



U.S. DEPARTMENT OF THE INTERIOR
Office of the Secretary
FISCAL YEAR 2021
MD-715 ANNUAL STATUS REPORT



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PARTS A THROUGH D

Part A: DEPARTMENTAL OR AGENCY IDENTIFYING INFORMATION

Agency	Second Level Component	Address	City	State	Zip Code	Agency Code	FIPS Code
U.S. Department of the Interior (DOI)	Office of the Secretary	1849 C Street, NW	Washington	DC	20240	IN01	

PART B – TOTAL EMPLOYMENT

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	3,568	212	3,780

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

Agency Leadership	Name	Title
Head of Agency	Deb Haaland	Secretary
Head of Agency Designee	Joan M. Mooney	Principal Deputy Assistant Secretary for Policy, Management, and Budget (PMB)



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PART C.2 – AGENCY OFFICIAL(S) RESPONSIBLE FOR OVERSIGHT OF EEO PROGRAM(S)						
EEO Program Staff	Name	Title	Occupational Series	Pay Plan and Grade	Phone Number	Email Address
Acting Principal EEO Director/ Official (Departmental)	Alesia Pierre-Louis	Acting Principal Diversity Officer and Director of Civil Rights	0301	ES	703-390-6320	alesia.pierre-louis@bia.gov
Affirmative Employment Program Manager	Kimberly Ly	Social Science Research Analyst	0101	GS-14	771-888-4921	kimberly_ly@ios.doi.gov
Complaint Processing Program Manager	Melba Vaughn	Office of the Secretary, Complaints Manager	0260	GS-14	202-208-6112	melba_vaughn@ios.doi.gov
Diversity & Inclusion Officer	Alesia Pierre-Louis	Acting Principal Diversity Officer and Director of Civil Rights	0301	ES	703-390-6320	alesia.pierre-louis@bia.gov
Hispanic Employment Program Manager (SEPM)	Vacant					
Women's Program Manager (SEPM)	Vacant					
Disability Employment Program Manager (SEPM)	Vacant					
Special Placement Program Coordinator	Andrea Martinez	HR Specialist	0201	GS-13	703-787-1572	andrea.martinez@bsee.gov
Reasonable Accommodation Program Coordinator	Mark Guberman	Director, Employee & Labor Relations Div.	0201	GS-14	202-208-1894	mark.guberman@bsee.gov
Anti-Harassment Program Manager	Vacant					
EEO Alternative Dispute Resolution Manager	Molly Tepper and Ava Stone	COREPLUS Program Managers	0301	GS-13	Molly: 202-617-0762	Molly_tepper@ios.doi.gov Ava_stone@ios.doi.gov



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

Subordinate Component	City	State	Country	Agency Code	FIPS Code
Office of the Secretary (OS)	Washington	DC	United States	IN	01

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

Did the Department of the Interior submit the following mandatory documents?	Please Respond Yes or No	Comment
Organizational Chart	Yes	
EEO Policy Statement	Yes	
Strategic Plan	Yes	
Anti-Harassment Policy and Procedures	Yes	
Reasonable Accommodation (RA) Procedures	Yes	
Personal Assistance Services (PAS) Procedures	Yes	
Alternative Dispute Resolution (ADR) Procedures	Yes	

Did the Office of the Secretary submit the following optional documents?	Please Respond Yes or No	Comment
Federal Equal Opportunity Recruitment Program (FEORP) Annual report	Yes	
Disabled Veterans Affirmative Action Program (DVAAP) Annual report	Yes	
Operational Plan for Increasing Employment of Individuals with Disabilities Under Executive Order 13548	Yes	
Diversity and Inclusion Plan Under Executive Order 13583	Yes	
Diversity Policy Statement	Yes	
Human Capital Strategic Plan	Yes	
EEO Strategic Plan	No	DOI issued a DEIA Strategic Plan, 2022.
Results from Most Recent Federal Viewpoint Survey or Annual Employee Survey	Yes	



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PART E. 1 – EXECUTIVE SUMMARY: MISSION

Department of the Interior Office of the Secretary

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

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

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

At the close of FY 2021, the Department's mission was accomplished by 66,452 employees and 300,000 volunteers in over 2,300 locations throughout the United States. Achieving the mission requires dedicated and talented individuals who can work and succeed in a variety of work environments including sometimes remote or strenuous outdoor work conditions. The Department’s employees are from every facet of American life. The richness of our workforce serves as a competitive advantage in that it bolsters the Department’s ability to better serve



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Native Americans, enhancing knowledge and science, protecting wildlife, and preserving our cultural heritage.

In addition to the eleven bureaus that comprise the Department of the Interior, there are several offices that fall under the Office of the Secretary (OS). Those offices are, the Assistant Secretary for Fish and Wildlife and Parks (FWP), Assistant Secretary for Insular and International Affairs (IIA), Assistant Secretary for Indian Affairs (IA), Assistant Secretary for Land and Mineral (LM), Assistant Secretary for Policy, Management, and Budget (PMB), Assistant Secretary for Water and Science (WS), Office of the Solicitor (SOL), the Office of Inspector General (OIG), and several other Offices, collectively known as the Departmental Offices (DOs). Each office has a different, but equally important mission and role that together serve the broader Department mission. This diversity of mission represents Diversity, Equity, Inclusion, and Accessibility (DEIA) in its broadest sense and the benefits accrued when diversity is a priority. The threats and challenges facing the Department and the Nation are complex and require a prepared and ready workforce. To meet the needs of our Nation, DEIA must not merely be in compliance with laws or federal mandates. It also must encompass all employees' full participation and utilization in the workforce and maximizing our collective teams' productivity and effectiveness. Building trust and leading change in the lives of the American people also depends on our effectiveness in executing sustainable strategies to attract, develop, and retain high performing employees and teams that reflect America.

The activities of this annual report align with Department's fiscal year (FY) 2018 - 2022 Department Strategic Plan (DSP) and Department Annual Performance Plan (DAPP), per Title 5 of the Code of Federal Regulation (CFR) Part 250; and the Government Performance Results Act- Modernization, Act, 2010, P.L. 111-352 (GPRA-MA). The strategies, milestones, performance measures, and metrics in this annual report support the mission and goals outlined within the DSP and DAPP. More specifically, the DEIA efforts in this annual report align with the FY 2018–2022 DSP Mission Area 6: Modernizing Our Organization and Infrastructure for the Next 100 Years, Goal #1: Align DOI Organizational Structure to Improve Partnership



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Engagement and Mission Delivery, Strategy #2: Improve strategic hiring, placement, and retention efforts to ensure mission-critical service delivery through data driven processes and increased employee engagement efforts. As such, the accomplishments identified in this annual report measure progress made by OS in promoting workplace practices that create and enhance opportunities for all employees to achieve their fullest potential in the workplace.

During FY 2021, leadership across the OS DOs committed to affirming the Department as a “Model EEO Employer.” Leaders were actively involved in championing and advancing equity and inclusion efforts by outwardly participating in planned events to bolster cross-cultural awareness, encourage engagement, and foster inclusion within the OS DOs. Several leaders served as champions for special emphasis observance events and broadly disseminated messaging regarding the importance of inclusion, including creating opportunities for people with disabilities and targeted disabilities to fully engage in the workplace.

At the close of FY 2021, discussions were ongoing to establish an independent EEO Program Office within the OS DOs to oversee program functions aligned with the tenets of a Model EEO Program as specified by Management Directive (MD) 715. The MD 715 is an annual report outlining the OS DOs activities to support its commitment to the EEO program responsibilities under 29 CFR § 1614.102. It serves as the OS Dos report card for its effectiveness in meeting program objectives and it details the strengths, vulnerabilities, and projected plans to eliminate program deficiencies that did not meet the Equal Employment Opportunity Commission's (EEOC) expected performance outcomes for every federal agency.



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PART E.2. – EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

Key Performance Indicators (KPIs) of a “Model EEO Program”

Ensuring equality of opportunity for all employees, valuing differences within the workforce, and creating a workplace in which differences are used as a strategic advantage can enhance the OS DOs effectiveness and impact. To that end, the EEOC established the Six Essential Elements of a Model EEO program as key performance indicators (KPI) to determine the effectiveness of the OS DOs proactive preventative measures to establish itself as a model employer in the Federal workplace.

During the fiscal year (FY) 2021, when comparing the OS DOs overall EEO program to the Management Directive key performance indicators (KPIs), the OS DOs made significant accomplishments in complying with federal standards. While admirable, additional work is required to establish the OS DOs as a model employer for equity and inclusion. More importantly, improvements are needed in four primary areas for the OS DOs to be effective. The four areas are:

1. Integration of EEO into OS DOs Overall Strategic Mission
2. Management and Program Accountability
3. Proactive Prevention of Unlawful Discrimination
4. Program Efficiency

A detailed explanation of all KPIs and an analysis of how the OS DOs fared compared to the KPIs is provided below.



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**ESSENTIAL ELEMENT A:
DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP**

The KPI, *Demonstrated Commitment from OS DOs Leadership* for ensuring an equitable, diverse, and inclusive workplace environment, contains 14 measures that examine a range of factors that consider the OS DOs effectiveness in actively maintaining a discrimination-free workplace. The measures include, but are not limited to, the agency head (or Designee) issuing written policy statements annually to declare the position of the OS DOs against discrimination and harassment, and its support of an organization-wide workplace that fosters diversity, equity, and inclusion (DEI). A detailed list of requirements for this KPI can be found in the appendices of this report.¹

Below is a snapshot of the OS DOs program compliance from FY 2019 to FY 2021 which demonstrates the progressive movement toward fulfilling the performance measures within this KPI.

Bureau	Met Measures FY 2019	Met Measures FY 2020	Met Measures FY 2021	Unmet Measures FY 2019	Unmet Measures FY 2020	Unmet Measures FY 2021
OS	13	10	14	1	4	0

Successes:

- In the Spring of 2021, the Secretary of the Interior disseminated a message to the entire DOI workforce communicating her commitment and expectations for creating an equitable and inclusive workforce in all aspects of Interior business.
- For the first time since 2014, the Secretary of the Interior signed and issued an EEO policy statement that addresses all protected bases.
- The Secretary of the Interior communicated her expectation for EEO and DEIA in the workplace and hosted a series of listening sessions with employee organizations to understand employment experiences.

¹ EEOC Part G Self-Assessment Check List



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- The reasonable accommodation procedures and personal assistant services policy are publicly posted and available to all OS employees on the DOI Reasonable Accommodation website at <https://www.doi.gov/pmb/hr/accommodations>.
- The leaders within the Civil Rights and Human Capital communities are proactively working to develop a comprehensive approach to DEIA.
- The Office of Diversity, Inclusion, and Civil Rights (ODICR) as well as the Office of Human Capital (OHC) worked collaboratively to develop the DOI Secretarial Diversity Award criteria. Five awards were issued in June 2021 during the Secretarial Convocation Award Program.
- ODICR launched a pledge for DEI in the workplace and multiple Senior Executives participated and encouraged their subordinate staff to engage as well.

Opportunities for Improvement:

- The policy statement must be improved to ensure it complies with EEOC required language.



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**ESSENTIAL ELEMENT B:
INTEGRATION OF EQUITY AND INCLUSION INTO OS DOs OVERALL
STRATEGIC MISSION**

The KPI, *Integration of EEO into DOI’s Overall Strategic Mission*, requires the OS DOs and its leaders to view EEO as an integral part of its strategic plan and operate from the perspective that the success of transforming the workplace culture, increasing employee engagement, and achieving optimal employee performance rests in OS DOs embrace and utilization of EEO as a foundational ingredient for mission success. Additionally, the OS DOs can achieve success in this KPI if it organizes and structures its EEO programs to serve as a catalyst for maintaining an equitable and inclusive workplace, thereby helping to create a workplace free from harassment and discrimination.

Below is a snapshot of the OS DOs effectiveness in meeting the requirements of this KPI from FY 2019 to FY 2021. When comparing internal actions, the assessment revealed that integrating equity and inclusion into the overall strategic mission of the OS DOs is the most significant area where improvements are needed. Progression has occurred over the years, and additional actions are still required. Progress in satisfying this performance measure is foundational for holding managers accountable for equity and inclusion in the workplace, establishing an efficient EEO program, and complying with statutory and regulatory requirements for a discriminatory-free workplace.

Bureau	Met Measures FY 2019	Met Measures FY 2020	Met Measures FY 2021	Unmet Measures FY 2019	Unmet Measures FY 2020	Unmet Measures FY 2021
OS	Not Reported	11	33	Not Reported	25	18

Successes:

- The Acting ODICR Director provided the Secretary of the Interior with the “State of the Agency” briefing. This briefing outlined the Department’s effectiveness in meeting the EEOC benchmarks for a model EEO employer.



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- The OS DOs have two Reasonable Accommodation Coordinators (RAC) designated to ensure that requests for reasonable accommodation are adequately addressed when raised. In addition, the human resource team has a designated Special Placement Coordinator. This individual works to facilitate the hiring and advancement of people with disabilities within the OS DOs.
- The OS DOs exceeded the affirmative action hiring goals for people with disabilities and targeted disabilities at every grade level within the organization.
- The ODICR Proactive Prevention of Discrimination Program (AKA Embrace) Division conducted monthly meetings with Bureau MD-715 program managers throughout the Department to unify and standardize EEO program efforts. Employees from the OS DOs were regular and active participants at each meeting.
- The Assistant Secretary for Policy, Management and Budget (PMB) established an MD-715 Inter-Bureau Expert Team (I-BET) to partner with ODICR to fulfill the requirements of the EEOC standards.
- The ODICR Director position reports to the Secretary of the Interior for resource allocation and the Assistant Secretary for Policy Management and Budget for day-to-day supervision.
- The Secretary of the Interior approved establishing a Diversity, Equity, Inclusion and Accessibility (DEIA) Council to oversee the Department's Equity and Inclusive efforts enterprise wide.

Opportunities for Improvement:

- OS DOs should establish a fully staffed programmatic office dedicated to providing EEO services to the approximately 4,000 employees.
- Allocate a Disability Program Manager within the OS DOs EEO Office to ensure Affirmative Action Program requirements for inclusion are addressed throughout the year.
- Involve supervisors and managers in the implementation of its OS DOs EEO program.



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**ESSENTIAL ELEMENT C:
MANAGEMENT AND PROGRAM ACCOUNTABILITY FOR EEO**

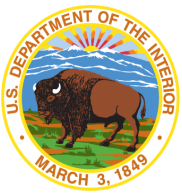
The KPI, *Management and Program Accountability for EEO*, requires the Secretary of the Interior and each Deputy Assistant Secretary to hold all managers, supervisors, and program officials responsible for the effective implementation of its EEO Program and Plan. More specifically, the measures in this KPI focus the OS DOs efforts to ensure managers and supervisors are equipped and held accountable for resolving workplace issues, and have the appropriate soft skills to effectively manage and optimize the performance of diverse employees. This KPI also evaluates leadership’s skill and ability to promptly provide reasonable accommodation solutions and remove barriers to employment of people with disabilities, and take disciplinary action to promptly address and correct behaviors that operate contrary to the tenets of a model employer.

Below is a snapshot of the OS DOs performance within this KPI from FY 2019 to FY 2021. As indicated, there are still several unmet performance measures and an opportunity to increase the OS DOs effectiveness within this KPI. While progress has occurred, additional work is necessary to achieve optimal results for leaders to demonstrate their accountability for an effective equitable, and inclusive workplace environment.

Bureau	Met Measures FY 2019	Met Measures FY 2020	Met Measures FY 2021	Unmet Measures FY 2019	Unmet Measures FY 2020	Unmet Measures FY 2021
OS DOs	Not Reported	28	31	Not Reported	13	10

Successes:

- The OS Internal Communication Office published and disseminated its weekly “Employee Digest” digital newsletter, which covers some aspects of trending issues, hot topics, workplace concerns, upcoming training, and events relating to cross-cultural awareness and DEIA initiatives.
- The OS Internal Communication Office launched “One Interior” page that highlights Secretary Haaland’s commitment to employee heritages, and nationally recognized months.



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- The ODICR launched a SharePoint website, offering employees an accessible, intuitive, and user-friendly experience when searching for information about DOI's comprehensive EEO/DEIA's programs, initiatives, and services. New features on the site will include refined search results, providing users with the ability to find information quickly, a calendar of events, and more.
- The Secretary communicates monthly the value and importance of the heritages of the people within Interior and the benefits employees bring to helping DOI accomplish its mission.
- OHC, ODICR, and other senior leaders within the Human Resource (HR) community partnered to develop performance standards for Senior Executives that mirrored MD 715 standards.
- Supervisory and managerial performance plans include obligations to prevent discrimination and harassment. Additionally, the OS DOs adopted new SES performance standards that aligned with the requirements set forth by the MD 715 standards.

Opportunities for Improvement:

- Revise the existing reasonable accommodation policy and procedure to comply with the EEOC's final rule implementing the requirements of Section 501 of the Rehabilitation Act.
- Develop processes and procedures to ensure the OS DOs conduct regular audit assessments for possible program shortfalls and non-compliance.
- Ensure managers and supervisors actively partner with the OS EEO Office to identify and remove barriers to equal employment opportunity.
- Ensure effective coordination between its EEO program and the Human Resources (HR) office to establish timetables to review employment policies, practices, and procedures for systemic barriers that may impede all employees' full use of development and career advancement opportunities.



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**ESSENTIAL ELEMENT D:
PROACTIVE PREVENTION OF UNLAWFUL DISCRIMINATION**

The KPI, *Proactive Prevention of Unlawful Discrimination*, requires that the Secretary and subordinate leaders proactively assess its internal processes, policies, and procedures on a recurring basis to determine where impediments may exclude any group and to develop action plans to eliminate identified barriers.

Below is a snapshot of the OS DOs performance from FY 2019 to FY 2021 within this KPI. As in the preceding program areas, the OS DOs demonstrated progress towards meeting the benchmark standards for establishing a viable proactive prevention program. While progress was made, additional work is needed to fully comply with the standards of this KPI.

Bureau	Met Measures FY 2019	Met Measures FY 2020	Met Measures FY 2021	Unmet Measures FY 2019	Unmet Measures FY 2020	Unmet Measures FY 2021
OS	Not Reported	4	7	Not Reported	10	7

Successes:

- The ODICR launched its Building Allies campaign for FY 2021. As part of the campaign, ODICR developed a SharePoint site that provides managers and supervisors specific steps they can take to support EEO and inclusion.
- OS DOs servicing Human Resource Offices (HRO) worked closely with the OHC to revise the Department’s exit survey to account for the individual employee’s experience. The revisions solicit feedback on how to improve the recruitment, hiring, inclusion, and advancement of individuals with disabilities and improved employment experiences for women and people of color.

Opportunities for Improvement:

- Conduct an audit assessment to monitor progress towards achieving equal employment opportunity throughout the year.
- Establish appropriate action plans to remove identified barriers.
- Develop strategic plans to track and analyze recruitment processes and procedures to identify potential barriers.



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- Establish internal processes to ensure consistency in using all available data, to identify triggers to potential barriers to equal opportunity and the ability to sustain respectful and safe workplaces across the OS DOs.



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ESSENTIAL ELEMENT E: EFFICIENCY

The KPI, *Efficiency*, requires the Secretary or Designee to ensure there are effective systems in place for evaluating the impact and effectiveness of the OS DOs complaints management program and to establish an efficient and fair dispute resolution process. Below is a snapshot of the OS DOs performance from FY 2019 to FY 2021, which demonstrates their effectiveness in meeting the program elements of this KPI.

Bureau	Met Measures FY 2019	Met Measures FY 2020	Met Measures FY 2021	Unmet Measures FY 2019	Unmet Measures FY 2020	Unmet Measures FY 2021
OS	Not Reported	24	30	Not Reported	9	3

Successes:

- The ODICR holds monthly EEO Directors meetings and host recurring EEO community town hall discussions to standardize the knowledge and performance of EEO practitioners that aligns with MD 110 and MD 715 program expectations.
- The ODICR updated Final Agency Decision (FAD) language to be more instructive regarding discipline. It also shared Report of Investigations (ROIs) and FADs with only those with a need to know to ensure there was appropriate evidence to weigh disciplinary considerations.
- The ODICR backfilled one FTE dedicated to writing FADs and submitted budget requests for additional FTEs and funding to address timeliness challenges with FADs.
- Merit FADs for the OS EEO program significantly decreased from 83% in FY 2019 to 14% in FY 2021.
- The Office of Collaborative Action Dispute Resolution (CADR) developed various outreach products to provide awareness for the Department's Alternative Dispute Resolution (ADR) program, including the launch of a SharePoint site and multiple supervisory training sessions to increase the knowledge and understanding of the ADR process.

Opportunities for Improvement:

- Develop and implement systems to accurately collect, monitor, and analyze recruitment activities within the OS DOs.
- Regularly survey the workforce to understand the employment experiences of underrepresented groups and people with disabilities working within the OS DOs.



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- Conduct comparative studies of the OS DOs EEO processes with those of similarly sized Bureaus and external agencies to accurately benchmark the OS DOs performance.
- Establish a mechanism to track, process, and ensure timely responses to requests for reasonable accommodation.
- Launch a campaign to improve the OS DOs workforce knowledge and implementation of disability employment and the reasonable accommodation process.



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ESSENTIAL ELEMENT F: RESPONSIVENESS AND LEGAL COMPLIANCE

The KPI, *Responsiveness and Legal Compliance*, requires the Secretary or Designee to have processes in place to ensure timely and full compliance with EEOC orders and settlement agreements. These processes are to ensure that the leadership comply with the law, including EEOC regulations, management directives, orders, and other written instructions, and that agency annually reports to the EEOC its program efforts and accomplishments on being a model EEO employer.

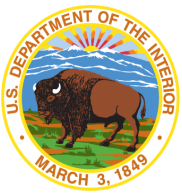
Successes:

- The OS DOs complied with federal EEO statutes and regulations, policy guidance, EEOC orders, and others.



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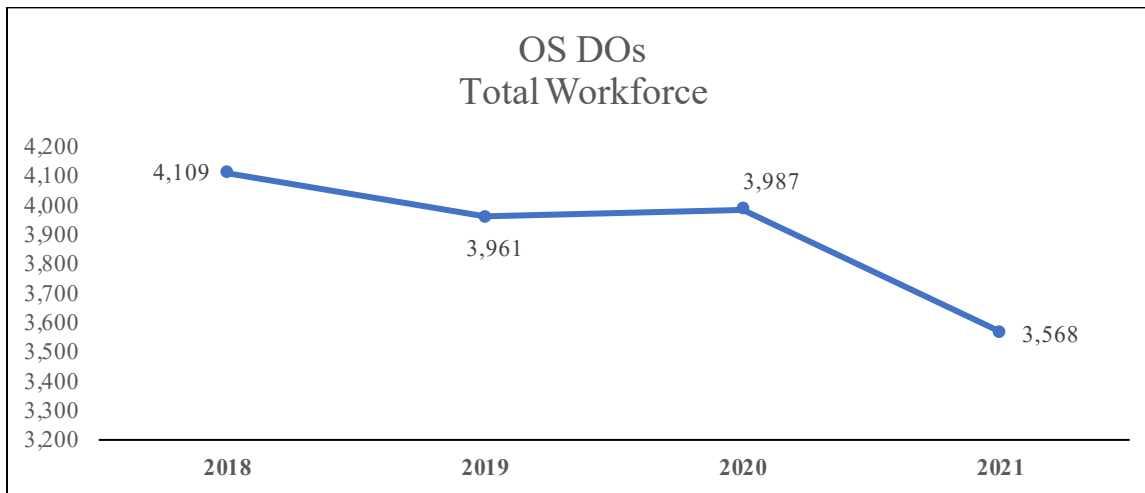
WORKFORCE ANALYSIS



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PART E.3 – EXECUTIVE SUMMARY: WORKFORCE ANALYSES

The workforce data by race, sex, and disability was retrieved from the Federal Personnel/Payroll System (FPPS) and is compared to the 2020 U.S. Census Civilian Labor Force (CLF)². At the close of FY 2021, the total number of permanent employees working within OS DOs was 3,568. The number of employees working within the OS DOs has incrementally decreased in recent years, resulting in a one percent decrease overall from FY 2018 to 2021. This diminutive percentage change speaks well for the OS DOs ability to retain employees to fulfill its mission.



Data Source: Workforce Table A1-1

There were noteworthy changes to the permanent workforce as indicated below. Specifically,

1. Persons with Disabilities (PWD) exceeded the affirmative action hiring goal for employees occupying permanent positions at the GS-1 to GS-10 grade levels, yet did not meet the standard for permanent positions at the GS-11 to SES levels. Respectively, PWD occupied 20.3 percent (79) of the GS-1 to GS-10 permanent positions and 10.6 percent (314) of GS-11 to SES permanent positions.

² OS uses the CLF data (2014-2018).



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2. Persons with Targeted Disabilities (PWTD) exceeded the federal standard in both the GS-1 to GS-10 and GS-11 to SES affirmative action categories, which is an exceptional story for the OS DOs. Respectively, PWTD occupied 5.6 percent (22) of the GS-1 to GS-10 permanent positions and 2.2 percent (65) of the GS-11 to SES permanent positions.
3. Within the OS DOs there are multiple groups that have consistently not met the federal benchmarks for occupying permanent positions within the workforce. For four consecutive years, White men, White women, Hispanic men, and Black or African American men did not meet the CLF.
4. Other groups, such as Black or African American women, Asian men, Asian women, Native Hawaiian or Other Pacific Islander men, Native Hawaiian or Other Pacific Islander women, American Indian/Alaska Native men, and American Indian/Alaska Native women had favorable results, in that year-over-year there has been an increase in the number of individual occupying permanent positions within the OS DOs and each of these groups met or exceeded the CLF.



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Workforce Trend		2018		2019		2020		2021		CLF
		#	%	#	%	#	%	#	%	%
White	Men	1,213	29.5%	1,162	29.3%	1,164	29.2%	1,110	31.1%	36.2%
	Women	1,182	28.8%	1,125	28.7%	1,132	28.4%	1,091	30.6%	34.8%
Black/African	Men	176	4.3%	183	4.6%	178	4.5%	162	4.5%	5.3%
	Women	327	8.0%	328	8.3%	345	8.7%	327	9.2%	6.3%
Hispanic/Latino	Men	124	3.0%	128	3.2%	129	3.2%	116	3.3%	6.0%
	Women	213	5.2%	207	5.2%	216	5.4%	219	6.1%	6.2%
Asian	Men	74	1.8%	79	2.0%	88	2.2%	87	2.4%	2.2%
	Women	124	3.0%	122	3.1%	122	3.1%	115	3.2%	2.2%
Native Hawaiian/Pacific Islander	Men	16	0.4%	17	0.4%	18	0.5%	12	0.3%	0.1%
	Women	17	0.4%	18	0.5%	19	0.5%	11	0.3%	0.1%
American Indian/Alaska Native	Men	201	4.9%	180	4.5%	172	4.3%	72	2.0%	0.3%
	Women	423	10.3%	391	9.9%	367	9.2%	112	3.1% ³	0.3%
Two/More Races	Men	9	0.2%	9	0.2%	15	0.4%	16	0.5%	1.0%
	Women	10	0.2%	12	0.3%	23	0.6%	23	0.6%	1.1%
Total Workforce	Men	1,813	44.1%	1,758	44.4%	1,764	44.2%	1,616	45.3%	51.8%
	Women	2,296	55.9%	2,203	55.6%	2,223	55.8%	1,952	54.7%	48.2%
	All	4,109	100.0%	3,961	100.0%	3,987	100.0%	3,568	100.0%	
Total Disabilities Workforce	Disability	409	10.0%	414	10.5%	470	10.0%	52	9.5%	12.0%
	Person with Targeted Disability	82	2.0%	82	2.1%	97	2.3%	14	2.6%	2.0%

A summary of the FY 2018 to FY 2021 workforce demographic is provided in Table 1.

During FY 2021, men represented 45 percent, and women represented 55 percent of the permanent workforce. The number of men and women employed within the OS DOs remained constant between 44 and 56 percent for four consecutive reporting periods, despite the number of hiring and separations occurring year over year.

NEW HIRES

The number of new hires onboarding within the OS DOs increased from 499 in FY 2020 to 506 in FY 2021. Diverse candidates were selected to fill a variety of positions within the OS DOs. The number of new hires who were Black or African American men, Hispanic or Latino men,

³BTFA used to be under OS, but they became a new bureau during FY 2021.



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Asian men and women, Native Hawaiian or Other Pacific Islander women, American Indian or Alaska Native women, and Person with Disabilities increased during FY 2021. The data revealed that all demographic groups by race and national origin were among the new employees hired within the OS DOs during FY 2021.

SENIOR EXECUTIVE SERVICE (SES)

In FY 2021, the OS DOs employed 109 SES employees. Men occupied 55 positions, and women occupied 54 positions. The number of women occupying SES positions within the OS DOs steadily increased from 34 in FY 2018 to 54 in FY 2021, which compliments the Office of Personnel Management's agenda to increase the number of women occupying SES positions. Women of color were less likely than White women to occupy SES positions. Women of color represented 15 percent of the SES positions, while White women represented 30 percent of the SES positions.

When comparing all Race and National Origin (RNO) groups to their availability in executive positions in the CLF, apart from White men and women, American Indian and Alaskan Natives men and women, and Persons with Targeted Disabilities (PWTD), most demographic groups are underrepresented in SES positions in the OS DOs. The number of American Indian and Alaskan Natives occupying executive-level positions in the OS DOs far exceeds the government-wide average and the CLF. This employment pattern is a positive testament to the hiring preferences used by the OS DOs for employing America's indigenous people.

The table below displays the number of SES employees in the OS DOs by fiscal year and demographic group. The number of women, Black/African American, and Asian in the OS DOs SES positions increased from FY 2018 to FY 2021. The number of American Indians or Alaska Natives, Hispanic/Latino, PWD and PWTD decreased from 2018 to 2021. A barrier analysis is needed to determine the root cause for triggers found in the data for these groups occupying senior-level positions.



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Senior Executive Service (SES) Snapshot				
Group	FY 2018	FY 2019	FY 2020	FY 2021
Total Employees	105	112	121	109
Men	71 (67.6%)	75 (67.0%)	80 (63.6%)	55 (50.5%)
Women	34 (32.4%)	37 (33.0%)	41 (36.4%)	54 (49.5%)
Ethnicity				
Hispanic/Latino	4 (3.9%)	2 (1.8%)	4(3.3%)	2 (1.8%)
Race				
White	77 (73.3%)	86 (76.8%)	91 (75.2%)	77(70.6%)
Black/African American	6 (5.8%)	9 (8.0%)	10 (8.3%)	13 (11.9%)
Asian	2 (1.9%)	2 (1.8%)	3 (2.5%)	4 (3.7%)
Native Hawaiian/Other Pacific Islander	1 (1.0%)	1 (0.9%)	1 (0.8%)	1 (0.9%)
American Indian or Alaska Native	15 (14.3%)	11 (9.8%)	11(9.1%)	10 (9.2%)
Two or More Races	0 (0.0%)	1 (0.9%)	1 (4.6%)	2 (1.8%)
Disabilities				
Persons with Disabilities (PWD)	8 (7.6%)	4 (12.1%)	7 (8.1%)	2 (6.3%)
Persons with Targeted Disabilities (PWTD)	0 (0.0%)	1 (3.0%)	2 (2.3%)	1 (3.1%)
Data Source: Workforce Table A4GSP				

SEPARATIONS

In FY 2021, a total of 489 employees separated from the OS Dos, of which 12 were removed, 125 resigned, 134 retired, and 218 were terminated. The number of Hispanic/Latino employees separating from OS DOs increased by 7.8 percent, PWD employees increased by 15.3 percent, and PWTD employees increased by 3.5 percent during the reporting period. A barrier analysis is



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needed to determine the root cause for the increase in the number of employees within these groups separating from the OS DOs.

OS Separation Trends, FY 2018-2021				
Group	FY 2018	FY 2019	FY 2020	FY 2021
Total Employees	379	496	436	489
Men	174 (45.9%)	223 (45.0%)	194 (44.5%)	244 (49.9%)
Women	205 (54.1%)	273 (55.0)	242 (55.5%)	245 (50.1%)
Ethnicity				
Hispanic/Latino	23 (6.1%)	37 (7.5%)	33 (7.8%)	38 (7.8%)
Race				
White	236 (62.3%)	314 (63.3%)	256 (58.7%)	333 (68.1%)
Black/African American	43 (11.3%)	37 (7.5%)	63 (14.5%)	59 (12.1%)
Asian	16 (4.2%)	20 (4.0%)	16 (3.7%)	24 (4.9%)
Native Hawaiian/Other Pacific Islander	3 (0.8%)	2 (0.4%)	2 (0.5%)	4 (0.8%)
American Indian or Alaska Native	54 (14.2%)	84 (16.9%)	64 (14.7%)	25 (5.1%)
Two or More Races	4 (1.1%)	2 (0.4%)	2 (0.46)	6 (1.2%)
Disabilities				
Persons with Disabilities (PWD)	51 (13.5%)	60 (12.1%)	52 (11.9%)	62 (15.3%)
Persons with Targeted Disabilities (PWTD)	11 (2.9%)	12 (2.4%)	8 (1.8%)	14 (3.5%)
Data Source: Workforce Table A1-1				



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IDENTIFIED TRIGGERS



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SUMMARY ANALYSIS OF IDENTIFIED TRIGGERS

1. Black or African American Men Employment

The number of Black or African American men occupying permanent positions within the OS DOs workforce remains below the average (5.5%) for Black or African American men in the Civilian Labor Force (CLF). In FY 2021, the total for this group was 4.8 percent. The data revealed that since FY 2017, the number of newly hired men identifying as Black or African American remained at approximately 3.6 to 4 percent, which consistently fell below the federal benchmark of 5.5 percent year-over-year. The number of Black or African American men separating from the OS DOs decreased from 4.6 percent in FY 2020 to 4.1 percent in FY 2021.

An analysis must be conducted to determine what impediments exist in the hiring, recruitment, retention, and advancement of Black or African American men employed within the OS DOs.

2. White Women Employment

White women occupied 30.6 percent of the OS DOs permanent workforce, compared to 34.0 percent in the CLF. The overall number of White women occupying permanent positions within the OS DOs workforce decreased by 22 employees from FY 2021 and continues to remain below the CLF. The number of White women separating from the OS DOs increased from 30.5 percent in FY 2020 to 32.0 percent in the current reporting year.

A barrier analysis must be conducted to determine what impediments exist that impact the retention of White women working in the OS DOs.

3. Hispanic/Latino Men Employment

Hispanic/Latino men occupied 3.3 percent of the permanent positions within the OS DOs workforce compared to 5.2 percent in the CLF. This group decreased by eight employees in FY 2021. The number of Hispanic/Latino men occupying permanent positions within the OS DOs



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workforce increased slightly over the past four years. The overall number of Hispanic/Latino men in the permanent workforce remains below the CLF for Hispanic/Latino men.

Hispanic/Latino men were also underrepresented in the percentage of new hires at OS DOs.

Hispanic/Latino men comprise 5.1 percent of the federal benchmark yet account for 2.8 percent of new hires within the OS DOs.

The number of Hispanic/Latino men separating the OS DOs workforce went from 3.0 percent in FY 2020 to 4.5 percent in the current reporting cycle.

As previously stated, a root cause analysis is needed to determine if impediments exist in the hiring, recruitment, retention, or advancement opportunities for Hispanic or Latino and other employees within the OS DOs.



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ACCOMPLISHMENTS



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PART E.4 - EXECUTIVE SUMMARY: ACCOMPLISHMENTS

- The ODICR Director wrote a memo supporting the Asian American and Pacific Islander (AAPI) friends, families, and colleagues, standing against violence, hate, and discrimination in the workplace.
- The Secretary conducted a roundtable discussion with employees in the AAPI community during a critical period in the nation. She communicated empathy and her support for employees and their families during troubling and stressful times.
- The Secretary issued the EEO policy statement in September 2021. (See Part H).
- The ODICR engaged the Employee Resource Groups (ERGs) to assist with special emphasis and equity and inclusion efforts.
- The ODICR staff served as the central point of contact for the White House Initiative to advance the economic excellence of Historically Black Colleges and Universities (HBCU). It unified the Bureaus to collaboratively strategize ways to show DOI as a partner to improve conditions for HBCUs. ODICR served as a member of the HBCU Interagency Working Group (IWG).



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PLANNED ACTIVITIES



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PART E.5 – EXECUTIVE SUMMARY: PLANNED ACTIVITIES

In FY 2022, OS intends to execute the following activities to address program challenges identified in Parts H, I, and J of this report:

1. Allocate resources to the OS EEO program function to ensure proactive prevention measures are addressed.
2. Increase collaboration between the OS EEO Office, the two servicing Human Resources Offices, and key stakeholders within the OS DOs to identify triggers; provide an organizational workplace analysis; and develop strategies to increase cultural awareness, foster inclusion, and remove identified deficiencies.
3. Finalize and issue an updated reasonable accommodation policy and implement an awareness campaign to educate employees on the new policy.

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

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



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

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



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

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Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP
This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.

 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments	Current Part G Questions
	A.1 – The agency issues an effective, up-to-date EEO policy statement.			
A.1.a	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency’s commitment to EEO for all employees and applicants? If “yes”, please provide the annual issuance date in the comments column. [see MD-715, II(A)]	Y	The Secretarial Policy Statement was issued on September 30, 2021.	A.1.a.2
A.1.b	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]	Y		New
	A.2 – The agency has communicated EEO policies and procedures to all employees.			
	A.2.a			
	Does the agency disseminate the following policies and procedures to all employees?			
A.2.a.1	Anti-harassment policy? [see MD 715, II(A)]	Y		New
A.2.a.2	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]y	Y		New
	A.2.b			
	Does the agency prominently post the following information throughout the workplace and on its public website?			
A.2.b.1	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]	Y		New



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A.2.b.2	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	Y		A.2.c
A.2.b.3	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	Y	https://www.doi.gov/pmb/hr/accommodations	A.3.c
A.2.c	Does the agency inform its employees about the following topics:			
A.2.c.1	EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often.	Y	Annually	A.2.a
A.2.c.2	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	Y	Annually	New
A.2.c.3	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	Y	Annually	New
A.2.c.4	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.	Y	Annually	New
A.2.c.5	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] If “yes”, please provide how often.	Y	Annually	A.3.b
 Compliance Indicator	A.3 – The agency assesses and ensures EEO principles are part of its culture.	Measure Met? (Yes/No/NA)	Comments	New Compliance Indicator
 Measures				
A.3.a	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section.	Y	The Secretary implemented a Diversity Award to individuals, teams, or organizations for their work for advancing diversity, inclusion, equity, and	New



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			accessibility in the workplace. During FY 2021, five employees were awarded the distinguished award.	
A.3.b	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	Y		New
Essential Element B: Integration of EEO into the agency's Strategic Mission				
This element requires that the agency's EEO programs are structured to maintain a workplace that is free from discrimination and support the agency's strategic mission.				
 Compliance Indicator	B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.	Measure Met? (Yes/No/NA)	Comments	
 Measures				
B.1.a	Is the agency head the immediate supervisor of the person ("EEO Director") who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]	Y		B.1.a
B.1.a.1	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If "yes," please provide the title of the agency head designee in the comments.	Y	The Acting ODICR Director serves as the OS EEO Director. This individual reports to the Assistant Secretary - Policy, Management and Budget for day-to-day administrative support.	New
B.1.a.2	Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Y		B.1.d



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B.1.b	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]	Y		B.2.a
B.1.c	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comments column.	Y		B.2.b
B.1.d	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)N	Y		New
 Compliance Indicator  Measures	B.2 – The EEO Director controls all aspects of the EEO program.	Measure Met? (Yes/No/NA)	Comments New Compliance Indicator	
B.2.a	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)]	Y		B.3.a
B.2.b	Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR §1614.102(c)(4)]	Y		New
B.2.c	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Y		New



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B.2.d	Is the EEO Director responsible for overseeing the timely issuing final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Y		New
B.2.e	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	Y		F.3.b
B.2.f	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]	Y		New
B.2.g	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2) and (c)(3)]	N/A		New
 Compliance Indicator  Measures	B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.	Measure Met? (Yes/No/NA)	Comments	
B.3.a	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]	Y		B.2.c & B.2.d
B.3.b	Does the agency’s current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If “yes”, please identify the EEO principles in the strategic plan in the comments column.	N	The new FY 2022 – FY 2026 DOI Strategic Plan does include DEIA principles.	New

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 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments	
B.4	The agency has sufficient budget and staffing to support the success of its EEO program.			
B.4.a	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:			
B.4.a.1	to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	N		B.3.b
B.4.a.2	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	N		B.4.a
B.4.a.3	to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	Y		E.5.b
B.4.a.4	to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.	Y		B.4.f & B.4.g
B.4.a.5	to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]	N/A	OS is a DOI subcomponent	E.1.c
B.4.a.6	to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	Y		B.4.c
B.4.a.7	to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section.	Y		New
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]	N		B.3.c, B.3.c.1, B.3.c.2, & B.3.c.3

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B.4.a.9	to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Y	.	New
B.4.a.10	to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]	Y		B.4.d
B.4.a.11	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	Y		New
B.4.b	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	N		New
B.4.c	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Y		B.1.b
B.4.d	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?	Y		E.2.d
B.4.e	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	Y		E.2.e
 Compliance Indicator	B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.	Measure Met? (Yes/No/NA)	Comments	
 Measures				
B.5.a	Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:			
B.5.a.1	EEO Complaint Process? [see MD-715(II)(B)]	Y		New
B.5.a.2	Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]	Y		A.3.d

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B.5.a.3	Anti-Harassment Policy? [see MD-715(II)(B)]	Y		New
B.5.a.4	Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	N		New
B.5.a.5	ADR, with emphasis on the federal government’s interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	Y		E.4.b

 Compliance Indicator  Measures	B.6 – The agency involves managers in the implementation of its EEO program.	Measure Met? (Yes/No/NA)	Comments New Indicator		
	B.6.a	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	Y	New	
	B.6.b	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	N		D.1.a
	B.6.c	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	N		D.1.b
	B.6.d	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR § 1614.102(a)(5)]	N		D.1.c

Essential Element C: Management and Program Accountability
This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency’s EEO Program and Plan.

 Compliance Indicator  Measures	C.1 – The agency conducts regular internal audits of its component and field offices.	Measure Met? (Yes/No/NA)	Comments	
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C.1.a	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	N/A	OS is a DOI subcomponent which does not have field offices.	New
C.1.b	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	N/A		New
C.1.c	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]	N/A		New
 Compliance Indicator  Measures	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Measure Met? (Yes/No/NA)	Comments New Indicator	
C.2.a	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Y		New
C.2.a.1	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Y		New
C.2.a.2	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	Y		New



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C.2.a.3	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Y		New
C.2.a.4	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity-alleging harassment? [see Enforcement Guidance, V.C.]	Y		New
C.2.a.5	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <u>Complainant v. Dep't of Veterans Affairs</u> , EEOC Appeal No. 0120123232 (May 21, 2015); <u>Complainant v. Dep't of Defense (Defense Commissary Agency)</u> , EEOC Appeal No. 0120130331 (May 29, 2015)] If “no”, please provide the percentage of timely-processed inquiries in the comments column.	Y		New
C.2.a.6	Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR 1614.203(d)(2)]	Y		New
C.2.b	Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR 1614.203(d)(3)]	N		New
C.2.b.1	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)]	Y		E.1.d
C.2.b.2	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	Y		New
C.2.b.3	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR 1614.203(d)(1)(ii)(B)]	Y		New
C.2.b.4	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR 1614.203(d)(3)(i)(M)]	Y		New

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C.2.b.5	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests in the comments column.	Y		E.1.e
C.2.c	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC’s regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]	Y		New
C.2.c.1	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If “yes”, please provide the internet address in the comments column.	Y	https://www.doi.gov/pmb/hr/accommodations	New
 Compliance Indicator  Measures	C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	Measure Met? (Yes/No/NA)	Comments New Indicator	
C.3.a	Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	Y		New
C.3.b	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities?			
C.3.b.1	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]	Y		A.3.a.1
C.3.b.2	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	Y		A.3.a.4
C.3.b.3	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	Y		A.3.a.5





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C.3.b.4	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	Y		A.3.a.6
C.3.b.5	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	Y		A.3.a.7
C.3.b.6	Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]	Y		A.3.a.8
C.3.b.7	Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]	Y		New
C.3.b.8	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]	Y		A.3.a.2
C.3.b.9	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	Y		New
C.3.c	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	Y		New
C.3.d	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	Y		New
 Compliance Indicator  Measures	C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.	Measure Met? (Yes/No/NA)	Comments	





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C.4.a	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	Y	The Acting Director, ODICR meets every week with the Director Office of Human Capital	New
C.4.b	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]	N		C.2.a, C.2.b, & C.2.c
C.4.c	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	Y		New
C.4.d	Does the HR office timely provide the EEO office timely access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	Y		New
C.4.e	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:			
C.4.e.1	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	N		New
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	N		New
C.4.e.3	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	N		New
C.4.e.4	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	N		New
C.4.e.5	Assist in preparing the MD-715 report? [see MD-715, II(C)]	Y		New




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 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments	
C.5.a	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? 29 CFR § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)	Y		C.3.a.
C.5.b	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Y	4	C.3.c
C.5.c	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [see MD-715, II(C)]	Y		New
 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments	
C.6.a	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If “yes”, please identify the frequency of the EEO updates in the comments column.	Y	Updates are provided weekly in the Weekly Report to the Secretary and shared with the Acting Assistant Secretary, PMB	C.1.a
C.6.b	Are EEO officials readily available to answer managers’ and supervisors’ questions or concerns? [see MD-715 Instructions, Sec. I]	Y		New




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Essential Element D: Proactive Prevention This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.				
 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments	
D.1.a	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	Y		New
D.1.b	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I]	N		New
D.1.c	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]	Y		New
 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments	
D.2.a	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	N	New Indicator	New

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D.2.b	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	N		B.2.c.2
D.2.c	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	N		B.2.c.1
D.2.d	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] If “yes”, please identify the data sources in the comments column.	N		New
 Compliance Indicator	D.3 – The agency establishes appropriate action plans to remove identified barriers.	Measure Met? (Yes/No/NA)	Comments New Indicator	
 Measures				
D.3.a.	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	N		New
D.3.b	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	N		New
D.3.c	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	N		New
 Compliance Indicator	D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities	Measure Met? (Yes/No/NA)	Comments New Indicator	



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 Measures				
D.4.a	Does the agency post its affirmative action plan on its public website? [see 29 CFR 1614.203(d)(4)] Please provide the internet address in the comments.	Y	https://www.doi.gov/pmb/eeo/management-directive-715-md-715-reports	New
D.4.b	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]	Y		New
D.4.c	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]	Y		New
D.4.d	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR 1614.203(d)(7)(ii)]	Y		New
Essential Element E: Efficiency				
This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency's EEO programs and an efficient and fair dispute resolution process.				
 Compliance Indicator	E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.	Measure Met? (Yes/No/NA)	Comments	
 Measures				
E.1.a	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	Y		E.3.a.1
E.1.b	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	Y		E.3.a.2
E.1.c	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(l)?	Y		New





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E.1.d	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(l)? If so, please provide the average processing time in the comments.	Y	All OS acceptance/dismissal letters were issued on average in 11 days. See Part H.	New
E.1.e	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?	Y		New
E.1.f	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	Y		E.3.a.3
E.1.g	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	Y		New
E.1.h	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	Y		E.3.a.4
E.1.i	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?	Y		E.3.a.7
E.1.j	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comments column.	Y	In accordance with the contractor's statement of work (SOW), the Agency may demand the removal of a contract investigator where it determines an investigator is ineffective). If the contractor delivers a report that is insufficient, the report is returned to the	E.2.c



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			contractor for further development.	
E.1.k	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Y		New
E.1.l	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (?)? [See 29 CFR § 1614.403(g)]	Y		New
 Compliance Indicator  Measures	E.2 – The agency has a neutral EEO process.	Measure Met? (Yes/No/NA)	Comments Revised Indicator	
E.2.a	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)]	Y		New
E.2.b	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If “yes”, please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.	Y	Attorneys in the Adjudication, Complaints, and Equity Division (ACE) of ODICR	E.6.a
E.2.c	If the EEO office relies on the agency’s defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]	Y		New
E.2.d	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]	Y		E.6.b

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E.2.e	If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)	Y		E.6.c
 Compliance Indicator  Measures	E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	Measure Met? (Yes/No/NA)	Comments	
E.3.a	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	Y		E.4.a
E.3.b	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	Y		E.4.c
E.3.c	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	Y		D.2.a
E.3.d	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Y		New
E.3.e	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	Y		E.4.d
E.3.f	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Y		New
 Compliance Indicator  Measures	E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Measure Met? (Yes/No/NA)	Comments	
E.4.a	Does the agency have systems in place to accurately collect, monitor, and analyze the following data?			



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E.4.a.1	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	Y		E.5.a
E.4.a.2	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	Y		E.5.c
E.4.a.3	Recruitment activities? [see MD-715, II(E)]	N		E.5.f
E.4.a.4	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]	Y		New
E.4.a.5	The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]	N		New
E.4.a.6	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	Y		New
E.4.b	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Y		New
 Compliance Indicator  Measures	E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.	Measure Met? (Yes/No/NA)	Comments	
E.5.a	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Y	An annual Complaint Processing Report issued by Adjudication, Complaints, and Equity Division identifying agency wide and bureau specific trend data	E.5.e





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E.5.b	Does the agency review other agencies' best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If "yes", provide an example in the comments.	Y	ODICR created and launched a SharePoint website, offering a more elegant user experience, intuitive access to EEO/DEIA's comprehensive programs and initiatives, and improved accessibility to ODICR services.	E.5.g
E.5.c	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	Y		E.3.a

Essential Element F: Responsiveness and Legal Compliance
This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.

 Compliance Indicator	F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.	Measure Met? (Yes/No/NA)	Comments	
 Measures				
F.1.a	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	Y		F.1.a
F.1.b	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	Y		E.3.a.6
F.1.c	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Y		F.2.a.1
F.1.d	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Y		F.2.a.2

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F.1.e	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	Y		F.3.a.
 Compliance Indicator  Measures	F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Measure Met? (Yes/No/NA)	Comments	
			Indicator moved from E-III Revised	
F.2.a	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	Y		C.3.d
F.2.a.1	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]	Y		E.3.a.5
F.2.a.2	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]	Y		E.3.a.7
F.2.a.3	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 CFR §1614.403(e)]	Y		New
F.2.a.4	Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Y		F.3.d (1 to 9)
 Compliance Indicator  Measures	F.3 - The agency reports to EEOC its program efforts and accomplishments.	Measure Met? (Yes/No/NA)	Comments	
F.3.a	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	Y		New

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F.3.b	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	Y		New
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STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY				
TYPE OF PROGRAM DEFICIENCY	BRIEF DESCRIPTION OF PROGRAM DEFICIENCY			
Essential Element A: Demonstrated Commitment from Agency Leadership (A.1)	The Secretary of the Interior did not develop and disseminate an EEO Policy Statement.			
OBJECTIVE(S) AND DATES FOR EEO PLAN – ACTION RESOLVED – SEPTEMBER 2021				
DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2018	Develop and disseminate an EEO Policy Statement that addresses the Secretary’s commitment to EEO in the workplace	03/30/2021	03/30/2022	09/29/2021
RESPONSIBLE OFFICIAL(S)				
TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN		



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		(YES OR NO)
Acting Director, Office of Diversity, Inclusion and Civil Rights Principal Diversity Officer	Alesia Pierre-Louis (or designee)	Yes
Principal Deputy Assistant Secretary, Office of Policy, Management and Budget (PMB)	Joan M. Mooney (or designee)	Yes
DOI Secretary	Deb Haaland (or designee)	Yes

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING & (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2019	Disseminate EEO Policy Statement to all DOI employees, including those in OS DO	No	01/30/2023	09/30/2021

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FISCAL YEAR	ACCOMPLISHMENTS
FY 2019	<p>The ODICR developed the EEO Policy Statement and disseminated it to key stakeholders for input. The stakeholders provided feedback. The policy went to the Office of Policy, Management, and Budget (PMB) leadership for review, but it had not been signed at the close of the fiscal year.</p> <p>In September 2019, DOI hired a permanent executive to lead the ODICR. The new ODICR Director reviewed and updated the existing draft EEO Policy Statement and re-distributed it to key stakeholders for their feedback. The policy was circulated to PMB leadership, and as of the close of the fiscal year, the ODICR was awaiting final approval and release.</p>
FY 2020	<p>On June 9, 2020, the ODICR Director updated and re-submitted the draft policy statement to OS stakeholders for their review and input. At the close of the fiscal year, the ODICR is awaiting final approval from PMB leadership to officially release the document to the workforce, which the OS will adopt.</p>
FY 2021	<p>This action is resolved. On September 30, 2021, the Secretary of the Interior signed and issued a Departmental EEO policy statement that clearly communicates leadership’s commitment to EEO, protected bases, and employees’ rights and responsibilities to ensure non-discrimination.</p> <p>In addition, in May 2021, the Secretary communicated via an all-employee message, outlining the expectation for Equity, Diversity and Inclusion (EDI) in the DOI workforce and authorized the standup of a DEIA Council to oversee DEIA efforts throughout the Department.</p> <p>The Secretary hosted two roundtable discussions with Employee Resource Groups to understand employee experiences. The Secretary will continue with this endeavor until all groups have had the opportunity to have face-to-face discussions with the Secretary.</p>



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STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY

TYPE OF PROGRAM DEFICIENCY	BRIEF DESCRIPTION OF PROGRAM DEFICIENCY
Essential Element A: Demonstrated Commitment from Agency Leadership (A.2)	The OS EEO office did not prominently post business contact information and written materials concerning the EEO program, laws, policy statements, and the operation of the complaint process on their public websites.

OBJECTIVE(S) AND DATES FOR EEO PLAN ACTION RESOLVED – SEPTEMBER 2021

DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2021	The OS EEO Director or designee will work with offices to review current practices and ensure that offices post EEO program information on their websites	09/30/2022		06/30/2021

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Acting MD 715 Program Manager	Kimberly Ly	Yes



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PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE				
TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
03/01/2022	The OS EEO Director or designee will meet to assess how EEO program information is currently made available and implement corrective action for any problems identified.	No		06/30/2021
REPORT OF ACCOMPLISHMENTS				
FISCAL YEAR	ACCOMPLISHMENTS			
FY 2020	No activity during this period, due to the absence of an OS EEO Director.			
FY 2021	<p>This action is resolved. The ODICR appointed a lead Program Specialist to oversee MD 715 Program Management responsibilities in the absence of a dedicated staff. A part of the individual’s duties is to review the web content for accuracy in reporting EEO and diversity and inclusion matters in line with MD 715 reporting.</p> <p>The individual ensured that the OS EEO page was distinctive from the ODICR site and that the information developed was linked to ODICR’s comprehensive shared point site that communicates the Secretary of Interior, ODICR, and other Senior Official’s expectations for EEO and Inclusion in the DOI workforce. The site contains applicable strategies for implementing EEO, tools and tips for ensuring workforce DEIA, and other relevant tools for inclusion. It also contains the contact information of all Bureau EEO Officials, their counselors, and Special Emphasis Program personnel. Building of the site is ongoing and is available to employees within Interior only. Messaging regarding the site was widely communicated to the DOI workforce. Equal Employment Opportunity- The Law U.S. Department of the Interior (doi.gov)</p>			



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TYPE OF PROGRAM DEFICIENCY	BRIEF DESCRIPTION OF PROGRAM DEFICIENCY			
Essential Element A: Demonstrated Commitment from Agency Leadership (A.3.a)	The OS DOs did not provide recognition to employees, supervisors, managers, and offices that demonstrated superior accomplishments in EEO.			
OBJECTIVE(S) AND DATES FOR EEO PLAN ACTION RESOLVED – MARCH 2021				
DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2021	Develop and implement a program to provide recognition to employees, supervisors, managers, and offices	12/31/2022		03/03/2021
RESPONSIBLE OFFICIAL(S)				



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TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Director, Human Resource Office Interior Business Center	Devin Cummings (or designee)	No
Director, Human Resource Office BSEE	Cynthia Piper (or designee)	No
Kimberly Ly	Acting MD 715 Program Manager	No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE				
TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
01/31/2021	Meet with key stakeholders to address the program deficiency and to establish a way forward	No	12/30/2021	03/8/2021
12/31/2021	Incorporate an EDI(EEO) award into the existing reward structure	No		03/15/2021



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12/31/2021	Implement the EDI(EEO) recognition program.	No		06/30/2021
REPORT OF ACCOMPLISHMENTS				
FISCAL YEAR		ACCOMPLISHMENTS		
FY 2020		No Action Taken.		
FY 2021		<p>This action is resolved. In March 2021, representatives from ODICR Embrace team and OHC Labor and Employee Relations team met to establish an EDI award program. The group immediately revised the Department's award program policy to establish the Secretary's Diversity Award criteria. OHC communicated the new standards to the Bureau HR communities and disseminated them during the call for nominations in the FY 2021 Secretary's Convocation Award Program.</p> <p>In June 2021, five awardees received the Secretary's Diversity Award, which showcased promising practices for establishing an equitable, accessible, diverse, and inclusive work environment within the Department.</p>		



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TYPE OF PROGRAM DEFICIENCY		BRIEF DESCRIPTION OF PROGRAM DEFICIENCY		
Essential Element B: Integration of EEO into the Agency's Strategic Mission (B.2.a, B.3.b, B.4, B.5.a.4 and B.5.a.5 and B.6)		The OS EEO program requires additional resources (budget and staffing) to implement an effective EEO program.		
OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2021	Provide an OS EEO Director and Affirmative Employment Program Manager to implement an effective EEO program among OS employees	12/30/2022		09/30/2021 (partially)
09/30/2021	Establish timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and	09/30/2022		



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	practices for systemic barriers that may be impeding full participation in the program by all EEO groups			
09/30/2021	Ensure OS EEO Director has access to accurate and complete data required to prepare MD-715 workforce tables	09/30/2022		09/20/2021
09/30/2021	Ensure HR servicing office provides OS EEO Director timely access to exit survey, grievance, and climate survey data upon request	09/30/2022		09/20/2021
09/30/2021	Coordinate with HR to implement the Affirmative Action Plan for Individuals with Disabilities	09/30/2022		09/20/2021
09/30/2021	Coordinate with OS HR to develop outreach and recruitment activities	09/30/2022		
09/30/2021	Coordinate with OS HR to provide training for OS managers and employees	09/30/2022		
09/30/2021	Ensure HR collaborates with OS EEO Director in identifying and removing workforce barriers	09/30/2022		
09/30/2021	Ensure OS HR assists OS EEO with preparing the OS MD-715 report	09/30/2022		09/30/2021
RESPONSIBLE OFFICIAL(S)				
TITLE		NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)	
Director, Human Resource Office, Interior Business Center		Devin Cummings (or designee)	No	



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Director, Human Resource Office, BSEE	Cynthia Piper (or designee)	No
Director, Office of Collaborative Action and Dispute Resolution	William Hall (or designee)	Yes
Acting MD 715 Program Manager	Kimberly Ly	No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2023	Conduct a thorough barrier analysis across the OS	No		
12/30/2022	Train all supervisors and employees on their roles and responsibilities for the EDI(EEO) program across the OS	No		
12/30/2022	Administer special emphasis programs across the OS aligned with MD 715 Program objectives	No		06/20/2021
09/30/2022	Ensure publication and distribution of EEO materials to OS staff	No		
09/30/2022	Ensure effective operation of the OS EEO complaint program	Yes		
09/30/2022	Increase use of ADR to resolve EEO complaints	No		
09/30/2022	Ensure access to all relevant OS data sources and conduct regular reviews to identify OS workforce trends	No		
09/30/2022	Conduct oversight of OS's anti-harassment and reasonable accommodation programs	No		
09/30/2022	Establish a separate budget for the OS EEO Office	No		



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REPORT OF ACCOMPLISHMENTS	
FISCAL YEAR	ACCOMPLISHMENTS
FY 2019	No activity during this period, due to the absence of an OS DEI (EEO) Director.
FY 2020	<p>The ODICR Director engaged in multiple discussions with PMB leadership regarding limited resources.</p> <p>CADR began work on an updated Department-wide training for supervisors on ADR, with expected completion in FY 2021. For OS, there was no activity during this period, due to the absence of an OS EEO Director.</p>
FY 2021	<p>The ODICR successfully hired three additional staff in FY 2021 to provide support in training and educational initiatives, special emphasis program management, as well as a Lead MD-715 Program Manager.</p> <p>This action is resolved: The ODICR assigned one of its existing resources to oversee MD 715 program functions within the OS EEO Program office in the absence of a dedicated staff to ensure program compliance. The individual met with HR Directors and designated staff within BSEE and IBC to introduce themselves, discuss the requirements of MD 715 and the EEOC compliance reporting. The HR leaders were asked to provide feedback to incorporate into the MD 715 annual report.</p> <p>The PDAS PMB issued a letter to all Departmental Assistant Secretaries, requiring that all OS Departmental Offices (DO) assign an MD 715 liaison to ODICR. The teams met twice during the reporting year, the first was a kickoff meeting to understand the MD 715 process and the requirements for each office. The second was to glean reportable accomplishments.</p>



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In February 2021, SESs within Region III partnered with ODICR, OPM, and each Bureau to reach students attending minority serving institutions and high schools in surrounding areas. The two-day event included sessions to prepare applicants to understand the missions of DOI and to successfully compete for open positions offered by DOI. At the close of the FY 2021, planning for phase two targeting Tribal Colleges, Universities and their local communities was underway. The premise is the same, to help the community understand who DOI is, the missions, jobs offered, and how to successfully compete for vacancies when announced.

In March 2021, at ODICR's request, CADR provided its standard Getting to the CORE of Conflict and Communication training as part of compliance training for the BLM on a pilot basis. CADR began revising its online resources to include a variety of outreach products on its SharePoint site that improves the effectiveness of ADR. CADR began changing its online resources to include a variety of outreach products on its SharePoint site that improves the effectiveness of ADR. At the close of the FY, CADR and ACE were actively developing a department-wide ADR campaign to enhance awareness of using ADR to resolve EEO complaint matters.



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TYPE OF PROGRAM DEFICIENCY		BRIEF DESCRIPTION OF PROGRAM DEFICIENCY		
Essential Element C: Management and Program Accountability (C.2.b)		The existing Reasonable Accommodation Policy and Procedures does not reflect the requirements of the final rule issued by the EEOC implementing requirements of Section 501 of the Rehabilitation Act		
OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
02/06/2018	Revise the Department's reasonable accommodation policy and procedures to comply with the final rule issued by the EEOC implementing the requirements of Section 501 of the Rehabilitation Act	06/30/2020	05/01/2022	
RESPONSIBLE OFFICIAL(S)				
TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)		
Director, Workforce Relations Division -BSEE	Mark Guberman (or designee)	Yes		



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Director, Human Resource Office, Interior Business Center	Devin Cummings (or designee)	
OS EEO Director	TBD	No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
03/01/2021	Update the existing reasonable accommodation policy and procedures to comply with the final rule issued by the EEOC implementing the requirements of Section 501 of the Rehabilitation Act	Yes	09/30/2021	7/16/2021
05/01/2021	Submit updated reasonable accommodation procedures to EEOC for its review and approval	Yes	09/30/2021	
05/01/2021	Design an enterprise-wide process to reassign employees with disabilities as a form of reasonable accommodation	No		

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FISCAL YEAR	ACCOMPLISHMENTS
FY 2019	OHC working in partnership with the EEO community throughout the Department of the Interior, reviewed and provided recommendations for improving the reasonable accommodation procedures. The team recommended significant improvements to include comprehensive information for supervisors and managers and their responsibilities in the process and the nearly thirty revisions required by Section 501 of the Rehabilitation Act.
FY 2020	OHC and ODICR conducted recurring meetings to go line-by-line over the recommended changes to the reasonable accommodation policy.
FY 2021	OHC, ODICR, and Bureau EEO and HR communities conducted a final line-by-line review incorporating all recommended changes. The DRAFT policy is scheduled to get released to all stakeholders for their review during the fourth quarter of FY 2022 after receipt of the EEOCs approval.



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TYPE OF PROGRAM DEFICIENCY		BRIEF DESCRIPTION OF PROGRAM DEFICIENCY		
Essential Element C: Management and Program Accountability (C.3.b.7)		Performance plans for the OS DOs leaders, do not hold managers and supervisors accountable for establishing action plans to identify and eliminate employment barriers within each of their respective areas of consideration.		
OBJECTIVE(S) AND DATES FOR EEO PLAN ACTION RESOLVED – SEPTEMBER 2021				
DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2020	Establish performance plans that hold managers and supervisors accountable for establishing action plans to identify and eliminate employment barriers within each of their respective areas of consideration	06/30/2025	09/30/2021	08/17/2021
RESPONSIBLE OFFICIAL(S)				
TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)		
Director, Human Resource Office, BSEE	Cynthia Piper (or designee)	No		



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Director, Human Resource Office, Interior Business Center	Devin Cummings (or designee)	No
Acting MD 715 Program Manager	Kimberly Ly	No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
11/30/2022	Incorporate DEI (EEO) element in performance standards of all DOI leaders	No		08/17/2021
12/31/2022	Engage senior managers in the implementation of Special Emphasis Programs	No		01/17/2021
12/31/2022	Involve senior managers in the barrier analysis process.	No		01/17/2021
12/31/2022	Solicit the participation of senior managers in developing agency DEI (EEO) action plans	No		9/30/2021

REPORT OF ACCOMPLISHMENTS

FISCAL YEAR	ACCOMPLISHMENTS
FY 2020	The ODICR, on behalf of the OS EEO, regularly engages Senior Leaders in the planning and implementation of Special Emphasis Program Activities. During the reporting year, an SES served as either an Executive Champion, guest speaker, or panel member in all observances conducted.



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FY 2021

This action is resolved. The ODICR, OHC, and Bureau HR leaders worked collaboratively to develop new performance elements for DOI Senior Executives specific to fulfilling the six essential elements of a model EEO program. The new performance element is effective as of October 1, 2021. EEO is an established performance element in line-manager performance plans for more than three years.

The ODICR, OHC, Bureau HR, and leaders within the OS Departmental Offices and Bureaus worked collaboratively throughout FY 2021 to develop action items to roll out a comprehensive DEIA strategic plan for the Department of the Interior. Funds were allocated to develop and implement a Departmental barrier analysis to understand impediments for full inclusion of DOI's entire workforce.



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STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY				
TYPE OF PROGRAM DEFICIENCY		BRIEF DESCRIPTION OF PROGRAM DEFICIENCY		
Essential Element C: Management and Program Accountability (C.4)		There is no process in place to ensure the OS Human Resources (HR) and OS EEO offices meet to review policies, practices, and procedures to identify and remove barriers to full inclusion for any group in the workplace.		
OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2021	Establish partnerships and timetables to review OS policies and practices for the merit promotion program, employee recognition and award program and procedure, and employee development and training for systemic barriers that may impede all groups' full utilization or promotional opportunities	09/30/2022		
RESPONSIBLE OFFICIAL(S)				
TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN		



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		(YES OR NO)		
Acting MD 715 Program Manager	Kimberly Ly	Yes		
Director, Human Resource Office, Interior Business Center	Devin Cummings (or designee)	No		
Director, Human Resource Office, BSEE	Cynthia Piper (or designee)	No		
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE				
TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
05/31/2022	HR officials and OS EEO Director to jointly establish timetables to review policies and procedures	No		
09/30/2023	Draft a report, identify impediments, and recommend solutions	No		
12/30/2023	Provide findings to OS and ODICR leadership	No		
REPORT OF ACCOMPLISHMENTS				
FISCAL YEAR	ACCOMPLISHMENTS			
FY 2019	OHC hired Deloitte Consulting LLC to assess its HR operation functions to ensure consistency throughout the entire Department, including OS. The evaluation focused on identifying challenges in its HR processes,			



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	<p>and recommendations to mitigate those challenges. At the close of the FY, the contractor provided a DRAFT report on the current state of the program with recommendations for improvement.</p>
<p>FY 2020</p>	<p>In October 2019, the OHC hired a contractor to assess its HR operations Department-wide, including OS. The assessment focused on identifying major barriers within HR that are linked to inefficiencies and ineffectiveness in the Department’s hiring processes.</p> <p>The assessment of HR operations was completed. The report of findings revealed the following key areas required improvement: 1) Establish an HR Governance and Policy Review Board, 2) Implement USA Staffing across the Department, 3) Improve Classification, 4) Expand Executive Resources, 5) Improve the process for Seasonal Hiring, 6) Increase Personnel Security, and 7) Reduce Delegated Examining Units (DEUs). Departmental OHC immediately initiated work to implement these recommendations.</p>
<p>FY 2021</p>	<p>At the close of the FY, ODICR designated one of its employees to serve as the Acting MD 715 program manager to work closely with HR and other stakeholders to accomplish MD 715 requirements in the absence of permanent staff. The individual made initial contact with stakeholder offices to engage in introductions and to establish working relationships. Additional meetings are forthcoming to address, and correct program deficiencies identified in the MD 715 report.</p> <p>ODICRs ACE Division Director is an active member of the Department’s policy review team. In this capacity, the ACE Division Director (or designee) receives a copy of every policy and procedure the Department intends to implement. The Division Director reviews such policies/procedures to ensure no impediments exist that will adversely impact any group(s) of employees. Where impediments are found, recommendations are provided to correct the proposed policies/procedures before disseminating as final to the workforce. The HR Servicing Office continued to conduct audits of merit promotion, personnel policies, employee development and employee award programs with OS and included EEO-compliance related questions for specific bureaus.</p>



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STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY				
TYPE OF PROGRAM DEFICIENCY	BRIEF DESCRIPTION OF PROGRAM DEFICIENCY			
Essential Element D: Proactive Prevention of Unlawful Discrimination (D.1, D.2, and D.3)	The OS DOs does not have internal processes, resources and staffing to identify and eliminate barriers in the workplace and develop corrective action plans.			
OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2021	Establish an internal process to annually assess the OS EEO program's progress towards complying with MD 715 standards	09/30/2022	12/30/2022	



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09/30/2021	Establish a process for identifying barriers that exclude EEO groups in the workplace	09/30/2022	12/30/2022	
09/30/2021	Develop an action plan to eliminate identified workplace barriers in OS	09/30/2022	12/30/2023	
RESPONSIBLE OFFICIAL(S)				
TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)		
Kimberly Ly	Acting MD 715 Program Manager	Yes		
Director, Human Resource Office, Interior Business Center	Devin Cummings (or designee)	No		
Director, Human Resource Office, BSEE	Cynthia Piper (or designee)	No		
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE				
TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2022	Conduct assessment to identify the current internal processes for OS	No	12/30/2023	



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	data collection and any challenges to accessing data			
12/30/2022	Establish business rules to assess employment data on a recurring basis to identify triggers	No	12/30/2023	
12/30/2022	Expand data collection and sources for trigger identification (applicant flow, exit surveys, climate surveys, focus groups, etc.)	No	12/30/2023	
12/30/2022	Develop action plans to address identified barriers and periodically review for effectiveness	No	12/30/2023	
12/30/2022	Receive training and research methods that can be utilized for identifying triggers	No	12/30/2023	
12/30/2022	Determine what reports, processes, procedures etc. should be looked at for inclusion in the trigger/barrier analysis identification process	No	12/30/2023	
12/30/2022	OS EEO and HR offices work collaboratively to establish a structure for receiving and sharing employment data on a recurring basis	No	12/30/2023	

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FISCAL YEAR	ACCOMPLISHMENTS
FY 2019	No activity during this period.
FY 2020	No activity during this period.
FY 2021	<p>In FY 2021 the OHC continued to work on the development of an enterprise level reasonable accommodation tracking system for all DOI employees. In addition, OHC and ODICR worked collaborative to review workforce data to determine employment experiences for all employees in line with the various presidential orders for establishing DEIA within the Interior. The ODICR’s DEIA Strategist led the Department’s efforts to review employment policies for language that potentially adversely impact inclusion of employees in the LGBTQIA+ community and worked to remove disqualifying language. Recurring briefings were provided to OS executives to update leaders on the state of DOI’s workforce regarding DEIA.</p> <p>At the close of the FY, processes were wrapping up for implementing an Executive DEIA Council within DOI. The charter and business rules were developed, and key executives identified who will serve on the DEIA Council. It is anticipated that by the third quarter FY 2022, the DEIA Council will be fully implemented and communicated to the workforce.</p> <p>In line with the Presidential Executive Order for DEIA, the Secretary of the Interior granted funding to ODICR and OHC to conduct a department-wide barrier analysis. ODICR, OHC, and PPA conducted a comprehensive assessment of the workplace data to get an initial understanding of trends and experiences. At the close of the fiscal year, ODICR and OHC were collaborating to obtain a contractor to conduct the barrier analysis.</p>



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STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY				
TYPE OF PROGRAM DEFICIENCY		BRIEF DESCRIPTION OF PROGRAM DEFICIENCY		
Essential Element E: Efficiency (E.1.d)		OS does not have a process in place to determine if it issues acceptance letters/dismissal decisions within the established timeframe specified by the Equal Employment Opportunity Commission.		
OBJECTIVE(S) AND DATES FOR EEO PLAN ACTION RESOLVED – FEBRUARY 2021				
DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/31/2021	Establish a process to track processing times for issuing OS acceptance letters/dismissal decisions, within a reasonable timeframe	09/30/2022		02/10/2021
RESPONSIBLE OFFICIAL(S)				
TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)		



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Director, Adjudication, Compliance & Equity (ACE) Division	Pennington Winberg (or designee)	Yes		
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE				
TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2021	Meet with the OS EEO Complaints Processing team to evaluate the internal processes for acceptance letters/dismissal decisions, investigations, final agency decisions, and final actions to identify solutions to ensure these processes are timely	No		01/20/2021
09/30/2021	Draft a plan to identify goals, objectives, resources, and staffing to ensure adequate quality control and timeliness	No		02/10/2021
12/31/2021	Implement the plan to ensure the timeliness of processes	No		02/10/2021
REPORT OF ACCOMPLISHMENTS				
FISCAL YEAR	ACCOMPLISHMENTS			



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FY 2020	<p>This is a new Part H. No action taken. The ODICR has provided oversight for the OS EEO complaint processing function in the absence of an OS EEO Director. This function will be managed by the OS EEO Director, once appointed.</p>
FY 2021	<p>This action is resolved. ACE developed and rolled out to the entire EEO Community standard operating procedures for complaints processing. ACE, at the direction of the ODICR Director, conducted two Department wide EEO Community training sessions to standardize the knowledge of all EEO practitioners regarding complaints processing. Both sessions were mandatory with 95% participation engaging in the learning experience.</p> <p>The ACE Division Director assigned the task of evaluating the iComplaints system to determine timely complaints processing in the Bureaus to one of the internal staff members. This individual provides bi-weekly reports to the ODICR Director and the Bureau EEO Offices regarding timely complaints processing. Bureaus are held accountable for actions to include speeding up or justifying potential late complaints.</p>



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STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY				
TYPE OF PROGRAM DEFICIENCY	BRIEF DESCRIPTION OF PROGRAM DEFICIENCY			
Essential Element E: Efficiency (E.4.a.3)	OS does not have systems in place to accurately collect, monitor, and analyze recruitment activities.			
OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
02/06/2018	Develop and implement Department-wide systems to accurately collect, monitor, and analyze recruitment activities and to regularly survey the workforce	12/30/2025	12/30/2023	
RESPONSIBLE OFFICIAL(S)				
TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN		



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		(YES OR NO)		
Acting MD 715 Program Manager	Kimberly Ly	Yes		
Director, Human Resource Office, Interior Business Center	Devin Cummings (or designee)	No		
Director, Human Resource Office, BSEE	Cynthia Piper (or designee)	No		
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE				
TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2023	Assess recruitment plans and schedules in the OS to identify triggers	No		
09/30/2023	Establish a process to partner with EEO practitioners to develop recruitment plans	No		
09/30/2023	Create a recruitment goal in the plans to target historically underrepresented groups	No		



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09/30/2023	Identify OS recruiters and train recruiters on diversity principles	No		
09/30/2023	Re-design OS Office websites to showcase OS commitment to a diverse, inclusive, and accessible workplace	No		01/20/2021
12/30/2023	The OS EEO Director or designee, will meet with stakeholders to collaborate on the development of enterprise systems for recruitment activities and resurveying the workforce	No		

REPORT OF ACCOMPLISHMENTS

FISCAL YEAR	ACCOMPLISHMENTS
FY 2019	No activity during this period.
FY 2020	No activity during this period.
FY 2021	<p>During the reporting year, OHC launched a marketing and awareness campaign to promote the DOI Careers online tool to various stakeholders to support workforce diversity hiring efforts.</p> <p>The Departmental ODICR hosted a Virtual Career Fair to help applicants learn about DOI, its mission, types of jobs offered and how to successfully compete for employment opportunities. OHC and Bureau HRs partnered to provide a variety of workshops to increase applicant and leadership knowledge of diverse</p>



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candidates and the availability of vacant positions. This included workshops on DOI Career and navigating the system to choose specific careers within DOI, schedule A hiring to fill vacant positions, utilizing minority serving institutions and other outreach approaches to reach diverse applicants for vacancies.



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STATEMENT OF MODEL PROGRAM ESSENTIAL ELEMENT DEFICIENCY				
TYPE OF PROGRAM DEFICIENCY	BRIEF DESCRIPTION OF PROGRAM DEFICIENCY			
Essential Element E: Efficiency (E.4.a.5)	The OS does not have a centralized or standardized tracking system in place to monitor reasonable accommodation requests.			
OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
9/30/2018	Establish a tracking mechanism to account for and ensure timely responses to requests for reasonable accommodation	12/30/2021		
RESPONSIBLE OFFICIAL(S)				
TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)		
Director, Workforce Relations Division	Ayanna Sears (or designee)	No		



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Director, Human Resources Information Systems Division	Christopher Lawson (or designee)	No			
Director, Human Resource Office, Interior Business Center	Devin Cummings (or designee)	No			
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE					
TARGET DATE (MM/DD/ YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/ YYYY)	DATE COMPLETED (MM/DD/ YYYY)	
12/30/2018	Secure an automated tracking system to account for timely issuance of reasonable accommodation solutions Department-wide	No	12/30/2021		
12/30/2020	Secure funding to develop a department-wide reasonable accommodation tracking system	Yes		09/30/2020	
09/30/2021	Secure vendor to design a comprehensive tracking system that accounts for the requirements of the Rehabilitation Act	Yes			
12/30/2022	Establish a recurring reporting process to monitor timeframes for reasonable accommodations in the OS	No			
REPORT OF ACCOMPLISHMENTS					



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FISCAL YEAR	ACCOMPLISHMENTS
FY 2019	OHC requested funding to create a department-wide reasonable accommodation tracking system.
FY 2020	No action reported.
FY 2021	At the close of the fiscal year, OHC reported that funding was not available. However, a centralized reasonable accommodation tracking system for the entire DOI is under consideration. No further action or information was reported.



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

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

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

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables	Workforce Tables A1, A8 and A9	<p>Black or African American Employment</p> <p>The number of Black or African American men in OS DOs permanent workforce remains below the Civilian Labor Force (CLF). In FY 2021, the total for this group was 4.8 percent whereas the CLF was 5.3%.</p> <p>For four consecutive years, the number of Black or African American men onboarding as new hires to the OS DOs remained below the CLF.</p> <p>The number of Black or African American men separating from the OS increased from 4.1 in FY 2020 to 4.6 in FY 2021. With that, this group continues to fall below the CLF year over year.</p>



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EEO GROUP(S) AFFECTED BY TRIGGER		
EEO Group	Yes or No	
Black or African American Men	Yes	
Black or African American Women	No	
Barrier Analysis Process		
Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Workforce Tables A1, A8, and A9
Complaint Data (Trends)	Yes	A review of the OS 462 Report revealed that, in FY 2021 for complaints based on Black or African American origin the issues cited were: Harassment, Appointment, Promotion, Non-Selection, and Conditions of Employment.
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	
Exit Interview Data	Yes	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	
Other (Please Describe)	No	



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Status of Barrier Analysis Process				
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)		
No		No		
OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/ YYYY)	MODIFIED DATE (MM/DD/ YYYY)	DATE COMPLETED (MM/DD/ YYYY)
9/30/2021	Conduct an analysis of DOI policies, practices, or procedures that may create potential barriers for hiring retention, career advancement, and upward mobility of Black or African American employees to the senior grades of GS-13 through SES.	09/30/2023		
RESPONSIBLE OFFICIAL(S)				
TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)		
OS EEO Director or designee	Kimberly Ly (Interim MD 715 Program Manager)	Yes		
Associate Director, Human Resources, Interior Business Center	Julie Bednar (or designee)	No		
Chief, Administrative Services, BSEE	Cynthia Piper (or designee)	No		
Director, Human Resource Division, IBC	Devin Cummings (or designee)	No		



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PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE				
TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/ YYYY)	DATE COMPLETED (MM/DD/ YYYY)
09/30/2021 <i>(Action Resolved)</i>	Appoint an OS EEO Director or Affirmative Employment Program Manager	No		09/30/2021
03/30/2022 <i>(Action Resolved)</i>	Conduct State of the Agency Briefing with OS Senior Executives and Agency head. Publish and disseminate approved FY 2020 MD 715 Report to Senior Executives across the OS.	No		09/30/2021
09/30/2022	Solicit representatives from each office to serve on the OS Barrier Analysis working group.	No		
12/30/2022	Begin phased barrier analysis.	No		
12/30/2022	Introduce OS managers, supervisors, and employees to the requirements of the White House Initiative on HBCUs. Utilize the ERG to develop recruitment sources and pipelines for Black or African American applicants.	No		



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REPORT OF ACCOMPLISHMENTS

FY 2021

The Assistant Secretary of Policy, Management, and Budget (PMB) established an MD 715 Inter-Bureau Expert Team (I-BET) made up of representatives at the GS-14 and GS-15 grade levels from each Departmental Office within the OS and Bureaus. Representatives within ODICR's Proactive Prevention Division conducted a series of discussions with the designees to provide detailed information regarding the requirements of the MD 715 and the ways activities within each office contribute to the Department's overall plan to be a model employer.

Action resolved: ODICR designated a member of the staff to serve as the Acting MD 715 Program Manager to work closely with OS leaders and the servicing human resource offices (HRO) to fulfill the requirements of the MD 715.

Action resolved: In September 2021, the Acting ODICR Director and Deputy Director gave a state of the agency briefing to the Secretary of the Interior and other Senior Executive leaders.

FY 2020

As of FY 2020, the OS does not have an independent and dedicated EEO Director and does not have an Affirmative Employment Program Manager to oversee the program and conduct barrier analysis. There has been no evaluation of OS model EEO program activities since FY 2017. The OS anticipates selecting an individual to assume this role in early FY 2022.



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

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

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

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables	Workforce Tables A1, A8 and A9	<p>Hispanic or Latino Male Employment The number of Hispanic/Latino men occupying permanent positions within the OS is below the civilian labor.</p> <p>While the number of Hispanic/Latino men in the permanent OS workforce increased steadily over the past four years, this group remained below the CLF.</p> <p>Hispanic/Latino men were underrepresented in the percentage of new hires within the OS. Hispanic/Latino men account for just 2.8 percent of new hires at OS.</p> <p>The number of Hispanic/Latino men separating from the OS increased from FY 2020 to FY 2021.</p> <p>An analysis must be conducted to determine if there are policies, practices, or procedures that may be creating impediments for the hiring, recruitment, retention, or advancement of Hispanic or Latino employees in OS.</p>

EEO GROUP(S) AFFECTED BY TRIGGER

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

Barrier Analysis Process

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



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Workforce Data Tables	Yes	Workforce Tables A1, A8 and A9
Complaint Data (Trends)	Yes	In reviewing the 462 Report for FY 2021, the complaint data revealed that complaints based on Hispanic/Latino origin the issues cited were: appointment, promotion, and non-selection. The working group for barrier analysis will conduct further analysis.
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	Yes	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	No	
Status of Barrier Analysis Process		
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
No		No



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OBJECTIVE(S) AND DATES FOR EEO PLAN				
DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/ YYYY)	MODIFIED DATE (MM/DD/ YYYY)	DATE COMPLE TED (MM/DD/ YYYY)
09/30/2021	Conduct analysis of policies, practices, or procedures that may create potential barriers to the upward mobility of Hispanic/Latino male employees to the senior grades of GS-13 through SES.	09/30/2023		
RESPONSIBLE OFFICIAL(S)				
TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)		
Acting MD 715 Program Manager	Kimberly Ly	Yes		
Associate Director, Human Resources, Interior Business Center	Julie Bednar (or designee)	No		
Chief, Administrative Services, BSEE	Cynthia Piper (or designee)	No		
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE				
TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/ YYYY)	DATE COMPLE TED (MM/DD/ YYYY)
09/30/2021 (Action Resolved)	Appoint an OS EEO Director and Affirmative Employment Program Manager.	No		09/30/2021



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09/30/2022	Solicit representatives from each office to serve on the OS Barrier Analysis working group.	No		
12/30/2022	Begin phased barrier analysis.	No		
12/30/2022	Utilize the DOI ERG to develop recruitment sources and pipelines for Hispanic applicants. Introduce recruitment staff and hiring managers to Hispanic/Latino stakeholder organizations such as HACU, CHCI, and LULAC to conduct outreach in Hispanic/Latino communities to promote DOI careers.	No		

REPORT OF ACCOMPLISHMENTS

FY 2021

Action resolved: During the 4th quarter of FY 2021, ODICR assigned one of its existing GS-14 senior staff members to oversee MD 715 program activities. The staff member met with the Director and Deputy Directors within each of the HR Servicing Offices for OS. The designee discussed the requirements of the MD 715 and how the OS is measured and collaborated to get feedback on activities that align with MD 715 reporting.

FY 2020

As of FY 2020, the OS does not have its own independent and dedicated EEO Director nor an Affirmative Employment Program Manager to oversee the EEO program and to conduct barrier analysis. Additionally, there has been no evaluation of OS model EEO program activities since FY 2017. The OS anticipates selecting an individual to assume this role in early FY 2022.



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

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

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

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data Tables	Workforce Tables A1	<p>White female employment The overall number of White women occupying positions in the permanent OS workforce decreased by 22 employees from FY 2020 to FY 2021.</p> <p>The number of White women separating from the OS increased from FY 2020 to FY 2021.</p> <p>A barrier analysis must be conducted to determine if policies, practices, or procedures may be creating impediments for the retention of White female employees at OS.</p>

EEO GROUP(S) AFFECTED BY TRIGGER

EEO Group	Yes or No
White women	Yes

Barrier Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	Workforce Tables A1, A8, A9
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-	No	



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Harassment Processes)		
Climate Assessment Survey (e.g., FEVS)	Yes	FEVS data
Exit Interview Data	Yes	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	Equal Employment Opportunity Commission (EEOC) Women's Work Group Report
Other (Please Describe)	No	

Status of Barrier Analysis Process

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

OBJECTIVE(S) AND DATES FOR EEO PLAN

DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2021	Conduct analysis of policies, practices, or procedures that may create potential barriers to employment and retention of female employees at OS.	09/30/2023		

RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
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OS EEO Director or designee	Kimberly Ly (interim MD 715 Program Manager)	Yes
Associate Director, Human Resources, Interior Business Center	Julie Bednar (or designee)	No
Chief, Administrative Services, BSEE	Cynthia Piper (or designee)	No
Director, Human Resource Office, IBC	Devin Cummings	No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
09/30/2021 (Action Resolved)	Appoint an OS EEO Director and Affirmative Employment Program Manager.	No		09/30/2021
03/30/2022 (Action Resolved)	Conduct State of the Agency Briefing with OS Senior Executives and Agency head. Publish and disseminate approved FY 2020 MD 715 Report to Senior Executives Across the OS.	No		09/30/2021
09/30/2022	Solicit representatives from each office to serve on the OS Barrier Analysis working group.	No		
12/30/2022	Begin phased barrier analysis.	No		
12/30/2022	Utilize the ERG to develop recruitment sources and pipelines for women applicants and introduce recruitment staff and hiring managers to women's employment stakeholder groups,	No		



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	including those working on women in STEM occupations.			
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REPORT OF ACCOMPLISHMENTS

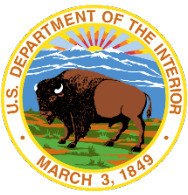
FY 2021

Action resolved: During the 4th quarter of FY 2021, ODICR assigned one of its existing GS-14 senior staff members to oversee MD 715 program activities for the OS.

In May 2021, DOI Region III held the Department’s first Minority Serving Institutions (MSIs) Virtual Career Fair. The ODICR, in conjunction with the Office of the Solicitor (SOL), BIA, NPS, FWS, USG, and OSMRE planned and executed this inaugural endeavor. The two-day event drew 385 registrants from four high schools and 310 colleges and universities throughout the United States.

FY 2020

The OS does not have its own independent and dedicated EEO Director nor Affirmative Employment Program Manager to oversee the EEO program and to conduct barrier analysis. Additionally, there has been no evaluation of OS model EEO program activities since FY 2017. The OS anticipates selecting an individual to assume this role in early FY 2022.



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

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

Section I: Efforts to Reach Regulatory Goals

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

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

Response:

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

Persons with Disabilities (PWD) occupied 20.3 percent (total of 79) of all GS-1 to GS-10 permanent positions in the OS DO’s workforce in FY 2021. PWD percentage employed in these grades increased by 3.8 percent from FY 2020.

PWD occupied 10.6 percent (total of 314) of GS-11 to SES permanent positions in the OS DO’s workforce in FY 2021 which is below the federal hiring goal mandate for employing PWD in senior level positions within the organization.

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

Response:

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



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Persons with Targeted Disabilities (PWTD) occupied 5.6 percent (total of 22) of all GS-1 to GS-10 positions in the OS DO's workforce in FY 2021 and 2.2 percent (total of 65) of all GS-11 to SES positions in FY 2021, both of which exceeded the federal hiring mandate of two percent. The percentage of PWTD in the OS DO's workforce increased from 2.0 percent in 2020 to 2.2 percent in the current reporting period.

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

Response:

In FY 2021, the Office of Human Capital (OHC) met regularly with all HR Directors to account for the proactive steps taken to achieve the hiring goal. The OHC and ODICR signed a joint memo on the numerical hiring goals. Numerical hiring goals are established for individuals with disabilities, and targeted disabilities are formally announced from the OHC to all Bureaus via the Human Capital Leadership Council (HCLC). The HCLC comprises senior human capital officials in OHC, the Bureaus, and other HR lines of business. OHC dedicated a full-time equivalent (FTE) to oversee the Department's efforts for meeting the hiring goals. The hiring goals are further communicated to the Interior Business Center (IBC) and BSEE staff to be implemented throughout the workplace.

During FY 2021, OS DOs continued to maintain a 12 percent hiring goal for PWD at all grade levels and a 2 percent hiring goal for PWTD at all grade levels. In FY 2021, 13.8 percent of all (permanent/temporary) new hires were PWD, and 3.2 percent were PWTD. In addition, Schedule A hires constituted 5.2 percent of all new hires in the workforce.

Section II: Model Disability Program

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



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A. Plan to Provide Sufficient and 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.

Response:

No ✓

A review of the FY 2021 EEO program revealed that the OS DOs is without a Disability Program Manager. There is no immediate plan in place to remedy the identified shortfall. In the interim, the ODICR Director has had frequent communication with the Principal Deputy Assistant Secretary for Policy, Management, and Budget regarding the need for additional resources to ensure the Office of the Secretary’s Equity, Diversity, and Inclusion EEO program is in complete compliance with statutory requirements.

In the interim, the ODICR Lead MD-715 Program Manager is working closely with the Inter-Bureau Expert Team (iBET) within OHC for the disability hiring goals to ensure the line-by-line instructions from the EEOC are adhered to by the OS DOs.

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	2	0	0	Cynthia Piper Director Human Resources, BSEE/BOEM cynthia.piper@bsee.gov



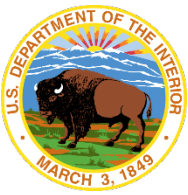
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Affirmative Action Plan (AAP) for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

				Devin Cummings Director Human Resources, IBC devin_cummings@ibc.doi.gov
Answering questions from the public about hiring authorities that take disability into account	2	0	0	Cynthia Baca (IBC) cynthia_a_baca@ibc.doi.gov Andrea Martinez (BSEE) andrea.martinez@bsee.gov
Processing reasonable accommodation requests from applicants and employees	2	0	0	Mark Guberman Supervisory HR Specialist, BSEE/BOEM mark.guberman@bsee.gov Devin Cummings Supervisory HR Specialist, Interior Business Center devin_cummings@ibc.doi.gov
Section 508 Compliance	1	0	0	Siddhartha Sharma DOI Section 508 Program Manager Siddhartha_Sharma@ios.doi.gov
Architectural Barriers Act Compliance	1	0		Sloan Farrell Director Public Civil Rights Sloan_Farrell@ios.doi.gov
Special Emphasis Program for PWD and PWTD	0	0	0	There are no Disability Program Managers within the Office of the Secretary.

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.



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Response:

No ✓

There are no Disability Program Managers in the OS. The Special Placement Coordinator in OHC assigned to ensure DOI hiring goals are achieved, conducted monthly trainings on disability recruitment and retention to standardize practitioner knowledge. Employees are encouraged to participate in the Federal Exchange on Employment & Disability (FEED), a federal interagency working group focused on information sharing, best practices, and collaborative partnerships designed to make the Federal government a model employer of people with disabilities. The MD 715 Program managers shares relevant information obtained during the FEED meeting with the Diversity and Inclusion network and other key stakeholders within the OS and beyond.

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.

Response:

No ✓

The ODICR Director provides regular updates to Departmental Senior Executive Leadership regarding the need for sufficient resources to establish an effective EEO program for the OS DOs, with an EEO Director expected to be appointed in FY 2023. In the interim, the ODICR provides oversight and technical assistance to OS DOs on providing timely and effective accommodations.



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Section III: Plan to Recruit and Hire Individuals with Disabilities

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

A. Plan to Identify Job Applicants with Disabilities

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

Response:

The OS DOs uses outreach to vocational rehabilitation centers, veteran organizations, and the resume mining feature from USAJOBS to search for applicants with disabilities. The OS DOs has also encouraged managers to use the Workforce Recruitment Program (WRP) database to identify applicants to fill positions.

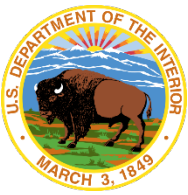
2. Pursuant to 29 C.F.R. § 1614.203(a)(3), describe the agency’s use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce.

Response:

OS DOs used the Schedule A and 30% or more Disabled Veterans appointing authorities, to identify and hire qualified PWD and PWTD applicants for positions in the permanent workforce.

All vacancy announcements included a statement that encouraged Schedule A and 30% or more Disabled Veteran applicants to apply. As a result, in FY 2021, 23.9 percent of new hires were placed using the Schedule A hiring authority and 8.3 percent 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



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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.

Response:

- 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.

Response:

No ✓

At the close of FY 2021, the OS DOs does not have a system to ensure all new supervisors and newly promoted supervisors are aware of hiring authorities for people with disabilities. The ODICR and the Office of Employee Development (OED) were engaged in ongoing discussions regarding establishing a training block of instruction in its new supervisor course that addresses



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all aspects of disability employment. OHC provides training on the use of disability hiring authorities on an as-needed basis. Also, all hiring managers are required to take the following online trainings as part of OPM’s mandated annual training: 1) A Roadmap to Success: Hiring, Retaining, and Including People with Disabilities, and 2) Veteran Employment Training.

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.

Response:

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 Listserv received e-mail notifications throughout the year of available job opportunities and free training events open to people with disabilities. Additionally, information from the Dept. of Labor, ODEP is shared with the supervisor to inform them of various events and activities related to the hiring activities and initiatives for PWD. Moreover, the Dept. of Veteran Affairs, the NAVSEA Wounded Warrior and Veteran Office, and Operation Warfighter (OWF) Program Office.

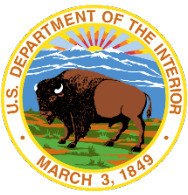
C. Progression Towards Goals (Recruitment and Hiring)

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.

Response:

- | | |
|---|--|
| a. New Hires for Permanent Workforce (PWD) | No <input checked="" type="checkbox"/> |
| b. New Hires for Permanent Workforce (PWTD) | No <input checked="" type="checkbox"/> |

In FY 2021, the rate of new hires for PWD is 13.8 percent, and the rate for PWTD is 3.2 percent.



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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.

Response:

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

Trigger - Currently, the B6 data does not include applicant flow data. While OHC obtained access to the USA JOB applicant flow data, not all EEO or HRO had full access to applicant flow data to communicate an accurate account of applicants applying for positions within the OS DOs. The team was unable to determine if the new hires within the MCO had any triggers with the available data. OS DOs will continue to coordinate with OPM, the DOI Data team, and the OHC to assess potential data gaps and recommend solutions.

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.

Response:

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

Trigger – As previously mentioned, not all human capital and EEO practitioners had complete access to applicant flow data. During the report year, the OS DOs staff was not able to determine if the new hires within the MCO contained triggers with the available data. OS DOs will continue to coordinate with OPM, the DOI Data team, and the OHC to assess potential data gaps and recommend solutions.

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.



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Response:

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

Trigger – Could not access applicant flow data to provide relevant analysis of table B6. It was impossible to determine if the new hires within the MCO had any triggers in the data. OS DOs will continue to coordinate with OPM, the DOI Data team, and the OHC to assess potential data gaps and recommend solutions.

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

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

A. Advancement Program Plan

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

Response: DOI conducted numerous training and development activities throughout the year to ensure all employees, including PWD and PWTD, were fully aware of and participated in the sponsored events. Announcements were communicated broadly using DOI employee digest, employee resource groups, and within the Diversity Partners Network. OS DOs does not have relevant tracking systems to account for the applicants and attendees of sponsored events.

Discussion was ongoing with the OHC to incorporate race, national origin, disability, and sex information in its learning management system to understand applicant data for training and



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development opportunities. The ODICR collaborated with PWD/PWTD Employee Resource Group to discuss challenges in opportunities for advancement during the current reporting cycle.

B. Career Development Opportunities

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

Response: The OS DOs offers an array of training and career development opportunities to all employees through multiple venues in the organization. Training and development opportunities are provided through the DOI University, Federal Consulting Group, DOI Talent, and National Indian Programs Training Center. These opportunities include classes providing technical information on administrative systems (e.g., travel, time and attendance, budget and acquisitions management, Microsoft Office), courses on professional development (e.g., Project Management, Managing Up, Change Management), and formal leadership development programs (the Aspiring Leadership, the Exploring Leadership, and the Senior Executive Service Candidate Development Program).

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 (%)
Internship Programs	Unknown ¹	Unknown	Unknown	Unknown	Unknown	Unknown
Fellowship Programs	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

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



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Mentoring Programs	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
Coaching Programs	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
Training Programs	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
Detail Programs	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown
DOI SESCDP	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

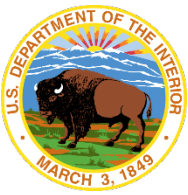
3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

Response:

- a. Applicants (PWD) **Yes** ✓
- b. Selections (PWD) **Yes** ✓

Trigger - The DOI Learning Management System (LMS) does not track applicant demographic information. Not monitoring applicant demographic information serves as a barrier to the OS DOs in understanding whether impediments exist for any group participating in career advancement programs. This is a corrective action plan within the MD 715 report. Key stakeholders in OED were made aware, and it is projected that LMS will have the capability to collect applicant data beginning in FY 2023.

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



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box.

Response:

- | | | |
|----|-------------------|-------|
| a. | Applicants (PWTD) | Yes ✓ |
| b. | Selections (PWTD) | Yes ✓ |

Trigger - The DOI Learning Management System (LMS) does not track demographic applicant information. As previously stated, the leadership within the OED is aware of the vulnerabilities of not monitoring applicant demographic data in the LMS and this is an area of consideration projected in FY 2023.

Awards

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

Response:

- | | | |
|----|--------------------------------------|-------|
| a. | Awards, Bonuses, & Incentives (PWD) | Yes ✓ |
| b. | Awards, Bonuses, & Incentives (PWTD) | Yes ✓ |

Trigger - During FY 2021, 12.4% of PWD employees and 1.4% of PWTD employees received time off awards in the 31-40 category whereas employees without disabilities received 78.8%. Additionally, there were no employees who self-identified as PWD or PWTD among the awardees of time off awards greater than 40 hours. Additionally, in FY 2021 PWD and PWTD employees received cash awards in all categories at a lower rate than employees without a disability.

2. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate



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benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.

Response:

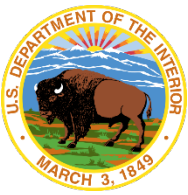
- a. Other Types of Recognition (PWD) **No** ✓
- b. Other Types of Recognition (PWTD) **No** ✓

C. 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.

Response:

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



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- ii. Internal Selections (PWD) **Yes** ✓

Trigger: The data was not analyzed for qualified internal applicants for this reporting period. The OS DO gained access to OPM’s USA-Staffing applicant flow system at the end of the FY. The OS DO will conduct an analysis of qualified PWD internal applicants for promotions to supervisory positions in FY 2022. Additionally, ODICR designated an interim MD 715 program manager to oversee program activities occurring within the immediate Office of the Secretary workforce at the beginning of FY 2022; the individual will conduct an accurate assessment of the program and implement activities by the second quarter FY 2023.

2. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels.

If “yes,” describe the trigger(s) below.

Response:

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



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

Trigger: The data was not analyzed for qualified internal applicants for this reporting period. The OS DOs did not have a designated official in place to review and report on applicant flow information in accordance with MD 715 standards. Access to OPM’s USA-Staffing applicant flow system was obtained at the end of the FY. The OS DOs will conduct an analysis of qualified PWD internal applicants for promotions to supervisory positions in FY 2022.

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.

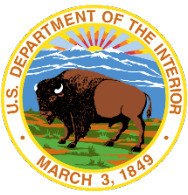
Response:

- | | | | |
|----|--------------------------|---|---|
| a. | New Hires to SES (PWD) | Yes <input checked="" type="checkbox"/> | |
| b. | New Hires to GS-15 (PWD) | Yes <input checked="" type="checkbox"/> | |
| c. | New Hires to GS-14 (PWD) | Yes <input checked="" type="checkbox"/> | |
| d. | New Hires to GS-13 (PWD) | Yes <input checked="" type="checkbox"/> | o |

Trigger: The data was not analyzed for qualified internal applicants for this reporting period. The OS DOs did not have a designated official in place to review and report on applicant flow information in accordance with MD 715 standards. The OS DOs gained access to OPM’s USA-Staffing applicant flow system at the end of the FY. The OS DOs will conduct an analysis of qualified PWD internal applicants for promotions to supervisory positions in FY 2022.

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) below.

Response:



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

Trigger: The data was not analyzed for qualified internal applicants for this reporting period. The OS DOs did not have a designated official in place to review and report on applicant flow information in accordance with MD 715 standards and therefore no analysis was conducted during the reporting year. The ODICR Director will assign one of its existing resources to the OS DOs EEO program to ensure MD 715 reporting requirements are addressed within the OS.

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) below.

Response:

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



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- ii. Internal Selections (PWD) **Yes** ✓

Trigger: The data was not analyzed for qualified internal applicants for this reporting period due to scarcity of resources within the OS DOs EEO Office. The OS DOs will conduct an analysis of qualified PWD internal applicants for promotions to supervisory positions in FY 2022.

6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectee.) If “yes,” then describe the trigger(s) below.

Response:

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

Trigger: Due to the scarcity of resources within the OS DOs EEO program, the data was not analyzed for qualified internal applicants for this reporting period.

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

Response:



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- a. Pay Increases (PWD) **Yes** ✓
- b. Pay Increases (PWTD) **Yes** ✓

Trigger: In FY 2021, PWD received 3.1% of Quality Step Increases (QSI) which is at a lower rate than employees without a disability (5.5%). PWTD did not receive a QSI at all during the reporting year.

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

Response:

- a. New Hires for Executives (PWD) **Yes** ✓
- b. New Hires for Managers (PWD) **Yes** ✓
- c. New Hires for Supervisors (PWD) **Yes** ✓

Trigger: Due to the scarcity of resources within the OS DOs EEO program, the data was not analyzed for internal applicants in Executive positions during the reporting year.

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

Response:

- a. New Hires for Executives (PWTD) **Yes** ✓
- b. New Hires for Managers (PWTD) **Yes** ✓
- c. New Hires for Supervisors (PWTD) **Yes** ✓

Trigger: Due to the scarcity of resources within the OS DOs EEO program, the data was not analyzed for new hires for supervisors. It is anticipated that the OS DOs EEO will conduct an



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analysis of qualified PWD internal applicants for promotions to supervisory positions in FY 2022.

Section V: Plan to Improve Retention of Persons with Disabilities

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

A. Voluntary and Involuntary Separations

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

Response:

Yes √

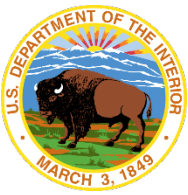
2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If “yes”, describe the trigger below.

Response:

a. Voluntary Separations (PWD) **Yes** √

Trigger on voluntary separations:

- Resignation: 3.4% for people with disabilities compared to 2.0% for people without disabilities- Trigger exists
- Retirement: 3.6% for people with disabilities compared to 3.6% for people without disabilities- No trigger exists



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- Other Separations: 7.5% for people with disabilities compared to 4.9% for people without disabilities- Trigger exists

b. Involuntary Separations (PWD) **Yes** ✓

Trigger on involuntary separations:

- Removal: 0.5% for people with disabilities compared to 0.3% for people without disabilities- Trigger exists

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.

Response:

a. Voluntary Separations (PWTD) **Yes** ✓

Trigger on voluntary separations:

- Resignation: 1.1% for people with targeted disabilities compared to 2.0% for people without disabilities- Trigger exists
- Retirement: 5.7% for people with targeted disabilities compared to 3.6% for people without disabilities- Trigger exists
- Other Separations: 9.1% for people with targeted disabilities compared to 4.9% for people without disabilities- Trigger exists

b. Involuntary Separations (PWTD) **No** ✓

Trigger involuntary separations:

- Removal: 0.0% for people with targeted disabilities compared to 0.3% for people without disabilities- No trigger exists



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

Response: OS DOs exit interview results related to the recruitment, hiring, inclusion, retention, and advancement of PWDs and PWTBs were insignificant. There was a low number of employees who completed the survey prior to their departure. Efforts to increase individual feedback will continue in FY 2022.

B. Accessibility of Technology and Facilities

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

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

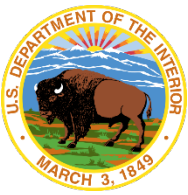
Response:

U.S. Department of the Interior Section 508 Program website
<https://www.doi.gov/ocio/section508> and 375 Departmental Manual (DM) 8 Section 508 Program and Responsibilities, and DOI’s Accessibility Statement
<https://www.doi.gov/accessibility>.

How to file a complaint:

Within 180 days of the date Complaints of discrimination filed against the DOI can be submitted by contacting the Office of Civil Rights, 1849 C Street NW, MS 4359 Washington DC 20240.

<https://www.doi.gov/pmb/eo/Complaints-Processing>



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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.

Response:

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.

Response:

The OCIO delivers information on the revised Section 508 standards and public website compliance scanning tool to key stakeholders and 508 Program Managers. The Section 508 Program Manager provides advice and training for OS on the proper development and presentation of accessible electronic information and technologies to aid in remediation during the reporting cycle. During the FY 2021, the Section 508 team conducted 28 training courses whereby Bureaus and OS DOs learned how to create compliant electronic documents for Excel,



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Adobe, Word, and other electronic documents. The Section 508 team also conducted 12 contracting and acquisition courses hosted in the DOI University.

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.)

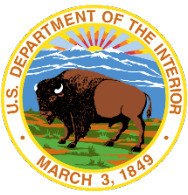
Response:

The average time frame for the initial processing of requests for reasonable accommodations at the OS DOs is unknown. OS DOs does not have a central tracking system 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.

Response:

- Reoccurring Training throughout FY 2021 -. Reasonable accommodation training is 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) per the Affirmative Action Plan for PWD and PWTD. The group met monthly to account for the



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Departmental process towards achieving the hiring goals. The OS DOs are invited to participate.

D. Personal Assistance Services Allowing Employees to Participate in the Workplace

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

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

Response:

The DOI implemented Personal Assistance Services (PAS) procedures with Personnel Bulletin (PB) No. 17-18, dated January 3, 2018, which applies to the OS DO. At the close of the FY, no complaints of discrimination were filed that alleged failure to provide PAS to employees, which denotes a process working as expected. A more thorough assessment of the effectiveness of PAS policies, procedures, and practices will occur in FY 2022 and beyond. The limited resources provided to the overall OS DO EEO program to ensure its effectiveness is noted as a deficiency in Part H.



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Section VI: 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 government-wide average?

Response:

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?

Response:

No

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.

Response: None



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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?

Response:

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?

Response:

No ✓

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.

Response: None



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Section VII: Identification and Removal of Barriers

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

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?
 No ✓

2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?
 No ✓

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

TYPE OF TRIGGER	BRIEF DESCRIPTION OF TRIGGER
	The higher the grade level, the least number of PWD and PWTD were selected to fill senior level positions. PWD and PWTD received the least number of QSIs awarded during FY 2020. The number of settlements in complaints of discrimination alleging disability discrimination.
TYPE OF BARRIER(s)	BRIEF BARRIER(s)
	A barrier analysis was not conducted during the reporting year due to the limited resources allocated to the EEO community throughout the Department. The limited resources spend a considerable amount of time on the planning and implementation of SEP events and end of year reporting.

OBJECTIVE(S) AND DATES FOR EEO PLAN

DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
02/06/2018	Increase PWD and PWTD employees at senior grade levels in the OS workforce.	12/30/2018	09/30/2022	
09/30/2020	Educate managers and supervisors on the intricacies of disability employment.	09/30/2021		
09/30/2020	Educate managers and supervisors on the intricacies on providing	09/30/2021		



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	reasonable accommodation solutions			
RESPONSIBLE OFFICIAL(S)				
TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)		
Director, Strategic Talent Programs Division	Landon Mock (or designee)	Yes		
Agency Special Employment Programs Manager	Angela Lennartson	Yes		
Disability Selective Placement Program Coordinator	TBD	Yes		
Managers and Supervisors	Various Offices	No		
Office of the Secretary, OS EEO Director	TBD	Yes		
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)		
No		No		
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected		
Workforce Data Tables	Yes	B1 Table – Total Permanent Workforce B14 Table – Separations were at the same level as on-boarding B-7 Table – Received lowest number of QSIs and other awards B9 Table – Employee Recognition and Awards B8Table – Internal promotions for senior level positions declined at the GS-14 and SES levels		
Complaint Data (Trends)	Yes			
Grievance Data (Trends)	No			
Focus Group	No			



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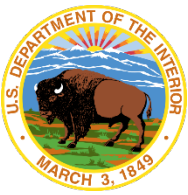
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Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	EEOC Report on Improving the Participation Rate of People with Targeted Disabilities in the Federal Work Force
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Other (Please Describe)	No	

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
12/1/2018	Office of Human Capital (OHC), to finalize and publish a department-wide reasonable accommodation policy and procedure that aligns with the EEOC final rule.	Yes	09/30/2022	
12/1/2018	ODICR to partner with OED to establish a systematic approach for ensuring managers and supervisors are aware of their obligations for reasonable accommodation.	No	09/30/2022	
09/30/2022	Obtain and analyze Applicant Flow Data for PWD and PWTD	No		
09/30/2022	HR offices and OS EEO Director to establish a plan to gradually	No		



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	increase the number of PWD and PWTD.			
09/30/2022	Develop and implement OS-wide campaign regarding disability employment.			

REPORT OF ACCOMPLISHMENTS

FY 2019	<p>During FY 2019:</p> <p>OHC requested funding to create a Department-wide reasonable accommodation tracking system.</p> <p>Departmental 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. 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>DOI posted its reasonable accommodation and personal assistance services procedures to the public website.</p>
FY 2020	<p>OHC selected a GS-14 action officer to oversee the Affirmative Action hiring of people with disabilities throughout the Department of the Interior. The selectee worked closely with the Bureau Special Placement Coordinators to educate managers and supervisors on the statutory requirement for hiring, advancing and developing people with disabilities. The number of people with disabilities and targeted with disabilities increased in GS-13 through SES throughout Department, including the OS DOs.</p>



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	<p>OHC received funding for the Department-wide reasonable accommodation tracking system. A shell tracking system was created and exhibited to OHC and OED practitioners for feedback.</p> <p>No OS activities during this period due to the absence of an OS EEO Director.</p>
--	---

FY 2021	No Action Taken During the Reporting Period.
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4. Please explain the factor (s) that prevented the agency from timely completing any of the planned activities.

Limited staffing and resources to provide the requisite attention needed to run an efficient disability employment program, to address barriers to employment, and improve the employment experience for PWD and PWTD within the OS.

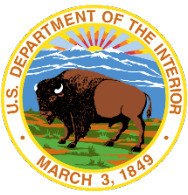
5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

There is a steady increase in communication regarding employing people with disabilities through podcasts, tweets, training, and Department-wide publications (e.g., HR Monthly, Employee Digest, and Connections Magazine, etc.). At the close of the FY, discussions were underway within the Bureau of FWS and the OHC to develop a Disability ERG for the Department.

The ODICR developed an internal website to serve as a platform for managers and employees for all aspects of OS EEO, whereby, there is a strong emphasis on disability employment. The website launched 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.

Increased targeted communication with hiring managers within the OS DO, providing a thorough breakdown of their respective workplaces and strategy development to increase their proactiveness in hiring and retention of diverse people with disabilities. Utilize Diversity Partners Network to launch a Department-wide campaign to resurvey the workforce of people with targeted disabilities.



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Section VII: Identification and Removal of Barriers

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

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?
 Yes **No** ✓

2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?
 Yes **No** ✓

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

TYPE OF TRIGGER	BRIEF DESCRIPTION OF TRIGGER
	PWD 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.
TYPE OF BARRIER(S)	BRIEF BARRIER(S)
	None identified. A barrier analysis was not conducted due to limited resources allocated to the OS EEO.

OBJECTIVE(S) AND DATES FOR EEO PLAN

DATE INITIATED (MM/DD/YYYY)	OBJECTIVE	TARGET DATE (MM/DD/YYYY)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
02/06/2018	Increase retention rates of PWD and PWTD.	12/30/2023		
09/30/2020	Improve employment experience for PWD and PWTD.	09/30/2022		

RESPONSIBLE OFFICIAL(S)

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



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Director, Strategic Talent Programs Division	Landon Mock (or designee)	Yes
Agency Special Employment Programs Manager	Angela Lennartson	Yes
OS MD-715 Program Manager	Kimberly Ly	Yes
Disability Selective Placement Program Coordinators	Various Bureaus	Yes
Managers and Supervisors	Various Bureaus	No
Office of the Secretary, Special Emphasis Program Manager	Acquanetta Newson	No
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)
No		No
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	B1 – New Hires Separations for PWD and PWTD are higher than the federal benchmark and are occurring at the same level as on-boarding, creating a potential retention issue. B8 Table – Internal promotions for senior level positions declined at the GS-14 and SES levels. B9 Table – Received lowest number of QSIs and other awards.
Complaint Data (Trends)	Yes	
Grievance Data (Trends)	No	
Focus Group	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	Yes	
Findings from Decisions (e.g., EEO, Grievance, MSPB,	Yes	



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Anti-Harassment Processes)				
PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE				
TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
12/31/2021	Review and analyze exit surveys to identify barriers to retention.	No		7/12/2021
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				
FY 2019	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. OCR representatives will ensure consideration of disability-related questions are included in the final submission of established core questions.			
FY 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.			
FY 2021	Exit Interview Results related to the recruitment, hiring, inclusion, retention, and advancement of PWDs and PWTDs were insignificant based on the number of			



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employees participating in the survey prior to their departure from the OS workforce. Discussions were ongoing with the OHC to increase employee participation in the exit survey.

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

As expressed throughout this report, resource allocation is a prevalent issue within the OS DO. The limited staff assigned to oversee activities within the OS DO EEO program routinely resulted in end of year reporting only and no proactive prevention activities to show OS DO as a model employer for equity and inclusion of people with disabilities. The decision was made to allocate one of ODICR's existing resources to serve as an interim MD 715 program manager within the OS DO EEO to implement activities to increase awareness of program requirements among the leadership team.

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

Collaboration with the human resource office to increase employee participation in the exit survey before their departure from the workplace.

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

The ODICR's strategic focus is on developing and implementing a department-wide campaign to educate the workforce on the intricacies of disability employment. The ODICR will establish a department-wide barrier analysis team to incrementally address impediments in employment for PWD, PWTD, and other affected groups, to include representatives from OS DO