

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

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

Section I: Efforts to Reach Regulatory Goals

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

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

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

Persons with Disabilities (PWD) occupied 16.5 percent (total 99) of all GS-1 to GS-10 permanent positions in the OS's workforce in FY 2020. The percentage of PWD employed by the OS decreased by 0.4 percent from FY 2019. Persons with Disabilities (PWD) occupied 10.0 percent (total 315) of GS-11 to SES permanent positions in the OS's workforce in FY 2020. Employment of PWD in senior graded positions did not meet the federal hiring goal mandate as anticipated

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

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

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

Persons with Targeted Disabilities (PWTD) occupied 4.7 percent (total 27) of all GS-1 to GS-10 positions in the OS's workforce in FY 2020, exceeding the federal hiring goal for PWTD to occupy two percent of all jobs within these grade distributions. Persons with Targeted Disabilities (PWTD) occupied 2.0 percent (total 64) of all GS-11 to SES positions in FY 2020, which meet the federal hiring mandate of two percent. The percentage of PWTD in the OS's workforce increased from 1.8 percent in 2019 to 2.0 percent in the current reporting period.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	598	99	16.56	27	4.52
Grades GS-11 to SES	3379	342	10.12	65	1.92

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

In FY 2019, the hiring goals were established and disseminated in the workplace for all agency components, including OS. In FY

2020, the Office of Human Capital (OHC) met regularly with all HR Directors to account for the proactive steps taken to achieve the hiring goal. OHC dedicated a full-time equivalent (FTE) to oversee the Department’s efforts for meeting the hiring goals. The OHC’s program lead for disability employment conducted a podcast for managers and supervisors encouraging leaders to take a proactive role in aiding the Department in reaching its affirmative action goals. The podcast provided detailed information on the hiring authorities and goals. Targeted activities to educate recruiters are slated for FY 2021.

Section II: Model Disability Program

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

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

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

Answer No

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

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 PWTDD	1	0	0	Cynthia Piper Director Human Resources, BSEE/ BOEM
Architectural Barriers Act Compliance	1	0	0	Sloan Farrell Director Public Civil Rights Sloan_Farrell@ios.doi.gov
Special Emphasis Program for PWD and PWTDD	0	0	0	
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Angela Lennartson Office of the Secretary Agency Special Employment Programs Manager angela_lennartson@ios.doi.

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing reasonable accommodation requests from applicants and employees	2	0	0	Mark Guberman Supervisory HR Specialist, BSEE/BOEM mark.guberman@bsee.gov
Section 508 Compliance	1	0	0	Siddhartha Sharma DOI Section 508 Program Manager Siddhartha_Sharma@ios.d

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

Answer No

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

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer No

The Departmental OCR Director provides regular updates to Departmental Senior Executive Leadership regarding the need for sufficient resources to establish an effective EDI (EEO) program for the OS, with an EEO Director expected to be appointed in early FY 2021. In the interim the Departmental Office of Diversity, Inclusion, and Civil Rights provide oversight and technical assistance to OS Offices on providing timely and effective accommodations.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]		
Objective	The OS DEI (EEO) Director will work with OS offices to review current practices and ensure that offices from posting DEI (EEO) program information on their websites.		
Target Date	Sep 30, 2022		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	May 3, 2021		Identify and barriers and solutions for office and write an action plan to resolve the issues.
	Sep 30, 2021		Implement solutions for each office to resolve any identified issues and complete the posting of information on the website.
	Mar 1, 2022		The OS DEI (EEO) Director and OS Office leads will meet to assess how DEI (EEO) program information is currently made available.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2020	No activity during this period, due to the absence of an OS DEI (EEO) Director.	

Brief Description of Program Deficiency	B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]
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Brief Description of Program Deficiency	B.4.a.4. to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.
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Brief Description of Program Deficiency	B.4.a.6. to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]
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Brief Description of Program Deficiency	B.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]
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Brief Description of Program Deficiency	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)]		
Objective	Establish a tracking mechanism to account for and ensure timely responses to requests for reasonable accommodation.		
Target Date	Dec 30, 2021		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Dec 30, 2018		Secure an automated tracking system to account for timely issuance of reasonable accommodation solutions Department-wide.
	Dec 30, 2020	September 30, 2020	Secure funding to develop a Department-wide reasonable accommodation tracking system.
	Sep 30, 2021		Secure vendor to design a comprehensive tracking system that accounts for the requirements of the Rehabilitation Act.
	Dec 30, 2022		Establish a recurring reporting process to monitor timeframes for reasonable accommodations in the OS
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	OHC requested funding to create a Department-wide reasonable accommodation tracking system.	
	2020	No OS activity during this period, due to the absence of an OS DEI (EEO) Director.	

Brief Description of Program Deficiency	C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC’s regulations and guidance? [see 29 CFR §1614.203(d)(3)]
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Brief Description of Program Deficiency	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]
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Brief Description of Program Deficiency	D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.
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Brief Description of Program Deficiency	E.4.a.5. The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(4)]		
Objective	Establish a tracking mechanism to account for and ensure timely responses to requests for reasonable accommodation.		
Target Date	Dec 30, 2021		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Dec 30, 2018		Secure an automated tracking system to account for timely issuance of reasonable accommodation solutions Department-wide
	Dec 30, 2020		Secure funding to develop a Department-wide reasonable accommodation tracking system
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	

Brief Description of Program Deficiency	E.4.b. Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]
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Section IV: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

The Department actively engaged in collaborative recruiting partnerships with academia, governmental, and non-profit organizations with access to candidates with disabilities. The following strategies were used to recruit individuals with disabilities in the permanent workforce at OS and other areas of the Department: • DOI Careers used Twitter to send vacancy announcements to disability advocacy groups such as the National Rights Network, the National Alliance on Mental Illness, the American Association of People with Disabilities, etc., to alert these organizations of available positions throughout the Department

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

OS used the Schedule A and 30% or more Disabled Veterans appointing authorities, to identify and hire qualified PWD and PWTD applicants for positions in the permanent workforce. All vacancy announcements included statements that encouraged Schedule A and 30% or more Disabled Veteran applicants to apply. As a result, in FY 2020, 15.3% of new hires were placed using the Schedule A hiring authority and 4.5% of the new hires used the 30% or more disabled veterans hiring authority.

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

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

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

Answer No

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

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

During FY 2020, the DOI maintained a database that contained partnerships with over 300 U.S. military installations, Veterans Employment Service, Academia, State Job Offices, and Veterans’ Assistance Centers nationwide. Participants of the List. SERV received e-mail notifications throughout the year of available job opportunities and free training events open to people with disabilities. At the close of FY 2020, discussions were underway with the National Association with the School of the Deaf, Gallaudet University, MERS Goodwill, the VA Non-Paid Work Experience Program, Military Transition Programs, etc. to solidify partnership opportunities with these groups to expand DOI’s recruitment and outreach efforts for these untapped resources.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

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

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

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	0				
% of Qualified Applicants	0				
% of New Hires	304	9.87	1.64	2.96	0.66

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

a. New Hires for MCO (PWD) Answer Yes

b. New Hires for MCO (PWTD) Answer Yes

Trigger - During FY 2020, for a large portion of the year, OS did not have access to applicant flow data to determine if PWD and PWTD applied for mission critical positions. In July 2020, the OHC received access to OPM’s USA-Staffing applicant flow system. The data was not analyzed in this reporting period, however, the OS expects to conduct a thorough analysis of applicant flow data at the close of FY 2021. The data shows that PWD and PWTD were selected to fill vacant positions at nearly every grade level throughout the Department, with the exception of GS-15 and SES where PWTD were not selected.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
0301 MISCELLANEOUS ADMINISTRATION AND PROGRAM	65	13.85	3.08
0343 MANAGEMENT AND PROGRAM ANALYSIS	19	5.26	0.00
0501 FINANCIAL ADMINISTRATION AND PROGRAM	9	22.22	11.11
0510 ACCOUNTING	19	21.05	5.26

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability	Targetable Disability
		New Hires (%)	New Hires (%)
Numerical Goal	--	12%	2%
0511 AUDITING	8	12.50	12.50
0905 GENERAL ATTORNEY	67	5.97	1.49
1102 CONTRACTING	15	0.00	0.00
1171 APPRAISING	4	50.00	0.00
1811 CRIMINAL INVESTIGATING	2	0.00	0.00
2210 INFORMATION TECHNOLOGY MANAGEMENT	32	21.88	9.38

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

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

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

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

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

Trigger – The main trigger FY 2020 is DOI’s inability to access applicant flow data, and the late permissions granted to the OHC for extracting said data from USA-Staffing.

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

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

A. ADVANCEMENT PROGRAM PLAN

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

Trigger – DOI conducted numerous training and development activities throughout the year to ensure all employees, to include PWD and PWTD were fully aware and participated in the sponsored events. OS lacks relevant tracking systems to account for the applicants and attendees of sponsored events. In the absence of a plan, the following activities occurred in FY 2020: • The DOI initiated the preliminary phase of a Department-wide Interior Coaching Program in that it solicited, through a competitive hiring

process, employees to serve as coaches in the department-wide program when launched. Selectees to serve as coaches, will undergo an extensive training to prepare individuals to be effective coaches. At the close of the FY, selectees included PWD and PWTD to serve as coaches. Due to the lack of tracking, the exact number is unknown • he OHC conducted podcasts to educate hiring managers on the benefits and ease of use of the WRP. Managers were encouraged to utilize the WRP to obtain qualified talent and reduce the time to fill vacancies using non-competitive appointments. • The DOI University (DOIU) Learning Centers provided 525 training courses opportunities throughout FY 2020. Approximately 6,800 DOI employees attended said trainings to receive a continuous learning and development experience throughout the year. DOI Talent does not track applicant data to ascertain the number of PWD and PWTD OS employees that engaged in this employment opportunity. • In June 2020, DOI deployed the DOI Career Connection, an online portal for offering short-term detail and lateral opportunities across the Department. Throughout the year, applicant tracking was not captured and therefore, unable to determine if PWD and PWTDs were among the employees engaging in these employment opportunities.

B. CAREER DEVELOPMENT OPPORTUNITES

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

Aspiring to Leadership – An Entry Level Leadership Program This 5-month program is designed for the employees at the GS 7-11 levels who want leadership roles. The program focuses on increasing awareness of personal leadership style, reinforcing strengths, and building practical leadership skills that will prepare participants for future leadership roles. Through assessments, lectures, and large and small group discussions, participants develop knowledge and expertise in the following competency areas: • Conflict Management • Interpersonal Skills • Oral Communication • Problem Solving and Decisiveness. Applicant data for FY 2020 is not available. Exploring Leadership – A Mid-Level Leadership Program This developmental program is designed for a mid-level employee at GS-11-12 and high performing GS-9s who have demonstrated leadership potential. The program focuses on the competencies critical to successfully leading in the challenging and complex Federal environment. The program is comprised of three core sessions, tailored to develop proficiency in Team Building, Accountability, Problem Solving, Decisiveness, and Influencing/Negotiating. Exploring Leadership uses a blended learning approach and includes assessment, instructor-led learning, large and small group discussion, case studies, mentoring, and webinars to give participants a challenging and enriching leadership development experience. Applicant data for FY 2020 is not available. Senior Executive Service Candidate Development Program The Department of the Interior’s Senior Executive Service Candidate Development Program (SESCDP) is an OPM certified program tailored to grow and develop a cadre of highly qualified leaders for senior executive positions. The SESCO DP focuses on developing the competencies in each of the Executive Core Qualifications (ECQs) to prepare candidates to lead at the executive level. The SESCO DP is a 12-month competitively selected program and includes formal classroom training, formal leadership assessments, executive-level developmental assignments, networking opportunities with other senior executives, exposure to government-wide leadership challenges, and mentoring. This program was not sponsored in FY 2020.

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

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

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

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

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

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

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

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

C. AWARDS

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

- a. Awards, Bonuses, & Incentives (PWD) Answer Yes
- b. Awards, Bonuses, & Incentives (PWTDD) Answer Yes

During FY 2020, OS PWD employees (11.8%) and PWTDD employees (12/1%) received time off awards of 31-40 (12.1%) at a lower rate than OS employees without a disability (13.4%). Additionally, no self-identified PWD or PWTDD were among employees who received time off awards of greater than 40 hours. Additionally, in FY 2020 OS PWD and PWTDD employees received cash awards at all levels at a lower rate than employees without a disability.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	620	17.12	14.98	15.22	17.61
Time-Off Awards 1 - 10 Hours: Total Hours	4588	127.93	110.62	115.22	131.25
Time-Off Awards 1 - 10 Hours: Average Hours	7.4	1.68	0.23	8.23	-0.03
Time-Off Awards 11 - 20 hours: Awards Given	452	11.49	11.02	13.04	11.08
Time-Off Awards 11 - 20 Hours: Total Hours	7557	190.54	184.34	221.74	182.39
Time-Off Awards 11 - 20 Hours: Average Hours	16.72	3.74	0.51	18.48	-0.12
Time-Off Awards 21 - 30 hours: Awards Given	431	9.68	11.18	13.04	8.81
Time-Off Awards 21 - 30 Hours: Total Hours	10375	235.36	268.35	315.22	214.49

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 21 - 30 Hours: Average Hours	24.07	5.47	0.74	26.27	0.04
Time-Off Awards 31 - 40 hours: Awards Given	542	12.16	14.22	11.96	12.22
Time-Off Awards 31 - 40 Hours: Total Hours	21034	470.50	552.20	450.00	475.85
Time-Off Awards 31 - 40 Hours: Average Hours	38.81	8.71	1.19	40.91	0.30
Time-Off Awards 41 or more Hours: Awards Given	4	0.00	0.12	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	192	0.00	5.89	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	48	0.00	1.47	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	835	19.59	21.95	23.91	18.47
Cash Awards: \$501 - \$999: Total Amount	594979	14487.16	15531.62	17816.30	13617.05
Cash Awards: \$501 - \$999: Average Amount	712.55	166.52	21.72	809.84	-1.62
Cash Awards: \$1000 - \$1999: Awards Given	1259	27.03	32.27	20.65	28.69
Cash Awards: \$1000 - \$1999: Total Amount	1763172	37973.87	45255.79	28447.83	40463.64
Cash Awards: \$1000 - \$1999: Average Amount	1400.45	316.45	43.06	1497.25	7.83
Cash Awards: \$2000 - \$2999: Awards Given	803	16.67	21.00	19.57	15.91
Cash Awards: \$2000 - \$2999: Total Amount	1900283	38913.06	49841.63	44273.91	37511.93
Cash Awards: \$2000 - \$2999: Average Amount	2366.48	525.85	72.87	2459.66	20.42
Cash Awards: \$3000 - \$3999: Awards Given	392	7.21	10.44	2.17	8.52
Cash Awards: \$3000 - \$3999: Total Amount	1336356	24596.40	35583.21	7577.17	29044.60
Cash Awards: \$3000 - \$3999: Average Amount	3409.07	768.64	104.66	3788.59	-20.67
Cash Awards: \$4000 - \$4999: Awards Given	113	3.15	2.89	1.09	3.69
Cash Awards: \$4000 - \$4999: Total Amount	501081	13684.91	12862.45	4636.96	16049.72
Cash Awards: \$4000 - \$4999: Average Amount	4434.35	977.49	136.83	4636.96	21.04
Cash Awards: \$5000 or more: Awards Given	239	3.60	6.54	6.52	2.84
Cash Awards: \$5000 or more: Total Amount	3119379	36803.38	87997.24	48165.22	33833.81
Cash Awards: \$5000 or more: Average Amount	13051.79	2300.21	413.13	8027.53	803.30

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

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

OS did not collect data for other recognition programs in FY 2020.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	103	1.80	2.82	2.17	1.70

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

D. PROMOTIONS

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
- a. SES
 - i. Qualified Internal Applicants (PWD) Answer Yes
 - ii. Internal Selections (PWD) Answer Yes
 - b. Grade GS-15
 - i. Qualified Internal Applicants (PWD) Answer Yes
 - ii. Internal Selections (PWD) Answer Yes
 - c. Grade GS-14
 - i. Qualified Internal Applicants (PWD) Answer Yes
 - ii. Internal Selections (PWD) Answer Yes
 - d. Grade GS-13
 - i. Qualified Internal Applicants (PWD) Answer Yes
 - ii. Internal Selections (PWD) Answer Yes

The data was not analyzed for qualified internal applicants for this reporting period. The Department gained access to OPM’s USA-Staffing applicant flow system at the end of the FY and OS will conduct an analysis of qualified PWD internal applicants for promotions to supervisory positions in FY 2021.

2. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants

and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

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

The data was not analyzed for qualified internal applicants for this reporting period. The Department gained access to OPM’s USA-Staffing applicant flow system at the end of the FY and OS will conduct an analysis of qualified PWD internal applicants for promotions to supervisory positions in FY 2021.

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

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

The data was not analyzed for qualified internal applicants for this reporting period. The Department gained access to OPM’s USA-Staffing applicant flow system at the end of the FY and OS will conduct an analysis of qualified PWD internal applicants for promotions to supervisory positions in FY 2021.

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

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

d. New Hires to GS-13 (PWTD) Answer Yes

The data was not analyzed for qualified internal applicants for this reporting period. The Department gained access to OPM’s USA-Staffing applicant flow system at the end of the FY and OS will conduct an analysis of qualified PWD internal applicants for promotions to supervisory positions in FY 2021.

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

a. Executives

i. Qualified Internal Applicants (PWD) Answer Yes

ii. Internal Selections (PWD) Answer Yes

b. Managers

i. Qualified Internal Applicants (PWD) Answer Yes

ii. Internal Selections (PWD) Answer Yes

c. Supervisors

i. Qualified Internal Applicants (PWD) Answer Yes

ii. Internal Selections (PWD) Answer Yes

The data was not analyzed for qualified internal applicants for this reporting period. The Department gained access to OPM’s USA-Staffing applicant flow system at the end of the FY and OS will conduct an analysis of qualified PWD internal applicants for promotions to supervisory positions in FY 2021.

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

a. Executives

i. Qualified Internal Applicants (PWTD) Answer Yes

ii. Internal Selections (PWTD) Answer Yes

b. Managers

i. Qualified Internal Applicants (PWTD) Answer Yes

ii. Internal Selections (PWTD) Answer Yes

c. Supervisors

i. Qualified Internal Applicants (PWTD) Answer Yes

ii. Internal Selections (PWTD) Answer Yes

The data was not analyzed for qualified internal applicants for this reporting period. The Department gained access to OPM’s USA-

Staffing applicant flow system at the end of the FY and OS will conduct an analysis of qualified PWD internal applicants for promotions to supervisory positions in FY 2021. In FY 2020, PWD received Quality Step Increases (4.36%) and Performance Based Pay Increases (1.74%) at a lower rate than employees without a disability (7.75% and 2.66%, respectively.)

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

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

OS did not have access to applicant flow data until the end of the FY to ascertain whether PWD were among the qualified applicants for leadership positions. The second trigger revealed that only one out of 32 total hires for supervisors, managers, and executives identified as a PWD.

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

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

OS did not have access to applicant flow data until the end of the FY to ascertain whether PWTD were among the qualified applicants for leadership positions. The second trigger revealed that only one out of 32 total hires for supervisors, managers, and executives identified as a PWTD.

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer No

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

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

- a. Voluntary Separations (PWD) Answer No

b.Involuntary Separations (PWD)

Answer No

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	13	0.00	0.35
Permanent Workforce: Resignation	43	2.13	0.88
Permanent Workforce: Retirement	151	2.77	3.69
Permanent Workforce: Other Separations	180	4.47	4.25
Permanent Workforce: Total Separations	387	9.36	9.18

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

a.Voluntary Separations (PWTD)

Answer Yes

b.Involuntary Separations (PWTD)

Answer Yes

OS PWTD employees voluntarily separated from DOI at a higher rate (5.49%) than OS employees who reported having no disability (5.09%) in FY 2020, based on the inclusion rate for each group

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	13	0.00	0.32
Permanent Workforce: Resignation	43	3.09	0.97
Permanent Workforce: Retirement	151	2.06	3.62
Permanent Workforce: Other Separations	180	3.09	4.31
Permanent Workforce: Total Separations	387	8.25	9.22

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

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

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

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

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

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

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

In FY 2020, the Department took a proactive approach to ensure managers and employees were aware of how to establish 508 compliant documents. During the FY, the Section 508 team conducted 28 training courses whereby Bureaus and OS Offices learned how to create compliant electronic documents for Excel, Adobe, Word, and other electronic documents. The Section 508 team also conducted 12 contracting, and acquisition courses hosted in the DOIU. The Department hosted "Inclusive Social Media: Making Images Accessible" virtual webinar which covered best practices and decisions that go into writing appropriate alternative text for images such as maps and infographics. Approximately 380 DOI employees attended the webinar. A recording of the presentation is currently available on DOI's Office of Communication website and is used by employees on a recurring basis. The Department hosted a DOI Digital Week Event, which included a segment that addressed Section 508 awareness. The event included presentations on various accessibility topics and demonstrations with accessibility tools to assist employees with disabilities. Approximately 4,674 employees attended the presentations. The recorded versions of the presentations are posted on the DOI Digital Event SharePoint site.

C. REASONABLE ACCOMMODATION PROGRAM

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

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

The average time frame for initial processing of requests for reasonable accommodations at the OS is unknown. DOI nor OS do not have a central tracking system in place to account for timely receipt and issuance of accommodation solutions. The lack of a centralized system is a deficiency identified in Part H.

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

• Reoccurring Training throughout FY 2020 -. 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) in accordance with the Affirmative Action Plan for PWD and PWTD. The group met monthly to account for the Departments process towards achieving the hiring goals. OS Offices are invited to participate.

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

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

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

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

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer No

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

Answer 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.

none

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer No

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

Answer 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.

None

Section VIII: Identification and Removal of Barriers

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

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

Answer No

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

Answer No

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

Source of the Trigger:		Workforce Data (if so identify the table)							
Specific Workforce Data Table:		Workforce Data Table - B1							
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?		The higher the grade level, the least number of PWD and PWTD were selected to fill senior level positions. PWD and PWTD received the least number of QSIs awarded during FY 2020. The number of settlements in complaints of discrimination alleging disability discrimination.							
STATEMENT OF BARRIER GROUPS:		<i>Barrier Group</i> People with Disabilities People with Targeted Disabilities							
Barrier Analysis Process Completed?:		N							
Barrier(s) Identified?:		N							
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.		<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:50%; text-align: center;">Barrier Name</th> <th style="width:50%; text-align: center;">Description of Policy, Procedure, or Practice</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>				Barrier Name	Description of Policy, Procedure, or Practice		
Barrier Name	Description of Policy, Procedure, or Practice								
Objective(s) and Dates for EEO Plan									
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description				
09/30/2020	09/30/2021	No			Educate managers and supervisors on the intricacies of disability employment.				
09/30/2020	09/30/2021	No			Educate managers and supervisors on the intricacies on providing reasonable accommodation solutions				
02/06/2018	12/30/2018	Yes	09/30/2022		Increase PWD and PWTD employees at senior grade levels in the DOI workforce.				
Responsible Official(s)									
Title		Name		Standards Address The Plan?					
Office of the Secretary, DEI (EEO) Director		TBD		No					
Director, Strategic Talent Programs Division		Landon Mock (or designee)		Yes					
Disability Selective Placement Program Coordinator		TBD		Yes					
Agency Special Employment Programs Manager		Angela Lennartson		Yes					

Responsible Official(s)				
Title	Name	Standards Address The Plan?		
Managers and Supervisors	Various Offices	No		
Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/01/2018	Office of Human Capital (OHC), to finalize and publish a Department-wide reasonable accommodation policy and procedure that aligns with the EEOC final rule.	Yes	09/30/2021	
12/01/2018	OCR to partner with OSEOD to establish a systematic approach for ensuring managers and supervisors are aware of their obligations for reasonable accommodation.	No	09/30/2022	
12/01/2018	OHC to obtain funding to develop and implement a Department-wide tracking system for reasonable accommodations.	No		
09/30/2022	Obtain and analyze Applicant Flow Data for PWD and PWTD	No		
09/30/2022	HR offices and OS DEI (EEO) Director to establish a plan to gradually increase the number of PWD and PWTD.	No		
09/30/2022	Develop and implement OS-wide campaign regarding disability employment.	No		
Report of Accomplishments				
Fiscal Year	Accomplishment			
2019	<p>During FY 2019:</p> <p>OHC requested funding to create a Department-wide reasonable accommodation tracking system.</p> <p>Department issued hiring goals to comply with the final rule for Section 504 of the Rehabilitation Act.</p> <p>The goals were broadly disseminated throughout the Department.</p> <p>OHC allocated an FTE, GS-14 equivalent to oversee the Affirmative Action employment goals for people with disabilities.</p> <p>At the close of the FY, the position was advertised and a selection pending.</p> <p>Two Employee Resource Groups were established for the further advancement of People with Disabilities and Targeted Disabilities within the DOI workforce. The Employees for the Advancement of People with Disabilities (EAPWD) and People with Special Abilities of Power (PSAP).</p> <p>DOI posted its reasonable accommodation and personal assistance services procedures to the public website.</p>			
2020	<p>OHC received funding for the Department-wide reasonable accommodation tracking system. A shell tracking system was created and exhibited to OHC and DEI (EEO) practitioners for feedback.</p> <p>No OS activities during this period due to the absence of an OS DEI (EEO) Director.</p>			

Source of the Trigger:	Workforce Data (if so identify the table)								
Specific Workforce Data Table:	Workforce Data Table - B14								
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	PWD and PWTD voluntarily separated at the same level in which the DOI onboarded this group to the workforce. This imbalance suggests a potential retention issue.								
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> People with Disabilities People with Targeted Disabilities								
Barrier Analysis Process Completed?:	N								
Barrier(s) Identified?:	N								
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%; text-align: center;">Barrier Name</th> <th style="width: 50%; text-align: center;">Description of Policy, Procedure, or Practice</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>					Barrier Name	Description of Policy, Procedure, or Practice		
Barrier Name	Description of Policy, Procedure, or Practice								
Objective(s) and Dates for EEO Plan									
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description				
02/06/2018	12/30/2023	No			Increase retention rates of PWD and PWTD.				
09/30/2020	09/30/2022	Yes			Improve employment experience for PWD and PWTD.				
Responsible Official(s)									
Title		Name		Standards Address The Plan?					
Managers and Supervisors		Various Bureaus		No					
Office of the Secretary, Special Emphasis Program Manager		Acquanetta Newson		No					
Agency Special Employment Programs Manager		Angela Lennartson		Yes					
Director, Strategic Talent Programs Division		Landon Mock (or designee)		Yes					
Departmental Lead MD-715 Program Manager		Julia Bumbaca		No					
Disability Selective Placement Program Coordinators		Various Bureaus		Yes					

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

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

The Office of the Secretary lacks sufficient resources, staffing, and funding to provide the requisite attention needed to run an efficient disability employment program, to address barriers to employment, and improve the employment experience for PWD and PWTD 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, Training Tuesday, and Connections Magazine, etc.). The Departmental OCR developed an internal website to serve as a platform for managers and employees for all aspects of EDI (EEO), whereby, there is a strong emphasis on disability employment. The website is scheduled to launch during the third quarter of FY 2021.

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

The exit surveys exposed DOI to the voice of PWD and PWTD regarding their employment experience. A further analysis is warranted to identify barriers to employment.