

*U.S. Equal Employment Opportunity Commission*  
**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

Department of the Interior 2019 MD-715

**Affirmative Action Plan (AAP) for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities**

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their 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 PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

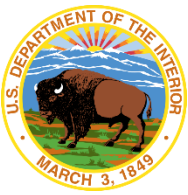
Cluster GS-1 to GS-10 (PWD)	Yes 0	No <input checked="" type="checkbox"/>
Cluster GS-11 to SES (PWD)	Yes <input checked="" type="checkbox"/>	No 0

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 PWTD 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 <input checked="" type="checkbox"/>
b) Cluster GS-11 to SES (PWTD)	Yes <input checked="" type="checkbox"/>	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



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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 √



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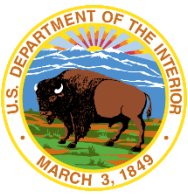
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A review of the FY 2019 EDI program revealed that the Office of the Secretary, OCR, and multiple Bureau EDI programs are without a Disability Program Manager.

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 <a href="mailto:cynthia.piper@bsee.gov">cynthia.piper@bsee.gov</a>  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 <a href="mailto:akia_west-butler@ios.doi.gov">akia_west-butler@ios.doi.gov</a>  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 <a href="mailto:cynthia.piper@bsee.gov">cynthia.piper@bsee.gov</a>  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 <a href="mailto:Siddhartha_Sharma@ios.doi.gov">Siddhartha_Sharma@ios.doi.gov</a>  Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.



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Architectural Barriers Act Compliance	10		4	Sloan Farrell Director Public Civil Rights <a href="mailto:Sloan_Farrell@ios.doi.gov">Sloan_Farrell@ios.doi.gov</a>  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.

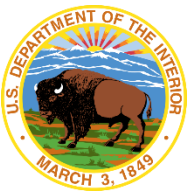
3. Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If “yes”, describe the training that disability program staff have received. If “no”, describe the training planned for the upcoming year.

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.



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- 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



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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.



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- 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.



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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.

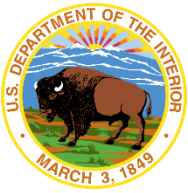
The proof of disability is in the form of a letter, certifying that the applicant has a disability. The letter must clearly state that the applicant is qualified for an appointment under the Schedule A Appointing Authority. The HR practitioners conduct a qualification analysis based on the resume and 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.

Yes 0      No       N/A 0

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.





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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**

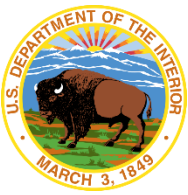
1. Describe the agency's efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

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 <input checked="" type="checkbox"/>
b. New Hires for Permanent Workforce (PWTD)	Yes 0	No <input checked="" type="checkbox"/>



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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



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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**

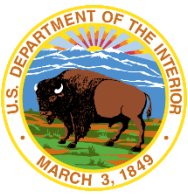
Pursuant to 29 C.F.R §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs 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.



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## **B. CAREER DEVELOPMENT OPPORTUNITIES**

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

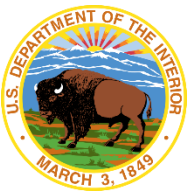
Some of the Bureaus offered various opportunities for employees to further their career development goals. In FY 2019, the following leadership development opportunities included:

- 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



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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.



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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 <sup>1</sup>	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 <sup>2</sup>	20	Unable to determine	0.0% <sup>3</sup>	Unable to determine	0.0%
Other Career Development Programs	199	68	11.8%	8.3%	3.6%	0.0%

<sup>1</sup> 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.

<sup>2</sup> Applicants were from across the federal government and were not tracked and currently have only selectee data.

<sup>3</sup> Selectee information is available for DOI employees only.



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

a. Applicants (PWD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	0
b. Selections (PWD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	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 PWTD 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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>
b. Selections (PWTD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

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. AWARDS

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 <input type="checkbox"/>	No <input checked="" type="checkbox"/>
b. Awards, Bonuses, & Incentives (PWTD)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>



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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 ✓

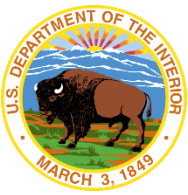
DOI did not have any other types of recognition programs in FY 2019.

**D. PROMOTIONS**

1. Does your agency have a trigger involving PWD among the qualified *internal* applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

a. SES			
i. Qualified Internal Applicants (PWD)	Yes 0	No 0	
ii. Internal Selections (PWD)	<b>Yes</b> ✓	No 0	
b. Grade GS-15			
i. Qualified Internal Applicants (PWD)	Yes 0	No 0	
ii. Internal Selections (PWD)	<b>Yes</b> ✓	No 0	
c. Grade GS-14			
i. Qualified Internal Applicants (PWD)	Yes 0	No 0	
ii. Internal Selections (PWD)	<b>Yes</b> ✓	No 0	
d. Grade GS-13			
i. Qualified Internal Applicants (PWD)	Yes 0	No 0	
ii. Internal Selections (PWD)	<b>Yes</b> ✓	No 0	





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**Affirmative Action Plan (AAP) for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities**

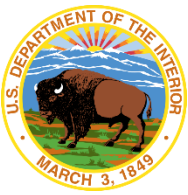
Trigger: The Department does not have access to applicant data. This inhibits our ability to determine promotional opportunities for internal applicants applying for positions. The table below shows how internal selections are not meeting the federal goal of 12%.

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.



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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 PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

a. New Hires to SES (PWD)	Yes <input checked="" type="checkbox"/>	No 0
b. New Hires to GS-15 (PWD)	Yes <input checked="" type="checkbox"/>	No 0
c. New Hires to GS-14 (PWD)	Yes <input checked="" type="checkbox"/>	No 0
d. New Hires to GS-13 (PWD)	Yes <input checked="" type="checkbox"/>	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 PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

a. New Hires to SES (PWTD)	Yes <input checked="" type="checkbox"/>	No 0
b. New Hires to GS-15 (PWTD)	Yes <input checked="" type="checkbox"/>	No 0
c. New Hires to GS-14 (PWTD)	Yes <input checked="" type="checkbox"/>	No 0
d. New Hires to GS-13 (PWTD)	Yes <input checked="" type="checkbox"/>	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.



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4. Does your agency have a trigger involving PWD among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

a. Executives

i. Qualified Internal Applicants (PWD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
ii. Internal Selections (PWD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

b. Managers

i. Qualified Internal Applicants (PWD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
ii. Internal Selections (PWD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

c. Supervisors

i. Qualified Internal Applicants (PWD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
ii. Internal Selections (PWD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

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 PWTD among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectee.) If “yes,” then describe the trigger(s) in the text box.

a. Executives

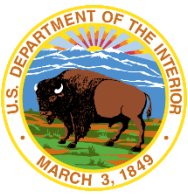
i. Qualified Internal Applicants (PWTD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
ii. Internal Selections (PWTD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

b. Managers

i. Qualified Internal Applicants (PWTD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
ii. Internal Selections (PWTD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

c. Supervisors

i. Qualified Internal Applicants (PWTD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
ii. Internal Selections (PWTD)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>



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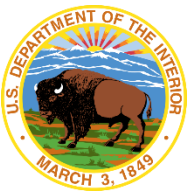
**Affirmative Action Plan (AAP) for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities**

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)	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> 0
b. Pay Increases (PWTD)	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> 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%.



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

- |                                    |   |                             |
|------------------------------------|---|-----------------------------|
| a. New Hires for Executives (PWD)  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| b. New Hires for Managers (PWD)    | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| c. New Hires for Supervisors (PWD) | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

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 PWTD 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 <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| b. New Hires for Managers (PWTD)    | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| c. New Hires for Supervisors (PWTD) | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

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.



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**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 <input checked="" type="checkbox"/>	No 0
e. Involuntary Separations (PWD)	Yes <input checked="" type="checkbox"/>	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 <input checked="" type="checkbox"/>	No 0
b. Involuntary Separations (PWTD)	Yes <input checked="" type="checkbox"/>	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.



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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/eo/Complaints-Processing>

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

How to File a Public Civil Rights Complaint: Within 180 days of the date of the alleged discrimination, a signed, written complaint should be filed with the Director, Office of Civil Rights, Department of the Interior, 1849 C Street, NW Mailstop 4359

Washington, DC, 20240.

<https://www.doi.gov/pmb/eo/public-civil-rights>



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The complaint should include your name, address, zip code, and telephone number; the name and address of the alleged discriminatory official(s) and public entity; the nature of the complaint, the basis of the complaint (race, color, national origin, gender, age, sex, and disability), and the date the alleged discrimination occurred. If the alleged discrimination occurred outside DOI jurisdiction, DOI will forward the complaint to the State or Federal agency with jurisdiction.

You can read more about the PCR complaint process in Civil Rights Directive 2011-01 <https://www.doi.gov/pmb/eo/Public-Civil-Rights>.

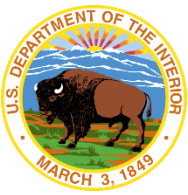
3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

In FY 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.





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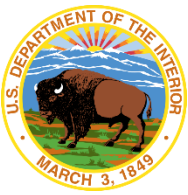
### **C. Reasonable Accommodation Program**

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.



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- Re-Drafted Reasonable Accommodation Policy - 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.



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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**



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<b>TYPE OF TRIGGER</b>	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 SESCO. PWD and PWTD received the least number of QSIs in DOI.			
<b>TYPE OF BARRIER(S)</b>	<b>BRIEF BARRIER(S)</b>			
	None identified, not enough resources to conduct a thorough barrier analysis.			
<b>OBJECTIVE(S) AND DATES FOR EEO PLAN</b>				
<b>DATE INITIATED (MM/DD/YYYY)</b>	<b>OBJECTIVE</b>	<b>TARGET DATE (MM/DD/YYYY)</b>	<b>MODIFIED DATE (MM/DD/YYYY)</b>	<b>DATE COMPLETED (MM/DD/YYYY)</b>
02/06/2018	Increase PWD and PWTD employees at senior grade levels in the DOI workforce.	12/30/2018	09/30/2022	
<b>RESPONSIBLE OFFICIAL(S)</b>				
<b>TITLE</b>	<b>NAME</b>	<b>PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)</b>		
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		
<b>Barrier Analysis Process Completed? (Yes or No)</b>		<b>Barrier(s) Identified? (Yes or No)</b>		
No		No		



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<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
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, and Q71) 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**



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<b>TARGET DATE (MM/DD/YYYY)</b>	<b>PLANNED ACTIVITIES</b>	<b>SUFFICIENT FUNDING &amp; STAFFING (YES OR NO)</b>	<b>MODIFIED DATE (MM/DD/YYYY)</b>	<b>DATE COMPLETED (MM/DD/YYYY)</b>
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	



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	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	<p>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.</p> <p><b>Hiring Goals:</b>            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.</p> <p>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.</p> <p>During the reporting year, two Employee Resource Groups were established for the further advancement of People with Disabilities and Targeted Disabilities within the</p>



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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.

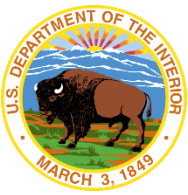
5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

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.





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## 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	
<b>TYPE OF TRIGGER</b>	PWD are voluntarily separating at the same level of their onboarding to the DOI workforce, which leads to a potential retention issue.
BRIEF BARRIER(S)	
<b>TYPE OF BARRIER(S)</b>	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



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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
<b>Barrier Analysis Process Completed? (Yes or No)</b>		<b>Barrier(s) Identified? (Yes or No)</b>
No		No
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
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	



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### 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.



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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 .