

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

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

Section I: Efforts to Reach Regulatory Goals

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

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

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

For five consecutive years the Department has not met the federal hiring goal of 12% for PWD in grades GS-11 to SES. In FY 2021, the total for this group was 8.8 percent (2,791) compared to 8.4 percent (2,612) in 2020, and 7.8 percent (2,407) 2019. While this group remains lower than the federal hiring goal, the total number of PWD employees in this cluster has increased by 15.9 percent since 2019.

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

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

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

In FY 2019, the hiring goals were established and disseminated to the hiring managers and human resource communities. In FY 2020, the Office of Human Capital (OHC) met regularly with Bureau HR Directors to account for the proactive steps taken to achieve the hiring goal. OHC dedicated a full-time equivalent (FTE) to oversee the Department's efforts for meeting the hiring goals. Each of the Bureaus designated an HR practitioner to work along-side OHC's program lead for disability employment. These individuals work closely with managers and supervisors to convey the Department's targeted goals during the completion of the hiring action. In FY 2021 OHC continued to engage with its Departmental Veteran & PWD Recruitment Intra-Bureau Expert Team (I-BET), which meets monthly to discuss strategies and best practices to increase PWD recruitment and hiring across DOI. Additionally, OHC reviews Special emphasis program data weekly via workforce reports, to make recommendations at the reoccurring I-BET meetings. OHC Leadership is also briefed in the event there are significant barriers or trends that pose program concerns.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical Goal	--	12%		2%	
Grades GS-1 to GS-10	14881	2084	14.00	541	3.64
Grades GS-11 to SES	32536	2818	8.66	643	1.98

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

In FY 2019, the hiring goals were established and disseminated to the hiring managers and human resource communities. In FY 2020, the Office of Human Capital (OHC) met regularly with Bureau HR Directors to account for the proactive steps taken to achieve the hiring goal. OHC dedicated a full-time equivalent (FTE) to oversee the Department’s efforts for meeting the hiring goals. Each of the Bureaus designated an HR practitioner to work along-side OHC’s program lead for disability employment. These individuals work closely with managers and supervisors to convey the Department’s targeted goals during the completion of the hiring action. In FY 2021 OHC continued to engage with its Departmental Veteran & PWD Recruitment Intra-Bureau Expert Team (I-BET), which meets monthly to discuss strategies and best practices to increase PWD recruitment and hiring across DOI. Additionally, OHC reviews Special emphasis program data weekly via workforce reports, to make recommendations at the reoccurring I-BET meetings. OHC Leadership is also briefed in the event there are significant barriers or trends that pose program concerns.

Section II: Model Disability Program

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

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

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

Answer No

A review of the FY 2021 EEO program revealed that the Office of the Secretary, ODICR, and multiple Bureau EEO programs did not have designated Disability Program Managers for majority of FY 2021. Without designated resources, DOI was unable to determine where barriers exist for people with disabilities and to ensure full inclusion. The Director of ODICR had frequent communication with the Principal Deputy Assistant Secretary for Policy, Management, and Budget regarding the need for additional resources to prevent program deficiencies and impediments for any group. As a result of the frequent discussions with agency leadership, five Bureaus received additional FTEs to maintain an adequate EEO program by the close of the FY. Of which, the Bureaus USGS and BSEE recruited and onboarded Disability Program Managers to fulfill program requirements. In the interim, the ODICR’s Lead MD-715 Program Manager is working with I-BET in OHC for the Affirmative Action hiring goals to ensure the line-by-line instructions from the EEOC are adhered to throughout the Department.

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	50	24	0	Cynthia Piper Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.
Answering questions from the public about hiring authorities that take disability into account	53	24	0	Angela Lennartson Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing reasonable accommodation requests from applicants and employees	9	7	0	Mark Guberman and Devon Cummings Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.
Special Emphasis Program for PWD and PWTD	4	7	1	At the close of FY 2021 only the BLM, BSEE, NPS and USGS had permanent Disability Program Managers (DPM) assigned to the EEO. BLM identified two collateral duty DPM in field offices. ODICR has a Special Emphasis PM with DPM duties assigned to a one-year pa
Architectural Barriers Act Compliance	10	0	4	Sloan Farrell Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.
Section 508 Compliance	3	6	8	Siddhartha Sharma Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.

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.

Answer No

There are permanent Disability Program Managers (DPM) assigned to four out of 11 Bureaus within the Department and ODICR has a detailee to perform DPM work. DOI also has Reasonable Accommodation and Special Placement Coordinators as part of its HR operations. The Reasonable Accommodation Coordinators work with managers and employees requiring accommodations to identify accommodation solutions through interactive dialogue. Special Placement Coordinators work closely with hiring managers, employees, and applicants to ensure DOI hiring goals are achieved, and standardized knowledge is received. During the reporting years, NPS staffing, and recruitment personnel received training on using special hiring authorities and the Workforce Recruitment Program (WRP). Additionally, employees assigned to special emphasis programs participated in the following training opportunities conducted in various Bureaus and Offices: • The Department and Bureaus conducted webinars on Reasonable Accommodations, Special Hiring Authorities, Disability Sensitivity, and Disability Awareness, as part of its Departmental Special Emphasis Observance activities. • In FY 2021 the Departmental Section 508 Program Manager hosted a series one-hour courses on making accessible electronic documents, which provided training to nearly 700 DOI personnel. The Program Manager also provided a presentation on Section 508 and the importance of digital accessibility to DOI Office of Communications, and to members of the DOI Diversity Partners Community of Practice. • DOI continued to stand up its I-BET for the PWD and Veterans employment and conducted monthly meetings with Bureaus and Offices to inform, educate, and engage in all matters concerning PWD recruitment, retention, training, and inclusion. • Multiple Bureau and Office representatives participated in the Federal Exchange on Employment and Disability (FEED) meetings where participants learned about policies/guidelines, best practices for

implementing effective disability programs, as well as the tools and tips for enhancing disability employment, and creating sustainable partnerships.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer No

The Department has appointed reasonable accommodation coordinators in each of the Bureau Human Capital Offices, however, it did not allocate Disability Program Managers to conduct barrier identification and elimination to ensure equal access for people with disabilities in the workplace. Plan - The ODICR Director provides regular updates to Departmental Senior Executive Leadership regarding the need for sufficient resources to establish an effective EEO program overall. In the interim the Affirmative Employment staff meet regularly with the Reasonable Accommodation coordinators throughout the Department to ensure that they have the knowledge and leeway to provide timely accommodation solutions. The team also helps to facilitate from the Office of the Secretary level, accessibility to facilities, obtaining accessible technologies, and provide consultative services when required.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]
--	--

Brief Description of Program Deficiency	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]
--	--

Brief Description of Program Deficiency	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)]		
Objective	Establish a tracking mechanism to account for and ensure timely issuance of request for reasonable accommodations.		
Target Date	Dec 30, 2021		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2018	September 30, 20	Discuss issue at monthly Reasonable Accommodation Community of Practice meetings and ensure Reasonable Accommodation Annual reports monitor and track timeliness.
	Sep 30, 2018	September 30, 2019	Meet with Director, OCR and Director, Workforce Relations Division to discuss the necessity for a reasonable accommodation tracking system.
	Dec 30, 2018	September 22, 2019	Conduct market research on potential GSA vendor's reasonable accommodation tracking and reporting systems.
	Dec 30, 2018	July 30, 2019	Provide justification to Director, Workforce Relations Division to secure reasonable accommodation tracking system.
	Dec 30, 2018		Secure a new automated reasonable accommodation tracking system to improve the processing of reasonable accommodations in accordance with the guidelines set forth in the Department's Reasonable Accommodation policy and procedures.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2021	At the close of the fiscal year, OHC reported that an enterprise-level centralized system to track reasonable accommodation requests is under consideration. No further action or information was reported. At BLM, through weekly Human Capital/Civil Rights Coordination Meetings, Human Capital is in process of putting in place a Bureau-level effective tracking system for all Reasonable Accommodation requests. This will enable the EEO program to have adequate data on RA requests and timeliness, address where there may be deficiencies in this area, and partner with HR to identify plans to address such deficiencies.	
	2019	The Office of Human Capital requested funding to create a Department-wide reasonable accommodation tracking system. Once funding has been secured, the Office of Human Capital, in partnership with the Office of Civil Rights and Bureau representatives, will work with an established vendor to develop the system to meet both human resources and equal employment opportunity needs. In the absence of a Department-wide tracking system, DOI will issue data calls to the bureaus for this information.	
	2020	In the absence of a Department-wide tracking system, the Departmental reasonable accommodation coordinator issued data calls to the Bureaus to provide updates on the number of timely issued RA solutions. This process revealed that there is not a systematic approach to account for reasonable accommodations. Multiple Bureaus did not track, some tracked certain aspects of the process that could not account for timeliness, and etc. Discussions were ongoing about the need for a standardized tracking system. At the close of the FY, OHC received funding to develop a Department-wide reasonable accommodation tracking system. No further action was taken.	

Brief Description of Program Deficiency	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.
--	---

Brief Description of Program Deficiency	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]		
Objective	Train managers and supervisors on the requirements of the Affirmative Action Plan for persons with disabilities. Ensure all Bureaus post the Affirmative Action Plan on external websites.		
Target Date	Sep 30, 2021		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 20		Establish joint discussions with the Departmental ODICR and OSEOD to collaborate on incorporating Disability Employment as a training block of instruction in the new supervisor course.
	Sep 30, 2020		OHC and ODICR to develop and implement continuous training for HR and EDI (EEO) practitioners to carry out their responsibilities effectively for the Affirmative Action Plan.
	Sep 30, 2020		Establish and implement a continual campaign to engage managers and supervisors in actively supporting the Affirmative Action Plan for persons with disabilities..
	Sep 30, 2021		Verify that disability-related questions from members of the public are answered promptly and correctly.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2020	Bureau HR Specialists provided multiple training sessions to managers and supervisors regarding the use of the special hiring authorities for hiring and placement of PWD and PWTD. Bureau HR Specialists provided deskside training to leaders as requests for reasonable accommodation arose throughout the year. OHC conducted podcasts to educate hiring managers on WRP and encouraged them to utilize the WRP to obtain qualified talent and reduce the time to hire by using non-competitive appointments.	
	2019	During the reporting year, the Directors of the Departmental ODICR and OHC issued joint messaging, on behalf of the Secretary of the Interior, instituting the affirmative action plan for advancing individuals with disabilities throughout the Department. The memorandum also provided resources, including the Workforce Recruitment Program. Some Bureaus enacted ongoing training to communicate the various hiring authorities available to employ people with disabilities. The OHC provided a webinar to HR practitioners and hiring managers on the specifics of using the Workforce Recruitment Program (WRP) to obtain qualified talent.	

Brief Description of Program Deficiency	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)]
--	---

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

Brief Description of Program Deficiency	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)]
--	--

Brief Description of Program Deficiency	E.4.a.5. The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(4)]		
Objective	Establish a tracking mechanism to account for and ensure timely responses to requests for reasonable accommodation.		
Target Date	Dec 30, 2021		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Dec 30, 2018		Secure an automated tracking system to account for timely issuance of reasonable accommodation solutions Department-wide.
	Dec 30, 2020	September 30, 2020	Secure funding to develop a Department-wide reasonable accommodation tracking system.
	Sep 30, 2021		Secure vendor to design a comprehensive tracking system that accounts for the requirements of the Rehabilitation Act.
	Sep 30, 2021		Secure vendor to design a comprehensive tracking system that accounts for the requirements of the Rehabilitation Act.
	Dec 30, 2022		Establish a recurring reporting process to monitor timeframes for reasonable accommodations.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2021	At the close of the fiscal year, OHC reported that an enterprise-level centralized system to track reasonable accommodation requests is under consideration. No further action or information was reported. At BLM, through weekly Human Capital/Civil Rights Coordination Meetings, Human Capital is in process of putting in place a Bureau-level effective tracking system for all Reasonable Accommodation requests. This will enable the EEO program to have adequate data on RA requests and timeliness, address where there may be deficiencies in this area, and partner with HR to identify plans to address such deficiencies.	
	2019	OHC requested funding to create a Department-wide reasonable accommodation tracking system.	
	2020	In the absence of a Department-wide tracking system, the Departmental reasonable accommodation coordinator issued data calls to the Bureaus to provide updates on the number of timely issued RA solutions. This process revealed that there is not a systematic approach to account for reasonable accommodations. Multiple Bureaus did not track, some tracked certain aspects of the process that could not account for timeliness, and etc. Discussions were ongoing about the need for a standardized tracking system. At the close of the FY, OHC received funding to develop a Department-wide reasonable accommodation tracking system. No further action was taken.	

Section IV: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

A recruitment strategy for the DOI is to utilize the Workforce Recruitment Program (WRP) to connect hiring managers with students and recent graduates with disabilities and to utilize Schedule A hiring authority for persons with disabilities and 30% or more disabled veteran hiring authority. In addition to the WRP, the Department leverages the DOI Skill Bridge MOU to provide internship opportunities for disabled veterans with the potential to convert to a competitive service appointment. DOI also utilized a

MSEP partnership that is available to certain disabled Military Spouses for non-competitive appointments under Schedule A. The Department actively engaged in collaborative recruiting partnerships with academia, governmental, and non-profit organizations with access to candidates with disabilities. The following strategies were used to recruit individuals with disabilities in the permanent workforce: • My DOI Careers used Twitter to send vacancy announcements to disability advocacy groups such as the National Rights Network, the National Alliance on Mental Illness, the American Association of People with Disabilities, etc., to alert these organizations of available positions throughout the Department.

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

The Department currently utilizes the WRP to connect hiring managers with students and recent graduates with disabilities. DOI also uses the Schedule A and 30% or more Disabled Veterans appointing authorities, to identify and hire qualified PWD and PWTD applicants for positions in the permanent workforce. All vacancy announcements included statements that encouraged Schedule A and 30% or more Disabled Veteran applicants to apply. As a result, in FY 2021, 1.6% of new hires were placed using the Schedule A hiring authority and 5.5% of the new hires used the 30% or more disabled veterans 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.

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

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

Answer No

At the close of FY 2021, the Department does not have a system in place to ensure all new supervisors, and newly promoted supervisors are made aware of hiring authorities for people with disabilities. To remedy this deficiency, the Departmental ODICR, and the Office of Employee Development were engaged in ongoing discussions regarding establishing a training block of instruction in its new supervisor course that addresses all aspects of disability employment. In the absence on a systematic approach to reach new and newly appointed supervisors, the following activities occurred in FY 2021: • OHC offers hiring managers consultations on strategic recruitment options (e.g., targeted outreach to underserved communities, the use of Schedule A, etc.). • OHC has made training and resources available to all hiring managers on the use of Schedule A hiring authorities, but this training is not currently mandatory. Additional focus on the utilization of Schedule A hiring is planned for FY 2022. • NPS and BLM provided training to regional staff on the use of hiring flexibilities, Schedule A hiring, and the WRP.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

During FY 2021, the DOI maintained a database that contained partnerships with over 300 U.S. military installations, Veterans Employment Service, Academia, State Job Offices, and Veterans' Assistance Centers nationwide. Participants of the List. SERV received e-mail notifications throughout the year of available job opportunities and free training events open to people with disabilities. DOI has an established partnership with Department of Labor (DOL) WRP and DOL Office of Disability Employment

Programs (ODEP) to broadcast webinars, informational sessions, usage of platforms, encourage hiring managers to interview candidates for the WRP database. OHC also looks to Bureaus to provide input on how they form alliances and partnerships in the local community and in their workforce plans to secure and maintain PWD. NPS staff across the country continued to establish partnerships with local and national organizations to expand its disability employment activities, including the Alaska Native Science and Engineering Program, local veteran organization, the National Association with the School of the Deaf, MERS Goodwill, and the Job Accommodation Network (JAN).

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

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

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	0				
% of Qualified Applicants	0				
% of New Hires	4816	1.70	3.53	0.33	0.85

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

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

Trigger - During FY 2021, for a large portion of the year, DOI did not have adequate training in extracting applicant flow data from various systems to determine if PWD and PWTD applied for mission critical positions to properly extract and analyze applicant flow data. The data shows that PWD and PWTD were selected to fill vacant positions at every grade level throughout the Department, with the exception of SES where PWTD were not selected.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
0025 PARK RANGER	195	8.72	2.56
0028 ENVIRONMENTAL PROTECTION	29	10.34	3.45
0080 SECURITY ADMINISTRATION	32	25.00	9.38
0085 SECURITY GUARD	23	13.04	0.00
0401 GEN NATURAL RESOURCES MGMT & BIO SCIENCES	263	5.70	0.76
0455 RANGE TECHNICIAN	9	0.00	0.00

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
0462 FORESTRY TECHNICIAN	258	3.10	0.78
0802 PETROLEUM ENGINEERING TECHNICIAN	8	12.50	0.00
0810 CIVIL ENGINEERING	86	8.14	0.00
0881 PETROLEUM ENGINEERING	22	4.55	0.00
1313 GEOPHYSICS	11	18.18	0.00
1315 HYDROLOGY	53	5.66	1.89
1350 GEOLOGY	44	15.91	4.55
1801 GEN INSPECT, INVESTIG, ENFORCE, & COMPL	24	12.50	0.00
1811 CRIMINAL INVESTIGATING	41	2.44	0.00
2151 DISPATCHING	51	5.88	0.00

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

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

Trigger – During FY 2021, multiple Bureaus have only one person assigned to review disability employment data and to determine impediments for the disabled community. This individual in most cases is also the special emphasis program manager for other major groups like Federal Women, Black Employment, Hispanic Employment, and the like. With competing priorities to plan and execute SEP observance month events, serving on teams for DEIA for various Executive Order, time constraints prohibited the EEO staff from reviewing and analyzing applicant flow data to determine if PWD and PWTD were deemed qualified for internal mission critical occupations (MCO). As previously stated, the entire HR and EEO communities received access to OPM’s USA-Staffing applicant flow system in July with subsequent training in August 2020. The teams were unable to determine if triggers existed outside of access to the relevant data.

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

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

The main trigger FY 2021 is the limited staffing assigned to each of the EEO Offices and the existing staff’s inability to analyze applicant flow data throughout the year or in a reasonable timeframe to determine where impediments (if any) exist. The employment data revealed that of the 16 MCOs, PWTD were selected in only five (5) out of 16 MCOs for promotional opportunities.

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

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

awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

A. ADVANCEMENT PROGRAM PLAN

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

DOI conducted numerous training and development activities throughout the year to ensure all employees, to include PWD and PWTD were fully aware and participated in the sponsored events. DOI does not have relevant tracking systems to account for the applicants and attendees of sponsored events. DOI does not have a department-wide mentoring program in place to ensure any of its employees engage in specialized development opportunities offered through an organized mentoring program. Both triggers are the subject of a Part H corrective action plan to ensure tracking and development is institutionalized throughout the DOI. In the absence of a plan, the following activities occurred in FY 2021: • The DOI continued to operate a department-wide Interior Coaching Program in that it solicited, through a competitive hiring process, employees to serve as coaches in the department-wide program when launched. Selectees to serve as coaches, will undergo an extensive training to prepare individuals to be effective coaches. Due to the absence of tracking, it is unknown the exact number of PWD/PWTD employees selected as coaches or participants. • Multiple Bureaus and Offices established career ladder positions requiring on-the-job and classroom training and mentoring to ensure success and opportunity for advancement. When advertised, people with disabilities were encouraged to apply. • Multiple Bureaus and Offices provided developmental opportunities and mentorship/coaching for employees, including PWD and PWTD, to improve their skills and to increase their opportunities for advancement. • Managers were encouraged to utilize the WRP to obtain qualified talent and reduce the time to fill vacancies using non-competitive appointments. • The DOI University (DOIU) Learning Centers provided leadership and management training courses opportunities throughout FY 2021. DOI Talent does not track applicant data to ascertain the number of PWD and PWTD that enrolled in these courses. • DOI actively maintained the DOI Career Connection, an online portal for offering short-term detail and lateral opportunities across the Department. Throughout the year, applicant tracking was not captured and therefore, unable to determine if PWD and PWTDs were among the employees engaging in these employment opportunities.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

Some of the Bureaus offered various leadership development opportunities for employees to further their career advancement goals. In FY 2021, the following leadership development opportunities were provided: • Bureau of Land Management (BLM) continued to operate its Emerging Leader Leadership Academy with its 2020 cohort, even though the pandemic prevented the selection of a 2021 cohort. Applicant data was not captured. Additionally, the BLM National Operations Center's (NOC) Leadership Council (TLC) provided a two-hour virtual Resume Workshop and 40 NOC employees attended and benefited from receiving tips for their personal career development. There was no data collected on PWD/PWTD participants. • BSEE sponsored the Emerging Leader Program (ELP) for all employees GS-11 to GS-13. Applicant data was not captured. • BOEM sponsored the Navigating Leadership Program, a mid-level development program designed for grades GS-14 and GS-15, and the Aspiring to Leadership Program, an entry-level leadership development program. Applicant data was not captured. • The NPS once again sponsored the Future Leaders Program that provides developmental opportunities for disabled veterans. Applicant data was not captured. NPS has also begun hiring regional Diversity Program Managers and training regional SEPMs on Disability Program Management to work with HR staff on ensuring PWD/PWTD employees have greater participation in career development opportunities. DOIU offers Leadership and Development Programs to improve diversity management, and professional skill sets of DOI employees. The Program Opportunities included: Aspiring to Leadership – An Entry Level Leadership Program This 5-month program is designed for the employees at the GS 7-11 levels who want leadership roles. The program focuses on increasing awareness of personal leadership style, reinforcing strengths, and building practical leadership skills that will prepare participants for future leadership roles. Through assessments, lectures, and large and small group discussions, participants develop knowledge and expertise in the following competency areas: • Conflict Management • Interpersonal Skills • Oral Communication • Problem Solving and Decisiveness. Applicant data for FY 2021 is not available. Exploring Leadership – A Mid-Level Leadership Program This developmental program is designed for a mid-level employee at GS-11-12 and high performing GS-9s who have demonstrated leadership potential. The program focuses on the competencies critical to successfully leading in the challenging and complex Federal environment. The program is comprised of three core sessions, tailored to develop proficiency in Team Building, Accountability, Problem Solving, Decisiveness, and Influencing/Negotiating. Exploring Leadership uses a blended learning approach and includes assessment, instructor-led learning, large and small group discussion, case studies, mentoring, and webinars to give participants a challenging and enriching leadership development experience. Applicant data for FY 2021 is not available. Pathways to Leadership – Bureau of Indian Affairs Pathways to Leadership is a 4- month program designed explicitly for the Bureau of Indian Affairs developing

leaders. The program prepares participants to lead the programs and responsibilities affecting Indian Affairs. Targeted to employees at the GS-13 and GS-14 levels, the program focuses on increasing competency proficiency in Conflict Management, Resilience, External Awareness, Political Savvy, Partnering, and Accountability. Participants explore the impact of personal values on ethical decision making, learn the importance of emotional intelligence and its effect on employee engagement and performance, build skills in leveraging diversity, political savvy, creating partnerships, and influencing/negotiating. They also produce a leadership network through mentoring and presentations by BIA senior leaders. Applicant data for FY 2021 is not available. Senior Executive Service Candidate Development Program The Department of the Interior's Senior Executive Service Candidate Development Program (SESCDP) is an OPM certified program tailored to grow and develop a cadre of highly qualified leaders for senior executive positions. The SESCO 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. The SES CDP was not offered in FY 2021.

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

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

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

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

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

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

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

Trigger - As stated above, the DOI Learning Management System (LMS) does not track applicant information. The lack of monitoring serves as a barrier to the DOI in understanding whether impediments exist for any group participating in career

advancement programs. The lack of tracking systems is a corrective action plan within the MD 715 report. Critical stakeholders in OSEOD were made aware, and it is projected that LMS will have the capability to collect applicant data beginning in FY 2022.

C. AWARDS

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

In FY 2021, based on the inclusion rate as the benchmark, PWD and PTWD employees received the following awards at lower rates than non-PWD employees: • Cash Awards: \$2,000-\$2,999: No Disability (23%), PWD (18%), PWTW (17%) • Cash Awards: \$3,000-\$3,999: No Disability (8.7%), PWD (6.3%), PWTW (6.3%) • Cash Awards: \$4,000-\$24,999: No Disability (3.4%), PWD (2.2%), PWTW (1.6%)

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	3955	8.00	7.26	7.55	8.14
Time-Off Awards 1 - 10 Hours: Total Hours	27328	55.40	50.13	50.90	56.81
Time-Off Awards 1 - 10 Hours: Average Hours	6.91	0.12	0.02	0.50	0.00
Time-Off Awards 11 - 20 hours: Awards Given	4156	7.39	7.63	7.10	7.48
Time-Off Awards 11 - 20 Hours: Total Hours	65128	122.34	119.03	118.68	123.48
Time-Off Awards 11 - 20 Hours: Average Hours	15.67	0.29	0.04	1.25	0.00
Time-Off Awards 21 - 30 hours: Awards Given	2591	5.47	4.76	5.90	5.33
Time-Off Awards 21 - 30 Hours: Total Hours	65404	137.83	120.49	148.58	134.47
Time-Off Awards 21 - 30 Hours: Average Hours	25.24	0.45	0.06	1.88	0.00
Time-Off Awards 31 - 40 hours: Awards Given	4147	7.87	7.89	7.70	7.93
Time-Off Awards 31 - 40 Hours: Total Hours	157459	301.87	299.40	292.15	304.91
Time-Off Awards 31 - 40 Hours: Average Hours	37.97	0.68	0.09	2.84	0.01
Time-Off Awards 41 or more Hours: Awards Given	20	0.02	0.04	0.00	0.02
Time-Off Awards 41 or more Hours: Total Hours	1079	0.86	2.29	0.00	1.12
Time-Off Awards 41 or more Hours: Average Hours	53.95	0.86	0.13	0.00	1.12

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	9183	18.65	16.82	19.21	18.48
Cash Awards: \$501 - \$999: Total Amount	7036187	14302.87	12902.22	14674.51	14186.58

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Average Amount	766.22	13.66	1.78	57.10	0.07
Cash Awards: \$1000 - \$1999: Awards Given	21948	39.62	41.84	39.76	39.57
Cash Awards: \$1000 - \$1999: Total Amount	30184978	53498.82	57659.49	52867.64	53696.33
Cash Awards: \$1000 - \$1999: Average Amount	1375.3	24.06	3.20	99.38	0.49
Cash Awards: \$2000 - \$2999: Awards Given	11719	17.92	23.23	16.82	18.26
Cash Awards: \$2000 - \$2999: Total Amount	27905339	42650.73	55341.62	40098.65	43449.30
Cash Awards: \$2000 - \$2999: Average Amount	2381.2	42.40	5.53	178.22	-0.10
Cash Awards: \$3000 - \$3999: Awards Given	4374	6.27	8.83	6.28	6.27
Cash Awards: \$3000 - \$3999: Total Amount	14612822	20973.64	29523.07	20962.63	20977.08
Cash Awards: \$3000 - \$3999: Average Amount	3340.84	59.58	7.75	249.56	0.14
Cash Awards: \$4000 - \$4999: Awards Given	1692	2.16	3.46	1.57	2.34
Cash Awards: \$4000 - \$4999: Total Amount	7436713	9513.34	15205.50	6971.97	10308.56
Cash Awards: \$4000 - \$4999: Average Amount	4395.22	78.62	10.19	332.00	-0.66
Cash Awards: \$5000 or more: Awards Given	2065	2.58	4.24	2.91	2.48
Cash Awards: \$5000 or more: Total Amount	17973519	21275.65	37280.81	24439.16	20285.76
Cash Awards: \$5000 or more: Average Amount	8703.88	146.73	20.38	626.64	-3.44

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

a. Pay Increases (PWD) Answer Yes

b. Pay Increases (PWTD) Answer Yes

• Quality Step Increases: No Disability (4.4%), PWD (3.6%), PWTD (3.2%) • Performance Based Bonuses No Disability (0.6%), PWD (0.3%), PWTD (0.2%)

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	272	0.32	0.57	0.22	0.35

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

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

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

DOI established a Departmental award for accomplishments in EEO/DEIA, but no additional data on PWD recognitions or other awards was available in FY 2021.

D. PROMOTIONS

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

a. SES

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

b. Grade GS-15

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

c. Grade GS-14

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

d. Grade GS-13

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

Trigger - DOI HR and EEO communities received access to applicant flow data in July 2020. The data for this FY was not analyzed to determine if impediments exist due to the limited staff assigned to the EEO Community for disability employment, barrier identification, elimination, and full inclusion. In majority of the EEO offices, there is one individual assigned to oversee all special emphasis program responsibilities and to plan observance month events. Due to competing priorities that took precedence throughout the year, these individuals did not conduct root cause analysis to understand the reasons for recurring triggers identified in the applicant flow data. The table below shows how internal selections are not meeting the 12 % federal goal in FY 2021. Promotions Qualified Internal Applicants Internal Selections Regulatory GS-13 Data not available 38 (7.4%) 12% GS-14 Data not available 21 (7.1%) 12% GS-15 Data not available 6 (5.1%) 12% SES Data not available 0 (0.0%) 12%

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

a. SES

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

b. Grade GS-15

- i. Qualified Internal Applicants (PWTB) Answer Yes

- ii. Internal Selections (PWTD) Answer Yes
- c. Grade GS-14
 - i. Qualified Internal Applicants (PWTD) Answer Yes
 - ii. Internal Selections (PWTD) Answer Yes
- d. Grade GS-13
 - i. Qualified Internal Applicants (PWTD) Answer Yes
 - ii. Internal Selections (PWTD) Answer Yes

Trigger: DOI was unable to analyze the data for the number of PWTD applying for internal selections. The number of selections of PWTDs fell below the federal standard of 2% for all senior graded positions. More work is required to meet the standards. The table below shows the internal selections made during FY 2021 for PWTD as compared to the 2% federal hiring goal. Promotions Qualified Internal Applicants Internal Selections Regulatory GS-13 Data not available 7 (2.1%) 2% GS-14 Data not available 8 (2.7%) 2% GS-15 Data not available 1 (5.1%) 2% SES Data not available 0 (0.0%) 2%

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

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

Trigger: The trigger revealed that the higher the grade level, the least number of PWDs were selected to fill senior level positions (e.g., 5-PWDs for GS-15, 15-PWDs for GS-14, 33-PWDs for GS-13, etc.).

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

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

Trigger: The higher the grade level, the least number of PWTDs were selected to fill senior level positions (e.g., 0-PWTDs for GS-15, 4-PWTDs for GS-14, 9-PWTDs for GS-13, etc.).

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

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

Trigger: The FY 2021 data revealed that the higher the grade level, the least number of PWDs were selected to fill senior level positions. DOI was unable to fully analyze applicant flow data in FY 2021.

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

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

Trigger: DOI was unable to fully analyze qualified internal applicant data for this reporting period. The Department gained access to OPM’s USA-Staffing applicant flow system at the end of the FY and will conduct an analysis of qualified PWTD internal applicants for promotions to supervisory positions in FY 2022. The second trigger revealed that the higher the grade the least number of PWTD were selected for higher graded positions. The data revealed that PWTDs were selected at the GS-13 grade level, however, the number of selectees declined at the GS-14 grade level and were no selections of PWTDs at the GS-15 and SES grade levels.

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

- a. New Hires for Executives (PWD) Answer Yes
- b. New Hires for Managers (PWD) Answer Yes

c. New Hires for Supervisors (PWD) Answer Yes

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

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTDS among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires for Executives (PWTDS) Answer Yes

b. New Hires for Managers (PWTDS) Answer Yes

c. New Hires for Supervisors (PWTDS) Answer Yes

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

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer No

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

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

a. Voluntary Separations (PWD) Answer Yes

b. Involuntary Separations (PWD) Answer Yes

Trigger: Based on the inclusion rate while PWDs voluntarily separated from DOI at lower rates than individuals without a disability in FY 2021, they voluntarily separated at the same level in which the DOI onboarded this group to the workforce. This imbalance suggests a potential retention issue. Additionally, PWDs had higher removal rates (0.67%) than employees without a disability (0.3%) in FY 2021.

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	14	0.03	0.02
Permanent Workforce: Removal	134	0.50	0.17

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Resignation	1235	2.59	1.77
Permanent Workforce: Retirement	2018	3.88	2.93
Permanent Workforce: Other Separations	950	2.22	1.34
Permanent Workforce: Total Separations	4351	9.21	6.23

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

- a. Voluntary Separations (PWTD) Answer Yes
- b. Involuntary Separations (PWTD) Answer Yes

Trigger: Based on the inclusion rate while PTWDs voluntarily separated from DOI at lower rates than individuals without a disability in FY 2021, they voluntarily separated at nearly the same level in which the DOI onboarded this group to the workforce. This imbalance suggests a potential retention issue. Additionally, PTWDs had higher removal rates (0.79%) than employees without a disability (0.3%) in FY 2021.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	14	0.00	0.02
Permanent Workforce: Removal	134	0.40	0.20
Permanent Workforce: Resignation	1235	2.51	1.84
Permanent Workforce: Retirement	2018	3.56	3.01
Permanent Workforce: Other Separations	950	1.91	1.41
Permanent Workforce: Total Separations	4351	8.38	6.48

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: As of the end of FY 2021, according to DOI Exit Survey Data, 15 percent of respondents identified as a PWD. Among those who identified as a PWD, respondents frequently cited failure to provide timely and effective reasonable accommodations, harassing workplace conduct, and lack of career development opportunity as reasons for separating from the agency.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

U.S. Department of the Interior Section 508 Program website <https://www.doi.gov/ocio/section508> and 375 Departmental Manual (DM) 8 Section 508 Program and Responsibilities, and DOI’s Accessibility Statement <https://www.doi.gov/accessibility>. How to file a complaint: Within 180 days of the date Complaints of discrimination filed against the DOI can be submitted by contacting the Office of Civil Rights, 1849 C Street NW, MS 4359 Washington DC 20240. <https://www.doi.gov/pmb/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. 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 2021 the DOI Section 508 Coordinator conducted several activities to increase understanding on accessible information technology and ensure accessibility considerations were addressed in agency activities related to information technology. These included:

- Tracking the status of Section 508 consultations requests received by the Departmental Section 508 Program and responding to at least 71 consultation requests from bureaus and offices and provided policy guidance regarding Section 508 of the Rehabilitation Act and related Section 508 laws and regulations. Specifically, provided guidance to bureau/office Section 508 coordinators, Contracting Officers and Contracting Officers Representatives (CORs), Information Technology (IT) personnel, Human Resources (HR) personnel and other employees/contractors on topics such as the Access Board's Information and Communication Technology (ICT) Standards and Guidelines at 36 CFR 1194, Web Content Accessibility Guidelines (WCAG) 2.0 standards, contents of procurement solicitations, requirements for the accessibility of various ICT (such as electronic documents, videos, websites, mobile applications, information kiosks and transaction machines, copiers, etc.), and processes for testing software and web applications for Section 508 conformance.
- Revision of 375 Departmental Manual (DM) Chapter 8, Section 508 Program and Responsibilities is ongoing. A draft was submitted to the IMTLT for feedback. Feedback is being incorporated.
- Collaborating with bureau and OCIO staff to develop DOI 21st Century Integrated Digital Experience Act (IDEA) implementation guide. Specifically, involved with developing content for Section 2 modernizing websites and Section 3 digital services and forms in guide. The implementation guide was published at the end of September 2021 to ensure DOI bureaus and offices develop accessible websites and digital services.
- Providing Section 508 content to the OCIO correspondence team in the first quarter FY 2021, to include into the OCIO Correspondence Handbook to ensure correspondence disseminated to DOI bureaus and offices is accessible.
- Providing Section 508 content to the program manager for the DOI Charge Card Program to include into the draft Purchase Card Program Policy to ensure procurement of accessible products and services.
- Conducting manual testing to determine the compliance of bureau/office websites with the standards identified in the Web Content Accessibility Guidelines (WCAG) 2.0, in response to the OMB/CIO Council Section 508 reporting requirement. This entailed scanning 545,449 bureau/office internet web pages and 4,891 intranet web pages for the February 2021 reporting requirement, as well as 717,506 bureau/office internet web pages and 4,926 intranet web pages for the August 2021 reporting requirement. This also included conducting follow-up testing using screen readers for certain pages to confirm results of automated scans. The compliance percentages were reported in the February and August 2021 Section 508 reports. Conformance reports were shared with website owners to address deficiencies.
- Tracking the status of Section 508 testing requests received by the Departmental Section 508 Program and responding to at least 47 testing requests from bureaus and offices and provided feedback regarding the accessibility of web pages, web applications, documents, spreadsheets, presentations, videos, forms, web-based courses, and Tableau data visualizations. Used Compliance Sheriff, screen readers and accessibility tools such as Accessible Name and Description Inspector (ANDI) to test ICT.
- Upon requests from DOI bureaus and offices, reviewing voluntary product accessibility templates (VPAT) to determine compliance of the associated ICT with applicable Section 508 standards and provided responses to bureaus and offices where appropriate. Specifically, this included reviewing VPATS for products such as Adobe Experience Manager, Foxit PDF Editor, iSpring authoring tool for training, and various web accessibility evaluation tools such as Deque Systems WorldSpace, Level Access Accessibility Management Platform, and TPGI Arc Platform. Additionally, the Coordinator reviewed procurement solicitations to ensure Section 508 standards are incorporated. These solicitations were for the procurement of ICT such as web-based training courses, web applications, and hardware.
- Developing a draft SOW to establish a Blanket Purchase Agreement (BPA) for 508 support services to assist bureaus/offices meet Section 508 requirements. This BPA will provide document remediation services, captioning and audio description services, sign-language interpretation, testing of ICT, training and project management services. The BPA will be established in calendar year 2022.
- Working with DOI partners to communicate to our deaf and hard-of-hearing community within DOI to transition to the Federal Communications Commission (FCC) Telecommunication Relay Services (TRS). In addition, working with contracting officers to compete remote communications access real-time translation (live real-time captions) and video remote interpreting (VRI) services on the GSA Multiple Award Schedule (MAS) 541930. Vendor(s) will be selected by January 2022.
- Collaborating with staff to train bureau/office personnel in creating Section 508 compliant electronic documents (1-hour course) in FY 2021.
- Collaborating with staff to train bureau/office personnel in creating Section 508 compliant Excel spreadsheets (1-hour course) in FY 2021.
- A webinar on Making Your Training Events Accessible to bureau/office personnel. This

webinar enabled users to provide accessible training events by ensuring they know their responsibilities regarding accessibility and Section 508. The session also reinforced best practices for effective training events and helped trainers be more effective when addressing accessibility needs for their learners. • The DOI 508 Coordinator collaborating with the OCIO IT enterprise Solutions team and representatives from the Office of Communications to host the 2021 DOI Digital Week Event, to include Section 508 awareness, from May 17-20, 2021. Representatives from Microsoft, Adobe, the U.S. Access Board, DOI Office of Communications and the DOI Section 508 Program provided presentations on various accessibility topics. • The Departmental 508 Coordinator providing a presentation on Section 508 and the importance of digital accessibility to DOI Office of Communications on Sept. 30, 2021. The presentation included a screen reader demonstration. • The DOI 508 Coordinator providing a presentation on the importance of digital accessibility to DOI Diversity Partners Community of Practice on July 27, 2021. The presentation included a screen reader demonstration and a demonstration of a video with captioning and audio description. Separately, the Departmental ODICR, Public Civil Rights Division (PCR) initiated a collaborative effort in FY 2018 that continued into FY 2021, whereby key senior executives at the Bureaus, the Departmental ODICR, and OHC work collaboratively to improve access to public lands for people with disabilities.

C. REASONABLE ACCOMMODATION PROGRAM

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

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

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

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

• Reoccurring Training throughout FY 2021 - Some Bureaus, including BLM, NPS, and FWS provided reasonable accommodation training to managers and supervisors. The training provided managers and supervisors insight into how to recognize a request for reasonable accommodation when plain language was used, to engage in the interactive process, to meet timelines, and to ensure proper documentation throughout the process. Reasonable accommodation training is also offered via the DOI Talent Management system. • Inter-Bureau Expert Team (I-BET) - OHC established an I-BET for the Employment/Special Placement of Persons with Disabilities (PWD) in accordance with the Affirmative Action Plan for PWD and PWTD. The group met monthly to account for the Departments process towards achieving the hiring goals. The Bureaus and Offices engaged in best practices for recruitment, retention, and training.

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

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

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

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

to the Civil Rights community is necessary to conduct a more thorough review. The continual shortage of resources to ensure and effectively run the EEO program is noted as “needing improvement” and is noted in Part H of the report.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the governmentwide average?

Answer No

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

Answer Yes

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

In FY21, there were two (2) findings of discrimination alleging harassment based on disability status. 1. DOI-OS-14-0184 The following corrective action was ordered by an EEOC Administrative Judge: • Compensatory damages, costs, and attorney’s fees. • The restoration of leave. • Expunge Agency records issued as a result of the Agency’s discriminatory conduct. • (8) hours of training for involved Agency officials with a focus on the Rehabilitation Act, and with an emphasis on non-discrimination based on disability and the prohibition against retaliation for engaging in protected EEO activity. • Consideration of appropriate disciplinary action against three (3) responsible management officials. • Physically post a Notice of Violation in conspicuous places, including all places where notices to employees are customarily posted. (As a result of COVID-19, and the Agency’s concern for the safety of employees, physical posting of the Notice of Violation was suspended until further notice from the Agency’s Office of Diversity, Inclusion and Civil Rights.) Note: Complainant has appealed the EEOC Administrative Judge’s decision, and the appeal is currently pending before the EEOC’s Office of Federal Operations. The Agency has stayed the implementation of compliance pending the outcome of the appeal. 2. DOI-OS-15-0745 The following corrective action was ordered by an EEOC Administrative Judge: • Compensatory damages, costs, and attorney’s fees. • The restoration of annual and sick leave associated with the Agency’s discriminatory conduct. • Expunge Agency records issued as a result of the Agency’s discriminatory conduct. • (8) hours of training for involved Agency officials with a focus on the Rehabilitation Act, and with an emphasis on non-discrimination based on disability and the prohibition against retaliation for engaging in protected EEO activity. • Consideration of appropriate disciplinary action against three (3) responsible management officials. • Physically post a Notice of Violation in conspicuous places, including all places where notices to employees are customarily posted. (As a result of COVID-19, and the Agency’s concern for the safety of employees, physical posting of the Notice of Violation was suspended until further notice from the Agency’s Office of Diversity, Inclusion and Civil Rights.) Note: Complainant has appealed the EEOC Administrative Judge’s decision, and the appeal is currently pending before the EEOC’s Office of Federal Operations. The Agency has stayed the implementation of compliance pending the outcome of the appeal.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer No

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

Answer Yes

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

There were seven findings of discrimination related to failure to provide reasonable accommodation in FY 2021. 1. DOI-BLM-16-0155 The following corrective action was ordered and implemented by the Agency: • An award of compensatory damages, costs, and attorney's fees. • (8) hours of training for all involved Agency officials focused on disability and reasonable accommodation. • Consideration of appropriate disciplinary action against two (2) responsible management officials. • Physically post a Notice of Violation in conspicuous places, including all places where notices to employees are customarily posted. (As a result of COVID-19, and the Agency's concern for the safety of employees, physical posting of the Notice of Violation was suspended until further notice from the Agency's Office of Diversity, Inclusion and Civil Rights.) • Electronically post the Notice of Violation on the Agency's public-facing website. 2. DOI-BOR-18-0489 The following corrective action was ordered and implemented by the Agency: • An award of compensatory damages and attorney's fees. • (8) hours of training for all involved Agency officials on Title VII and the Rehabilitation Act. • Consideration of appropriate disciplinary action against two (2) responsible management officials. • Physically post a Notice of Violation in conspicuous places, including all places where notices to employees are customarily posted. (As a result of COVID-19, and the Agency's concern for the safety of employees, physical posting of the Notice of Violation was suspended until further notice from the Agency's Office of Diversity, Inclusion and Civil Rights.) • Electronically post the Notice of Violation on the Agency's public-facing website. 3. DOI-BOR-18-0612 The following corrective action was ordered and implemented by the Agency: • An investigation regarding an award of compensatory damages, costs, and attorney's fees. A final agency decision on compensatory damages, costs, and attorney's fees is pending. • (8) hours of training for responsible management official with a focus on the Rehabilitation Act, reasonable accommodation, and disability. • Physically post a Notice of Violation in conspicuous places, including all places where notices to employees are customarily posted. (As a result of COVID-19, and the Agency's concern for the safety of employees, physical posting of the Notice of Violation was suspended until further notice from the Agency's Office of Diversity, Inclusion and Civil Rights.) • Electronically post the Notice of Violation on the Agency's public-facing website. • Consideration of appropriate disciplinary action against the responsible management official. 4. DOI-BOR-20-0200 The following corrective action was ordered and implemented by the Agency: • An investigation regarding an award of compensatory damages, costs, and attorney's fees. A final agency decision on compensatory damages, costs, and attorney's fees is pending. • (8) hours of training for involved Agency officials with a focus on the Rehabilitation Act and reasonable accommodation. • Physically post a Notice of Violation in conspicuous places, including all places where notices to employees are customarily posted. (As a result of COVID-19, and the Agency's concern for the safety of employees, physical posting of the Notice of Violation was suspended until further notice from the Agency's Office of Diversity, Inclusion and Civil Rights.) • Electronically post the Notice of Violation on the Agency's public-facing website. • Consideration of appropriate disciplinary action against three (3) responsible management officials. 5. DOI-NPS-19-0506 The following corrective action was ordered and implemented by the Agency: • Granting the complainant's request to telework. • (8) hours of training for involved Agency officials with a focus on the Title VII of the Civil Rights Act of 1964 and the Rehabilitation Act. • Physically post a Notice of Violation in conspicuous places, including all places where notices to employees are customarily posted. (As a result of COVID-19, and the Agency's concern for the safety of employees, physical posting of the Notice of Violation was suspended until further notice from the Agency's Office of Diversity, Inclusion and Civil Rights.) • Electronically post the Notice of Violation on the Agency's public-facing website. 6. DOI-OS-14-0184 The following corrective action was ordered by an EEOC Administrative Judge: • Compensatory damages, costs, and attorney's fees. • The restoration of annual and sick leave associated with the Agency's discriminatory conduct. • Expunge Agency records issued as a result of the Agency's discriminatory conduct. • (8) hours of training for involved Agency officials with a focus on the Rehabilitation Act, and with an emphasis on non-discrimination based on disability and the prohibition against retaliation for engaging in protected EEO activity. • Consideration of appropriate disciplinary action against three (3) responsible management officials. • Physically post a Notice of Violation in conspicuous places, including all places where notices to employees are customarily posted. (As a result of COVID-19, and the Agency's concern for the safety of employees, physical posting of the Notice of Violation was suspended until further notice from the Agency's Office of Diversity, Inclusion and Civil Rights.) Note: Complainant has appealed the EEOC Administrative Judge's decision, and the appeal is currently pending before the EEOC's Office of Federal Operations. The Agency has stayed the implementation of compliance pending the outcome of the appeal. 7. DOI-OS-17-0098 The following corrective action was ordered by an EEOC Administrative Judge: • Compensatory damages, costs, and attorney's fees. • Issue the complainant backpay and benefits. • The restoration of annual and sick leave associated with the Agency's discriminatory conduct. • Expunge Agency records issued as a result of the Agency's discriminatory conduct. • (40) hours of training on the Rehabilitation Act and reasonable accommodation process to all Agency employees charged with reviewing, assessing, advising, and granting accommodation requests, which includes but is not limited to managers, Human Resources personnel, Employee and Labor Relations personnel, and attorney advisors involved in the legal sufficiency review of reasonable accommodation requests. • Physically post a Notice of Violation in conspicuous places, including all places where notices to employees are customarily posted. (As a result of COVID-19, and the Agency's concern for the safety of employees, physical posting of the Notice of Violation was suspended until further notice from the Agency's Office of Diversity, Inclusion and Civil Rights.) Note: The Agency has appealed the EEOC Administrative Judge's decision, and the appeal is currently pending before the EEOC's Office of Federal Operations. The Agency has stayed the implementation of compliance pending the outcome of the appeal.

Section VIII: Identification and Removal of Barriers

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

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

Answer No

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

Answer No

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

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

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

Report of Accomplishments	
Fiscal Year	Accomplishment
2021	<p>ODICR and OHC completed a draft for an updated Departmental Reasonable Accommodation Policy and circulated to Bureau EEO Directors for review and comment. DOI anticipates finalizing and issuing the updated policy in FY 2022.</p> <p>The Secretary of the Interior issued an EEO policy statement on September 29, 2021, which reaffirms DOI's commitment to equal employment opportunity for all protected groups including persons with disabilities, and clarifies employees' responsibilities for ensuring a non-discriminatory and inclusive workplace.</p> <p>NPS and BLM hired Disability Program Managers to provide support to managers and supervisors on disability employment matters.</p> <p>In September 2021, the BLM Office of the Director announced a requirement to all BLM States/Centers to designate/hire specific staff to conduct strategic outreach and recruitment towards increasing the diversity of the BLM workforce.</p> <p>Additionally, in FY 2021 the BLM Office of Human Capital, in partnership with the BLM Office of Civil Rights, established an Inclusion, Diversity, Equity, and Accessibility (IDEA) Team, which meets regularly to plan strategic actions for the BLM in the areas of outreach and recruitment, training, career development opportunities, workplace inclusion, and leadership accountability in all areas of IDEA. This plan has been approved by the Deputy Director, Operations for BLM.</p> <p>FWS conducted a barrier analysis of telework policies to identify potential barriers for employees in the Bureau's current telework approval policy and will explore creating a panel to review telework agreement decisions once the full-time telework status for all employees ends in FY 2022.</p>
2020	<p>ODICR developed its DRAFT Diversity and Inclusion strategic plan that heavily addresses disability employment.</p> <p>The ODICR Director created and disseminated to key stakeholders, the DRAFT EEO and Diversity Policy Statement.</p> <p>The Departmental ODICR hired a Lead MD-715 Program Manager to work closely with the Bureau EEO and OHC communities to ensure compliance with the EEOC Affirmative Action Plan.</p> <p>OHC received funding for the Department-wide reasonable accommodation tracking system. A shell tracking system was created and exhibited to OHC and EEO practitioners for feedback.</p> <p>ODICR met with the Disability ERGs to ascertain sticking points for employment of people with disability throughout the DOI. The information contained is source of information used in the Department-wide campaign in the future.</p> <p>OHC selected a GS-14 action officer to oversee the Affirmative Action hiring of people with disabilities. Each Bureau designated officials to work closely with the OHC representative to account for disability hiring. The team establish a charter to government processes for disability hiring. Established goals for FY 2021 and beyond for meeting Affirmative Action goals.</p>

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

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/31/2021	Review and analyze exit surveys to identify barriers to retention.	No		
12/31/2021	Conduct study on reasonable accommodation requests. Identify trends in processing requests, delays, denials, etc. to ascertain correlations to separations.	No		
12/31/2021	Establish process to monitor separations on recurring basis by disability.	No		
09/30/2021	Utilize ERGs to improve employment experience for PWD and PWTD.	No		
Report of Accomplishments				
Fiscal Year	Accomplishment			
2020	In June 2020, DOI centralized the exit survey data in a Department-wide system and trained the Bureaus and Offices on how to download the data to identify barriers to retention.			
2021	<p>ODICR hired an additional SEPM who will serve as the Disability Program Manager on a collateral duty basis. The individual began discussions with leaders within the Employee Resource Groups to discuss ways of partnering with Special Emphasis Program Managers to improve product deliverables. The selectee assessed the SEP to determine knowledge gaps, training needs, and understanding of how SEP and ERGs partner to accomplish DEIA mission. This information will be used in the development of a comprehensive training and development process in the near future.</p> <p>ODICR SEPM planned multiple observance activities in collaboration with ERGs BTFA, USGS, and NPS. The events were comprehensive, engaging and in line with MD 715 reporting requirements.</p> <p>Two bureaus announced and onboarded Disability Program Managers during the reporting year. Both are actively involved in understanding the workplace culture and developing strategies to improve employment for people with disabilities within their respective workforces.</p>			
2019	DOI OHC convened an exit and retention survey working group to review the current DOI Exit Survey and Bureau Exit Survey and provided recommended changes to the senior leadership team. ODICR representatives will ensure consideration of disability-related questions are included in the final submission of established core questions.			

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

The entire EEO community, both at the HQ and Bureau location operated on limited resources, e.g., staffing, and funding to provide the requisite attention to run an efficient disability employment program. As such the program was relegated to providing updating the internal and external site with tools and resources to improve the knowledge of the workforce and the planning and execution of observance month activities. The heavy lift of conducting a thorough barrier analysis was not conducted during the reporting year. As previously noted, several of the Bureaus received FTEs during the reporting year, two of which recruited and onboarded Disability Program Managers and three had active recruitment announcements on USAjobs at the close of the FY.

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

The implementation of hiring goals and the establishing of a designated POC for affirmative action hiring resulted in 1,192 (7.8 percent) new PWD hires, and 283 (1.9 percent) new PWTD hires. There were five (5) PWD new hires selected to fill GS-15 positions, 15 PWD new hires selected to fill GS-14 positions, and 43 PWD new hires selected to fill GS-13 positions during the reporting year. Additionally, three (3) PWTD new hires selected to fill GS-14 positions, and seven (7) PWTD new hires selected to

fill GS-13 positions. The exit surveys exposed DOI to the voice of PWD and PWTD regarding their employment experience. DOI must conduct further analysis to identify barriers to employment. DOI has steadily increased the total number of PWD employed at DOI each year, increasing from 8.0 percent in FY 2013 to 9.7 percent in FY 2021. Likewise, DOI incrementally increased its total employment of PWTD, from 1.5 percent in FY 2013 to 2.3 percent in FY 2021. There is a steady increase in communication regarding employing people with disabilities through podcasts, tweets, training, and department-wide publications (e.g., HR Monthly, Training Tuesday, and Connections Magazine, etc.). In FY 2021 ODICR published an internal website to serve as a platform for managers and employees for all aspects of DEIA, which includes information and resources on disability employment. Year after year, DOI has steadily increased the number of PWD employed throughout the agency, increasing from 8.0 percent in FY 2013 to 12.7 percent in FY 2020. Likewise, DOI incrementally increased its hiring of PWTD, from 1.5 percent in FY 2013 to 2.0 percent in FY 2020. There is a steady increase in communication regarding employing people with disabilities through podcasts, tweets, training, and Department-wide publications (e.g. HR Monthly, Training Tuesday, and Connections Magazine, etc.). The Departmental ODICR developed an internal website to serve as a platform for managers and employees for all aspects of EDI (EEO), whereby, there is a strong emphasis on disability employment. The website is scheduled to launch during the third quarter of FY 2021.

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

ODICR's strategic focus is on developing and implementing a department-wide campaign to educate the workforce on the intricacies of disability employment.