally out of compliance with the EEOC's two percent goal for

55

PWTD.

5. Women occupied 39.6 percent (total 20,854) of the Department's permanent workforce, compared with 48.1 percent in the CLF. This group decreased by 250 employees in FY 2019, a loss of 1.2 percent. The overall number of women in the Department's permanent workforce has not increased since FY 2017 and remains below the availability of women in the CLF.

6. White women occupied 26.9 percent (total 14,308) of the Department's permanent workforce, compared with 34.0 percent in the CLF. The overall number of White women in the Department's permanent workforce declined by 141 employees since the last annual reporting period and continues to remain below the availability of white women in the CLF.

7. Hispanic/Latino Men occupied 3.8 percent (total 2,031) of the Department's permanent workforce, compared with 5.2 percent in the CLF. This group increased by 24 employees in FY 2019. The number of Hispanic/Latino men in the Department's permanent workforce has steadily increased over the past four consecutive years; however, the overall number of Hispanic/Latino men in the Department's permanent workforce continues to remain below the availability of Hispanic/Latino men in the CLF.

8. Hispanic/Latino women occupied 2.8 percent (total 1,462) of the Department's permanent workforce, compared with 3.5 percent in the CLF. This group decreased by 14 employees in FY 2019. The number of Hispanic/Latino women in the Department's permanent workforce has steadily increased over the past four consecutive years. However, despite the increases, the overall number of Hispanic/Latino women in the Department's permanent workforce remains below the availability of Hispanic/Latino women in the CLF.

9. Black or African American men occupied 2.7 percent (total 1,422) of the Department's permanent workforce, compared with 5.5 percent in the CLF. This group decreased by 15 employees in FY 2019, a loss of 1.0 percent in the current annual reporting cycle. The

number of Black or African American men in the Department's permanent workforce has steadily decreased for four consecutive years and remains below the availability of Black or African American men in the CLF. This trend is inconsistent with other federal agencies that are showing increases in the employment of Black or African American men year after year.

10. Black or African American women occupied 2.9 percent (total 1,524) of the Department's permanent workforce, compared with 6.5 percent in the CLF. This group decreased by 18 employees in FY 2019. The number of Black or African American women employed with the Department has steadily decreased for four consecutive years and remains below the availability of Black or African American women in the CLF. This trend is inconsistent with other federal agencies that show incremental increases in the employment of Black or African American women year after year.

11. Asian men occupied 1.5 percent (total 781) of the Department's permanent workforce, compared with 2.0 percent in the CLF. This group increased by 19 employees, a gain of 0.1 percent. Despite the increase, the number of Asian men in the Department's permanent workforce remained the same over the past two consecutive years and remains below the availability of Asian men in the CLF.

12. Asian women occupied 1.3 percent (total 710) of the Department's permanent workforce, compared with 1.9 percent in the CLF. This group increased by ten employees, a gain of 1.4 percent. Despite the increase, the number of Asian women employed in the Department's permanent workforce has remained the same over the past two consecutive years and below the availability of Asian women in the CLF.

A summary of the FY 2016 to FY 2019 workforce demographic statistics are provided in the following table.

GROUP		2016		2017		2018		2019		CLF
		#	%	#	%	#	%	#	%	%
White	Men	25,526	46.8%	25,646	46.8%	31,006	46.1%	24,963	47.0%	38.3%
	Women	14,710	27.0%	14,766	26.9%	18,034	26.8%	14,308	26.9%	34.0%
Black/African	Men	1,487	2.7%	1,498	2.7%	1,595	2.4%	1,422	2.7%	5.5%
	Women	1,640	3.0%	1,617	2.9%	1,647	2.5%	1,524	2.9%	6.5%
Hispanic/Latino	Men	1,917	3.5%	1,973	3.6%	2,375	3.5%	2,031	3.8%	5.2%
	Women	1,471	2.7%	1,466	2.7%	1,665	2.5%	1,462	2.8%	4.8%
Asian	Men	722	1.3%	746	1.4%	891	1.3%	781	1.5%	2.0%
	Women	701	1.3%	707	1.3%	802	1.2%	710	1.3%	1.9%
Native Hawaiian/Pacific Islander	Men	193	0.4%	193	0.4%	251	0.4%	190	0.4%	0.1%
	Women	111	0.2%	114	0.2%	145	0.2%	115	0.2%	0.1%
American Indian/Alaska Native	Men	3,032	5.6%	3,034	5.5%	3,977	5.9%	2,753	5.2%	0.6%
	Women	2,906	5.3%	2,879	5.3%	4,577	6.8%	2,640	5.0%	0.5%
Two/More Races	Men	94	0.2%	108	0.2%	141	0.2%	117	0.2%	0.3%
	Women	71	0.1%	84	0.2%	109	0.2%	95	0.2%	0.3%
Total	Men	32,971	60.4%	33,198	60.5%	40,236	59.9%	39,746	59.9%	51.9%
	Women	21,610	39.6%	21,633	39.5%	26,979	40.1%	26,647	40.1%	48.1%
	All	54,581	100.0%	54,831	100.0%	67,215	100.0%	66,393	100.0%	
Data Source: Workforce Table A1.										

During FY 2019, men represented approximately 60 percent of the Department's permanent workforce, compared with 51.9 in the CLF. In FY 2019, women represented roughly 40 percent of the Department's permanent workforce, compared to 48 percent in the CLF. As previously stated, for four consecutive years, the number of women in the Department's permanent workforce continues to remain below the availability of women in the CLF.

Gender

40.1

2019

59.59

■ Men ■ Women
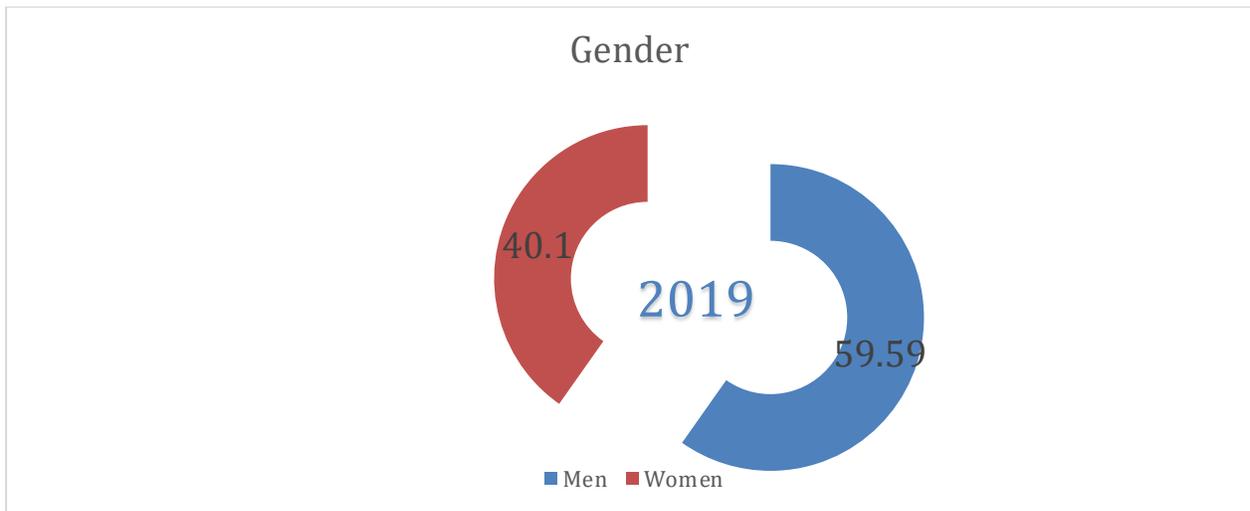
NEW HIRES

The Department hired a total of 14,860 new employees, both permanent and temporary, in FY 2019. The Department hired 3,988 permanent employees. Men represented 2,472 (62.0 percent) of new employees hired, while women represented 1,517 (38.0 percent) of new employees hired. The Department hired 11,923 temporary employees, of which 7,454 (62.5 percent) were men, and 4,469 (37.6 percent) were women. The number of temporary employees hired decreased by 744 between FY 2017 (4,762 temporary employees hired) and FY 2019 (3,988 temporary employees hired). Of the total new hires, Hispanic/Latino men increased by 0.5 percent, and Hispanic/Latino women increased by 0.6 percent. White men increased by 1.8 percent, and White women decreased by 1.0 percent. The data revealed that all demographic groups by race and national origin were represented in the number of new employees hired by DOI during the FY 2019 reporting year.

In comparing all demographic groups by race and national origin, Black or African American men and women represented the lowest number of new employees hired by the Department when compared to the availability of these groups in the CLF. Respectively, the availability of Black or African American men in the CLF was 4.3%, while the percentage of Black or African American men hired by the Department was 1.5%. The availability of Black or African American women in the CLF was 4.7%, while the percentage of Black or African American women hired by the Department was 1.4%. In addition, and as discussed earlier, Hispanic/Latino men and women, White women, and Asian men and women were hired by the Department at a percentage less than their respective availability in the CLF.

Of the Department's 3,441 permanent new hires, 434 (12.6 percent) were PWD, and 108 (3.1 percent) were PTWD. EEOC established an ongoing Affirmative Action goal to ensure an agency's workforce is comprised of 12 percent PWD and two percent PWTD. Year after year, the Department has steadily increased the number of PWD employed by DOI, increasing from 8.0 percent in FY 2013 to 12.6 percent in FY 2019. Likewise, the Department incremental increased its hiring of PWTD, from 1.5 percent in FY 2013 to 3.1 percent position in FY 2019. A summary of the Department's hiring statistics for PWD and PWTD from FY 2017 to FY 2019 is provided in the following table.

New Hires for Permanent Employees				
	CLF % 2010	FY 2017	FY 2018	FY 2019
Total Number		4,762	2,937	3,441
Hispanic Men	5.2%	3.9% (138)	4.4% (130)	4.4% (160)
Hispanic Women	4.8%	2.3% (82)	3.2% (95)	2.8% (98)
White Men	38.3%	44.3% (1,577)	45.3% (1,331)	44.6% (1,533)
White Women	34.0%	27.6% (982)	27.2% (799)	27.7% (952)
Black Men	5.5%	3.7% (133)	2.5% (73)	2.8% (96)
Black Women	6.5%	3.0% (107)	2.7% (78)	3.7% (127)
Asian Men	2.0%	1.7% (62)	2.2% (64)	2.0% (70)
Asian Women	1.9%	1.4% (51)	1.5% (45)	1.9% (66)
Native Hawaiian/Other Pacific Island Men	0.1%	0.3% (11)	0.4% (11)	0.3% (12)
Native Hawaiian/Other Pacific Island Women	0.1%	0.3% (9)	0.1% (4)	0.4% (14)
American Indian/Alaska Native Men	0.6%	5.4% (191)	5.2% (152)	4.7% (161)
American Indian/Alaska Native Women	0.6%	5.3% (190)	4.7% (138)	3.7% (128)
Two or More Races Men	0.3	0.5% (17)	0.2% (6)	0.3% (12)
Two or More Races Women	0.3	0.3% (11)	0.4% (11)	0.3% (12)
Persons with Disabilities (PWD)	12.0%	12.2% (435)	11.9% (350)	12.6% (434)
Persons with Targeted Disabilities (PWTD)	2.0%	2.8% (100)	2.2% (64)	3.1% (108)

Notes: * Data Source: Workforce Tables A8/B8.
Highlighted in red are groups that were hired at lower rates than their availability in the civilian labor population.

MISSION-CRITICAL OCCUPATIONS (MCO)

At the end of FY 2019, over 300 occupations were represented in the DOI workforce. For the purposes of this annual report and corresponding workforce and barrier analyses, the EEOC requires that agencies identify "mission-critical" occupations (MCO). Overall, 91 percent of the DOI's workforce was employed in 16 mission-critical occupations in the Department.

- Overall, year after year, there were a low number of women and people of color occupying mission-critical occupations in the Department. The data revealed that the number of people of color and women occupying mission-critical occupations continuously remained below their availability in the CLF for four consecutive years (FY 2016 to FY 2019).

- During FY 2019, there was an increase in the number of people of color, women, and PWD occupying positions in the six mission-critical occupations where most of the workforce is employed. The increases for these groups were seen in the Park Ranger, General Biology, Wildlife Biology, Civil Engineering, Hydrology, and Geology occupations in the Department.

  The table below summarizes these demographic statistics:

Series	Title	Groups Occupying the Lowest Number of MCO Positions (If less than one person is expected, the group was not listed in the table)
— see title	**2019 DOI Mission-Critical Occupations Compared to Occupational Civilian Labor Force (CLF)**	
0025	Park Ranger	Hispanic women, White women, Black or African American (men and women), Asian women, Two or More Races (men and women)
0028	Environmental Protection Specialist	White men, Black or African American men, Asian men, and Native Hawaiian/Other Pacific Islander (men and women)
0080	Security Administration	Hispanic women, White women, Asian (men and women), Native Hawaiian/Other Pacific Islander women, Two or More Races (men and women)
0085	Security Guard	Hispanic (men and women), White women, Black or African American (men and women), Asian women, Native Hawaiian/Other Pacific Islander women, American Indian/Alaska Native women, Two or More Races women
0401	General Natural Resources Mgmt & Bio Sciences	Hispanic women, White women, Black or African American (men and women), Asian (men and women), Two or More Races women
0455	Range Technician	Hispanic women, White women, Black or African American (men and women), Asian (men and women), Native Hawaiian/Other Pacific Islander women, Two or More Races (men and women)
0462	Forestry Technician	Hispanic women, White women, Black or African American (men and women), Asian (men and women), Native Hawaiian/Other Pacific Islander women, Two or More Races (men and women)
0810	Civil Engineering	Black or African American (men and women), Asian (men and women), Native Hawaiian/Other Pacific Islander women, Two or More Races women
0802	Petroleum Engineering Technician	Hispanic (men and women), White women, Black or African American (men and women), Asian (men and women), American Indian/Alaska Native women, Two or More Races (men and women)

0881	Petroleum Engineering	Hispanic (men and women), White, Asian women, Native Hawaiian/Other Pacific Islander women, Two or More Races (men and women)
1313	Geophysics	Hispanic (men and women), White men, Black or African American (men and women)
1315	Hydrology	Hispanic (men and women), Black or African American (men and women), Asian (men and women)
1350	Geology	Hispanic (men and women), Black or African American (men and women), Asian (men and women), American Indian/Alaska Native (men and women)
1801	Gen Inspector, Investigation, Enforcement, & Compliance	Hispanic women, White women, Black or African American (men and women), Asian (men and women), Two or More races (men and women)
1811	Criminal Investigating	Hispanic (men and women), White (men and women), Black or African American (men and women), Asian (men and women), Two or More Races men
2151	Dispatching	Hispanic (men and women), White women, Black or African American (men and women)

Data Source: Workforce Table A6. Attached in Appendix.

Demographic Statistics for Mission-Critical Occupations

Park Ranger: 0025 Series

- Park Rangers represented the largest occupation at DOI for the last four years. Men are overrepresented in DOI Park Ranger positions year after year. Currently, 2,114 men and 1,152 women are employed in this series at the Department.

- Male Park Rangers are overrepresented in DOI Park Ranger positions in comparison to the relevant CLF; men comprise 46.6 percent of individuals in similar jobs in the CLF but account for 64.7 percent of employees in Park Ranger positions at DOI.

- Hispanic/Latino men, White men, Asian men, Native Hawaiian/Other Pacific Islander men, and American Indian/Alaska Natives are overrepresented in DOI Park Ranger positions in comparison to the percentage of individuals from these demographic groups

in similar jobs in the CLF. Asian women and Hispanic women are also overrepresented in DOI Park Ranger positions compared to the percentage of individuals in these demographic groups in similar jobs in the CLF.

- Black or African American men and women are underrepresented in DOI Park Ranger positions in comparison to the percentage of Black or African American men and women in similar jobs in the CLF.

- Overall, the number of people of color in DOI Park Ranger positions has increased incrementally for four consecutive years.

Environmental Protection Specialist: 0028 Series

- Women in Environmental Protection Specialist positions at DOI slightly outnumbered men; women occupied 164 positions and men occupied 162 positions.

- Hispanic men and women, White women, Black or African American women, Asian women, American Indian/Alaska Natives, and Two or More Races men and women are overrepresented in DOI Environmental Protection Specialist positions at DOI in comparison to the percentage of individuals in these demographic groups in similar jobs in the CLF.

- White men, Black or African American men, Asian men, and Native Hawaiian/Other Pacific Islanders are underrepresented in DOI Environmental Protection Specialist positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the CLF.

- The data remains unchanged over the past four consecutive years for FY 2016-FY 2019.

Security Administration: 0080 Series

- Men in Security Administration positions at DOI outnumbered women; men occupied 73 positions and women occupied 57 positions.

- White men in DOI Security Administration positions are overrepresented at DOI in comparison to the percentage of white men in similar jobs in the CLF.

- Hispanic/Latinos, Black or African Americans, and American Indian/Alaska Natives are underrepresented in DOI Security Administration positions in comparison to the percentage of individuals in this demographic group in similar jobs in the CLF.

- The data remains unchanged over the past four consecutive years for FY 2016 - FY 2019.

Security Guard: 0085 Series

- This mission-critical occupation is predominantly occupied by men. Women are underrepresented in DOI Security Guard positions in comparison to the CLF; women comprise 22.8 percent of individuals in similar jobs in the CLF but account for just 4.5 percent of employee in Security Guard positions at DOI.

- White men outnumbered all people of color (men and women) in DOI Security Guard positions; men occupied 93 positions and people of color occupied 36 positions.

- Hispanic/Latino men, White women, and Black or African American men and women are underrepresented in DOI Security Guard positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the CLF.

- Hispanic/Latino women, Asian women, Native Hawaiian/Other Pacific Islander women, American Indian/Alaska Natives, and Two or More Races were not employed in DOI Security Guard positions.

- The data remains unchanged over the past four annual reporting periods for FY 2016-FY 2019.

General Natural Resources Mgmt. & Bio Sciences: 0401 Series

- Men outnumbered women in DOI General Natural Resources Mgmt. and Bio Sciences positions; men occupied 2,049 positions and women occupied 1,323 positions.

- Hispanic/Latino men, White men, Black or African American men, Native Hawaiian/Other Pacific Islanders, and American Indian/Alaska Natives are overrepresented in DOI General Natural Resources Mgmt. and Bio Sciences positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the CLF.

- Hispanic/Latino women, Black or African American women, and Asians are underrepresented in DOI General Natural Resources Mgmt. and Bio Sciences positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the CLF.

- The data remains unchanged over the past four consecutive years for FY 2016 - FY 2019.

Ranger Technician: 0455 Series

- Men outnumbered women in DOI Ranger Technician positions; men occupied 364 positions and women occupied 67 positions.

- Hispanic men, White men, and American Indian/Alaska Natives were overrepresented in DOI Ranger Technician positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the CLF.

- Hispanic/Latino women, White women, Black or African Americans, Asian, and Two or More Races are underrepresented in DOI Ranger Technician positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the CLF.

- Asian women and Native Hawaiian/Other Pacific Islander women are not represented in DOI Ranger Technician positions.

- The data remains unchanged over the past four consecutive years for FY 2016 - FY 2019.

Forestry Technician: 0462 Series

- Men outnumbered women in DOI Forestry Technician positions; men occupied 1,332 positions and women occupied 151 positions.

- Hispanic/Latino men, White men, and American Indian/Alaska Native men are overrepresented in DOI Forestry Technician positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the CLF.

- The data remains unchanged over the past four consecutive years for FY 2016 - FY 2019.

Civil Engineering: 0810 Series

- Men outnumbered women in DOI Civilian Engineering positions; men occupied 793 positions and women occupied 220 positions.

- Hispanic/Latino, White, Native Hawaiian/Other Pacific Islander men, and American Indian/Alaska Native are overrepresented in DOI Civil Engineering positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the CLF.

- Black or African Americans, Asian, and Two or More Races men are underrepresented in DOI Civil Engineering positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the CLF.

- Native Hawaiian/Other Pacific Islander women, and Two or More Races are not represented in DOI Civil Engineering positions.

- The data shows a slight increase over the past four annual reporting periods for FY 2016 - FY 2019.

Petroleum Engineering Technician: 0802 Series

- Men outnumbered women in DOI Petroleum Engineering Technician positions; men occupied 192 positions and women occupied 34 positions.

- Hispanic/Latino men, White men, and American Indian/Alaska Native men are overrepresented in DOI Petroleum Engineering Technician positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the CLF.

- Hispanic women, White women, Black or African Americans, Asian, and Two or More Races men occupied positions are underrepresented in DOI Petroleum Engineering positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the CLF.

- Hawaiian/Other Pacific Islanders and Two or More Races women were not represented in DOI Petroleum Engineering positions.

- The data remains unchanged over the past four consecutive years for FY 2016 - FY 2019.

Petroleum Engineering: 0881 Series

- Men outnumbered women in DOI Petroleum Engineering positions; men occupied 267 positions and women occupied 57 positions.

- Black or African Americans, Asian men, and American Indian/Alaska Native were overrepresented in DOI Petroleum Engineering positions in comparison to the percentage of individuals in these demographic groups in the CLF.

- Native Hawaiian/Other Pacific Islander women and Two or More Races were not represented in DOI Petroleum Engineering positions.

- The data remains unchanged over the past four consecutive years for FY 2016 - FY 2019.

Geophysics: 1313 Series

- Men outnumbered women in DOI Geophysics positions; men occupied 181 positions and women occupied 84 positions.

- Whites outnumbered all people of color in DOI Geophysics positions; (whites occupied 235 positions and people of color occupied 30 positions).

- Hispanic/Latinos, Black or African Americans, American Indian/Alaska Native, and Two or More Races were underrepresented in DOI Geophysics positions in comparison to the percentage of individuals in these demographic groups in the CLF.

- Asian and Native Hawaiian/Other Pacific Islanders were overrepresented in DOI Geophysics positions in comparison to the percentage of individuals in these demographic groups in the CLF.

- The data remains unchanged over the past four consecutive years for FY 2016 - FY 2019.

Hydrology: 1315 Series

- Men outnumbered women in DOI Hydrology positions; men occupied 860 positions and women occupied 350 positions.

- White, Hawaiian/Other Pacific Islander, and American Indian/Alaska Natives were overrepresented in DOI Hydrology positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the CLF.

- Hispanic/Latinos, Black or African Americans, and Asians were underrepresented in DOI Hydrology positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the CLF.

- Two or More Races women were not represented DOI Hydrology positions.

- The data remained unchanged over the past four consecutive fiscal years for FY 2016 - FY 2019.

Geology: 1350 Series

- Men outnumbered women in DOI Geology positions; men occupied 483 positions and women occupied 235 positions.

- Whites outnumbered people of color in DOI Geology positions; whites occupied 667 positions and people of color combined occupied 51 positions.

- Hispanic/Latinos, Black or African Americans, Asian, Native Hawaiian/Other Pacific Islanders, American Indian/Alaska Natives, and Two or More Races were underrepresented in DOI Geology positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the CLF.

- The data remains unchanged over the past four consecutive years for FY 2016 - FY 2019.

General Inspection, Investigator, Enforcements, & Compliance: 1801 Series

- Men outnumbered women in DOI General Inspection, Investigator, Enforcement and Compliance positions; men occupied 676 positions and women occupied 126 positions.

- Hispanic/Latino men, White men, Hawaiian/Other Pacific Islander men, and American Indian/Alaska Natives were overrepresented in DOI General Inspection, Investigator, Enforcement and Compliance positions in comparison to the percentage of individuals in these demographic groups in the CLF.

- The data remains unchanged over the past four consecutive years for FY 2016 - FY 2019.

Criminal Investigation: 1811 Series

- Men outnumbered women in DOI Criminal Investigation positions; men occupied 479 positions and women occupied 76 positions.

- White men and American Indian/Alaska Natives were overrepresented in DOI Criminal Investigation positions in comparison to the percentage of individuals in these demographic groups in the CLF.

- Hispanic/Latinos, White Women, Black or African Americans, Asian, and Two or More Races Men were underrepresented in DOI Criminal Investigation positions in comparison to the percentage of individuals in these demographic groups in the CLF.

- The data remains unchanged over the past four consecutive years for FY 2016 - FY 2019.

Dispatching: 2151 Series
- Men and women were represented equally in DOI Dispatching positions; men occupied 108 positions and women occupied 108 positions).

- White Men, Hawaiian/Other Pacific Islanders, and American Indian/Alaska Natives were overrepresented in the DOI Dispatching positions in comparison to the percentage of individuals in these demographic groups in the CLF.

- The data remains unchanged over the past four consecutive years for FY 2016 - FY 2019.

SENIOR EXECUTIVE SERVICE (SES)

In FY 2019, DOI employed 236 SES employees. Men occupied 159 positions and women occupied 77 positions. The number of women in SES positions in DOI increased from 72 in FY 2018 to 77 in FY 2019. Additionally, in FY 2019 the Department increased the number of women in the SES in its mission-critical occupations, including the appointment of an African American woman to serve as Director of the United States Fish and Wildlife Service (FWS); the selection of a woman to serve as Deputy Assistant Secretary for Public Safety, Resource Protection, and Emergency Services (DAS-PRE); the selection of a woman to serve as Deputy Assistant Secretary for Administrative Services (DAS-AS); the selection of an African American woman to serve as Director for the Office of Civil Rights and Chief Diversity Officer; and the selection of a woman to serve as the Deputy Chief Human Capital Officer.

Despite these notable changes, men outnumber women in most of the mission-critical occupations that lead to DOI SES positions and were consistently and with regularity chosen for senior positions in DOI. Women of color were less likely than White women to occupy SES positions. Respectively, women of color represented 11 percent of the SES, while white women represented 25 percent of the SES.

When comparing all RNO groups to the CLF, with the exception of White men and women and American Indian or Alaska Native men and women, all other demographic groups are underrepresented in SES positions in DOI in comparison to the percentage of individuals in these demographic groups in the CLF.

The table below displays the number of SES employees in DOI by fiscal year and demographic group. From FY 2015 to FY 2019 the number of women, Hispanic/Latino, Black or African American, Asian, and American Indian or Alaska Natives in DOI SES positions decreased. A barrier analysis is needed to determine the root cause for the decrease in SES employees in these demographic groups. There are several factors to consider when analyzing the workforce demographics for DOI SES positions, including the length of tenure, availability of opportunities, and how applicants enter the SES.

Participation Rates for SES					
	FY 2015	**FY 2016**	**FY 2017**	**FY 2018**	**FY 2019**
Total SES Employees	**251**	**257**	**234**	**222**	**236**
Men	159 (63.3%)	162 (63.0%)	157 (67.1%)	150 (67.6%)	159 (67.4%)
Women	92 (36.7%)	95 (37.0%)	77 (32.9%)	72 (32.4%)	77 (32.6%)
Hispanic/Latino	14 (5.6%)	15 (5.8%)	14 (6.0%)	13 (5.9%)	10 (4.3%)
White	176 (70.1%)	182 (70.8%)	162 (69.2%)	155 (69.8%)	169 (71.7%)
Black/African American	19 (7.6%)	17 (6.6%)	16 (6.8%)	15 (6.8%)	18 (7.6%)
Asian	4 (1.6)	4 (1.6)	3 (1.3%)	3 (1.3%)	3 (1.3%)
Native Hawaiian/Other Pacific Islander	1 (0.4%)	1 (0.4%)	1 (0.4%)	1 (0.4%)	1 (0.4%)
American Indian or Alaska Native	37 (14.7%)	38 (14.8%)	38 (16.2%)	35 (15.8%)	34 (14.4%)
Two or More Races	0 (0.0%)	0 (0.0%)	0 (0.0%)	0 (0.0%)	1 (0.4%)
Persons with Disabilities (PWD)	15 (6.0%)	12 (4.7%)	15 (6.4%)	16 (7.2%)	17 (7.2%)
Persons with Targeted Disabilities (PWTD)	0 (0.0%)	0 (0.0%)	3 (1.3%)	2 (0.9%)	3 (1.3%)
Data Source: Workforce Table A4-1					

EMPLOYEE RECOGNITION AND AWARDS

A review of the distribution of recognition and awards in FY 2019 in DOI indicates that overall women received 42 percent and men received 58 percent of the awards throughout the fiscal year. The six categories of awards are: 1) Time-Off awards: 1-9 hours; 2) Time-Off awards: 9+ hours; 3) Cash Awards: $100 - $500; 4) Cash Awards: $501+; 5) Senior Executive Service Performance Awards; 6) Quality Step Increases (QSIs).

It is important to note that women in all race/ethnicity groups, except for American Indian or Alaska Native (AIAN), received awards in all categories except for the SES Performance Awards. Of this group, White women received the highest percentage of awards in the Quality Step Increase award category, exceeding awards issued to all men and women in this award category. White women received 35.8 percent of QSI awards, which is 8.8 percent greater than their workforce representation rate.

SEPARATIONS

In FY 2019, 4,598 total employees separated from DOI: 4,434 voluntary, 161 involuntary, and 3 reduction in force (RIF). The number of Hispanic/Latino employees separated decreased by 6.5 percent; the number of Black or African American employees separated decreased by 6.6 percent; the number of American Indian/Alaska Native employees separated decreased by 11.1 percent; and the number of Two or More Races employees separated decreased by 0.5 percent. The voluntary and involuntary separation rates for both PWD (47.6 percent) and PWTD (7.3 percent) during FY 2019 was slightly higher compared to FY 2018.

IDENTIFIED TRIGGERS

SUMMARY ANALYSIS OF IDENTIFIED TRIGGERS

A trigger is a trend, disparity, or anomaly found in the employment data which suggests the need for further inquiry to determine root causes. Triggers are 'red flags' that can be gleaned from various sources of information, beginning with workforce statistics. An investigation into triggers helps to uncover barriers to EDI such as an agency's policies, procedures, or practices that limits or tends to limit employment opportunities for members of a particular EEO protected group based on their sex, race, ethnic background, or disability status. It is the expectation of the EEOC that when triggers are found, an agency will conduct a systematic and thorough investigation to reveal and eliminate barriers to ensure equal opportunities for all DOI employees.

During FY 2019, the following triggers were identified when reviewing DOI workforce statistics:

1. Black or African American Employment

The first trigger indicating a possible barrier for Black or African men was found in Workforce Data Table A1. A review of the data revealed Black or African American men were underrepresented in the Department's permanent workforce; Black or African American men comprise 5.5 percent of the CLF but account for just 2.6 percent of DOI's permanent workforce. The number of Black or African American men also decreased by 15 employees or 1.0 percent.

A second trigger was identified when reviewing the data for Black or African American women. A review of the data revealed that Black or African American women were underrepresented in the Department's workforce; Black or African American women comprise 6.5 percent of the CLF but account for just 2.9 percent of DOI's permanent workforce. A review of the data revealed similar trends for previous fiscal years for these groups, which resulted in Black or African American employees leaving the Department at high rates.

Another trigger for Black or African Americans was identified when reviewing the new hire data. Black or African Americans were underrepresented in the percentage of new hires at DOI; Black or African Americans comprise 9.0 percent of the available CLF, yet account for just 2.9 percent of new hires at DOI. An analysis must be conducted to determine if there are policies, practices,

or procedures that may be creating impediments for the hiring, retention, or advancement opportunities for Black or African American employees at DOI.

2. Asian American Employment

The first trigger indicating a possible barrier for Asian American employees in DOI was found in Workforce Data Table A1. The data revealed that Asian men were underrepresented in the Department's permanent workforce; Asian men comprise 2.0 of the CLF, but account for 1.5 percent of the Department's workforce. The number of Asian men in the Department's permanent workforce increased by 19 employees, a gain of 2.5 percent during FY 2019. However, despite this increase, the data revealed that the overall number of Asian men in DOI's permanent workforce did not increase for four consecutive years for FY 2016 - FY 2019.

The data also revealed a trigger for Asian women. Asian women were slightly underrepresented in the Department's permanent workforce; Asian men comprise 1.9 percent of the available CLF, yet account for 1.3 percent of the Department's permanent workforce. The number of Asian women in DOI's permanent workforce increased by ten employees, a gain of 1.4 percent. Despite this increase, the data revealed that there were no statistically significant changes in the overall number of Asian women in DOI's permanent workforce for FY 2016 - FY 2019.

Another trigger for Asians was identified when reviewing the new hire data. Asians were underrepresented in the percentage of new hires at DOI; Asians comprise 4.9 of the available CLF, yet account for only 2.4 percent of the new hires at DOI. An analysis must be conducted to determine if there are policies, practices, or procedures that may be creating impediments for the hiring, retention, or advancement opportunities for Asian employees at DOI.

3. Hispanic/Latino Employment

The first indication of a possible barrier was with the disparity in the number of Hispanic/Latino men and women employed in the Department's permanent workforce. Hispanic/Latino employees comprised 9.9 percent of the available CLF, yet accounted for only 6.4 of DOI's permanent

workforce. The data also revealed a second trigger based on the low number of Hispanic/Latino employees occupying positions at the GS-12 through GS-13 grade level throughout DOI's workforce.

4. Potential Blocked Pipelines and Glass Ceilings

For five consecutive years, people of color and women were underrepresented in higher graded positions at DOI in comparison to the CLF. In particular, the data revealed that women overall, Asians, Blacks or African Americans, Hispanic/Latinos, Native Hawaiian or Pacific Islanders, American Indian or Alaska Natives, PWDs, and PWTDs occupied the least number of senior level permanent positions in DOI for multiple years. The data for these same demographic groups reveals they are underrepresented in leadership roles at DOI in comparison to the CLF.

5. Disability Employment

In FY 2019, there were two triggers identified for persons with disabilities (PWD) at DOI. First, PWD are underrepresented in GS-11 to SES permanent positions throughout DOI in comparison to the EEOC's affirmative action goal of 12 percent for PWD. PWD accounted for just 7.6 percent of DOI employees in GS-11 to SES permanent positions in DOI.

The second trigger revealed that Persons with Targeted Disabilities (PWTD) are underrepresented in DOI compared to the CLF. PWTD accounted for just 1.9 percent of DOI employees in GS-11 to SES permanent positions in DOI. The number of PWTD has not changed since FY 2018, the last annual reporting period, and remains out of compliance with the Affirmative Action goal to ensure two percent of senior level positions are occupied by PWTD.

ACCOMPLISHMENTS

E.4 – Executive Summary: Accomplishments

Diversity Recruitment Efforts

DOI is actively engaged in developing new relationships with schools, communities, and other organizations; establishing new partnerships; and meeting with managers and supervisors to discuss recruitment and outreach events. DOI's bureau and Field Office national recruitment teams maintained relationships with professional organizations through attendance at regional and national conferences. In FY 2019, DOI participated in the following events:

- Minorities in Agricultural & Natural Resources Related Sciences (MANRRS);
- League of United Latin American Citizens (LULAC);
- American Indian Society for Engineering and Sciences (AISES);
- Society of Asian Scientists & Engineers (SACE);
- Society for Advancement of Chicanos/Hispanics and Native Americans in Science (SACNAS);
- Conference on Asian Pacific American Leadership (CAPAL);
- Hispanic Association of Colleges and Universities (HACU); and
- National Association for Equal Opportunity (NAFEO).

DOI continued its support of the White House Initiatives that mandate that federal agencies provide assistance to and partner with Historically Black Colleges & Universities (HBCU-Executive Order 12876), the Hispanic Association of Colleges & Universities (HACU-Executive Order 12900), and Tribal Affiliated Colleges & Universities (TACU-Executive Order 13270) with respect to a variety of areas, including research opportunities, internships, fellowships, grants, curricula development, and equipment donation. In FY 2019, the NPS provided financial assistance totaling approximately $5,000,000 to minority-serving colleges and universities.

DOI's bureaus continue to focus on providing learning and hands-on opportunities to young people from grade school through graduate school. Of note, the NPS works with nearly 10,000 youth through partnerships. The primary goal of the youth programs is to introduce young people to career opportunities within DOI.

DOI's bureaus continue to expand internship and apprenticeship programs to ensure students develop the knowledge, skills, and abilities needed for a career in the Department. Current programs include:

- Historically Black Colleges & Universities Internship Program (HBCUI). HBCUI connects approximately 50 undergraduate and graduate students attending historically black colleges and universities to NPS parks and units in the fields of health, recreation, and natural and cultural resource conservation. The Greening Youth Foundation serves as the partner organization.

- Historic Preservation Training Center (HPTC) Apprenticeship Program. HPTC provides a 26-week vocational training opportunity to young adults and returning veterans in the skilled historic preservation crafts (brick masonry and carpentry). Upon completion, participants are eligible for special hiring into NPS positions or opportunities with private sector trade unions.

- Ancestral Lands Conservation Corps Program (ALCCP). ALCCP supports employment opportunities for over 70 young people living on tribal lands that border national parks and supports educational and recreational opportunities for an additional 240 participants. Projects include river restoration, invasive vegetation inventory and monitoring, fuel mitigation, trail construction, preservation, and cultural/language immersion. Conservation Legacy serves as the partner organization.

- American Sign Language Conservation Crew Program (ASLCCP). ASLCCP is a collaborative partnership with the Northwest Conservation Corps to provide employment opportunities for deaf and/or hard-of-hearing individuals to support projects focused on

natural resource restoration. Over 70 percent of the participants came from racially and ethnically diverse backgrounds.

- Latino Heritage Internship Program (LHIP). LHIP provides internship opportunities to over 70 undergraduate and graduate students at 45 NPS sites. LHIP positions include the fields of archeology, historic preservation, interpretation and education, and community outreach. NPS utilizes the Hispanic Access Foundation and Environment for the Americas as partner organizations.

- Hawaii Island Youth Ranger Internship Program (HIYRIP). HIYRIP addresses the lack of representation of employees from the Asian American and Pacific Islander community. The Youth Ranger Internship Program trains up to 75 high school students in natural and cultural resources interpretation, environmental education, administration, protection (law enforcement), and park maintenance. Upon completion of training, students may be hired at a GS-1, WG-1 or equivalent salary to work during the summer.

Employee Development

The Department's commitment to ensuring employees have the opportunity to understand and explore career progression opportunities within and across career fields, and, within and across bureaus is evidenced by the launch of the Department's DOI Careers website in October 2019. DOI's nearly 70,000 employees occupy more than   350 distinct occupations and serve in both permanent and seasonal capacities in more than 2,400 operating locations across the country. The relaunched website focused first on mission-critical and densely populated occupations, which represent almost 30,000 current employees. After the initial launch, DOI continues to add information on additional occupations and will continue to expose connections between competencies that cross occupations to provide a broader view of career opportunities to explore. For each occupation, the DOI Careers website provides an overall description, the typical workplace environment, videos from DOI employees sharing their career stories, and information on strengths required at varying levels of seniority.

DOI created an orientation training so all employees understand from day one DOI's mission, values, and expectations related to workplace conduct and that everyone has a role in preventing and elimination of harassing conduct. Employees were also invited to share ideas and successes at transformdoi@doi.gov.

DOI hired a new Departmental Chief Learning Officer (CLO) and Director of Strategic Employee and Organizational Development. The CLO's primary leadership role is to formulate the strategy and drive DOI's learning direction, goals, and policies. The CLO works to create a collaborative community among DOI learning professionals to improve employee engagement, organizational effectiveness, and support the leadership's goal of "improving the employee experience."

On October 18, 2019, DOI launched its automated performance plan, which brings better clarity, transparency, and organization to the documentation requirements of the performance management program. With this launch, most DOI employees will use DOI Talent to conduct performance appraisals and complete the DI-3100 and DI-3100S employee and supervisor appraisal forms.

DOI Career Connection (DCC) is an online portal for sharing short-term projects, details, and lateral opportunities across DOI. The DCC facilitates opportunities to broaden employees' experiences, address staffing needs, and build a highly skilled workforce. DOI partnered with the Office of Personnel Management's Open Opportunities platform to bring DOI Career Connection to the workforce. The DCC also offers increased functionality and integration with USA JOBS.

Special Emphasis Program (SEP)
The Departmental OCR collaborated with several bureaus to conduct special observance programs for Black History, Women's History, Asian-American/Pacific Islander, Hispanic Heritage Month, and Women's Equality Day. During this annual reporting period, the Departmental OCR provided training specifically to the Department's Diversity Advocates and Employee Resource Groups (ERGs) on EDI initiatives. Training on preparation of the MD-715 report remains a popular request for training programs coordinated by the Departmental OCR. Annual reporting requirements are a frequent agenda item during the SEP monthly meeting.

Promoting a Workplace Free of Harassment

It is DOI's policy to treat all employees equitably regardless of race, color, national origin, sex (including pregnancy and gender identity), sexual orientation, age, disability, genetic information (including family medical history), status as a parent, marital status, and political affiliation. It is the Department's policy that employees and applicants be free from reprisal or harassment in the Department's workplaces.

According to EEOC's MD-715 guidance, all federal managers, supervisors, human resources professionals, and EEO officials are held accountable for the effective implementation of DOI's anti-harassment policy to achieve a model EDI program. Managers and supervisors are held accountable for anti-harassment program implementation and compliance in their performance standards to support DOI's effort create and maintain a workplace free of harassment.

Public Civil Rights (PCR) Program

In FY 2019, FWS finalized its Five Year Federally Assisted Plan and Federally Conducted Plan and closed 23 PCR complaints. The FWS PCR team was trained to conduct on-site compliance reviews through training with the US Access Board, the Departmental OCR, the National Park Service, and experiential learning opportunities (ELOs), such as a mock site review at Rocky Mountain Arsenal NWR. The FWS PCR team completed an on-site compliance review for Oregon and a Desk Review for New York. In collaboration with the National Wildlife Refuge Program, the FWS PCR team finalized the first version of its accessibility module for the FWS Assessment Management Inventory System, which will play a vital role in standardizing expectations and resources for improving access to facilities and programs for all, including PWD and PWTD.

Diversity Events, Programs and Initiatives

In FY 2019, the Department's enhanced diversity outreach efforts were consistent with the Department's overall Diversity and Inclusion Strategic Plan. Some of the trends and best practices the Department implemented included working with colleges and universities to encourage students to consider federal service as their "career of choice" and participate in DOI's Pathways Program. DOI uses the Pathway Internship Program and the Presidential Management Fellows Program for acquiring new federal talent for their competitive hiring plans.

The Diversity Joint Venture (DJV) is a partnership of 34 federal and state agencies, universities, non-governmental organizations, foundations, and professional societies working in collaboration to increase the number of women and people of color in the conservation workforce. The DJV launched a website that provides job-related resources for students, professionals, and employers in the field. In FY 2019, the DJV added to its website a video library of students and professionals, both women and people of color who work in the conservation field, to serve as a resource for anyone interested in understanding the culture, opportunities, and nature of work in the field of conservation.

The NPS, Office of Equal Opportunity Programs (OEOP) collaborated with Economic Systems, Inc. (EconSys) to conduct exploratory analysis on the NPS diversity and inclusion data and processes to identify opportunities for process improvement and optimization. Additionally, the OEOP partnered with George Mason University to conduct exploratory analysis on one of the NPS major occupations (Interpretive Ranger-0025). The OEOP conducted its annual three-day training workshop for NPS EEO Practitioners in August 2019. The theme for the workshop was "Leading Diverse Teams," with a focus on accessibility for PWD. The NPS Workforce and Inclusion Directorate hired 12 new employees to correct some of its EEO Program deficiencies identified by the EEOC. The NPS Office of Human Resources hired seven new employees, and the Ethics Office hired five new employees.

DOI's Diversity Change Agent (DCA) Program includes over 1,200 employees who are trained to assist in efforts to educate the workforce and position EDI as a mission-critical imperative. The DCAs are the voices of employees delivering the message of the power of diverse thinking to influence the new ground-rules that will define the inclusive workplace of the future. Many participants in the program are influential leaders who have enormous credibility from a mission standpoint, including senior executives, managers, supervisors, and non-supervisory permanent employees. DCAs can be found at every level of the organization. The primary objectives of the DCA program are to diplomatically draw DOI's workforce into the inclusivity conversation; serve as catalysts for change; and encourage managers, supervisors, and non-supervisory employees to embrace diversity and inclusion as strategic opportunities.

Employee Resource Groups

People are DOI's greatest asset. Creating and maintaining an inclusive workplace where employees feel empowered to be their authentic selves is a crucial driver to attracting and retaining talent. Employee resource groups (ERGs) are one way for organizations to build community while amplifying DOI's values and promoting EDI. All Department employees are encouraged to participate in ERGs. ERGs provide networking, mentoring, and outreach opportunities to interested employees, sponsor cultural and educational programs, and support DOI's EDI efforts. In FY 2019, each ERG received program support from the Office of Human Capital (OHC) and was encouraged to identify a Leadership Liaison (LL) sponsor. The following ERGs were active at DOI in FY 2019:

- DOI Vets
- DOI Federal Asian Pacific American Council (FAPAC)
- DOI National Association of Hispanic Employees (NAHE)
- Employee Empowerment Collective (EEC)
- Federal Employed Women (FEW)
- DOI Globe
- Hispanic Organization on Relevancy, Advising, Leadership and Excellence (HORALE)

Building an active and visible ERG program is a positive way for DOI to demonstrate its investment in its employees by putting dedicated Department resources towards employee education, community building, and EDI.

Veterans Employment Program

DOI is committed to increasing the employment of Veterans within the workforce. In FY 2019, DOI continued to actively recruit disabled veteran candidates through the veteran-specific job candidate programs and other resources and authorities, including:

- Veterans Recruitment Authority (VRA)
- 30 Percent or More disabled

- Veteran Employment Opportunities Act (VEOA)

- Schedule A Hiring Authority

- Warrior Transition Battalions (WTB)

- Operation Warfighter Program

- Paralyzed Veterans

- Team Rubicon

DOI bureaus and field offices conducted hiring initiatives such as the National Hiring for the Scientific Job Series 401, 402, 485, and 486. DOI also established a Memorandum of Understanding with the Veterans Affairs Vocational Rehabilitation Employment Program (VBAVACO) to provide work experience and on-the-job-training for disabled veterans participating in the Nonpaid Work Experience (NPWE) program. The Department onboarded a number of new hires as a result of this program.

PLANNED ACTIVITIES

Part E.5 - Executive Summary: Planned Activities

1. Increase collaboration between the Departmental OCR, OHC, and key stakeholders to identify triggers, conduct barrier analysis, and resolve deficiencies identified through the barrier identification and elimination process, including analysis of workforce data systems, and increased engagement with bureaus and field offices;

2. Analyze and improve resources (personnel, training, data systems, funding, and administrative support) for the Department's EDI program;

3. Deliver a State of the Agency briefing to Departmental leadership on the Department's performance in each of the six elements of the model EDI program, as well as a report on the progress of the Department in completing its barrier analysis;

4. Implement new automated data systems and enhance current IT systems; and

5. Collectively work to address identified deficiencies in Elements A, B, C, D, and E of this annual report.

Part G
SELF-ASSESSMENT CHECKLIST

The Part G Self-Assessment Checklist is a series of questions designed to provide federal agencies with an effective means for conducting the annual self-assessment required in Part F of MD-715. This self-assessment permits EEO Directors to recognize, and to highlight for their senior staff, deficiencies in their EEO program that the agency must address to comply with MD-715's requirements. Nothing in Part G prevents agencies from establishing additional practices that exceed the requirements set forth in this checklist.

All agencies will be required to submit Part G to EEOC. Although agencies need not submit documentation to support their Part G responses, they must maintain such documentation on file and make it available to EEOC upon request.

The Part G checklist is organized to track the MD-715 essential elements. As a result, a single substantive matter may appear in several different sections, but in different contexts. For example, questions about establishing an anti-harassment policy fall within Element C (Management and Program Accountability), while questions about providing training under the anti-harassment policy are found in Element A (Demonstrated Commitment from Agency Leadership).

For each MD-715 essential element, the Part G checklist provides a series of "compliance indicators." Each compliance indicator, in turn, contains a series of "yes/no" questions, called "measures." To the right of the measures, there are two columns, one for the agency to answer the measure with "Yes", "No", or "NA;" and the second column for the agency to provide "comments", if necessary. Agencies should briefly explain any "N/A" answer in the comments. For example, many of the sub-component agencies are not responsible for issuing final agency decisions (FADs) in the EEO complaint process, so it may answer questions about FAD timeliness with "NA" and explain in the comments column that the parent agency drafts all FADs.

A "No" response to any measure in Part G is a program deficiency. For each such "No" response, an agency will be required in Part H to identify a plan for correcting the identified deficiency. **If one or more sub-components answer "No" to a particular question, the agency-wide/parent agency's report should also include that "No" response.**

Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.				
➡️ **Compliance Indicator** ⬇️ **Measures**	**A.1 – The agency issues an effective, up-to-date EEO policy statement.**	**Measure Met? (Yes/No/NA)**	**Comments**	**Current Part G Questions**
A.1.a	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "yes", please provide the annual issuance date in the comments column. [see MD-715, II(A)]	No	The Departmental OCR, BOEM and BSEE has not yet met this measure.	A.1.a.2
A.1.b	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]	No	The Departmental OCR, BOEM and BSEE has not yet met this measure.	New
➡️ **Compliance Indicator** ⬇️ **Measures**	**A.2 – The agency has communicated EEO policies and procedures to all employees.**	**Measure Met? (Yes/No/NA)**	**Comments**	

A.2.a	Does the agency disseminate the following policies and procedures to all employees:			
A.2.a.1	Anti-harassment policy? [see MD 715, II(A)]	Yes		New
A.2.a.2	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	Yes		New
A.2.b	Does the agency prominently post the following information throughout the workplace and on its public website:			
A.2.b.1	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]	No	BOEM and BSEE has not yet met this measure.	New
A.2.b.2	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	No	The Departmental OCR, BOEM and BSEE has not yet met this measure.	A.2.c
A.2.b.3	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	Yes	https://www.doi.gove/accesscenter/access	A.3.c
A.2.c	Does the agency inform its employees about the following topics:			
A.2.c.1	EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If "yes", please provide how often.	Yes		A.2.a

3

A.2.c.2	ADR process? [see MD-110, Ch. 3(II)(C)] If "yes", please provide how often.	Yes		New	
A.2.c.3	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If "yes", please provide how often.	Yes		New	
A.2.c.4	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If "yes", please provide how often.	Yes		New	
A.2.c.5	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] If "yes", please provide how often.	Yes		A.3.b	
██████████					
Compliance Indicator ⬇ **Measures**	**A.3 – The agency assesses and ensures EEO principles are part of its culture.**	**Measure Met? (Yes/No/NA)**	**Comments New Compliance Indicator**		
A.3.a	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a)(9)] If "yes", provide one or two examples in the comments section.	No	The Departmental OCR, BOEM and BSEE has not yet met this measure.	New	

A.3.b	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	Yes		New

<table>
<tr><td colspan="5" align="center">Essential Element B: Integration of EEO into the agency's Strategic Mission
This element requires that the agency's EEO programs are structured to maintain a workplace that is free from discrimination and support the agency's strategic mission.</td></tr>
<tr><td>→

Compliance Indicator
↓

Measures</td><td>B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.</td><td>Measure Met? (Yes/No/N A)</td><td>Comments</td><td></td></tr>
<tr><td>B.1.a</td><td>Is the agency head the immediate supervisor of the person ("EEO Director") who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]</td><td>No</td><td>The Departmental OCR, BOR, BOEM and BSEE has not yet met this measure.</td><td>B.1.a</td></tr>
<tr><td>B.1.a.1</td><td>If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If "yes," please provide the title of the agency head designee in the comments.</td><td>No</td><td>Neither the Departmental OCR nor BOR has not yet met this measure.</td><td>New</td></tr>
<tr><td>B.1.a.2</td><td>Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]</td><td>No</td><td>The Departmental organizational chart does not</td><td>B.1.d</td></tr>
</table>

5

			accurately define the reporting structure for the Departmental OCR.	
B.1.b	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]	Yes		B.2.a
B.1.c	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I)] If "yes", please provide the date of the briefing in the comments column.	No	The Departmental OCR, BOEM and BSEE has not yet met this measure.	B.2.b
B.1.d	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)N	No	The Departmental OCR, BOR, BOEM and BSEE has not yet met this measure.	New

Compliance Indicator → ↓ Measures	B.2 – The EEO Director controls all aspects of the EEO program.	Measure Met? (Yes/No/NA)	Comments New Compliance Indicator	
B.2.a	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)]	No	BOR has not yet met this measure.	B.3.a
B.2.b	Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR §1614.102(c)(4)]	No	BOR (CRD Manager is engaged with discussion with senior leadership to consider options for strengthening relationships between CRD and regional EEO offices.	New
B.2.c	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes		New

B.2.d	Is the EEO Director responsible for overseeing the timely issuing final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes		New
B.2.e	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	Yes		F.3.b
B.2.f	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]	No	The Departmental OCR and BOR have not yet met this measure.	New
B.2.g	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2) and (c)(3)]	No	The Departmental OCR and BOR have not yet met this measure.	New
➡️ **Compliance Indicator** ⬇️ **Measures**	**B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.**	**Measure Met? (Yes/No/NA)**	**Comments**	
B.3.a	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for	No	The Departmental OCR, BIA, BOEM, BSEE and USGS has	B.2.c & B.2.d

	training/career development opportunities? [see MD-715, II(B)]		not yet met this measure.	
B.3.b	Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.	No	The Departmental OCR, BIA and USGS has not yet met this measure.	New
→ **Compliance Indicator** ↓ **Measures**	**B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.**	**Measure Met? (Yes/No/NA)**	**Comments**	
B.4.a	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:			
B.4.a.1	to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	No	The Departmental OCR has not met this measure.	B.3.b
B.4.a.2	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	No	The Departmental OCR, BIA, BOR and USGS has not yet met this measure.	B.4.a
B.4.a.3	to timely, thoroughly, and fairly process EEO complaints, including EEO	No	The Departmental	E.5.b

9

	counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]		OCR and NPS has not yet met this measure.	
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.	No	The Departmental OCR and NPS has not yet met this measure.	B.4.f & B.4.g
B.4.a.5	to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]	No	The Departmental OCR, BIA and NPS has not yet met this measure.	E.1.c
B.4.a.6	to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	No	The Departmental OCR has not met this measure.	B.4.c
B.4.a.7	to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section.	No	The iComplaints systems does not have sufficient funding to support electronic case	New

10

			filing as required.	
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]	No	The Departmental OCR, BIA, BOEM and BSEE has not yet met this measure.	B.3.c, B.3.c.1, B.3.c.2, & B.3.c.3
B.4.a.9	to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	No		New
B.4.a.10	to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]	No		B.4.d
B.4.a.11	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	Yes		New
B.4.b	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	Yes		New
B.4.c	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	No	The Departmental OCR EEO Director's position does not	B.1.b

			clearly the responsibilities as required.	
B.4.d	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?	Yes		E.2.d
B.4.e	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	Yes		E.2.e
Compliance Indicator ⬇ **Measures**	**B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.**	**Measure Met? (Yes/No/NA)**	**Comments** **New Indicator**	
B.5.a	Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:			
B.5.a.1	EEO Complaint Process? [see MD-715(II)(B)]	No		New
B.5.a.2	Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]	No		A.3.d
B.5.a.3	Anti-Harassment Policy? [see MD-715(II)(B)]	No		New

B.5.a.4	Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	Yes		New
B.5.a.5	ADR, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	No		E.4.b
➡️ **Compliance Indicator** ⬇️ **Measures**	**B.6 – The agency involves managers in the implementation of its EEO program.**	**Measure Met? (Yes/No/NA)**	**Comments** **New Indicator**	
B.6.a	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	No	The Departmental OCR, BOEM, BSEE and OSMRE has not yet met this measure.	New
B.6.b	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	No	The Departmental OCR, BOEM, BSEE, BOR, NPS and USGS has not met this measure.	D.1.a

13

B.6.c	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	No	The Departmental OCR, BIA, BOEM, BSEE and OSMRE has not yet met this measure.	D.1.b
B.6.d	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR § 1614.102(a)(5)]	No	The Departmental OCR, BIA and OSMRE has not yet met this measure.	D.1.c
██				
Essential Element C: Management and Program Accountability **This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency's EEO Program and Plan.**				
➡ **Compliance Indicator** ⬇ **Measures**	**C.1 – The agency conducts regular internal audits of its component and field offices.**	**Measure Met? (Yes/No/NA)**	**Comments**	
C.1.a	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	No	Multiple Bureaus have not yet met this measure.	New
C.1.b	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR	No	Multiple Bureaus have not yet met this measure.	New

14

	§1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.			
C.1.c	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]	No	Multiple Bureaus have not yet met this measure because no field audits have been conducted.	New
Compliance Indicator ⮕ ⬇ **Measures**	**C.2 – The agency has established procedures to prevent all forms of EEO discrimination.**	**Measure Met? (Yes/No/NA)**	**Comments** **New Indicator**	
C.2.a	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes		New
C.2.a.1	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful	Yes		New

	Harassment by Supervisors (1999), § V.C.1]			
C.2.a.2	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006]	Yes		New
C.2.a.3	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes		New
C.2.a.4	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity-alleging harassment? [see Enforcement Guidance, V.C.]	No	Multiple Bureaus have not met this measure.	New
C.2.a.5	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see Complainant v. Dep't of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Dep't of Defense (Defense Commissary Agency),	No	Multiple Bureaus have not met this measure.	New

	EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.			
C.2.a.6	Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR 1614.203(d)(2)]	Yes		New
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)]	Yes		New
C.2.b.1	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)]	Yes		E.1.d
C.2.b.2	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	Yes		New
C.2.b.3	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR 1614.203(d)(1)(ii)(B)]	Yes		New

C.2.b.4	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR 1614.203(d)(3)(i)(M)]	Yes		New
C.2.b.5	Does the agency process all accommodation requests 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 in the comments column.	No		E.1.e
C.2.c	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]	Yes		New
C.2.c.1	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column.	Yes		New

Compliance Indicator ⬇ Measures	C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	Measure Met? (Yes/No/NA)	Comments New Indicator	
C.3.a	Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	Yes		New
C.3.b	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:			
C.3.b.1	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]	No		A.3.a.1
C.3.b.2	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	No		A.3.a.4
C.3.b.3	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	No		A.3.a.5
C.3.b.4	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a	No		A.3.a.6

	workplace with diverse employees? [see MD-715 Instructions, Sec. I]			
C.3.b.5	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	No		A.3.a.7
C.3.b.6	Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]	No		A.3.a.8
C.3.b.7	Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]	No	Multiple Bureaus have not met this measure.	New
C.3.b.8	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]	Yes		A.3.a.2
C.3.b.9	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	Yes		New
C.3.c	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	No		New

20

C.3.d	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	No		New
Compliance Indicator ⬇ **Measures**	**C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.**	**Measure Met? (Yes/No/NA)**	**Comments**	
C.4.a	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	No	The Departmental OCR, BIA and USGS have not yet met this measure.	New
C.4.b	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]	No	The Departmental OCR, BIA, BOEM, BSEE and USGS have not yet met this measure.	C.2.a, C.2.b, & C.2.c

C.4.c	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	Yes		New
C.4.d	Does the HR office timely provide the EEO office have timely access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	No		New
C.4.e	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:	████	████	████
C.4.e.1	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	No	The Departmental OCR, BIA, BOEM, BSEE and USGS have not yet met this measure.	New
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	No	The Departmental OCR, BIA has not yet met this measure.	New
C.4.e.3	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	Yes		New

C.4.e.4	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	No	The Departmental OCR, BIA, BSEE, BOEM have not yet met this measure.	New
C.4.e.5	Assist in preparing the MD-715 report? [see MD-715, II(C)]	No	The Departmental OCR, BIA has not yet met this measure.	New
Compliance Indicator ⬇ **Measures**	**C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.**	**Measure Met? (Yes/No/NA)**	**Comments**	
C.5.a	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? 29 CFR § 1614.102(a)(6); see also Douglas v. Veterans Administration, 5 MSPR 280 (1981)	Yes		C.3.a.
C.5.b	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If "yes", please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Yes		C.3.c

23

C.5.c	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [see MD-715, II(C)]	Yes		New
Compliance Indicator **Measures**	**C.6 – The EEO office advises managers/supervisors on EEO matters.**	**Measure Met? (Yes/No/NA)**	**Comments**	
C.6.a	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If "yes", please identify the frequency of the EEO updates in the comments column.	No		C.1.a
C.6.b	Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [see MD-715 Instructions, Sec. I]	Yes		New
Essential Element D: Proactive Prevention **This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.**				

24

Compliance Indicator ⬇️ **Measures**	**D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.**	**Measure Met? (Yes/No/NA)**	**Comments**	
D.1.a	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	No	The Departmental OCR, BOEM and BSEE has not yet met this measure.	New
D.1.b	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I]	No	The Departmental OCR, BOEM and BSEE has not yet met this measure.	New
D.1.c	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]	No	The Departmental OCR, OSMRE and USGS has not yet met this measure.	New

25

➡ **Compliance Indicator** **⬇** **Measures**	**D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)**	**Measure Met? (Yes/No/NA)**	**Comments** **New Indicator**	
D.2.a	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	No	The Departmental OCR, BOEM and BSEE has not yet met this measure.	New
D.2.b	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	No	The Departmental OCR, BOEM, BSEE and USGS has not yet met this measure.	B.2.c.2
D.2.c	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	No		B.2.c.1
D.2.d	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable accommodation program; anti-	No		New

26

	harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] If "yes", please identify the data sources in the comments column.			

Compliance Indicator Measures	**D.3 – The agency establishes appropriate action plans to remove identified barriers.**	**Measure Met? (Yes/No/NA)**	**Comments** **New Indicator**	
D.3.a.	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	No	The Departmental OCR, BIA, BOEM, BSEE and USGS have not yet met this measure.	New
D.3.b	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	No	The Departmental OCR, BIA, BOEM and BSEE have not yet met this measure.	New
D.3.c	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	No	The Departmental OCR, BIA has not yet met this measure.	New

Compliance Indicator ⬇ Measures	D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities	Measure Met? (Yes/No/N A)	Comments New Indicator	
D.4.a	Does the agency post its affirmative action plan on its public website? [see 29 CFR 1614.203(d)(4)]. Please provide the internet address in the comments.	No	The Departmental OCR, BIA, BOEM, BSEE, NPS, OSMRE and USGS have not yet met this measure.	New
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)]	Yes		New
D.4.c	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]	Yes		New
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)]	No	The Departmental OCR, BIA and NPS have not yet met this measure.	New

28

Essential Element E: Efficiency **This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency's EEO programs and an efficient and fair dispute resolution process.**			
➡️ **Compliance Indicator** ⬇️ **Measures**	**E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.**	**Measure Met? (Yes/No/NA)**	**Comments**	
E.1.a	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	Yes		E.3.a.1
E.1.b	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	Yes		E.3.a.2
E.1.c	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?	Yes		New
E.1.d	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments.	No		New

E.1.e	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?	Yes		New
E.1.f	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	Yes		E.3.a.3
E.1.g	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	Yes		New
E.1.h	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	Yes		E.3.a.4
E.1.i	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?	Yes		E.3.a.7
E.1.j	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch.	Yes	In accordance with the contractor's statement of work (SOW), the Agency may	E.2.c

30

	5(V)(A)] If "yes", please describe how in the comments column.		demand the removal of a contract investigator where it determines an investigator is ineffective). If the contractor delivers a report that is insufficient, the report is returned to the contractor for further development.	
E.1.k	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes	.	New
E.1.l	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal ()? [See 29 CFR § 1614.403(g)]	Yes		New
➡️ **Compliance Indicator** ⬇️	**E.2 – The agency has a neutral EEO process.**	**Measure Met? (Yes/No/NA)**	**Comments Revised Indicator**	

Measures				
E.2.a	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)]	Yes		New
E.2.b	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If "yes", please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.	Yes	BOR currently employs two attorneys as EEO personnel within the Civil Rights Division who are trained in conducting legal sufficiency reviews of investigative Reports. OSMRE: in accordance with EEOC MD 110, Chapter 1 BLM sends an email to OCR's Employment & Labor Law Unit, General Law (ELLU) with the	E.6.a

32

			subject line titled Legal Sufficiency Review. OS – Departmental OCR, Employment Complaints Adjudication Division	
E.2.c	If the EEO office relies on the agency's defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]	NA		New
E.2.d	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]	Yes		E.6.b
E.2.e	If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? EEOC Report, *Attaining a Model Agency Program: Efficiency* (Dec. 1, 2004)	NA		E.6.c

Compliance Indicator ⬇ Measures	E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	Measure Met? (Yes/No/NA)	Comments	
E.3.a	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	Yes		E.4.a
E.3.b	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	Yes		E.4.c
E.3.c	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	No		D.2.a
E.3.d	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Yes		New
E.3.e	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	Yes		E.4.d
E.3.f	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	No		New

Compliance Indicator ⬇ Measures	E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Measure Met? (Yes/No/NA)	Comments	
E.4.a	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:			
E.4.a.1	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	Yes		E.5.a
E.4.a.2	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	Yes		E.5.c
E.4.a.3	Recruitment activities? [see MD-715, II(E)]	No	USGS has not yet met this measure.	E.5.f
E.4.a.4	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]	Yes		New
E.4.a.5	The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]	Yes		New
E.4.a.6	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	Yes		New

35

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]	No	The Departmental OCR and OSMRE has not yet met this measure.	New
Compliance Indicator ⬇ **Measures**	**E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.**	**Measure Met? (Yes/No/NA)**	**Comments**	
E.5.a	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If "yes", provide an example in the comments.	No		**E.5.e**
E.5.b	Does the agency review other agencies' best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If "yes", provide an example in the comments.	No		**E.5.g**
E.5.c	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	No		E.3.a

Essential Element F: Responsiveness and Legal Compliance This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.				
➡️ Compliance Indicator ⬇️ Measures	**F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.**	**Measure Met? (Yes/No/NA)**	**Comments**	
F.1.a	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	Yes		F.1.a
F.1.b	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	Yes		E.3.a.6
F.1.c	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes		F.2.a.1
F.1.d	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Yes		F.2.a.2
F.1.e	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or	Yes		F.3.a.

37

	delays during performance review? [see MD-110, Ch. 9(IX)(H)]			
➡️ **Compliance Indicator** ⬇️ **Measures**	**F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.**	**Measure Met? (Yes/No/N A)**	**Comments** **Indicator moved from E-III Revised**	
F.2.a	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	Yes		C.3.d
F.2.a.1	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]	Yes		E.3.a.5
F.2.a.2	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]	Yes		E.3.a.7
F.2.a.3	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 CFR §1614.403(e)]	Yes		New
F.2.a.4	Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes		F.3.d (1 to 9)

Compliance Indicator ⬇ Measures	F.3 - The agency reports to EEOC its program efforts and accomplishments.	Measure Met? (Yes/No/NA)	Comments	
F.3.a	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	Yes		New
F.3.b	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	Yes		New

Part H
PLANS OF ACTION

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY

TYPE OF PROGRAM DEFICIENCY	BRIEF DESCRIPTION OF PROGRAM DEFICIENCY
Essential Element A: Demonstrated Commitment from Agency Leadership (A.1.a and A.1.b)	DOI did not develop and disseminate an EEO and Diversity Policy Statement.

OBJECTIVE(S) AND DATES FOR EEO PLAN

DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2018	Develop and disseminate an EEO and Diversity Policy Statement that addresses the Secretary's commitment to Equity, Diversity and Inclusion (EDI).	12/30/2025	12/30/2021	

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Director, Office of Civil Rights and Chief Diversity Officer	Erica D. White-Dunston[1]	No
Acting Assistant Secretary for Policy, Management and Budget	Scott Cameron	No
DOI Secretary	David Bernhardt	No

---

[1] Erica White-Dunston assumed responsibility for this planned activity on September 30, 2019.

1

DOI 2019 MD-715 Part H

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
02/20/2019	Develop EEO and Diversity Policy Statement.	No		02/01/2019
09/30/2019	Disseminate EEO and Diversity Policy Statement to key stakeholders for input.	No		02/01/2019
03/31/2019	Package and disseminate for Secretary's signature.	No		03/01/2019
09/30/2019	Disseminate EEO and Diversity Policy Statement to all DOI employees.	No	12/30/2021	

REPORT OF ACCOMPLISHMENTS

FISCAL YEAR	ACCOMPLISHMENTS
2018	The Acting OCR Director addressed with PMB leadership several of the Department's sticking points for Affirmative Employment, one of which was the lack of an EEO and Diversity Policy Statement that had not been disseminated to the workforce in two years.
2019	OCR developed the EEO and Diversity Policy Statement and disseminated it to key stakeholders for input. The stakeholders provided feedback. The policy went to PMB leadership for review but at the close of the fiscal year, it had not been signed. In September 2019, DOI hired a permanent executive to lead OCR. The new Departmental OCR Director reviewed and updated the existing draft EEO and Diversity Policy Statement and re-distributed it to key stakeholders for their feedback. The policy was circulated to PMB leadership and as of the close of the fiscal year, OCR was awaiting final approval and release.

2

DOI 2019 MD-715 Part H

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY

TYPE OF PROGRAM DEFICIENCY	BRIEF DESCRIPTION OF PROGRAM DEFICIENCY
Essential Element A: Demonstrated Commitment from Agency Leadership (A.2.a.2)	DOI does not have established procedures for new supervisors and newly promoted supervisors from within DOI to understand their roles and responsibilities for providing reasonable accommodations.

OBJECTIVE(S) AND DATES FOR EEO PLAN

DATE INITIATED (MM/DD/YYYY)	Ensure new managers and supervisors understand their roles and responsibilities for providing reasonable accommodations.	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2018		04/01/2019	04/30/2021	

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Director, Affirmative Employment Program Division	Tyvonia Ward	No
Human Resource Officer/Deputy Human Capital Officer, BSEE	Cynthia Piper	Yes
Director, Strategic Employee & Organizational Development	Dr. Vicki Brown (or designee)	No
Director, Workforce Relations Division	Ayanna Sears	Yes

DOI 2019 MD-715 Part H

Senior Program Manager for Workers' Compensation and Reasonable Accommodation	Megan Castaneda[2]	Yes

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
12/31/2020	Meet with the 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.	No		
07/30/2021	Draft Department-wide training plan and circulate to Offices and Bureaus for feedback.	No		
09/30/2021	Finalize and execute the training plan Department-wide to ensure all new managers and supervisors receive reasonable accommodation training.	No		

REPORT OF ACCOMPLISHMENTS

FISCAL YEAR	ACCOMPLISHMENTS
FY 2018	No action taken.
FY 2019	No action taken.

---

[2] Megan Castaneda was appointed the Senior Program Manager for Workers Compensation and Reasonable Accommodation in March 2020.

DOI 2019 MD-715 Part H

DEPARTMENT OF THE INTERIOR
ANNUAL EEO PROGRAM STATUS REPORT
PLAN TO ATTAIN THE SIX ELEMENTS OF A MODEL AGENCY PROGRAM
FISCAL YEAR 2019

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY	
TYPE OF PROGRAM DEFICIENCY	**BRIEF DESCRIPTION OF PROGRAM DEFICIENCY**
Essential Element A: Demonstrated Commitment from Agency Leadership (A.3.a)	DOI did not provide recognition to employees, supervisors, managers, and offices that demonstrated superior accomplishments in EDI.

OBJECTIVE(S) AND DATES FOR EEO PLAN

DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2019	Develop and implement a Department-wide program to provide recognition to employees, supervisors, managers, and offices.	12/31/2021		

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Director, Workforce Relations Division	Ayana Sears	Yes
MD-715 Lead Program Manager, AEP	Vacant[3]	No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
01/31/2021	Meet with key stakeholders to address	No		

---

[3] Julia Bumbaca was hired for this vacancy in FY 2020.

DOI 2019 MD-715 Part H

	the program deficiency and to establish a way forward.			
12/31/2021	Incorporate an EDI (EEO) award into the existing reward structure.	No		
12/31/2021	Implement the EDI (EEO) recognition program.	No		

REPORT OF ACCOMPLISHMENTS	
FISCAL YEAR	**ACCOMPLISHMENTS**
FY 2019	This is a new Plan H, no action taken.

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY

TYPE OF PROGRAM DEFICIENCY	BRIEF DESCRIPTION OF PROGRAM DEFICIENCY
Essential Element B: Integration of EEO into the Agency's Strategic Mission (B.1.a, B.1.a.1)	The Departmental OCR Director does not report to the Secretary of the Interior and not all Bureau EEO Directors report directly to the Heads of their Bureaus. *(This non-compliance measure has previously been reported to the EEOC during three EEOC Technical Assistance Visits).*

OBJECTIVE(S) AND DATES FOR EEO PLAN

DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
2/06/2018	Standardize reporting structure so that the Departmental OCR Director reports to the Secretary of the Interior and all Bureau	12/30/2028	12/30/2022	

6

DOI 2019 MD-715 Part H

	EEO Directors report directly to the Heads of their Bureaus.			

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
DOI Secretary	David Bernhardt	No
Assistant Secretary for Policy, Management and Budget	Scott Cameron	No
Deputy Assistant Secretary - Human Capital and Diversity/Chief Human Capital Officer	Raymond Limon	No
Director, Office of Civil Rights and Chief Diversity Officer	Erica D. White-Dunston	No [4]

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
12/30/2019	OCR officials to research reporting structure for cabinet level agencies and develop comparative analysis to present to Senior Executives within DOI.	Yes		12/30/2019
12/30/2019	OCR Departmental Director to meet and outline criterion for reporting structure with the Assistant Secretary, PMB, Principal	Yes		08/30/2019

---

[4] This issue has already been addressed with the Acting Assistant Secretary of Policy, Management and Budget (PMB) who agreed to add a performance standard regarding EEO for Senior Leaders for FY 2022.

DOI 2019 MD-715 Part H

	Deputy Assistant Secretary, and Deputy Assistant Secretary of Human Capital and Diversity.			
12/30/2019	The Departmental OCR Director and Bureau EEO Officers to conduct joint meeting with Heads of Bureaus to outline the criterion for reporting.	Yes		09/30/2019
12/30/2020	Implement procedures to realign Departmental OCR Director to comply with 29 CFR 1614.102(b)(4).	Yes		
12/30/2022	Separate the EEO function from the HR function.			03/04/2019
12/30/2022	Reduce the number of reporting levels between the Departmental OCR Director and the Secretary of the Interior.		09/30/2021	

REPORT OF ACCOMPLISHMENTS

FISCAL YEAR	ACCOMPLISHMENTS
FY 2018	This is a new plan H. No action taken.
FY 2019	All Bureaus have met this measure except for BOR, BOEM, and BSEE. Effective March 4, 2019, the Departmental OCR was realigned to report directly to the Principal Deputy Assistant Secretary for Policy, Management, and Budget. While the realignment did allow the Departmental OCR to have a voice among senior staff, it did not establish the Departmental OCR as an independent reporting arm to the Secretary. More work needs to be done in order for the Departmental OCR Director to exercise a greater and more appropriate degree of independence and allow the office the opportunity to directly advise the Secretary of the Interior on matters related to EDI.

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY

TYPE OF PROGRAM DEFICIENCY	BRIEF DESCRIPTION OF PROGRAM DEFICIENCY
Essential Element B: Integration of EEO into the Agency's Strategic Mission (B.1.c)	The Departmental OCR Director did not present the "State of the Agency" briefing, which covers the six essential elements of the model EDI (EEO) program and the status of the barrier analysis process, to the Secretary of the Interior and other senior management officials.

OBJECTIVE(S) AND DATES FOR EEO PLAN

DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
12/03/2020	Present the "State of the Agency" briefing to the Secretary of the Interior and senior leaders.	03/30/2021		

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
DOI Secretary	David Bernhardt	No
Assistant Secretary for Policy, Management and Budget	Scott Cameron	No
Deputy Assistant Secretary - Human Capital and Diversity/Chief Human Capital Officer	Raymond Limon	No
Director, Office of Civil Rights and Chief Diversity Officer	Erica D. White-Dunston	Yes

9

DOI 2019 MD-715 Part H

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE				
TARGET DATE MM/DD/YYYY	**PLANNED ACTIVITIES**	**SUFFICIENT FUNDING & STAFFING (YES OR NO)**	**MODIFIED DATE (MM/DD/YYYY)**	**DATE COMPLETED (MM/DD/YYYY)**
12/30/2021	Conduct the "State of the Agency" briefing for the Secretary and senior leaders.	No		

REPORT OF ACCOMPLISHMENTS	
FISCAL YEAR	**ACCOMPLISHMENTS**
FY 2019	This is a new Part H, no action taken.

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY

TYPE OF PROGRAM DEFICIENCY	BRIEF DESCRIPTION OF PROGRAM DEFICIENCY
Essential Element B: Integration of EEO into the Agency's Strategic Mission (B.1.d, B.2.g, B4) **Essential Element C: Management and Program Accountability (C.1.a, C.1.b)**	The OCR and Bureau EDI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement EDI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies.

OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	**OBJECTIVE**	**TARGET DATE (MM/DD/YYYY)**	**MODIFIED DATE (MM/DD/YYYY)**	**DATE COMPLETED (MM/DD/YYYY)**
02/06/2018	Provide sufficient resources in each of the Bureaus to ensure adequate staff is available to perform EDI (EEO) program objectives including	12/30/2025	12/30/2022	

DOI 2019 MD-715 Part H

regularly conducting program assessments, audits, and reporting to the appropriate Executive with the authority to address opportunities for improvement (deficiencies).			

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Director, Office of Civil Rights and Chief Diversity Officer	Erica D. White-Dunston	No
Deputy Assistant Secretary - Human Capital and Diversity/Chief Human Capital Officer	Raymond Limon	No
Bureau/Office Directors	Various Personnel	No
Office of Budget	Various Personnel	No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
12/30/2022	The Departmental OCR Director and Bureau EEO Officers participate in senior level staff meetings concerning personnel,	Yes		

DOI 2019 MD-715 Part H

	budget, technology and other workforce issues.			
12/30/2022	Provide sufficient resources for conducting a thorough barrier analysis of the DOI workforce.	No		
12/30/2022	Provide sufficient resources for training all supervisors and employees on the EDI (EEO) program.	No		
12/30/2022	Provide sufficient resources to timely, thoroughly, and fairly process complaints.	No		
12/30/2022	Provide sufficient resources to conduct and implement field audits of EDI (EEO) programs.	No		
12/30/2022	Provide sufficient resources to administer special emphasis programs.	No		

REPORT OF ACCOMPLISHMENTS

FISCAL YEAR	ACCOMPLISHMENTS
FY 2018	The Acting Director, OCR, discussed several of the Department's deficiencies with PMB leadership and tasked the AEP Director to establish a plan of action for addressing DOI's significant vulnerabilities.
FY 2019	No action taken.

DOI 2019 MD-715 Part H

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY				
TYPE OF PROGRAM DEFICIENCY	**BRIEF DESCRIPTION OF PROGRAM DEFICIENCY**			
Essential Element B: Integration of EEO into the Agency's Strategic Mission (B6) **Essential Element C: Management and Program Accountability (C3)**	Internal processes are not standardized to ensure Senior Managers are accountable for establishing action plans to identify and eliminate employment barriers within each of their respective areas of consideration.			

OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	**OBJECTIVE**	**TARGET DATE (MM/DD/YYYY)**	**MODIFIED DATE (MM/DD/YYYY)**	**DATE COMPLETED (MM/DD/YYYY)**
09/30/2018	Standardize internal processes to ensure Senior Managers are accountable for establishing action plans to identify and eliminate employment barriers within each of their respective areas of consideration.	06/30/2025	09/30/2021	

RESPONSIBLE OFFICIAL(S)		
TITLE	**NAME**	**PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)**
Director, Office of Civil Rights and Chief Diversity Officer	Erica D. White-Dunston	No

DOI 2019 MD-715 Part H

Deputy Assistant Secretary - Human Capital and Diversity/Chief Human Capital Officer	Raymond Limon	No		

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
03/30/2025	Incorporate EDI (EEO) element in performance standards of all DOI leaders.	No	11/30/2022	
12/31/2022	Senior Managers are involved in the implementation of Special Emphasis Programs.	No		
12/31/2022	Senior Managers participate in the barrier analysis process.	No		
12/31/2022	Senior Managers assist in developing agency EDI (EEO) action plans.	No		

REPORT OF ACCOMPLISHMENTS

FISCAL YEAR	ACCOMPLISHMENTS
FY 2018	This is a new Part H, no action taken.
FY 2019	Two of the ten DOI Bureaus established action plans to assist Senior Managers in eliminating employment barriers within their respective organizations. Revised the mandatory critical element in the performance plans of all non-SES/SL/ST employees to better reflect their responsibilities to ensure harassment and discrimination free work environments. The Fully Successful standard for all covered supervisors now reads, in relevant part: "Consistently demonstrates commitment and adherence to equal employment opportunity laws, regulations and policy; responds to reasonable accommodation requests and reports of potential discrimination, harassing conduct, or retaliation timely and consistent with DOI policies and procedures; and addresses any findings of misconduct, taking steps to timely correct employee behavior."

DOI 2019 MD-715 Part H

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY				
TYPE OF PROGRAM DEFICIENCY	**BRIEF DESCRIPTION OF PROGRAM DEFICIENCY**			
Essential Element C: Management and Program Accountability	Establish procedures to ensure personnel policies regarding Schedule A Hiring for people with disabilities are clear and consistently applied throughout DOI.			
OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	**OBJECTIVE**	**TARGET DATE (MM/DD/YYYY)**	**MODIFIED DATE (MM/DD/YYYY)**	**DATE COMPLETED (MM/DD/YYYY)**
9/30/2018	Ensure personnel policies regarding Schedule A Hiring for people with disabilities are clear and consistently applied throughout DOI.	10/30/2021		
RESPONSIBLE OFFICIAL(S)				
TITLE	**NAME**	**PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)**		
Deputy Assistant Secretary - Human Capital and Diversity/Chief Human Capital Officer	Raymond Limon	No		
Director, Strategic Talent Management Programs Division	Martin Pursley	No		

DOI 2019 MD-715 Part H

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE				
TARGET DATE (MM/DD/YYYY)	**PLANNED ACTIVITIES**	**SUFFICIENT FUNDING & STAFFING (YES OR NO)**	**MODIFIED DATE (MM/DD/YYYY)**	**DATE COMPLETED (MM/DD/YYYY)**
12/30/2025	Provide recurring training on personnel policies and procedures to HR practitioners Department-wide.	Yes	10/30/2021	
12/30/2025	Develop and disseminate policies and procedures on Schedule A Hiring to all DOI employees.	Yes	10/30/2021	

REPORT OF ACCOMPLISHMENTS	
FISCAL YEAR	**ACCOMPLISHMENTS**
FY 2018	This is a new Part H. No action taken.
FY 2019	OCR and the Office of Human Capital (OHC) collaborated and issued joint messaging to the workforce Department-wide regarding the EEOC's numerical hiring goals for people with disabilities. (2 percent for persons with targeted disabilities and 12 percent for persons with disabilities). As a result of this partnership, 12.5 percent of new hires at the end of FY 2019 were people with disabilities (PWDs), and 3.1 percent were people with targeted disabilities (PWTDs). Additionally, during this same time, Schedule A hires constituted 4.3 percent of all new hires, exceeding the steady 2.9 percent of Schedule A new hires to the Department in previous years.

16

DOI 2019 MD-715 Part H

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY				

TYPE OF PROGRAM DEFICIENCY	BRIEF DESCRIPTION OF PROGRAM DEFICIENCY			
Essential Element C: Management and Program Accountability (C.2.a.4)	The Department does not have a process in place to ensure EDI (EEO) offices throughout the Department notify the Anti-Harassment Program of EEO Counseling activity alleging harassment.			

OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
9/30/2019	Establish a process to report allegations of harassment in informal complaints.	12/30/2021		

RESPONSIBLE OFFICIAL(S)		
TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Director, Employment Complaints and Adjudication Division	Thomas Ziehnert	No
Workplace Culture Transformation Advisory Council (WCTAC) Advisor	Tammy Duchesne	No

DOI 2019 MD-715 Part H

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2021	OCR and WCTAC Advisor to collaborate to establish a Department-wide procedure to collect and report on anti-harassment activity initiated in the informal complaint process.	No		
09/30/2021	Meet with Department EDI (EEO) and Anti-Harassment Communities to inform action officers of the requirement and to establish an internal business rule for implementation.	Yes		
09/30/2021	Implement processes and procedures to collect and report on anti-harassment activity in EEO complaints.	No		

REPORT OF ACCOMPLISHMENTS

FISCAL YEAR	ACCOMPLISHMENTS
FY 2019	This is a new Plan H. No action taken.
FY 2019	OHC requested funding to create a Department-wide reasonable accommodation tracking system. Once funding has been secured, OHC in partnership with OCR and Bureau representatives, will work with an established vendor to develop the system. In the absence of a Department-wide tracking system, DOI will issue data calls to the Bureaus for reasonable accommodation tracking reports.

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY	

TYPE OF PROGRAM DEFICIENCY	BRIEF DESCRIPTION OF PROGRAM DEFICIENCY
Essential Element C: Management and Program Accountability (C.2.b.5)	The Department does not have a tracking mechanism to account for and ensure timely issuance of requests for reasonable accommodation.

OBJECTIVE(S) AND DATES FOR EEO PLAN

DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
9/30/2018	Establish a tracking mechanism to account for and ensure timely responses to requests for reasonable accommodation.	12/30/2021		

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Director, Workforce Relations Division	Ayanna Sears	No
Employee Relations Program Manager	Megan Castaneda	No
Director, Human Resources Information Systems Division	Christopher Lawson	No
Managers and Supervisors	Various Personnel	No

19

DOI 2019 MD-715 Part H

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2018	Provide processes and procedures for Offices and Bureaus at monthly Reasonable Accommodation Community of Practice meetings and ensure Reasonable Accommodation Reports monitor and track for timeliness.	No	09/30/2018	09/30/2019
09/30/2018	Meet with Departmental OCR Director and Workforce Relations Division Director to discuss the necessity for a reasonable accommodation tracking system.	No		09/30/2019
12/30/2018	Conduct market research on potential reasonable accommodation tracking and reporting systems with GSA vendors.	No		09/22/2019
12/30/2018	Provide justification to Workforce Relations Division Director to secure the reasonable accommodation tracking system.	No		07/2019
12/30/2018	Secure a new automated reasonable accommodation tracking system to improve the processing of reasonable	No	12/30/2021	

DOI 2019 MD-715 Part H

	accommodations in accordance with the guidelines set forth in DOI's Reasonable Accommodation Policy and Procedures.			

REPORT OF ACCOMPLISHMENTS	
FISCAL YEAR	**ACCOMPLISHMENTS**
FY 2018	This is a new Plan H, no action taken.
FY 2019	OHC requested funding to create a Department-wide reasonable accommodation tracking system. Once funding has been secured, OHC in partnership with OCR and Bureau representatives, will work with an established vendor to develop the system. In the absence of a Department-wide tracking system, DOI will issue data calls to the Bureaus for reasonable accommodation tracking reports.

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY	
TYPE OF PROGRAM DEFICIENCY	**BRIEF DESCRIPTION OF PROGRAM DEFICIENCY**
Essential Element C: Management and Program Accountability (C.2.b.5)	The Department does not have a central system in place to track and report DOI's performance with regard to providing timely reasonable accommodation solutions to individuals with disabilities.

OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	**OBJECTIVE**	**TARGET DATE (MM/DD/YYYY)**	**MODIFIED DATE (MM/DD/YYYY)**	**DATE COMPLETED (MM/DD/YYYY)**
09/30/2018	Establish recurring reporting on the percentage of requests for reasonable accommodation that are timely processed and a	12/30/2021	12/30/2022	

21

DOI 2019 MD-715 Part H

	root cause analysis on those that were not with the intent to remove impediments to providing reasonable accommodation solutions.			

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Director, Workforce Relations Division	Ayanna Sears	Yes
Director, Human Capital Information Systems	Christopher Lawson	No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
12/30/2018	Hire Director for Departmental Affirmative Employment Programs (AEP) to oversee and bring overall AEP into compliance with EEOC requirements.	No		09/16/2018
09/30/2019	Communicate requirement for Department-wide tracking system.	No		7/01/2019
12/30/2022	Establish procedure for tracking and analyzing Department-wide reasonable accommodations.	Yes		

REPORT OF ACCOMPLISHMENTS

FISCAL YEAR	ACCOMPLISHMENTS

DOI 2019 MD-715 Part H

FY 2019	OHC requested funding to create a Department-wide reasonable accommodation tracking system. The Departmental reasonable accommodation coordinator worked closely with a contractor to design an enterprise tracking system. At the close of the FY, funding to finalize the tracking system was held in abeyance until 2021. In the absence of a Department-wide tracking system, the Departmental reasonable accommodation coordinator issues data calls to the Bureau for reasonable accommodation coordinators to account for timely issued RA solutions.

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY

TYPE OF PROGRAM DEFICIENCY	BRIEF DESCRIPTION OF PROGRAM DEFICIENCY
Essential Element C: Management and Program Accountability (C.2.b, C.2.b.1)	The existing Reasonable Accommodation Policy and Procedures for the DOI does not reflect the requirements of the final rule for Section 501 of the Rehabilitation Act.

OBJECTIVE(S) AND DATES FOR EEO PLAN

DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
02/06/2018	Revise the Department's Reasonable Accommodation Policy and Procedures to comply with the final rule for Section 501 of the Rehabilitation Act.	06/30/2020	05/01/2021	

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Director, Workforce Relations Division	Ayanna Sears	Yes

23

DOI 2019 MD-715 Part H

Employee Relations Program Manager	Megan Castaneda	Yes
Director, Employment and Labor Law Unit (ELLU)	Gavin Frost (or designee)	No
Director, OCR and Chief Diversity Officer	Erica White-Dunston	No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
06/30/2020	Update the existing Reasonable Accommodation Policy and Procedures to comply with the final rule for Section 501 of the Rehabilitation Act.	Yes	03/01/2021	
05/01/2021	Submit updated reasonable accommodation procedures to EEOC for its review and approval.			
05/01/2021	Design an enterprise wide process to reassign employees with disabilities as a form of reasonable accommodation.			

REPORT OF ACCOMPLISHMENTS

FISCAL YEAR	ACCOMPLISHMENTS
FY 2019	OHC, working in partnership with the EDI (EEO) community throughout the Department of the Interior, updated the Departmental reasonable accommodation procedures and submitted it to the solicitor for review. The revised procedures made significant improvements to include comprehensive information for supervisors and managers and their responsibilities in the process, as well as the nearly thirty revisions required by Section 501 of the Rehabilitation Act. At the conclusion of the FY, the document was awaiting release from Employment Labor Law Unit (ELLU) and a second review by the new Departmental OCR Director.

DOI 2019 MD-715 Part H

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY				
TYPE OF PROGRAM DEFICIENCY	**BRIEF DESCRIPTION OF PROGRAM DEFICIENCY**			
Essential Element C: Management and Program Accountability (C.4.d)	The Department does not have a standardized process in place to provide the OCR exit interview data, climate assessment surveys, and data from OHC and CADR to ascertain barriers in employment for any protected group.			
OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	**OBJECTIVE**	**TARGET DATE (MM/DD/YYYY)**	**MODIFIED DATE (MM/DD/YYYY)**	**DATE COMPLETED (MM/DD/YYYY)**
9/30/2018	Develop internal process to obtain receipt of exit interview data, climate assessment surveys, and grievance data from the OHC and CADR.	09/30/2025	09/30/2020	
RESPONSIBLE OFFICIAL(S)				
TITLE	**NAME**	**PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)**		
Director, Collaborative Action and Dispute Resolution	William Hall	No		
Director, Human Resources Information Systems Division	Christopher Lawson	Yes		
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE				
TARGET DATE (MM/DD/YYYY)	**PLANNED ACTIVITIES**	**SUFFICIENT FUNDING & STAFFING (YES OR NO)**	**MODIFIED DATE (MM/DD/YYYY)**	**DATE COMPLETED (MM/DD/YYYY)**
09/30/2025	Work with OHC and CADR on	No	09/30/2020	

DOI 2019 MD-715 Part H

	identifying a process or mechanism to access and gather this data.			

REPORT OF ACCOMPLISHMENTS	
FISCAL YEAR	**ACCOMPLISHMENTS**
FY 2018	This is a new Plan H. No action taken.
FY 2019	The Departmental OCR Director met with the Directors of CADR and ELLU to discuss the need for OCR 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. OCR'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 info.

26

DOI 2019 MD-715 Part H

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY				
TYPE OF PROGRAM DEFICIENCY	**BRIEF DESCRIPTION OF PROGRAM DEFICIENCY**			
Essential Element C: Management and Program Accountability (C.4.e.1)	Managers and supervisors are unaware of the requirements of the Affirmative Action Plan for persons with disabilities.			
OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	**OBJECTIVE**	**TARGET DATE (MM/DD/YYYY)**	**MODIFIED DATE (MM/DD/YYYY)**	**DATE COMPLETED (MM/DD/YYYY)**
01/30/2019	Train managers and supervisors on the requirements of the Affirmative Action Plan for persons with disabilities.	09/30/2021		
RESPONSIBLE OFFICIAL(S)				
TITLE	**NAME**	**PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)**		
Director, Affirmative Employment Program Division	Tyvonia Ward	Yes		
Director, Workforce Relation Division	Ayanna Sears	No		
Chief Learning Officer	Dr. Vicki A. Brown (or designee)	No		

27

DOI 2019 MD-715 Part H

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE				
TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
9/30/2020	The OCR AEP Director to meet with OHC training division to discuss the statutory requirement for training to meet Affirmative Action goal for people with disabilities.	Yes	06/30/2021	
9/30/2020	Provide training on the requirements of the Affirmative Action Plan for persons with disabilities.	No	09/30/2021	
9/30/2020	Incorporate the Affirmative Action Plan for persons with disabilities as a feature in the mandatory new supervisory and manager training.	No	09/30/2021	
9/30/2020	Provide continuous training to all responsible staff to ensure they have the most up-to-date information and resources to carry out their responsibilities effectively.	No	09/30/2021	

REPORT OF ACCOMPLISHMENTS	
FISCAL YEAR	ACCOMPLISHMENTS
FY 2018	This is a new Plan H. No action taken.
FY 2019	During the reporting year, the Directors of OCR 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 Workforce Recruitment Program to obtain qualified talent.

DOI 2019 MD-715 Part H

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY	

TYPE OF PROGRAM DEFICIENCY	BRIEF DESCRIPTION OF PROGRAM DEFICIENCY
Essential Element C: Management and Program Accountability	Involve managers and supervisors in removing employment barriers for people with disabilities.

OBJECTIVE(S) AND DATES FOR EEO PLAN

DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2018	Get managers involved in the barrier analysis process.	09/30/2025	09/30/2022	

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Director, Office of Civil Rights and Chief Diversity Officer	Erica D. White-Dunston (or designee)	No
Bureau EEO Officers	Various Personnel	No
Human Capital Officers	Various Personnel	
Managers and Supervisors	Various Personnel	

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2025	Initiate Barrier Analysis Project.	No	03/30/2022	
09/30/2025	Invite management participation.	No	04/30/2022	
09/30/2025	Organize barrier analysis team to identify next steps.	No	05/30/2022	

29

DOI 2019 MD-715 Part H

| 09/30/2025 | Conduct analysis. | No | 07/30/2022 | |
| 12/30/2025 | Produce report and recommend action items. | No | 08/31/2022 | |

REPORT OF ACCOMPLISHMENTS	
FISCAL YEAR	**ACCOMPLISHMENTS**
FY 2018	This is a new Plan H. No action taken.
FY 2019	Two of the ten Bureaus, FWS and USGS, have barrier analysis teams in place and completed barrier analysis initiatives in FY 2019. The remaining Bureaus, and the Departmental OCR do not have sufficient resources to conduct a barrier analysis as expected by the EEOC. The Departmental OCR obtained approval to hire a full-time Lead MD 715 Program Manager with responsibility for leading and coordinating a Department-wide barrier analysis team to identify and remove employment barriers.

DOI 2019 MD-715 Part H

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY				
TYPE OF PROGRAM DEFICIENCY	**BRIEF DESCRIPTION OF PROGRAM DEFICIENCY**			
Essential Element C: Management and Program Accountability	Develop internal procedures to ensure all employees, managers, and supervisors are aware of the penalties for engaging in discriminatory behavior or taking personnel actions based upon prohibited bases.			

OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	**OBJECTIVE**	**TARGET DATE (MM/DD/YYYY)**	**MODIFIED DATE (MM/DD/YYYY)**	**DATE COMPLETED (MM/DD/YYYY)**
09/30/2018	To ensure that agency managers and supervisors become aware of scenarios involving discriminatory conduct, and steps are taken to reduce the likelihood that similar types of misconduct are repeated.	09/30/2020	09/30/2021	

RESPONSIBLE OFFICIAL(S)		
TITLE	**NAME**	**PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)**
Director, Office of Civil Rights and Chief Diversity Officer	Erica D. White-Dunston (or designee)	No
Director, Employment and Labor Law Unit	Gavin Frost (or designee)	No
Deputy Chief Human Capital Officer	Jennifer Ackerman (or designee)	No

31

DOI 2019 MD-715 Part H

Workplace Culture Transformation Advisor	Tammy Duchesne	No		
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE				
TARGET DATE (MM/DD/YYYY)	**PLANNED ACTIVITIES**	**SUFFICIENT FUNDING & STAFFING (YES OR NO)**	**MODIFIED DATE (MM/DD/YYYY)**	**DATE COMPLETED (MM/DD/YYYY)**
09/30/2018	OCR and OHC, upon issuance of findings or settlements where findings would have been likely, will draft memoranda to all managers and supervisors, summarizing the case (leaving involved party names anonymous), the reason for the finding or settlement, and providing lessons learned.	No	09/30/2020	
09/30/2021	OCR will review EEO case history for the past five (5) years to identify discriminatory behaviors revealed in findings of discrimination or settlements.	No		
09/30/2021	OCR, in consultation with OHC, will review disciplinary actions for the past three (3) years to identify actions taken to address discriminatory misconduct.	No		
09/30/2021	OCR, in consultation with OHC, will prepare informative training materials for managers and supervisors highlighting scenarios involving discriminatory	No		

DOI 2019 MD-715 Part H

	misconduct. Training materials will include recommendations on how to proactively address and prevent future discriminatory misconduct.			

REPORT OF ACCOMPLISHMENTS

FISCAL YEAR	ACCOMPLISHMENTS
FY 2018	This is a new Plan H. No action taken.
FY 2019	All Bureaus/Offices completed the Civil Treatment for Leaders training curriculum addressing harassment, discrimination and bullying for over 9,000 supervisory employees (on board as of October 2016) by February 2019. DOI purchased 72 sessions of in-person 'Bystander Intervention and Intergenerational Sensitivity Training' to teach employees multiple strategies to stop unwelcome or unwanted behavior. Additional training will be provided in FY 2020 that is specific to the Department's Policy on Prevention and Elimination of Harassing Conduct to inform DOI employees about their specific rights, expectations, and responsibilities as it relates to harassing conduct in the workplace. Implemented a Department-wide misconduct case tracking system that allows DOI to identify trends, track harassment-related misconduct investigations, and ensure that managers take action when harassing conduct has occurred. Added six new harassment-related agency-specific questions in the FEVS to set a new baseline against which future years' responses can be measured and to inform anti-harassment policy, programming and training efforts. Revised the mandatory critical element in the performance plans of all non-SES/SL/ST employees to better reflect their responsibilities to protect the work environment. The Fully Successful standard for all covered supervisors now reads, in relevant part: "Consistently demonstrates commitment and adherence to equal employment opportunity laws, regulations and policy; responds to reasonable accommodation requests and reports of potential discrimination, harassing conduct, or retaliation timely and consistent with DOI policies and procedures; and addresses any findings of misconduct, taking steps to timely correct employee behavior."

33

DOI 2019 MD-715 Part H

	The Assistant Secretary for Policy, Management and Budget was designated to lead Department-wide anti-harassment and workplace culture transformation efforts. The Workplace Culture Transformation Advisory Council, consisting of Bureau/Office Heads and/or their Deputies, was established to support efforts to ensure that the Department has safe, welcoming work environments that engage employees and are safe from discrimination and harassment. The Director of the OCR ECAD Division developed a complaints processing report (CPR) which highlights triggers, hotspots, frequent bases and issues in complaints of discrimination, settlements and figures. The CPR communicated with the Assistant Secretary for PMB, the OHC Director and subordinate division Directors, and other leaders of the National Park Service. The goal was to highlight problem areas and to establish a way forward for correcting recurring problems. At the conclusion of the FY, no concrete deliverables were achieved as a result of the CPR communication.

DOI 2019 MD-715 Part H

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY

TYPE OF PROGRAM DEFICIENCY	BRIEF DESCRIPTION OF PROGRAM DEFICIENCY
Essential Element C: Management and Program Accountability (C4.a, C4.b, C4.e.4)	The HR and EEO Directors, nor the HR and EDI (EEO) Communities do not meet regularly to asses for systemic barriers. Effective communication and collaborative action between both the EDI (EEO) and HR programs are warranted.

OBJECTIVE(S) AND DATES FOR EEO PLAN

DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2018	Establish partnerships and timetables to review the Agency/Bureau policies and practices for the merit promotion program, employee recognition and award program and procedure, and employee development and training for systemic barriers that may impede full utilization and or promotional opportunities for all groups.	12/30/2024	09/30/2021	

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)

35

Director, Affirmative Employment Program Division	Tyvonia Ward (or designee)	No	
Director, Strategic Human Capital Planning and Evaluation (SHCPE) Division	Kermit Howard	No	
Director, Strategic Talent Management Programs	Martin Pursley	No	

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
04/30/2024	Train EDI Staff on HR processes.	Yes	04/30/2022	
05/31/2024	Identify 3 HR programs to review and identify an EDI Point Of Contact for each program.	No	05/31/2022	
06/30/2024	Initiate a review of programs.	No	06/30/2022	
09/30/2024	Draft a report on each program.	No	09/30/2022	
12/30/2024	Provide findings to OHC and OCR.	No	12/30/2022	

REPORT OF ACCOMPLISHMENTS

FISCAL YEAR	ACCOMPLISHMENTS
FY 2018	This is a new Part H, no action taken.
FY 2019	OHC hired the Deloitte firm to assess its HR operation functions to ensure consistency throughout the Department. The evaluation focused on identifying deficiencies in its HR processes, and recommendations to mitigate those challenges. At the close of the FY, the contractor provided a DRAFT report on the current state of the program with recommendations for improvement.

There was no action on the completion of the Strategic Human Plan, Affirmative Action Plan for People with Disabilities, and the Diversity and Inclusion Plan were not concluded. |

DOI 2019 MD-715 Part H

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY				

TYPE OF PROGRAM DEFICIENCY	BRIEF DESCRIPTION OF PROGRAM DEFICIENCY			
Essential Element D: Proactive Prevention (D.4.d)	DOI did not develop and issue a Department-wide policy with specific goals to hire, develop, and advance people with disabilities and targeted disabilities for the workforce.			

OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	**OBJECTIVE**	**TARGET DATE (MM/DD/YYYY)**	**MODIFIED DATE (MM/DD/YYYY)**	**DATE COMPLETED (MM/DD/YYYY)**
02/06/2018	Develop and disseminate a Department-wide policy with specific numerical goals for increasing the participation of persons with disabilities and targeted disabilities within the workforce.	12/30/2019		12/30/2019

RESPONSIBLE OFFICIAL(S)				
TITLE	**NAME**	**PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)**		
Director, Office of Civil Rights and Chief Diversity Officer	Erica D. White-Dunston (or designee)	No		
Deputy Assistant Secretary - Human Capital and Diversity/Chief Human Capital Officer	Raymond Limon (or designee)	No		
Director, Strategic Talent Management Programs Division	Martin Pursley	No		

37

DOI 2019 MD-715 Part H

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE				
TARGET DATE (MM/DD/YYYY)	**PLANNED ACTIVITIES**	**SUFFICIENT FUNDING & STAFFING (YES OR NO)**	**MODIFIED DATE (MM/DD/YYYY)**	**DATE COMPLETED (MM/DD/YYYY)**
12/30/2019	OCR and OHC to work collectively to establish numerical goals and strategies for increasing the participation of persons with disabilities and targeted disabilities within the workforce. Develop and distribute goals.	No		12/30/2019
REPORT OF ACCOMPLISHMENTS				
FISCAL YEAR	**ACCOMPLISHMENTS**			
FY 2018	The Acting OCR Director discussed several of the Department's sticking points with PMB leadership and tasked the AEP Director to establish a plan of action for addressing the Department's deficiencies, including developing and implementing strategies to increase the participation of persons with disabilities and targeted disabilities in the workforce.			
FY 2019	The Department instituted measures to comply with Section 501 of the Rehabilitation Act to ensure Affirmative Action measures were established for the Recruitment, Hiring, and Advancement of Individuals with Disabilities throughout the Department. In support of this endeavor, OCR and OHC collaborated and issued joint messages to the DOI workforce regarding EEOC's numerical goals (2 percent for persons with targeted disabilities and 12 percent for persons with disabilities). The OHC allocated a GS-14 FTE with full responsibility for actualizing hiring goals throughout the Department. At the end of the FY, the recruitment action was underway with an anticipation of onboarding the selectee on or before February 2020.			

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY

TYPE OF PROGRAM DEFICIENCY	BRIEF DESCRIPTION OF PROGRAM DEFICIENCY
Essential Element D: Proactive Prevention of Unlawful Discrimination (D.4.a)	The Department's Affirmative Action Plan is not clearly defined and posted on the DOI public website.

OBJECTIVE(S) AND DATES FOR EEO PLAN

DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2018	Post Affirmative Action Plan on DOI public website.	12/30/2020	09/30/2021	

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Director, Office of Civil Rights and Chief Diversity Officer	Erica D. White-Dunston (or designee)	No
Assistant Secretary for Policy, Management and Budget	Scott Cameron	No
Bureau EEO Directors	Multiple Bureaus EDI Offices without Disability Program Managers	No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
03/30/2020	Develop Affirmative Action Plan (AAP).	No		08/01/2019

39

DOI 2019 MD-715 Part H

06/30/2020	Review and approval of AAP.	No		08/01/2019
12/30/2020	Post AAP on public website.	No		08/01/2019
04/01/2021	Establish a comprehensive plan for the AAP for advancement and retention opportunities.	No		
02/01/2021	Post the AAP notice on DOI website.	No		
06/30/20201	Appoint a Disability Program Manager at the Departmental OCR and Bureau EEO Programs	No		

FISCAL YEAR	ACCOMPLISHMENTS
FY 2019	The existing Affirmative Action Plan established for FY 2018 was posted on the public website. The Office of Civil Rights AEP staff met with the leaders of OHC to discuss the requirements of the final rule of Section 501 of the Rehabilitation Act and the Department's non-compliance since the issuance of said rule.

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY				

TYPE OF PROGRAM DEFICIENCY	BRIEF DESCRIPTION OF PROGRAM DEFICIENCY			
Essential Element D: Proactive Prevention of Unlawful Discrimination (D.1, D.2.b, D.3) **Element E: Efficiency (E.4.a.4)**	Establish internal processes to ensure consistency in utilizing all available data (i.e., union data, results from reasonable accommodations, complaints filed, processes, procedures, etc.) to identify triggers to potential barriers in the workplace and develop action plans.			

OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	**OBJECTIVE**	**TARGET DATE (MM/DD/YYYY)**	**MODIFIED DATE (MM/DD/YYYY)**	**DATE COMPLETED (MM/DD/YYYY)**
09/30/2018	Utilize employment data to identify triggers to potential barriers in the workplace.	12/30/2021		
09/30/2018	EDI (EEO) and OHC offices work collaboratively to establish a structure for receiving and sharing employment data on a recurring basis.	12/30/2021		
09/30/2018	Establish internal process among EDI community to	12/30/2021		

41

DOI 2019 MD-715 Part H

	review and utilize relevant employment data.			

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Director, Affirmative Employment Division	Tyvonia Ward	Yes
Director, Strategic Talent Management Programs Division	Martin Pursley	No
Bureau MD 715 Program Managers	Various Personnel	Yes
Bureau Human Capital Management	Various Personnel	No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2021	Conduct assessment to monitor progress to achieve EDI (EEO) throughout the year.	No		
12/30/2021	OCR work collaboratively with Bureau EDI (EEO) and Human Capital Offices to establish business rule to assess employment data on a recurring basis to identify triggers.	No		
12/20/2021	Expand data collection and sources for trigger	No		

DOI 2019 MD-715 Part H

	identification (applicant flow, exit surveys, climate surveys, focus groups, etc.).			
12/20/2021	Revise exit survey data collection to ensure exit interviews or surveys include questions on how to improve the recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities.	No		
12/20/2021	Develop action plans to address identified barriers and periodically review for effectiveness.	No		
12/20/2021	Receive training and research methods that can be utilized for identifying triggers.	No		
12/20/2021	Determine what reports, processes, procedures etc. should be looked at for inclusion in the trigger/barrier analysis identification process.	No		

REPORT OF ACCOMPLISHMENTS	
FISCAL YEAR	**ACCOMPLISHMENTS**
FY 2018	This is a new Part H. No action taken.
FY 2019	In September 2019, OCR coordinated with the USGS EDI (EEO) Office to conduct a Department-wide one-week long barrier analysis, and Basic MD 715 training to standardize the EDI (EEO) community's knowledge regarding the EEOC MD 715 requirements. OCR established a recurring monthly meeting with MD 715 Program Managers across the Department to assess its program and ongoing initiatives to ensure Departmental compliance with EEOC MD 715 program requirements. OCR initiated program audits whereby a team is deployed to each Bureau and meet with its HR and EDI (EEO) program officials to go line-by-line over Part G

DEPARTMENT OF THE INTERIOR
ANNUAL EEO PROGRAM STATUS REPORT
PLAN TO ATTAIN THE SIX ELEMENTS OF A MODEL AGENCY PROGRAM
FISCAL YEAR 2019

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY				
TYPE OF PROGRAM DEFICIENCY	**BRIEF DESCRIPTION OF PROGRAM DEFICIENCY**			
Essential Element D: Proactive Prevention of Unlawful Discrimination	DOI does not currently have a standard process to consider whether any group of employees or applicants might be impacted prior to making human resource decisions, such as re-organizations and re-alignments.			
OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	**OBJECTIVE**	**TARGET DATE (MM/DD/YYYY)**	**MODIFIED DATE (MM/DD/YYYY)**	**DATE COMPLETED (MM/DD/YYYY)**
02/06/2018	Develop guidance for use by Bureau leaders, to consider the impact human resource decisions such as reorganizations and realignments, has on groups of employees with remedies to mitigate impact prior to finalizing organizational objectives.	09/30/2025	09/30/2023	
RESPONSIBLE OFFICIAL(S)				
TITLE	**NAME**	**PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)**		
Director, Office of Civil Rights and Chief Diversity Officer	Erica D. White-Dunston (or designee)	No		

44

DOI 2019 MD-715 Part H

Deputy Assistant Secretary - Human Capital and Diversity/Chief Human Capital Officer	Raymond Limon (or designee)	No		

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
07/30/21	Departmental OCR to assess policy and identify any possible issues from an EDI (EEO) standpoint.	No		
08/30/21	Departmental OCR to meet with OHC to discuss.	No		
09/30/22	OCR to work with OHC to address any possible issues in policies and procedures.	No		
09/30/23	Regularly examine the impact of personnel practices by race, national origin, sex and disability.	No		

REPORT OF ACCOMPLISHMENTS

FISCAL YEAR	ACCOMPLISHMENTS
FY 2018	This is a new Part H. No action taken.
FY 2019	In FY 2019, a Department-wide assessment of OHC operations was conducted. The assessment focused on identifying major barriers within OHC that are linked to inefficiencies and ineffectiveness of hiring processes and recommendations to mitigate those challenges. A contractor provided a report on the current state assessment and future state recommendations.

DOI 2019 MD-715 Part H

STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY

TYPE OF PROGRAM DEFICIENCY	BRIEF DESCRIPTION OF PROGRAM DEFICIENCY
Essential Element E: Efficiency (E.4.a.3, E.4.b)	DOI does not have sufficient data collection systems in place to evaluate the Departmental EDI (EEO) program.

OBJECTIVE(S) AND DATES FOR EEO PLAN

DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
02/06/2018	Establish sufficient data collection system to evaluate the Departmental EDI Program.	12/30/2025	12/30/2022	

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Director, Office of Civil Rights and Chief Diversity Officer	Erica D. White-Dunston	
Director, Human Resources Information Systems Division	Christopher Lawson	

46

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE				
TARGET DATE (MM/DD/YYYY)	**PLANNED ACTIVITIES**	**SUFFICIENT FUNDING & STAFFING (YES OR NO)**	**MODIFIED DATE (MM/DD/YYYY)**	**DATE COMPLETED (MM/DD/YYYY)**
12/30/28	Evaluate current data collection systems to determine if data collected is sufficient to evaluate the overall Departmental EDI (EEO) program.	No	12/30/22	

REPORT OF ACCOMPLISHMENTS	
FISCAL YEAR	**ACCOMPLISHMENTS**
FY 2018	This is a new Part H. No action taken.
FY 2019	Upon request, OHC provided OCR timely access to data (e.g., exit interview data, climate assessment surveys, and grievance data). An inventory and assessment needs to be conducted to assess whether all current data systems are providing sufficient information for evaluating the overall Departmental EDI (EEO) Program and identify any data gaps.

47

Part I
PLAN TO ELIMINATE IDENTIFIED BARRIER

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

☐   If the agency did not conduct barrier analysis during the reporting period, please check the box.

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables	Workforce Tables A1, A8 and A11	**Black or African American Employment** The number of Black or African American men and women in the Department's permanent workforce has steadily decreased for four consecutive years and remains below the availability of Black or African American men (5.5%) and women (6.9%) in the Civilian Labor Force (CLF). In FY 2019 the total for this group was 5.5% (2.6% men) and (2.9% women). The data revealed that since FY 2015, the number of new hires of Blacks or African Americans remained at approximately 2%, which is below the federal benchmark of 8.9%. Specifically, Black or African American men have been the least racial group to get to hired, to receive promotions, and to receive awards and recognition as compared to any other racial category in DOI. An analysis must be conducted to determine if there are policies, practices, or procedures that impede the hiring, recruitment, retention, or advancement opportunities for Black or African American employees at DOI.

EEO GROUP(s) AFFECTED BY TRIGGER

EEO Group	Yes or No
Black or African American Men	Yes
Black or African American Women	Yes

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Workforce Tables A1, A8, and A11. The data shows that for the last four years, and continuing to the present, Black or African American employees are trending at a higher attrition rate than other groups.
Complaint Data (Trends)	Yes	A review of the DOI 462 Report evidences that, in FY 2019, Black or African Americans were the most prevalent race to file a complaint. The prevailing issues were Appointment Hire, Assignment of Duties, Disciplinary Action, Performance Evaluation, and Harassment. The working group for barrier analysis will conduct further analysis.
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	FEVS and Workplace Environment Study Report The three questions (Q40, Q69, andQ71) used in the Best Places to Work report, which were based on the FY 2019 FEVS, revealed Black or African American employees responded less favorably regarding the workplace environment when compared to other responses of employees of other races.
Exit Interview Data	No	
Focus Groups	No	
Interviews	No	

2

Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Equal Employment Opportunity Commission (EEOC) Women's Work Group Report. EEOC Report on the Black or African American Employment Challenge in the Federal Government.
Other (Please Describe)	No	

Status of Barrier Analysis Process

Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
No	No

OBJECTIVE(S) AND DATES FOR EEO PLAN

DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
9/30/2019	Conduct an analysis of DOI policies, practices, or procedures that may create potential barriers for hiring, retention, career advancement, and upward mobility of Black or African American employees to the senior grades of GS-13 through SES.	09/30/2023		

DOI MD-715 Part I

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Director, Strategic Employee and Organizational Development	Dr. Vicki Brown (or designee)	
Director, Strategic Talent Management Programs Division	Martin Pursley	
Director, Strategic Human Capital Planning and Evaluation (SHCPE) Division	Kermit Howard	
AEP Division Director	Tyvonia Ward (or designee)	Yes
Bureau MD-715 Program Managers	Various Bureaus	
Bureau Human Capital Management	Various Personnel	
ERGs, Diversity Advocates and SEPMs	Various Personnel	

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)

DOI MD-715 Part I

12/30/2019	Develop and implement a series of career development initiatives and detail assignments through Bison Career Network.	Yes			9/30/2019
12/30/2019	Promote opportunities for employees to connect to employee resource groups and Diversity Advocates to establish resources for career advancement opportunities.	Yes			6/18/2019
12/30/2022	Introduce DOI managers, supervisors, and employees to the requirements of the White House Initiative on HBCUs. Utilize the DOI ERGs to develop recruitment sources and pipelines for Black or African American applicants.	No			
12/30/2023	Conduct a barrier analysis.	No			

REPORT OF ACCOMPLISHMENTS

U.S. Fish and Wildlife Service (FWS)

FWS sponsored the Directorate Resource Assistant Fellows Program (DFP) in compliance with the Direct Hiring Authority articulated in DOI Personnel Bulletin No. 12-15. The program's primary focus is to reach women and people of color for internships that lead to fulltime permanent positions in the FWS mission critical occupations. In FY 2019 FWS specifically targeted its recruitment activities at Historically Black Colleges and Universities (HBCUs).

FWS shared funding, internship and employment opportunities with faculty and staff at HBCUs across the country, and participated in events on campuses, including the 2019 HBCU Week Conference.

FWS conducted 'Zeta Days at the Refuge', a national initiative that encourages members of the Zeta Phi Beta Sorority to visit local national wildlife refuges across the country to enjoy the outdoors and learn about wildlife conservation. FWS also supported and promoted local refuge visits by members of Phi Beta Sigma Fraternity and the organization's youth affiliate organization, Sigma Beta Clubs, encouraging outdoor recreational and educational activities.

National Park Service (NPS)

The NPS Historically Black Colleges & Universities Internship Program (HBCUI) provided temporary employment opportunities to 50 HBCU undergraduate and graduate students to NPS parks and units in the fields of health, recreation, and natural and cultural resource conservation. The Greening Youth Foundation served as the partner organization.

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

☐ If the agency did not conduct barrier analysis during the reporting period, please check the box.

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables	Workforce Tables A1, A8 and A11	**Asian American Employment** For four consecutive years Asian American men and women did not meet the CLF benchmark of 3.9%. In FY 2019, the total for this group was 2.8% (1.5% men) and (1.3% women). The data also revealed DOI new hires of Asian Americans was 3.7%, which is below the federal benchmark of 4.9%. An analysis must be conducted to determine if there are policies, practices, or procedures that may be creating impediments for the hiring, recruitment, retention, or advancement opportunities for Asian employees at DOI.

EEO GROUP(s) AFFECTED BY TRIGGER

EEO Group	Yes or No
Asian Men	Yes
Asian Women	Yes

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Workforce Tables A1, A8, and A11. Asian men increased in the DOI workforce by 19 employees in FY 2019, a net gain of 2.5 percent.

6

		Asian women increased in the DOI workforce by 10 employees, a net gain of 1.4 percent. Despite these increases, the data showed no statistically significant changes from prior year rates at the DOI.
Complaint Data (Trends)	Yes	In reviewing the 462 Report (for what fiscal year?) the complaint data revealed that Asian Americans most often raise complaints for the following categories: Assignment of Duties, Awards, and Harassment appear to be high. The working group for barrier analysis will conduct further analysis.
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	FEVS and Workplace Environment Study Report

The three questions (Q40, Q69, andQ71) used in the Best Places to Work report and based on the FY 2019 FEVS, revealed Asian American employees responded neither dissatisfied or satisfied with the workplace environment compared to other employee responses. |
Exit Interview Data	No	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	EEOC Women's Work Group Report.

EEOC Report on the Asian Employment Challenge in the Federal Government. |
| Other (Please Describe) | No | |
| | | |

DOI MD-715 Part I

Status of Barrier Analysis Process

Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
No	No

OBJECTIVE(S) AND DATES FOR EEO PLAN

DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
9/30/2019	Conduct analysis of DOI policies, practices, or procedures that may create potential barriers for hiring and upward mobility of Asian employees to the senior grades of GS-13 through SES.	09/30/2023		

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Director, Strategic Employee and Organizational Development	Vicki Brown (or designee)	
Lead MD-715 Program Manager	VACANT	
Bureau MD-715 Program Managers	Various Bureaus	

8

DOI MD-715 Part I

Bureau Human Capital Management	Various Personnel	
ERGs, Diversity Advocates and SEPMs	Various Personnel	

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
12/30/2019	Develop and implement a series of career development initiatives and detail assignments through Bison Career Network.	Yes		12/30/2019
12/30/2019	Promote opportunities for employees to connect to Employee Resource Groups (ERGs) and Diversity Advocates.	No	Provide New Date	
12/30/2022	Introduce DOI managers, supervisors and employees to the White House Initiative on AAPI and ERGs to develop recruitment sources and pipelines of potential Asian applicants.	No		This hasn't occurred so how can it be listed as completed?

REPORT OF ACCOMPLISHMENTS

In support of the Asian American employees within the DOI workforce, the Federal Asian Pacific American Council (FAPAC) ERG, the White House Initiative on Asian Americans and Native American Pacific Islanders (AANAPIs), and the Diversity Advocates, collaborated as vital partners in assisting senior leadership in developing and maintaining an effective workforce by; 1) serving as a change agent to promote an inclusive work environment that furthers DOI's overarching vision for diversity; 2) identifying specific goals to achieve the DOI's diversity and inclusion, and engagement vision; 3) conducting an organizational assessment, using multiple measures, which will provide baseline research to assist DOI in better understanding the organizational climate, and to be used to further strategic diversity management goals; and lastly, 4) providing policy recommendations to the Department's Senior Leaders in the annual Management Directive (MD) 715 report and the White House Initiative on AANAPIs

9

Report, documenting the progress of organizational efforts to establish an inclusive environment for the AANAPIs workforce population. The ERGs serve as a professional and social network, which embraces collaboration to promote inclusiveness, cultural, and information exchange while working progressively towards its community's betterment.

U.S. Fish and Wildlife Service (FWS)

FWS sponsored the Directorate Resource Assistant Fellows Program (DFP) in compliance with the Direct Hiring Authority authorized under DOI Personnel Bulletin No. 12-15. The program's primary focus is to reach individuals who are enrolled in an institution of higher education with particular attention given to ensure full representation of women and participants from historically Black, Hispanic/Latino, Asian Pacific Islander and Native American schools or other schools with diverse student populations. The DFP allows greater flexibility in hiring, which enhances FWS' ability to achieve a more diverse workforce through targeted recruitment.

National Park Service (NPS)

NPS continued to expand internship and apprenticeship programs to ensure students develop the knowledge, skills and abilities needed for a career in NPS or any other public lands agency. Current programs include the Hawaii Island Youth Ranger Internship Program that trains up to 75 high school students in natural and cultural resources interpretation, environmental education, administration, protection (law enforcement) and park maintenance. Upon completion of training, students may be hired at a GS-1, WG-1 or equivalent salary to work during the summer.

In FY 2020, the planned activities are:

- partner with FAPAC, White House Initiative on AANAPIs, and the Federally Employed Women (FEW) to increase the participation of Asians in grade levels GS-12 and above;
- develop and facilitate virtual training and professional development forums annually to enhance workforce capacity in the areas of cultural competence, barrier analysis, change management, diversity and inclusion; and
- expand the delivery of HR – My DOI Career, Pathways and the Presidential Management Fellowships (PMF) Program.

DOI MD-715 Part I

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

☐   If the agency did not conduct barrier analysis during the reporting period, please check the box.

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables	Workforce Tables A1, A4, A8 and A11	**Hispanic or Latino Employment** A review of the data revealed Hispanic or Latino men and women occupied in the DOI permanent workforce did not meet the CLF benchmark of 10%. In FY 2019 the total for this group was 6.6% (3.8% men) and (2.8% women). The data also revealed a potential barrier for career advancement for Hispanic or Latino employees after the GS-12 level. An analysis must be conducted to determine if there are policies, practices, or procedures that may be creating impediments for the hiring, recruitment, retention, or advancement opportunities for Hispanic or Latino employees at DOI.

EEO GROUP(s) AFFECTED BY TRIGGER

EEO Group	Yes or No
Hispanic or Latino Men	**Yes**
Hispanic or Latina Women	**Yes**

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Workforce Tables A1, A4, A8 and A11
Complaint Data (Trends)	Yes	In reviewing the 462 Report the complaint categories for Harassment (Non-Sexual), and Promotions appear to be high. The working group for barrier analysis will conduct further analysis.

11

Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	FEVS and Workplace Environment Study Report The three questions (Q40, Q69, and Q71) used in the Best Places to Work report based on the FY 2019 FEVS, revealed Hispanic or Latino employees responded neither dissatisfied or satisfied with the workplace environment compared to other employee responses.
Exit Interview Data	No	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Equal Employment Opportunity Commission (EEOC) Women's Work Group Report EEOC Report on the Hispanic Employment Challenge in the Federal Government
Other (Please Describe)	Yes	U.S. Office of Personnel Management (OPM) and EEOC Memorandum on Hispanic Employment

Status of Barrier Analysis Process

Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
No	**No**

OBJECTIVE(S) AND DATES FOR EEO PLAN

DOI MD-715 Part I

DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
02/06/2018	Conduct analysis of DOI policies, practices, or procedures that may create potential barriers to the upward mobility of Hispanic/Latino employees to the senior grades of GS-13 through SES.	09/30/2023		

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Director, Strategic Employee and Organizational Development	Dr. Vicki Brown (or designee)	
Lead MD-715 Program Manager	VACANT	Yes
Bureau MD-715 Program Managers	Various Bureaus	
Bureau Human Capital Management	Various Personnel	
ERGs, Diversity Advocates and SEPMs	Various Personnel	

DOI MD-715 Part I

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
12/30/2019	Develop and implement a series of career development initiatives and detail assignments through Bison Career Network.	Yes		9/30/2019
12/30/2019	Promote opportunities for employees to connect to employee resource groups and Diversity Advocates.	Yes		6/18/2019
12/30/2019	Introduce DOI manager, supervisors and employees to the National Association of Hispanic Federal Executives (NAHFE), Hispanic Organization on Relevancy, Advising, Leadership and Excellence (HORALE), Professional Latinos and other Hispanic or Latino serving organizations to develop recruitment sources and pipelines of potential Hispanic or Latino applicants.	Yes		9/30/2019
12/30/2023	Conduct a barrier analysis.	No		

REPORT OF ACCOMPLISHMENTS

In support of the Hispanic or Latino community within the DOI workforce, the National Association for Hispanic Employees (NAHE), the Hispanic Organization on Relevancy, Advising, Leadership and Excellence (HORALE) and Professional Latinos served as vital partners in assisting senior leadership in developing and maintaining an effective workforce by 1) served as a change agent to promote an inclusive work environment that furthers DOI's overarching vision for diversity; 2) identified specific goals to achieve the DOI's diversity and inclusion, and engagement vision; 3) conducted an organizational assessment, using multiple measures, which will provide

DOI MD-715 Part I

baseline research to assist the DOI in better understanding the organizational climate, and to be used to further strategic diversity management goals; and lastly, 4) provided policy recommendations to the Department Senior Leaders in its annual MD-715 Report, documenting the progress of organizational efforts to establish an inclusive environment for the Hispanic or Latino workforce population. The NAHE, HORALE and the Professional Latinos also serve as a professional and social network, which embraces collaboration to promote inclusiveness, cultural and information exchange while working progressively towards the betterment of its community as well as all federal employees within DOI.

US Fish and Wildlife Service (FWS)

FWS established a Barrier Analysis Team (BAT) for the third year in a row to conduct an in-depth examination of barriers pertaining to recruitment, hiring, and retention of women, people of color, and persons with disabilities. FWS continued the Directorate Resource Assistant Fellows Program (DFP) in FY 2019, prioritizing recruitment at Minority-Serving Institutions (including Hispanic-Serving Institutions), and other institutions of higher education to reach Hispanic or Latino student populations. FWS partnered with the Director for Leadership Development Programs, UNCF-Gates Millennium Scholars Program (GMS). This partnership has provided a network to conduct targeted recruitment to reach Hispanic or Latino interns and alumni. For the FY 2019 - FY 2020 DFP, FWS collaborates with the Hispanic Access Foundation as one of its partners organizations to assist with recruitment, application, and administration of over 100 Fellowship project opportunities nationwide. The DFP announcement was also posted at 35 Hispanic-Serving Schools through Handshake, the college/university online portal for outreach.

The Office of Diversity and Inclusive Workforce Management (ODIWM) centralized a recruitment team to continue outreach efforts to Hispanic or Latino serving organizations and schools. The Service-wide Targeted Recruitment Team (STRT) works with the ODIWM recruiters to implement the targeted recruitment goals and objectives outlined in the Diversity and Inclusion Implementation Plan (DIIP). FWS conducts targeted recruitment to reach Hispanic or Latino applicants by providing vacancy announcements for temporary, term and permanent positions, as well as intern positions. The recruitment team actively reaches out to establish contacts with Hispanic or Latino affinity groups at colleges/universities to keep the community informed of vacancies and other student opportunities.

The FWS participated in events that serve Hispanic or Latinos and other people of color. These events included the FY 2019 HACU Conference, the FY 2019 Society for Advancement of Chicanos/Hispanics and Native Americans in Science (SACNAS) Conference, and the FY 2019 Minorities in Agriculture, MANRRS Conference and regional clusters. The recruiters also visited classrooms and occupied in career fairs at various Hispanic Serving Institutions (HSIs). They included Adams State University, Austin Community College, Colorado State University-Pueblo, Florida International University, Texas State University - San Marcos, University of Texas - San Antonio.

FWS collaborated with the Hispanic Access Foundation (HAF) to promote Latino Conservation Week, which encouraged Latinos nationwide to visit and engage in refuges across the country. HAF recruits, trains, places and supports Latino youth in internship positions. FWS provided HAF students with information about the mission of the FWS and career opportunities.

Bureau of Land Management (BLM)

BLM made progress in increasing the total number of Hispanic/Latinos in the workforce by utilizing various resources and programs, throughout their state offices. Some of those programs and resources included the Executive Orders Program, the Direct Hire Authority for Resource Assistant Internship, and Pathways Program. BLM's robust outreach, recruitment, and retention activities also included partnerships with numerous public and private agencies such as the Hispanic Association of Colleges and Universities (HACU), Minorities in Agriculture Natural Resources and Related Sciences (MANRRS), and active engagement with underrepresented communities and educational institutions at all levels. BLM also collaborated with other federal and non-federal agencies, and educational institutions to increase the diversity of the applicant pool and build sustainable talent pipelines.

Office of Surface Mining Reclamation and Enforcement (OSRME)

OSMRE's Human Resources Division collaborated with the Office of Equal Employment (OEO) and hiring managers on all recruitment actions to ensure an inclusive and diverse applicant pool. After conducting, an analysis of our workforce data (including applicant flow) OEO has discovered that there is a need to enhance their current recruitment and outreach efforts and to establish career development initiatives to ensure that OSMRE is attracting and retaining a diverse and inclusive workforce reflective of our national civilian labor force. Therefore, the OEO will begin collaborating with the Office for Human Capital to develop a targeted strategic recruitment plan for Hispanic/Latino employment. This plan will outline various recruitment and outreach events/opportunities that staff from Human Capital and EEO offices can attend to educate and appeal to Hispanic/Latinos regarding the OSMRE mission, critical job occupations and possible career opportunities.

US Geological Survey (USGS)

As part of a national targeted recruitment effort and relationship building with diverse students, professors and organizations, the USGS employees attended the Society for the Advancement of Chicanos/Hispanics and Native Americans in Science (SACNAS) conference and presented four symposia involving 12 scientists. In addition, the Office of Youth and Education in Science created a social media plan to promote the USGS exhibit booth and to communicate with SACNAS attendees.

In FY 2020, DOI will continue to:
- partner with Minority Serving Institutions (MSIs), including HSIs, and educational institutions with high Hispanic/Latino student populations, professional organizations, military transition assistance programs, and Veterans Service Organizations to conduct targeted outreach;
- partner with the NAHE, FEW, Hispanic Organization on Relevancy, Advising, Leadership and Excellence (HORALE) and Professional Latinos to increase the participation of Hispanic/Latinos in grade levels GS-12 and above;
- develop and facilitate virtual training and professional development forums annually to enhance workforce capacity in the areas of cultural competence, barrier analysis, change management, diversity and inclusion; and
- expand the delivery of HR – My DOI Career, Pathways and the Presidential Management Fellowships (PMF) Program.

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

☐   If the agency did not conduct barrier analysis during the reporting period, please check the box.

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Tables	Workforce Tables A1 and A4-1	**Potential Blocked Pipelines and Glass Ceilings** For five consecutive years, people of color and women were underrepresented in higher graded positions at DOI in comparison to the CLF. In particular, the data revealed that women overall, Asians, Blacks or African Americans, Hispanic/Latinos, Native Hawaiian or Pacific Islanders, American Indian or Alaska Natives, PWDs, and PWTDs occupied the least number of senior level permanent positions in DOI for multiple years. The data for these same demographic groups reveals they are underrepresented in leadership roles at DOI in comparison to the CLF.

EEO GROUP(s) AFFECTED BY TRIGGER

EEO Group	Yes or No
Black or African American Men	Y
Black or African American Women	Y
Asian Men	Y
Asian Women	Y
Native Hawaiian or Other Pacific Islander Men	Y
Native Hawaiian or Other Pacific Islander Women	Y
American Indian or Alaska Native Men	Y
American Indian or Alaska Native Women	Y

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected

Workforce Data Tables	Yes	Workforce Tables A1, A4-1, A6, A8.
Complaint Data (Trends)	Yes	462 Report and No Fear Act data
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	DOI analyzed the percentage of the combined positive responses of the minority group for questions 1, 22, 33, 43, and 67 of FEVS.
Exit Interview Data	No	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)		
Other Career Development Program	Yes	Discussion with HR Specialist from DOI Office of Human Capital Executive Resources Division team provided information on the Agency's SES process (application, qualification, and selection of candidates).

Status of Barrier Analysis Process

Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
No	**Yes**

OBJECTIVE(S) AND DATES FOR EEO PLAN

DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE	MODIFIED DATE	DATE COMPLETED

18

		(MM/DD/ YYYY)	(MM/DD/ YYYY)	(MM/DD/ YYYY)
8/1/2018	Assess opportunities to enter the SES through DOI's career development program and external hiring.	12/1/2023		

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Deputy Chief Human Capital Officer (DCHCO)	Jennifer Ackerman	
Director, Strategic Employee and Organizational Development	Dr. Vicki Brown	
Bureau Human Capital Offices	Various Personnel	
Bureau EEO Offices	Various Personnel	

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
9/1/2018	Annually, DOI Bureaus will promote participation in their career development programs, academic programs, and learning training programs sponsored by their offices and other government agencies. Also, they will have access to	Yes		9/30/2019

DOI MD-715 Part I

	training/career development programs courses via DOI Talent.			
9/1/2018	Annually, the Department will continue to promote/advertise DOI-wide the Senior Executive Service Candidate Development and President Management Fellows Program (PMF).	Yes		10/1/2019
11/30/2023	Get the career development data from the Office of Human Capital to assess whether a policy, practice, or procedure is a barrier to advancement to the SES.	No		
12/30/2023	Analyze how existing developmental programs for career development to SES are available to a broad and diverse applicant pool.	No		

REPORT OF ACCOMPLISHMENTS

DOI made 301 internal selections to GS-13. Of those, 58.5 percent were men and 41.5 percent women. Selections were made in all other employee groups. There were 151 internal selections for the GS-14 level. The men's selection rate was 62.3 percent, and the women's rate was 37.7 percent. The assessment of senior-level positions showed overall men and White men had high participation rates in Executive/Senior Level (Grades 15 and above) positions.

The Bureau EEO Offices and OHC collaborated on all recruitment activities to ensure a broader distribution of vacancy announcements. The OCR staff collaborated with OHC to get career development data.

The Department is currently operating under significant budget constraints. However, DOI is committed to providing training and career development opportunities to current and aspiring employees so they can acquire the needed skills to be successful and stay current in their respective career fields. During the reporting period, the DOI offered mission-related training to ensure employees had the necessary skills to perform the core functions of the agency. Additionally, the DOI encourages employees to develop their careers with Individual Development Plans (IDPs). The IDP is a personalized plan to facilitate employees in achieving their short and long-term career goals.

PART J
AFFIRMATIVE ACTION PLAN FOR PEOPLE 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 plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

Section I: Efforts to Reach Regulatory Goals

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

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

Cluster GS-1 to GS-10 (PWD)	Yes 0	**No** √
Cluster GS-11 to SES (PWD)	**Yes** √	No 0

For three consecutive years the Department has not met the federal hiring goal of 12% for PWD in grades GS-11 to SES. In FY 2019, the total for this group was 7.9% (2,443), compared to 7.6% (2,349) in FY 2018, and 7.4% (2,344) in FY 2017. While this group remains lower than the federal hiring goal, there has been an increase of 0.5% over the last three years.

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

a)	Cluster GS-1 to GS-10 (PWTD)	Yes 0	**No** √
b)	Cluster GS-11 to SES (PWTD)	**Yes** √	No 0

For three 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 2019, PWTD

occupied 1.9% (518). In FY 2018, this group was 1.6% (494) and in FY 2017 this group was 1.5% (489). There was a 0.4% increase from FY 2017 to FY 2019, however, the Department has not met the goal.

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

The Department Deputy Human Capital Officer and the Director, Office of Civil Rights, issued a joint memorandum via email to all DOI employees communicating the Department-wide numerical goals for increasing the participation of persons with reportable and targeted disabilities to the Bureau Human Capital Officers, and EEO Officers. OHC met regularly with all Bureau HR Directors on hiring goals. OHC allocated one FTE to oversee the Department's efforts for the hiring goals.

Section II: Model Disability Program

Pursuant to 29 C.F.R. §1614.203(d)(1), agencies must ensure sufficient staffing, 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.

Yes 0   No √

A review of the FY 2019 EDI program revealed that the Office of the Secretary, OCR, and multiple Bureau EDI programs are without a Disability Program Manager.

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**	
Processing applications from PWD and PWTD	50	24	0	Cynthia Piper cynthia.piper@bsee.gov Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.
Answering questions from the public about hiring authorities that take disability into account	53	24	0	Akia West-Butler HR Specialist akia_west-butler@ios.doi.gov 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	Cynthia Piper cynthia.piper@bsee.gov 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 DOI Section 508 Program Manager Siddhartha_Sharma@ios.doi.gov Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.

Architectural Barriers Act Compliance	10		4	Sloan Farrell Director Public Civil Rights Sloan_Farrell@ios.doi.gov Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.
Special Emphasis Program for PWD and PWTD				Office of the Secretary and Bureaus do not have designated staff.

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

Yes 0   No √

There are no appointed Disability Program Managers in the Office of the Secretary and multiple Bureaus. There is no Department wide training to ensure new or newly appointed supervisors are aware of their roles and responsibilities in the reasonable accommodation process.

In the absence of a formalized training below are some training opportunities presented in various Bureaus:

- DOI MD-715 and Barrier Analysis Training.

- OPM/EEOC sponsored events focusing on hiring veterans and people with disabilities.

- EEO/Diversity – led instructed, webinars and teleconferencing. Training topics included: Reasonable Accommodations, Civil Treatment for Leaders and Employees, Special Hiring Authorities, Disability Sensitivity, Disability Awareness.

- DOI Section 508 Program Manager hosted a series of webinars each month on various topics related to making the electronic and information technology accessible to the website.

- Employment Opportunities for Individuals with Disabilities webinar.

- Reasonable Accommodation Community of Practice sharing of best practices during monthly meetings to ensure consistency in communicating and understanding the requirements for a successful Reasonable Accommodation program.

- Multiple DOI 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

1. 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.

Yes 0   No √

The Department has appointed reasonable accommodation coordinators in each of the Bureaus Human Capital Offices. It did not ensure Disability Program Managers were appointed to identify barrier identification and elimination or equal access in the workplace. The Departmental Acting OCR Director provides regular updates to Departmental Senior Executive Leadership regarding the need for funding for the disability program. Affirmative Employment staff meets regularly

with the Reasonable Accommodation community to ensure disability employment matters are considered.

Section III: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICANTS 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 engages in collaborative recruiting partnerships with community, academic and governmental groups that can reach individuals with disabilities, with an emphasis on targeted disabilities. The Department implemented the following strategies to increase the participation of employees with targeted disabilities in the permanent workforce:

- Collaborated with subcomponents, Federal agencies, and advocacy organizations to sponsor workshops, forums, and training sessions to educate managers, supervisors, and HR and EEO practitioners on the laws, regulations, initiatives, and special hiring authorities for individuals with disabilities.

- Advocated with hiring managers to use the various resources, programs, and services available for the recruitment and employment of individuals with disabilities: State Vocational Rehabilitation agencies; Disability Services Offices at colleges and universities; Employer Assistance Referral Network; student employment authorities; Schedule A Hiring Authority; Workforce Recruitment Program; and Veterans Administration special programs for service members.

- Conducted consultation sessions with hiring managers and offered refresher training sessions on the availability and use of other non-competitive hiring flexibilities. The Interior Business Center (IBC) encouraged managers to recruit and select Schedule A applicants based on a successful history in hiring Schedule A applicants.

- Some Bureaus offered one-on-one training sessions with applicants to help them understand the federal hiring process and trained them on how to write a resume when applying for federal jobs/promotions.

- Sent vacancy announcements to various organizations, such as: veterans' organizations, vocational rehabilitation, youth organizations, employee organizations and partner organizations, diversity/job service organizations, and colleges and universities.

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 appointing authority and eligible 30% or more disabled veterans, to identify and hire qualified PWD and PWTD professionals for positions in the permanent workforce. When utilizing the Schedule A hiring authority, recruitment staff collaborated with hiring managers and EEO professionals to review and approve requests to fill vacancies, which included discussions on recruitment strategies, policies, and areas of consideration to reach candidates, including veterans with disabilities.

Vacancy announcements included statements indicating that applications will be accepted from veterans with compensable disabilities of 30% or more disabled veterans. As a result, in FY 2019, there were 191 individuals hired utilizing the Schedule A Hiring Authority, representing 4.3% of new hires, exceeding the FY 2018 new hires of 2.9% using the Schedule A Hiring Authority.

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.

Upon receipt of an application for a Schedule A appointment, the Human Resource Offices (HRO) representatives verify that the applicant provided proof of disability by submitting documentation from either:

1.   A licensed medical professional;

2.   A certified rehabilitation professional; or

3.   Any Federal, state, District of Columbia, or US Territory agency that issues or provides disability benefits.

The proof of disability is in the form of a letter, certifying that the applicant has a disability. The letter must clearly state that the applicant is qualified for an appointment under the Schedule A Appointing Authority. The HR practitioners conduct a qualification analysis based on the resume and any supporting documentation relating to the applicant's knowledge, skills, and ability to perform the duties of the position under the Office of Personnel Management qualification requirements, contacts the hiring official, and explains/guides the process for hiring a Schedule A appointee under the Special Hiring Authority.

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.

<div align="center">

Yes 0   No √   N/A 0
</div>

Some Bureaus provided disability training to its hiring managers using various educational methods. These methods included consultation sessions with hiring managers, refresher training sessions on the availability and use of other non-competitive hiring flexibilities through meetings, instructor-led courses, on-the-job training, and online webinars.

Some Bureaus hosted state and local rehabilitation departments to provide disability awareness training to its managers and employees. In addition, some Bureaus partnered with the VA's Office of Vocational Rehabilitation and Employment to provide workshops on processes to hire veterans with disabilities.

The Office of Human Capital employees received refresher training for disability hiring authorities on an as-needed basis.

There is not a Department-wide training plan or procedures for training all hiring managers on the use of disability hiring authorities.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

1. 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, some Bureaus collaborated with state vocational rehabilitation departments and local military installations to provide workshops, mentorship opportunities, advice and guidance in federal employment, federal resume writing, and developing quality interview skills.

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)   Yes 0   **No √**

    b. New Hires for Permanent Workforce (PWTD)   Yes 0   **No √**

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.

    a.   New Hires for MCO (PWD)   Yes √   No 0

    b.   New Hires for MCO (PWTD)   Yes √   No 0

Trigger: The data was not analyzed as required due to the Department not having access to OPM's USA-Staffing applicant flow system. At the end of FY 2019, discussions were underway with OPM's Product Development Branch officials to gain access to applicant flow data.

2.   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.

    a.   Qualified Applicants for MCO (PWD)   Yes √   No 0

    b.   Qualified Applicants for MCO (PWTD) Yes √   No 0

Trigger: during FY 2019, DOI could not determine if discrepancies between the number of applicants who applied and were selected for vacancies because of the Department's inability to gain access to applicant flow systems. At the end of FY 2019, discussions were underway with OPM's Product Development Branch officials to gain access to applicant flow data.

3. 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.

    a.   Promotions for MCO (PWD)   Yes √   No 0

    b.   Promotions for MCO (PWTD)   Yes √   No 0

Trigger: for four consecutive years the Departments has not had access to applicant flow data which prohibited our ability to analyze this data in accordance of EEOC's requirement of all federal agencies. DOI will coordinate with the USA Staffing team to obtain the data.

SECTION IV: 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

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

There is not a Department-wide Affirmative Action Plan established to ensure the advancement of people with disabilities. In the absence of a plan, some Bureaus have taken the following actions:

- All employees, to include PWD and PWTD, were encouraged to complete an Individual Development Plan with their supervisor, which is used to identify training needs necessary to succeed in their current position, and possible future advancement opportunities.

- Some of the Bureaus and Offices established career ladder positions requiring on-the-job and classroom training and mentoring to ensure success and opportunity for advancement.

- Some of the Bureaus and Offices provided developmental opportunities and mentorship/coaching for its employees, including PWD and PWTD, to improve their skills and to increase their opportunities for advancement.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

Some of the Bureaus offered various opportunities for employees to further their career development goals. In FY 2019, the following leadership development opportunities included:

- Bureau of Land Management (BLM) National Leadership Academy.

- BSEE Emerging Leader Program (ELP) for all employees GS-11 to GS-13.

- BOEM initiated two leadership development programs: 1) the Navigating Leadership Program, a mid-level development program designed for grades GS-14 and GS-15 with some leadership or supervisory responsibility, and 2) the Aspiring to Leadership Program, an entry-level leadership development program.

- The NPS has a Future Leaders Program that provides developmental opportunities for disabled veterans.

- BOR has two development programs: 1) Exploring Supervision at Reclamation (ESR), and 2) the 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.

- Some Bureaus provided resources for disabled veterans hired at the entry-level to enter positions with career ladder or multi-graded advancement opportunities.

- Some Bureaus also launched a shadowing program that provided disabled veterans, PWD, and PWTD with a broader awareness of culture, mission, and vision for professional engagement.

The DOI University (DOIU) offers Leadership and Development Programs to improve diversity management, and professional skill sets. Some of those programs are listed below:

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

12

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.

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.

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.

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 SESCDP focuses on developing the competencies in each of the Executive Core Qualifications (ECQs) to prepare candidates to lead at the executive level. The SESCDP 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.

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 (%)
Internship Programs	Unknown[1]	Unknown	Unknown	Unknown	Unknown	Unknown
Fellowship Programs	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
Mentoring Programs	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
Coaching Programs	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
Training Programs	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
Detail Programs	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
DOI SESCDP	154[2]	20	Unable to determine	0.0%[3]	Unable to determine	0.0%
Other Career Development Programs	199	68	11.8%	8.3%	3.6%	0.0%

---

[1] The DOI Learning Management System (LMS) does not track the applicant information. The Agency will have the capability to collect data beginning in FY 2022 through the DOI Talent System.

[2] Applicants were from across the federal government and were not tracked and currently have only selectee data.

[3] Selectee information is available for DOI employees only.

Do triggers exist for <u>PWD</u> 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.

    a. Applicants (PWD)   Yes √   No 0

    b. Selections (PWD)   Yes √   No   0

Trigger: The DOI Learning Management System (LMS) does not track the applicant information. The Agency will have the capability to collect data beginning in FY 2022 through the DOI Talent System. The current LMS for all employees, including PWD, does not populate into the Table B-12 Career Development Distributed by Disability.

Do triggers exist for <u>PWTD</u> among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

    a. Applicants (PWTD)   Yes √   No 0

    b. Selections (PWTD)   Yes √   No 0

Trigger: The DOI Learning Management System (LMS) does not track the applicant information. The Agency will have the capability to collect data beginning in FY 2022 through the DOI Talent System. The LMS for all employees, including PWTD, does not populate into the Table B-12 Career Development Distributed by Disability.

C. <u>AWARDS</u>

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

    a. Awards, Bonuses, & Incentives (PWD)   Yes 0   **No** √

    b. Awards, Bonuses, & Incentives (PWTD)   Yes 0   **No** √

2. 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)	Yes 0	No 0	**N/A** √
b.	Other Types of Recognition (PWTD)	Yes 0	No 0	**N/A** √

DOI did not have any other types of recognition programs in FY 2019.

D. PROMOTIONS

1. Does your agency have a trigger involving <u>PWD</u> 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.

    a. SES

i.	Qualified Internal Applicants (PWD)	Yes 0	No 0
ii.	Internal Selections (PWD)	**Yes** √	No 0

    b. Grade GS-15

i.	Qualified Internal Applicants (PWD)	Yes 0	No 0
ii.	Internal Selections (PWD)	**Yes** √	No 0

    c. Grade GS-14

i.	Qualified Internal Applicants (PWD)	Yes 0	No 0
ii.	Internal Selections (PWD)	**Yes** √	No 0

    d. Grade GS-13

i.	Qualified Internal Applicants (PWD)	Yes 0	No 0
ii.	Internal Selections (PWD)	**Yes** √	No 0

Trigger: The Department does not have access to applicant data. This inhibits our ability to determine promotional opportunities for internal applicants applying for positions. 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	31 (7.4%)	12%
GS-14	Data not available	11 (4.7%)	12%
GS-15	Data not available	1 (1.2%)	12%
SES	Data not available	1 (5.6%)	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.

   a. SES
      i. Qualified Internal Applicants (PWTD)   Yes 0   No 0
      ii. Internal Selections (PWTD)   **Yes** √   No 0
   b. Grade GS-15
      i. Qualified Internal Applicants (PWTD)   Yes 0   No 0
      ii. Internal Selections (PWTD)   **Yes** √   No 0
   c. Grade GS-14
      i. Qualified Internal Applicants (PWTD)   Yes 0   No 0
      ii. Internal Selections (PWTD)   **Yes** √   No 0
   d. Grade GS-13
      i. Qualified Internal Applicants (PWTD)   Yes 0   No 0
      ii. Internal Selections (PWTD)   **Yes** √   No 0

Trigger: DOI cannot determine the percentage of qualified internal applicants by disability distribution, due to the unavailability of applicant flow data during the reporting year. The current rate of PWTDs who were selected for promotion at grades GS-13 is 1.7%; GS-14 is 0.9%, GS-15 is 0.0% and SES is 0.0%. Each of these groups in the table below, fell below the expected 2% federal goal as required by the hiring goals outlined in Section 501 of the Rehabilitation Act.

Promotions	Qualified Internal Applicants	Internal Selections	Regulatory GS-13
Data not available	7 (1.7%)	2%	
GS-14	Data not available	2 (0.9%)	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 <u>PWD</u> 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.

    a. New Hires to SES (PWD)   Yes √   No 0

    b. New Hires to GS-15 (PWD)   Yes √   No 0

    c. New Hires to GS-14   (PWD)   Yes √   No 0

    d. New Hires to GS-13 (PWD)   Yes √   No 0

Trigger: For five consecutive years the Department was unable to collect applicant flow data to give an accurate account of the number of PWD applying for senior level positions. The second trigger revealed that the higher the grade the least number of PWD are selected for senior positions.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWTD</u> 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.

    a. New Hires to SES (PWTD)   Yes √   No 0

    b. New Hires to GS-15 (PWTD)   Yes √   No 0

    c. New Hires to GS-14 (PWTD)   Yes √   No 0

    d. New Hires to GS-13 (PWTD)   Yes √   No 0

Trigger: For five consecutive years the Department was unable to collect applicant flow data to give an accurate account of the number of people with disabilities applying for senior level positions. The second trigger revealed that the higher the grade the least number of PWTD are selected for higher graded positions.

4. Does your agency have a trigger involving <u>PWD</u> 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.

    a. Executives
        i. Qualified Internal Applicants (PWD)   Yes √   No 0
        ii. Internal Selections (PWD)   Yes √   No 0
    b. Managers
        i. Qualified Internal Applicants (PWD)   Yes √   No 0
        ii. Internal Selections (PWD)   Yes √   No 0
    c. Supervisors
        i. Qualified Internal Applicants (PWD)   Yes √   No 0
        ii. Internal Selections (PWD)   Yes √   No 0

Trigger: For five consecutive years the Department was unable to collect applicant flow data to give an accurate account of the number of people with disabilities applying for senior level positions. The second trigger revealed that the higher the grade the least number of PWD are selected for higher graded positions.

6. Does your agency have a trigger involving <u>PWTD</u> 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 selectee.) If "yes," then describe the trigger(s) in the text box.

    a. Executives
        i. Qualified Internal Applicants (PWTD)   Yes √   No 0
        ii. Internal Selections (PWTD)   Yes √   No 0
    b. Managers
        i. Qualified Internal Applicants (PWTD)   Yes √   No 0
        ii. Internal Selections (PWTD)   Yes √   No 0
    c. Supervisors
        i. Qualified Internal Applicants (PWTD)   Yes √   No 0
        ii. Internal Selections (PWTD)   Yes √   No 0

Trigger: For five consecutive years the Department was unable to collect applicant flow data to give an accurate account of the number of people with disabilities applying for senior level positions. PWTD are selected at the GS-13 level, however, the selections begin to decline at the GS-14 level and there are no selections at the GS-15 and SES levels.

7. 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)   **Yes** √   No 0
   b. Pay Increases (PWTD)   **Yes** √   No 0

Trigger: In FY 2019, PWD and PWTD received the least number of QSIs in DOI. Both groups were below the benchmark standards for QSIs in FY 2019. The benchmark for the QSI award category for PWD is 9.0%, yet PWD received 7.8% of QSIs. The same is true for PWTD where QSIs for PWTD were 1.4%, below the benchmark of 2.0%.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWD</u> among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.

   a. New Hires for Executives (PWD)   Yes √   No 0

   b. New Hires for Managers (PWD)   Yes √   No 0

   c. New Hires for Supervisors (PWD)   Yes √   No 0

Trigger: For five consecutive years the Department was unable to collect applicant flow data to give an accurate account of the number of people with disabilities applying for supervisory positions. The second trigger revealed that PWD are among the new hires, the majority were hired at the GS-13 level.

9. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving <u>PWTD</u> among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box.

   a. New Hires for Executives (PWTD)   Yes √   No 0

   b. New Hires for Managers (PWTD)   Yes √   No 0

   c. New Hires for Supervisors (PWTD)   Yes √   No 0

Trigger: For five consecutive years the Department was unable to collect applicant flow data to give an accurate account of the number of people with disabilities applying for supervisory positions.

SECTION V: PLAN TO IMPROVE RETENTION OF PERSONS WITH DISABILITIES

To be a 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 personal 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.

   Yes 0   No √

   Trigger: During the reporting year, OCR was unable to obtain and collect relevant data to determine whether Schedule A employees were converted after two year of satisfactory service.

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

   d. Voluntary Separations (PWD)   Yes √   No 0
   e. Involuntary Separations (PWD) Yes √   No 0

   Trigger: PWD are voluntarily separating at the same level of their onboarding to the DOI workforce, which leads to a potential retention issue.

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)   Yes √   No 0
   b. Involuntary Separations (PWTD)   Yes √   No 0

   Trigger: PWTD are voluntarily separating at the same level of their onboarding to the DOI workforce, which leads to a potential retention issue.

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: For FY 2019, the DOI's exit survey tool did not collect data on disability status. There was no business rule for collecting the data, only two of the Bureaus were consistent with collecting data and the questions asked varied.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 C.F.R. § 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/eeo/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.
    https://www.doi.gov/pmb/eeo/public-civil-rights

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/eeo/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 2019, DOI hosted a Section 508 Awareness training that included approximately 1,000 employees attending each training session. The training modules included:

- Creating Section 508 compliant electronic documents.
- Adobe Train-the-Trainer event for creating accessible PDF documents.
- Creating Section 508 Compliant MS Excel Spreadsheets course.
- Provided Section 508 training for contracting/acquisition courses.

A Public Civil Rights collaborative effort was initiated in FY 2018 between key senior executives at the Bureaus, OCR, and OHC to improve access to public lands for people with disabilities. In FY 2019 an important achievement was reached whereby the Secretary issued Secretarial Order 3376, dated August 29, 2019, authorizing Bureaus the ability to allow PWD and PWTD to use Electric Bikes (e-Bikes) on public lands managed by the Department.

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 during the reporting period was approximately 15 days. The average number of business days to grant accommodation is five days. The average number of days reported by DOI Bureaus are as follows:
   - BOR – 10 days
   - FWS – 15 days
   - OSMRE – 20 days
   - No other Bureaus, Offices, or the Office of the Secretary reported. This 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 2019 - 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, to engage in the interactive process, to meet timelines, and to ensure proper documentation throughout the process. Reasonable accommodation training was also offered via the DOI Talent Management system. The RA policy provides detailed procedures for the entire process.

   - Community of Practice – The HR Reasonable Accommodation Coordinators and EDI community met monthly to establish processes and procedures and share best practices to improve timely issuance of accommodation solutions.

- <u>Re-Drafted Reasonable Accommodation Policy</u> - The Department redrafted its current policy to bring it into line with Section 501 of the Rehabilitation Act and make it easier to follow for managers and supervisors.

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

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

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

The DOI implemented procedures for Personal Assistance Services (PAS) with Personnel Bulletin (PB) No. 17-18, dated January 3, 2018. These procedures have been disseminated throughout the workforce for implementation. Some Bureaus incorporated PAS in reasonable accommodation training for onboarding employees and new manager and supervisor training. This has been noted as a deficiency in Part H.

SECTION VI: EEO COMPLAINT AND FINDINGS DATA
A. EEO COMPLAINT DATA INVOLVING HARASSMENT

During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the government-wide average?

Yes √   No 0   N/A 0

During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Yes √   No 0   N/A 0

1. 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 had no findings of discrimination alleging harassment based on disability status. EEO compliance training is ordered as corrective action in each finding. DOI had seven settlements in lieu of findings of harassment or failure to accommodate.

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?

    Yes √   No 0   N/A 0

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?

    Yes 0   No √   N/A 0

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.

    N/A

Section VII: 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?   **Yes 0   No √**
2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?   **Yes 0   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
BRIEF DESCRIPTION OF TRIGGER

TYPE OF TRIGGER	The higher the grade the least number of PWD and PWTD are selected for senior positions. There were no PWDs or PWTDs selected into the SESCDP. PWD and PWTD received the least number of QSIs in DOI.

TYPE OF BARRIER(s)	**BRIEF BARRIER(s)**
	None identified, not enough resources to conduct a thorough barrier analysis.

OBJECTIVE(S) AND DATES FOR EEO PLAN

DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
02/06/2018	Increase PWD and PWTD employees at senior grade levels in the DOI workforce.	12/30/2018	09/30/2022	

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Agency Special Employment Programs Manager	Angela Lennartson	Yes
Director, Strategic Talent Programs Division	Martin Pursley	Yes
Disability Selective Placement Program Coordinators	Various Bureaus	Yes
Managers and Supervisors	Various Bureaus	No
Office of the Secretary, Special Emphasis Program Manager	Acquanetta Newson	Yes
Barrier Analysis Process Completed? (Yes or No)	**Barrier(s) Identified? (Yes or No)**	
No	No	

Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	B1 Table – Total Permanent Workforce B14 Table – Separations were at the same level as on-boarding B-7 Table – Received lowest number of QSIs and other awards B9 Table – Employee Recognition and Awards B11 Table – Internal promotions for senior level positions declined at the GS-14 and SES levels
Complaint Data (Trends)	Yes	462 – (Part IV) Bases and Issues Alleged in Complaints Filed: for four consecutive years disability was among the top bases of discrimination complaints throughout the Department and trending upward. Over the past few years there have been numerous findings of discrimination against DOI for failure to provide reasonable accommodation. In FY 2019, 7.5% of all formal EEO complaints filed against DOI alleged a failure to accommodate disability.
Grievance Data (Trends)	No	
Focus Group	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	EEOC Report on Improving the Participation Rate of People with Targeted Disabilities in the Federal Work Force
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	462 Report FY 2019 – Over the past few years there have been numerous findings of discrimination against DOI for failure to provide reasonable accommodation.
Climate Assessment Survey (e.g., FEVS)	Yes	Employees with disabilities, including Veterans with disabilities, are providing slightly negative responses to almost all questions in the Federal Employee Viewpoint Survey (FEVS). The three questions (Q40, Q69, andQ71) used in the Best Places to Work report based on the FY 2019 FEVS, indicates an employee's intent to remain with an agency, reveals PWDs responded less favorably when compared to persons without disabilities.
Other (Please Describe)	No	

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

29

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
10/1/2017	Joint meeting with the Office of Civil Rights and Office of Human Capital at the Headquarters to discuss program requirements and to establish an agency-wide goal.			9/30/2019
12/1/2018	Disseminate goal requirements to the workforce.			9/30/2019
12/1/2018	Office of Human Capital, working in partnership with the Departmental Office of Civil Rights (OCR), will finalize and publish a new Department-wide policy on reasonable accommodation.	No	12/1/2021	
12/1/2018	OCR to provide subject matter expertise to the Office of Strategic Employee and Organization Development in their development of training for new supervisors and newly promoted supervisors on effectively responding to and acting on requests for reasonable accommodations to qualified individuals with a disability.	No	12/30/2020	
12/1/2018	Office of Human Capital requested	No	12/01/2021	

30

	funding to create a Department-wide reasonable accommodation tracking system.			
06/01/2020	Obtain and analyze Applicant Flow Data for PWD and PWTD	No		
05/01/2021	Establish a plan to gradually increase the number of PWD and PWTD.	No		

REPORT OF ACCOMPLISHMENTS

2018	Newly established. No action is taken.
2019	OHC requested funding to create a Department-wide reasonable accommodation tracking system. Once funding has been secured, OHC will work with an established vendor to develop the system to meet both human resources and equal employment opportunity needs in partnership with OCR and Bureau representatives. **Hiring Goals:** During FY 2019, DOI set a 12 percent hiring goal for PWD an all grade levels, a 2 percent hiring goal for PWTD at all grade levels. The Departments Deputy Human Capital Officer and the Director, Office of Civil Rights, communicated the Department's numerical goals to the Human Capital Officers, Human Resources Officers, and EEO Officers via a joint memorandum. The numerical goals were further communicated to Diversity and Inclusion practitioners, EEO practitioners, and hiring managers. As a result of these goals, 12.5 percent of new hires were PWDs, and 3.1 percent were PWTDs. A slight increase in the number of hires compared to FY 2018. During the reporting year, two Employee Resource Groups were established for the further advancement of People with Disabilities and Targeted Disabilities within the

31

DOI workforce. The Employees for the Advancement of People with Disabilities (EAPWD) and People with Special Abilities of Power (PSAP).

Reasonable Accommodation Policy (Revised):
The new Department-wide Reasonable Accommodation Policy (draft) has been reviewed, and the Bureaus and Offices have received comments. The policy is currently with the Director, Division of Workforce Relations, for final review and approval. In FY 2019, DOI posted the personal assistance services procedures on its public website.

The tracking system has been developed and tested and is ready to go. Awaiting additional funding for the deployment of the tracking system.

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

- Lack of sufficient resources, staffing and funding for OCR and EDI community to focus attention on addressing barriers to employment and full implementation of disability program.
- Funding for the tracking system was halted and OHC unable to proceed with developing a Department-wide tracking system.
- The Departmental Reasonable Accommodation Coordinator within HR retired, and it took some time to backfill the position which left a gap in overseeing the program.

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

As a result of OCR and OHC leadership meetings to review Section 501 of the Rehabilitation Act and the Department's non-compliance, DOI issued a joint memorandum for implementing the affirmative action hiring goals. The Bureaus also appointed special selective placement program coordinators as a result of the hiring goal.

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.

OCR will collaborate with OHC to address the planned activities. The Department will focus on the planned activities outlined above until the barriers have been identified and removed by forming a working group to conduct barrier analysis to identify any impediments for PWD and PWTD employment.

32

Section VII: 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?**
   Yes **0**   No **√**

2. **Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?**
   Yes **0**   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**

TYPE OF TRIGGER	BRIEF DESCRIPTION OF TRIGGER
	PWD are voluntarily separating at the same level of their onboarding to the DOI workforce, which leads to a potential retention issue.

TYPE OF BARRIER(s)	BRIEF BARRIER(s)
	None identified, not enough resources to conduct a thorough barrier analysis.

OBJECTIVE(S) AND DATES FOR EEO PLAN

DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
02/06/2018	Increase retention rates of PWD and PWTD.	12/30/2023		

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Agency Special Employment Programs Manager	Angela Lennartson	Yes
Director, Strategic Talent Programs Division	Martin Pursley	Yes

Disability Selective Placement Program Coordinators	Various Bureaus	Yes
Managers and Supervisors	Various Bureaus	No
Office of the Secretary, Special Emphasis Program Manager	Acquanetta Newson	No

Barrier Analysis Process Completed? (Yes or No)	**Barrier(s) Identified? (Yes or No)**
No	No

Sources of Data	**Sources Reviewed? (Yes or No)**	**Identify Information Collected**
Workforce Data Tables	Yes	B14 Table and B8 Table – New Hires Separations for PWD and PWTD are higher than the federal benchmark and are occurring at the same level as on-boarding, creating a potential retention issue. B7 Table – Received lowest number of QSIs and other awards. B11 Table – Internal promotions for senior level positions declined at the GS-14 and SES levels.
Complaint Data (Trends)	Yes	462 – (Part IV) Bases and Issues Alleged in Complaints Filed: for four consecutive years disability was among the top bases of discrimination complaints throughout the Department and trending upward. Over the past few years there have been numerous findings of discrimination against DOI for failure to provide reasonable accommodation. In FY 2019, 7.5% of all formal EEO complaints filed against DOI alleged a failure to accommodate disability.
Grievance Data (Trends)	No	
Focus Group	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	EEOC Report on Improving the Participation Rate of People with Targeted Disabilities in the Federal Work Force
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
12/31/2020	Review and analyze exit surveys to identify barriers to retention.	No	12/31/2021	
12/31/2021	Conduct study on reasonable accommodation requests and procedures for delayed and denied accommodations to identify any potential correlation to high separations.	No		
12/31/2021	Monitor separations on a quarterly basis by disability distribution.	No		

REPORT OF ACCOMPLISHMENTS

2018	Newly established. No action taken.
2019	DOI HCO 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. OCR 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.

   No planned activities were taken at the end of FY 2019. In FY 2020, DOI will centralize exit survey data that will be used to identify barriers to retention.

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

   Further analysis needs to be conducted to identify the barriers.

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.

Until a barrier(s) has been identified, DOI will continue to focus on the planned activities.