

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

|   |  |                                       |
|---|--|---------------------------------------|
| <b>PART A</b><br>Department or Agency Identifying Information | <b>1. Agency</b>                               | <b>1.</b> DOI Office of the Secretary |
|   | <b>1.a</b> 2nd level reporting component       |                                       |
|   | <b>2. Address</b>                              | <b>2.</b> 1849 C Street, NW           |
|   | <b>3. City, State, Zip Code</b>                | <b>3.</b> Washington, DC 20240        |
|   | <b>4. Agency Code</b>   <b>5. FIPS code(s)</b> | <b>4.</b> IN01   <b>5.</b> 1405       |

|                                   |   |                |
|-----------------------------------|---|----------------|
| <b>PART B</b><br>Total Employment | <b>1.</b> Enter total number of permanent full-time and part-time employees | <b>1.</b> 3987 |
|                                   | <b>2.</b> Enter total number of temporary employees                         | <b>2.</b> 221  |
|                                   | <b>3. TOTAL EMPLOYMENT [add lines B 1 through 2]</b>                        | <b>4.</b> 4208 |

| <b>PART C</b>  | <b>Title Type</b>   | <b>Name</b>            | <b>Title</b>  |
|--|---|------------------------|---|
| Agency Official(s) Responsible For Oversight of EEO Program(s) | Head of Agency  | Deb Haaland            | Secretary   |
|  | Head of Agency Designee   | Rachael Taylor         | Principal Deputy Assistant Secretary, Office of Policy, Management and Budget (PMB) |
|  | Principal EEO Director/Official                                       | Erica D. White-Dunston | Principal EEO Director (Departmental)   |
|  | Complaint Processing Program Manager                                  | Melba Vaughn           | Office of the Secretary, Complaints   |
|  | Special Placement Program Coordinator (Individuals with Disabilities) | Angela Lennartson      | Senior HR Policy Analyst (Staffing)   |
|  | Reasonable Accommodation Program Manager                              | Mark Guberman          | Director, Employee & Labor Relations Div.   |
|  | ADR Program Manager   | William E. Hall        | Director, Office of Collaborative Action and Dispute Resolution                     |

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| <b>PART D</b><br>List of Subordinate Components Covered in This Report               | Subordinate Component and Location<br>(City/State) | Country         | Agency Code |
|--|--|-----------------|-------------|
| <b>EEOC FORMS and Documents</b>  | <b>Required</b>                                    | <b>Uploaded</b> |             |
| Anti-Harassment Policy and Procedures  | Y  | Y               |             |
| EEO Policy Statement   | Y  | Y               |             |
| Organization Chart   | Y  | Y               |             |
| Personal Assistance Services Procedures  | Y  | Y               |             |
| Reasonable Accommodation Procedure   | Y  | Y               |             |
| Agency Strategic Plan  | Y  | Y               |             |
| Alternative Dispute Resolution Procedures  | Y  | Y               |             |
| Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey | N  | N               |             |
| Disabled Veterans Affirmative Action Program (DVAAP) Report                          | N  | N               |             |
| Diversity Policy Statement   | N  | N               |             |
| EEO Strategic Plan   | N  | N               |             |
| Federal Equal Opportunity Recruitment Program (FEORP) Report                         | N  | N               |             |
| Human Capital Strategic Plan   | N  | N               |             |

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**EXECUTIVE SUMMARY: MISSION**

The Department of the Interior (DOI or Department) conserves and manages the Nation's natural resources and cultural heritage for the benefit and enjoyment of the American people. It provides scientific and other information about natural resources, 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, DOI 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.

DOI 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.

Achieving the Department's vast and unique mission requires the skillset of dedicated and talented individuals who can succeed in the sometimes remote or strenuous outdoor work environments where the majority of DOI mission objectives are accomplished and are invested in the organization's purpose. At the close of FY 2020, the Department's mission was accomplished by 66,452 employees and 300,000 volunteers in over 2,300 locations throughout the United States. The people of DOI are comprised of star performers from every facet of life represented in America. The richness of our workforce serves as a competitive advantage in that it bolsters DOI's ability to maximize the local communities' resourcefulness and knowledge to enhance park operations, assist in recovering from natural disasters, and participate in environmental education that improves our effectiveness to the American people.

In addition to the eleven bureaus that comprise the Department of the Interior, there are a number of offices that fall under the Office of the Secretary (OS); Assistant Secretary for Fish and Wildlife and Parks; Assistant Secretary for Insular and International Affairs (IIA); Assistant Secretary for Land and Mineral; Assistant Secretary for Policy, Management, and Budget (PMB); Assistant Secretary for Water and Science; Office of the Solicitor (SOL); and the Office of Inspector General (OIG), collectively known as the Departmental Offices (DOs), each with exclusive, but equally important work and missions that together serve the broader DOI mission. This structure 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 continuously progressing. To establish a prepared and ready workforce to meet the greater need of our Nation means DEIA is not mere compliance with laws or federal mandates. It encompasses all employees' full workplace utilization, maximizing our collective teams' productivity and effectiveness, and increased authority and creditability for the Department as a model DEIA employer. 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 teams comprised of individuals reflective of America.

The Management Directive 715 (MD-715) Annual Program Status Report is a high-level overview of the proactive measures the OS has instituted throughout Fiscal Year (FY) 2020 to actualize the tenets of DEIA across the Department. When comparing FY 2020 activities of OS to the Equal Employment Opportunity Commission's (EEOC) Key Performance Indicators (KPIs) of a "Model DEIA Employer," there were notable successes and opportunities for improvements in the performance elements of: (1) Demonstrated Commitment from DOI Leadership for Ensuring DEIA; (2) Integration of DEIA into DOI's Overall Strategic Mission; (3) Management and Program Accountability for DEIA; (4) Proactive Prevention Measures to effectuate DEIA in DOI; (5) DEIA Program Efficiency; and (6) Legal Compliance with statutory requirements for DEIA.

The activities of this annual report aligns with DOI's FY 2018 - 2022 Department Strategic Plan (DSP) and Department Annual Performance Plan (DAPP), per Title 5 of the Code of Federal Regulation (CFR) Part 250 and the Government Performance Results Act- Modernization, Act, 2010, P.L. 111-352 (GPRA-MA). The strategies, milestones, performance measures, and metrics in this annual report directly and indirectly support the mission and goals outlined within the DSP and DAPP. More specifically, the 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 Engagement and Mission Delivery, Strategy #2: Improve strategic hiring, placement and retention efforts to ensure mission-critical service delivery through data driven processes and increased employee engagement efforts. As such, the accomplishments identified in this annual report measure: 1) the progress of OS in promoting workplace practices that create

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**EXECUTIVE SUMMARY: MISSION**

and enhance opportunities for all employees to achieve their fullest potential in the workplace; and 2) effectiveness of OS in using DEIA to successfully provide the management necessary to address the scale and complexity of the conservation challenges in managing 20 percent of the Nation's lands, including national parks, national wildlife refuges, and public lands.

During FY 2020, leadership across OS demonstrated commitment to affirming DOI as a "Model DEIA Employer." While there were instances whereby not all leaders championed and advanced DEIA as a strategic business objective, a significant number of leaders were actively involved in outwardly furthering the message that DEIA is relevant to the success of the DOI mission. While there are many examples where the leadership team within the OS has shown their support to actualizing an effective DEIA program, the fundamental requirements of a comprehensive program have not been met. At the close of FY 2020, the OS leadership team has not allocated sufficient resources to implement a fully functional EEO (DEIA) program that fulfills the tenets of a model EEO (DEIA) employer. As such, the OS has not conducted self-assessments to ascertain barriers to DEIA since FY 2017. At the conclusion of this reporting period, talks were underway to implement an independent EEO (DEIA) Program Office within the Office of the Secretary to oversee the development and execution of planned activities conducted within the Departmental offices that align with the MD 715 reporting requirements. This annual report outlines the Office of the Secretary's activities to support its continued commitment to its DEIA program responsibilities under 29 C.F.R. § 1614.102. This report details the Department's strengths, vulnerabilities, and projected plans to eliminate program deficiencies that failed to meet the EEOC's expected performance outcomes for every federal agency.

**Summarization of Self-Assessment Results**

Each fiscal year, the EEOC provides a series of questions to federal agencies in an attempt to allow each organization the opportunity to assess its DEIA program to determine if deficiencies exist to actualizing a "Model DEIA" program.

The FY 2020 OS self-assessment results indicated that there are material deficiencies in five out of six Key Performance Indicators (KPIs) of a "Model DEIA" program. The deficiencies exist in the areas of:

1. Demonstrated Commitment from Agency Leadership for Ensuring DEIA.
2. Integration of DEIA into DOI's Overall Strategic Mission.
3. Management and Program Accountability for DEIA.

Proactive Prevention Measures to effectuate DEIA throughout DOI.

5. DEIA Program Efficiency.

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**EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F**

Harnessing the power of DEIA creates advantages. Ensuring equality of opportunity for all employees, valuing differences within the workforce, and creating a workplace in which difference is used as a strategic advantage can enhance the Office of the Secretary's effectiveness and impact in leading the Department. As the Nation continues to change and increase in complexity, recognition of DEIA as a vital component of the Office of the Secretary's ability to attract and retain talent while achieving mission success becomes more relevant and necessary. To that end, the EEOC established the Six Essential Elements of a Model DEIA Employer as key performance indicators (KPI) to determine the effectiveness of an agency's EEO program and as a model employer for DEIA in the federal workplace.

The KPIs measure the efficacy of OS in establishing and adhering to policies, practices, and business operations that create a workplace free of discrimination, which comports to the requirements set forth by Title VII of the Civil Rights Act and the Rehabilitation Act to identify and eliminate employment barriers to full inclusion. A detailed analysis of the success of OS in adhering to the EEOCs KPI follows.

**ESSENTIAL ELEMENT A:**

**DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP**

The KPI Demonstrated Commitment from DOI Leadership for ensuring DEIA contains 14 measures that examines a range of factors that considers the effectiveness of OS 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 OS against discrimination and harassment, and its support of OS-wide workplace diversity, equity, inclusion and accessibility. The broad dissemination of such policy statements ensures all employees, volunteers, and contractors are informed and adhere to the principles of DEIA as a fundamental characteristic of DOI culture. In addition, issuing such policy statements sets expectations and communicates organizational behaviors that conflict with the Department's support of DEIA for its employees. A detailed list of requirements for this KPI can be found in the appendices of this report.[1]

An assessment of the overall FY 2020 program performance for this KPI revealed that DOI regressed in meeting the established standards. Below is a FY 2019 and FY 2020 snapshot for the Office of the Secretary (OS), showing the progressive movement toward fulfilling the performance measures within this KPI.

Bureau

Met Measures

FY 2019

Met Measures

FY 2020

Unmet Measures

FY 2019

Unmet Measures

FY 2020

OS\*

13

EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

10

1

4

The OS failed to comply with four measures for this KPI. The OS does not currently have an independent DEIA (EEO) Officer nor Affirmative Employment Program Manager to oversee the operational and proactive prevention efforts and to ensure the tenets of the MD-715 program were actualized during FY 2020. As a result, there was no EEO official for OS who was involved in key decisions that impacted employment throughout the Departmental offices, nor established regular and/or recurring means of advising the head of the agency or respective designed within the OS of, amongst other things, widespread impediments in employment that adversely impacted one or more groups of employees working in the OS.

Successes:

In FY 2020, DOI enacted several Department-wide initiatives that ensured internal accountability, improved work-life balance, instilled greater professionalism, and increased focus on the early resolution of workplace conflicts. All these initiatives have served to enhance DOI's overall performance as well as that of the OS. Specifically:

The Department issued numerical goals to hire, develop, and advance people with disabilities and targeted disabilities in accordance with the Section 501 of the Rehabilitation Act.

The Office of Collaborative Action and Dispute Resolution (CADR) provided leadership, guidance, and assistance to employees utilizing a wide variety of collaborative and alternative dispute resolution processes. CADR supported intra-organizational collaboration, dispute resolution, and engagement with external stakeholders on natural resources, public lands, and tribal issues. In FY 2020, CADR ensured that employees had immediate access to an OMBUDS to provide a safe, confidential space to discuss concerns, explore options and possible solutions to any work-related issue, and help employees at all levels address conflict early.

Areas Requiring Improvement:

A concerted and consistent effort by OS leadership within all DO's to proactively ensure the principles of DEIA are readily a part of its respective workforce culture is warranted to maximize performance and foster inclusion environment for all employees. Most importantly, leadership at the OS must take proactive steps to ensure that all employees clearly understand their responsibilities with respect to ensuring the OS is a model EEO employer.

29 percent of the required measures within this KPI were not fulfilled during the reporting year. The impact of these unmet measures was evidenced in the frequency in which retaliation and harassment were the bases and issues in complaints of discrimination filed against OS for six consecutive years. In FY 2020, retaliation was the leading bases in complaint activity and harassment was the leading issue raised in complaint activity throughout the Department. Specifically, approximately 37 formal complaints of discrimination were filed against the Department, of which 20 involved allegations of harassment and 20 involved allegations of retaliation.

In FY 2020, disability was among the top bases of discrimination complaints throughout the OS. Many of these complaints could have been prevented by ensuring new supervisors and newly promoted supervisors were properly trained to understand their roles and responsibilities for providing reasonable accommodations, which is an established policy in the Department. Although RA training is required by EEOC, neither a dedicated OS EEO Officer nor an Affirmative Employment Program Manager Program has not been funded to provide this necessary training and additional supports.

Standardize the use of Schedule A Hiring for People with Disabilities throughout the OS DO's. Given the lack of a dedicated EEO Director for the Office of the Secretary's operations, there is no clear understanding how Schedule A is being used by OS hiring managers.

There is currently no means by which to recognize employees in the OS, who demonstrate superior accomplishment in DEIA (EEO), which would create incentives to adhere to such principles.

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**EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F**

The OS head can correct this deficiency by appointing a DEIA (EEO) Officer and Affirmative Employment Program, who, together, can enact proactive measures to hold OS leaders and employees accountable for promoting and implementing DEIA (EEO) strategies in their organizations.

Recommendations for Improvement:

Designate an independent EEO Director and an Affirmative Employment Program Manager for the OS and sufficient staffing to support its activities.

Ensure broad dissemination and accountability for policy statements for DEIA (EEO) and the use of Schedule A Appointing Authority.

Acknowledge and reward organizational leaders and offices that exhibit the behaviors that foster DEIA (EEO) in the workplace. Prominently highlight on multiple platforms those leaders and employees that exemplify OS as a "Model DEIA (EEO) Employer."

Make promoting and implementation of DEIA (EEO) a factor for bonuses, promotions, key assignments, and the like for OS staff.

Ensure all OS offices prominently post business contact information and written materials concerning the DEIA (EEO) program, laws, policy statements, and the operation of the complaint process on their public websites.

Establish procedures for new supervisors and newly promoted supervisors to understand their roles and responsibilities for providing reasonable accommodations.

ESSENTIAL ELEMENT B:

INTEGRATION OF DEIA (EEO) INTO DOI'S OVERALL STRATEGIC MISSION

The KPI Integration of DEIA (EEO) into OS Overall Strategic Mission requires OS and its leaders to view DEIA (EEO) as an integral part of its strategic focus, its overarching 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's embrace and utilization of DEIA (EEO) as a foundational ingredient for mission success. Additionally, success in this KPI is enhanced if the OS organizes and structures its DEIA (EEO) programs to serve as a catalyst and conduit for maintaining diversity, equity, inclusivity, a workplace free from harassment and discrimination, and as a resource for employee preparedness to support the Department's top priorities.

An assessment of the OS program for this KPI revealed that a combination of deficiencies exists in this element that raises a reasonable possibility that the operational controls for integrating DEIA (EEO) as a strategic focus in the overall mission in OS is ineffective or non-existent. In particular, the lack of resources allocated to an independent and dedicated DEIA (EEO) program centered on ensuring the OS's compliance with the measures in this KPI.

Bureau

Met Measures

FY 2019

Met Measures

EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

FY 2020

Unmet Measures

FY 2019

Unmet Measures

FY 2020

OS

Not Reported

11

Not Reported

25

The reporting structure for an effective DEIA (EEO) program provides the principal DEIA (EEO) official with the appropriate authority and resources to effectively operate a successful enterprise DEIA (EEO) program. OS has a deficiency in this KPI because there is currently no OS EEO Director to serve as a direct report to the OS head, there is no staff dedicated to proactive prevention measures to aid OS leadership in understanding their roles and responsibilities and to assist them to incorporate DEIA into everyday business practices, nor is there sufficient funding to meet the articulated requirements listed as KPIs.

There is therefore no DEIA (EEO) Director to participate in discussions with senior leadership or HR regarding decisions that impact recruitment, training, career development, succession planning, and any other significant change occurring within OS offices; or who can be consulted for an impact analysis/es or strategic recommendation(s) to consider the risk impact of to mitigate risk before implementation. The lack of an independent OS DEIA (EEO) Director and staff to participate in critical organizational discussions not only directly contradicts the clearly articulated participation as expected for this KPI, but it also places the OS in the position of making decisions without understanding the full impact its decisions have on its entire workforce population, often resulting in an adverse impact on employees, damaging trust, and negatively impacting strides to improve inclusion and engagement efforts within OS.

Successes:

At the close of FY 2020, the Departmental Office of Human Capital (OHC) received funding to develop a Department-wide reasonable accommodation tracking system, which will also be used for OS requests. A contractor is working to complete the system in FY 2021.

OHC has designated two primary Reasonable Accommodation Coordinators (RAC) within the OS to ensure the various DO's are adequately covered. In addition, there is a designated Special Placement Coordinator, separate from the RAC, to facilitate hiring and advancement of people with disabilities within the Department.

The Departmental ODICR Director and the Departmental Deputy Chief Human Capital Officer (DCHCO) meet bi-weekly to discuss and collaborate on pertinent plans, policies, and practices to determine its impact on employees across the entire Department.

The Departmental ODICR Affirmative Employment Programs Division conducts monthly meetings with diversity partners throughout the Department to unify and standardize DEIA (EEO) efforts, which include representatives from DO's within the OS.

Areas Requiring Improvement:



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As previously stated, the essential element of Integration of DEIA (EEO) into OS's overall Strategic Plan has a series of program deficiencies that reasonably suggest that the operational controls for this element is lagging or non-existent. More than 71 percent of the required measures for this KPI were not met by the OS.

As previously noted, the lack of a dedicated DEIA (EEO) Program for OS means there is insufficient staff and/or budget to conduct a thorough barrier analysis to proactively identify impediments to equity, diversity, inclusion, accessibility and to institute measures to avert prejudicial and or discriminatory practices in the OS workforce that leads to exclusion. One such example is that OS does not have a designated Disability Program Manager or other Special Emphasis Program Managers. This is significant because such managers have oversight of disability employment, employment of specifically identified underrepresented groups, barrier identification and elimination of practices or policies that prevent these groups from being fully integrated into the overall OS workplace culture. Such managers are also required to ensure equitable promotional and training opportunities, and to ensure the employment experiences of these groups are a targeted focuses for OS leaders, hiring managers, and other key decision makers.

**Recommendations for Improvement:**

Provide sufficient staffing and funding to stand up an OS DEIA (EEO) Office to ensure adequate resources are available to carry out DEIA (EEO) strategic priorities and statutory/regulatory requirements.

Appoint full-time Disability Program Managers and other Special Emphasis Program Managers to the OS DEIA (EEO) office.

Standardize internal policies and processes to ensure senior managers are accountable for demonstrating a high level of commitment to the merit system principles; standards of ethical conduct for federal employees; equal employment opportunity; whistleblower protection; and anti-discrimination and anti-harassment laws, regulations, and policies. In addition, standardize internal policies and processes to ensure senior managers have a significant positive impact on fostering an inclusive, safe, and fair work environment; strengthening diversity and inclusion; and improving employee engagement. Incorporate this responsibility specifically into the performance plans for every manager and supervisor in the Department.

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

Implement OS measures that track senior manager's progress in establishing and implementing DEIA (EEO) strategic priorities.

**ESSENTIAL ELEMENT C:**

**MANAGEMENT AND PROGRAM ACCOUNTABILITY FOR DEIA**

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

Like elements A and B, an assessment of this KPI revealed a combination of deficiencies that raises a reasonable possibility that the operational controls for Management and Program Accountability for DEIA (EEO) are either ineffective or non-existent. Below is a breakout of the total measures met and unmet in this KPI during FY 2019 and FY 2020. As previously noted, the OS does not currently stand a DEIA (EEO) program to assess its own performance as a model EEO employer.

Bureau

Met Measures

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EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

FY 2019

Met Measures

FY 2020

Unmet Measures

FY 2019

Unmet Measures

FY 2020

OS

Not Reported

28

Not Reported

13

Successes:

In FY 2020, DOI completed a Department-wide assessment of HR operations, the assessment, initiated in FY 2019, focused on identifying major barriers within HR that are linked to inefficiencies and ineffectiveness in the Department's hiring processes. The report of findings revealed the following key areas required improvement: 1) Establish an HR Governance and Policy Review Board, 2) Implement USAStaffing across the Department, 3) Improve Classification, 4) Expand Executive Resources, 5) Improve process for Seasonal Hiring, 6) Increase Personnel Security, and 7) Reduce Delegated Examining Units (DEUs). OHC immediately initiated work to implement these recommendations.

In FY 2020, OHC met regularly with HR Directors to account for the proactive steps taken to achieve the hiring goals for people with disabilities and targeted disabilities. OHC dedicated a full-time equivalent (FTE) to oversee the Department's efforts and each bureau and office designated practitioners to work along-side OHC's program lead disability hiring efforts. Throughout the year, the team conducted podcasts, training sessions, information sessions and other proactive measures to educate managers and supervisors on the hiring goals and the expectation for leaders to meet the affirmative action requirement.

The OHC's program lead provided detailed information sessions throughout the year that discussed the intricacies of the hiring authorities available to leaders for increasing employment of people with disabilities and to meet the hiring goals. Targeted activities to educate recruiters are slated for FY 2021.

All supervisors and managers have obligations to prevent discrimination and harassment embedded in the mandatory managerial/supervisory critical element in supervisory performance standards. Supervisors and managers are evaluated on their compliance with these standards.

Reasonable accommodation procedures were made available on web pages.

DOI consistently acts promptly to comply with all EEOC orders and other orders issued by the Merit Systems Protection Board (MSPB) containing findings regarding harassment or discrimination. The Departmental Office of Diversity, Inclusion, and Civil Rights currently oversees the OS EEO complaints processing and adjudication program, to ensure these orders are fully implemented in OS-specific matters.

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The Departmental ODICR ensured practitioners across the Department, including those assigned to OS activities, received appropriate training to fulfill program objectives. During the reporting year, practitioners received Refresher Counselor, Basic MD-715 and Barrier Analysis training; training on the internal workforce database system – Oracle Business Intelligence Enterprise Edition (OBIEE); Applicant Flow extraction from USA Staffing, and Micro Inequities – Unconscious Bias training. The Departmental ODICR increased the overall training of its EEO practitioners by 40% by conducting five trainings to the overall DOI civil rights community on the intricacies of Title VI, D&I, case law, complaints processing, and reasonable accommodation. In addition, Departmental ODICR provide Basic EEO Counselor Training to the entire DOI civil rights community at a cost savings of over \$150K in individual trainings typically implemented throughout the Department.

OHC conducted podcasts to educate hiring managers on The Workforce Recruitment Program (WRP) and encouraged them to utilize the WRP to obtain qualified talent and reduce the time to hire by using non-competitive appointments.

OHC published and disseminated its “InHR” Quarterly Newsletter, which covers some aspect of trending issues, hot topics, workplace concerns, upcoming training, and events relating to DEIA initiatives.

The WCTAC launched a website to inform employees about the progress of actions taken to prevent and respond to harassing conduct.

The Department’s new harassment case management system was used to track complaints, investigations, and findings that resulted in disciplinary actions taken to hold managers, supervisors, and employees accountable for harassing conduct. The complaint data will be used to drive anti-harassment initiatives and activities for subsequent years.

In the second quarter FY 2020, OHC revised the DOI Exit Survey to include specific questions relating to employee experiences. The survey was updated to include demographic information for disability, LGBTQ+, etc.

In fourth quarter FY 2020, OHC trained the entire HR and MD-715 community on how to access the Exit Survey System to extract relevant data for barrier analysis.

OHC completed the move of all bureaus to USAStaffing to centralize and standardize the Department with one recruitment and hiring system. In July 2020, OHC coordinated with the Office of Personnel Management (OPM) to grant access to Applicant Flow Data and train DOI HR and DEIA (EEO) practitioners on how to use the system to extract the data.

**Areas Requiring Improvement:**

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

Standardization of competencies and position descriptions for the same mission-critical positions within bureaus and across OS offices.

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

Standardized vacancy announcements, training and detail opportunities, and other career advancement opportunities, announcements in a manner that encourages people with disabilities to apply.

**Recommendations for Improvement:**

Develop processes and procedures to ensure OS offices conduct regular assessments for possible program shortfalls and deficiencies.

Ensure senior managers and supervisors actively partner with the OS DEIA (EEO) Director, once appointed, to identify and remove barriers to equal employment opportunity.

Complete the tracking system and review process to ensure all requests for reasonable accommodations are processed within

**EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F**

the established timeframes in the Department's policy and procedures for reasonable accommodation.

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

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

Train OS managers and supervisors on the requirements of the Department's Proactive Prevention responsibilities for underrepresented communities as well as the advancement and inclusion of people with disabilities.

Actively involve OS managers and supervisors in identifying and removing employment barriers that impact one or more group(s) of employees.

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

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

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

Establish internal procedures to ensure the OS DEIA (EEO) Director (or designee) (when established) and OS HR Director (or designee) meet regularly to assess whether personnel programs, policies, and procedures conform to employment laws and regulations.

**ESSENTIAL ELEMENT D:**

**PROACTIVE PREVENTION MEASURES TO EFFECTUATE DEIA IN OS**

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

An assessment of the overall DOI program revealed that a combination of deficiencies exists in this KPI that raises a reasonable possibility that the Department's operational controls for Proactive Prevention efforts are ineffective. The lack of progress of OS in eliminating the ineffectiveness is largely due to insufficient staffing and funding for an OS DEIA (EEO) office, which hinders the ability to take systematic and continuous approaches to eradicate prejudice, harassment and discrimination across the Department. This lack of staffing and funding means that the OS DEIA (EEO) function, at present, is relegated to reactively responding to findings of discrimination issued against the OS, rather than operate from a preventative stance to help the OS position itself to operate equitably and inclusively; thereby reducing the likelihood of complaints filed.

The EEOC has long determined that multiple discrimination complaints, especially when substantiated discrimination is determined, means a root cause analysis is warranted and the appropriate course of action to identify and eliminate barriers in employment. Although the Departmental ODICR has consistently recognized the need for a barrier analysis, it lacks funding and resources to actualize Department-wide barrier analysis. As such, multiple findings of discrimination, settlements in lieu of

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findings of discrimination, and frequent turnovers persist due to the dysfunctional workforce.

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

Below is a breakout of the total measures met and unmet by OS in this KPI during FY 2019 and FY 2020.

Bureau

Met Measures

FY 2019

Met Measures

FY 2020

Unmet Measures FY 2019

Unmet Measures FY 2020

OS

Not Reported

4

Not Reported

10

Successes:

As DOI worked towards attracting and developing an even more diverse talent pool, some groups were exiting the workforce at an equal or greater rate than they were onboarded, which thwarted the Department's recruitment efforts. A root cause analysis is needed to determine the reason(s) for the frequent turnover. Additionally, it is important to note that while these accomplishments stretch across the entire Department, the lack of an OS DEIA (EEO) Director has limited the capacity of OS to effectively evaluate how these departmental activities have been implemented in OS, and/or to take additional proactive prevention measures.

In FY 2020, the Departmental ODICR capitalized on Diversity Partner meetings by providing training and tools to enhance practitioner knowledge and effectiveness in implementing DEIA (EEO) program initiatives. FY 2020 topics included:

Accessing applicant flow data using USAStaffing.

Accessing exit survey data using the DOI exit survey system.

A demonstration of DOI Career Connections (a website that provides opportunities for employee details).

A lecture on the importance and how to Build Allies for DEIA

Although, DOI instituted a zero-tolerance standard for inappropriate workplace behaviors and practices that lead to unlawful harassment or harassing conduct that violates the Department's policy espoused in (PB 18-01) and contributes to an unsafe and unwelcoming workplace environment in all parts of DOI; there is no accountability for managers who fail to timely report

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harassment.

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

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

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

The Selective Placement Program Coordinators (SPPC) throughout the DOI help managers and supervisors recruit, hire, and accommodate individuals with disabilities.

**Areas Requiring Improvement:**

review of OS's FY 2020 performance against this KPI, revealed that 71 percent of the required actions in this performance element were not met during the FY. The area of Proactive Prevention is the element that poses the greatest risk for the OS because the lack of success in this element impedes employee productivity and the retention of quality team members, it weakens morale for our diverse staffs, increases legal expenses, and diminishes the Department's ability to build a reputation for being a model DEIA employer. Consequently, creating an organizational culture and environment for OS employees whereby equity, diversity, acceptance, accessibility and inclusion are encouraged dissuades discrimination and is critical for continued organizational and mission success.

**Recommendations for Improvement:**

Appoint a DEIA (EEO) Director and an Affirmative Employment Program Manager for the OS to oversee activities to address deficiencies in this KPI.

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

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

Develop guidance for use by leaders at all levels across the OS to consider the impact that human resource decisions such as re-organizations and realignments have on groups of employees and develop remedies to mitigate impact prior to finalizing such organizational objectives.

**ESSENTIAL ELEMENT E**

**DEIA PROGRAM EFFICIENCY**

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

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This KPI consists of 32 measures to determine the OS's compliance with establishing an efficient program. Below is a breakout of the measures met and unmet in this KPI in FY 2019 and FY 2020.

Bureau

Met Measures

FY 2019

Met Measures

FY 2020

Unmet Measures FY 2019

Unmet Measures FY 2020

OS

Not Reported

24

Not Reported

6

Note: This element includes a response of N/A

The OS does maintain an effective complaints management program that ensures complaints of discrimination are fairly and thoroughly investigated and final actions are taken in a timely manner. In the absence of an independent OS EEO Director, the OS complaints management program reports to the Departmental ODICR Director, which potentially prematurely requires not only the participation of the ODICR Director but further requires recusal should an OS complaint require a Final Agency Decision which is written by ODICR's Adjudication, Compliance & Equity (ACE) Division and generally approved by the ODICR Director. ODICR implemented several initiatives to ensure the Department is meeting the EEOC's statutory and regulatory requirements for timely complaints processing. These initiatives ensured the Department consistently processed pre-complaints and formal complaints well within the regulatory complaints processing timeframes. The Departmental ODICR ensures that the OS complaint processing function remains vigil, neutral and is kept separate from the Department's legal defense arm. The Departmental ODICR continues to evaluate its complaint processes to improve early resolution of complaints and analyze processing data to develop solutions for continuously improving its processing times at all stages of the complaints process. Going forward, the OS complaints management program will be realigned to more appropriately report to the OS DEIA (EEO) Director, once appointed.

Successes:

In response to findings of discrimination and frequent complaints, the Adjudication, Compliance & Equity (ACE) Division conducted multiple training sessions for senior leadership throughout the Department regarding strategies to prevent complaints. The training included:

Discussions with the entire Office of Chief Information Officer community throughout the Department on anti-harassment, micro aggressions, and implicit bias, and its impact in the workplace.

Educating mediators in the Conflict Resolution Plus (CORE Plus) Program on the requirements set forth in MD-110 for DEIA (EEO) and ADR processes.

Areas Requiring Improvement:

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At the close of FY 2020, there were six deficiencies identified for this KPI. The deficiencies include: (1) failure to post the OS affirmative action plan for the employment of persons with disabilities on the public website; (2) failure to have OS DEI (EEO) Director in place to evaluate ADR program effectiveness; (3) the lack of a comprehensive tracking system for reasonable accommodations; (4) establishing a system to accurately collect, monitor, and analyze recruitment activities, (5) regularly surveying the workforce, especially those with disabilities and targeted disabilities and underrepresented groups to access employment experiences; and (6) conducting comparative studies of the OS EEO process against similarly sized agencies.

**Recommendations for Improvement:**

Once completed, posting the OS Affirmative Action Plan for the employment of persons with disabilities.

Ensuring the OS DEI (EEO) Director, once appointed, conducts annual evaluations of the ADR program for OS employees.

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

Develop and implement Department-wide systems to accurately collect, monitor, and analyze recruitment activities and to regularly survey the workforce to ascertain the employment experiences of underrepresented groups and people with disabilities and targeted disabilities, including for the OS.

Provide adequate resources to re-survey the OS workforce on an annual basis.

Conduct comparative studies of the OS EEO process with those of similarly sized agencies, to accurately benchmark performance.

**Complaint Activity**

**Findings of Discrimination**

In FY 2020, the OS reported no findings of discrimination in its final agency decisions or in complaints that went to a hearing.

**Efficiency of Complaints Processing:**

98.1 percent of the 54 pre-complaints initiated within the OS were counseled in a timely manner, above the federal sector average of 94.4 percent.

96.5 percent of investigations of OS complaints were timely completed, which is well above the federal sector average of 73 percent.

**Formal Complaints**

For OS formal complaints of discrimination filed in FY 2020, reprisal was the most frequently alleged basis, followed by sex, disability, and age. Harassment was by far the most frequently alleged issue, followed by, terms/conditions of employment, disciplinary actions, reasonable accommodation, and performance evaluation/appraisal.

**Monetary Cost in Settlements**

In FY 2020, OS paid \$26,000 in monetary awards to settle formal complaint(s), and \$1,500 to settle pre-complaints.



EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

Anti-Harassment

In FY 2020, the Office of the Secretary (OS) had the third largest number of formal EEO complaints alleging harassment among all DOI second level components.

Closures

There were 45 closures of OS complaints in FY 2020. This represents a 22.4 percent decrease from FY 2019 and includes three withdrawals during the formal stage, 18 settlements, 16 Final Agency Decisions (FADs) without an Administrative Judge (AJ) Decision, and eight Final Agency Orders with an AJ Decision.

Resolution

In FY 2020, 22 OS pre-complaints utilized ADR during the pre-complaint stage. Seven of those pre-complaints were resolved, either through a settlement with benefits or because no formal complaint was filed. OS had a 43 percent ADR resolution rate in the pre-complaint stage, which is well below the federal sector average of 64.4 percent. Four percent of pre-complaints were settled during the pre-complaint stage. This is also well below the federal sector average of 14.6 percent. During the pre-complaint stage, OS had an ADR offer rate of 94.4 percent, which exceeds the federal sector rate of 86.8 percent. However, OS had an ADR acceptance rate of 43.1 percent, well below the federal sector rate of 53 percent.

In FY 2020, two formal complaints were counseled with ADR during the formal stage, both of which were resolved in ADR, either through a settlement with benefits or because no formal complaint was filed. During the formal stage, OS had an ADR acceptance rate of 7.1 percent, underperforming the federal sector average of 9.3 percent in this regard.

ESSENTIAL ELEMENT F:

LEGAL COMPLIANCE WITH STATUTORY REQUIREMENTS FOR DEIA (EEO) IN THE WORKPLACE The essential element Legal Compliance with Statutory Requirements for DEIA (EEO) in the Workplace requires the Office of the Secretary Head or designee to have processes in place to ensure timely and full compliance with EEOC orders and settlement agreements; that agencies comply with the law, including EEOC regulations, management directives, orders and other written instructions; and that agencies annually reports to EEOC its program efforts and accomplishments.

Successes:

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

The OS annual end-of-year reporting requirements were developed and timely submitted in accordance with EEOC guidelines. Timely annual reports included:

Annual Federal EEOC Statistical Report of Discrimination Complaints (EEOC Form 462).

"No FEAR" Annual report.

Age Discrimination Act of 1975 Annual report.

Compliance with EEOC orders is included in the performance standards of DEIA (EEO) practitioners. In addition, an established partnership between the Departmental ODICR and the Office of Solicitor ensures that DOI consistently complies with all orders issued by the

EEOC, the MSPB and/or OSC. With the OS EEO Complaints processing team currently being overseen by Departmental ODICR, OS also has this requirement.

**EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F**

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

The Departmental ODICR, Adjudication, Compliance & Equity (ACE) Division created a Departmental Complaints Processing Handbook to standardize complaints processing across the Department. The Handbook includes standard form template letters, policy, and procedures for the timely and accurate processing of complaints of discrimination in accordance with EEOC regulations and guidance. OS EEO complaint processing staff currently follow this process.

The Departmental ODICR, ACE Division conducted training on the informal and formal DEIA (EEO) process, including the roles and responsibilities of complainants, managers/supervisors, and Counselors and Mediators in the DEIA (EEO) process.

[1] EEOC Part G Self-Assessment Check List

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## EXECUTIVE SUMMARY: WORKFORCE ANALYSES

The workforce profile data that follows presents the Office of Secretary (OS) workforce by race, sex, and disability, and was retrieved from the Federal Personnel/Payroll System (FPPS). OS uses the Civilian Labor Force (CLF) from the 2010 Census to compare its workforce. At the close of FY 2020, the total permanent workforce population for OS was 3,987 employees. The overall number of employees has decreased over the last three years. The demographic number has slightly increased from FY 2019 to the current reporting period, as shown in the chart below. Some groups have no changes, but others saw an increase in their overall representation in the workforce over the years.

Data Source: Workforce Table A1-1

There were noteworthy changes to the permanent workforce for sixteen of the 18 CLF groups that are highlighted below:

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. Although the percentage of PWD employed by the OS decreased by 0.4 percent from FY 2019, the current number brings OS into compliance with the EEOC's hiring goal mandated to all federal agencies to ensure that 12 percent of lower graded positions are comprised of PWD.

Persons with Disabilities (PWD) occupied 10.0 percent (total 315) of GS-11 to SES permanent positions in the OS workforce in FY 2020. Employment of PWD in senior graded positions did not meet the federal hiring goal mandate as anticipated. Although the hiring goal of 12 percent has been in effect since 2017, the percentage of people with PWD occupying senior-level GS-11 through SES positions has not changed and remains out of compliance with the EEOC's Affirmative Action Plan goals.

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 met 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.

Women occupied 55.8 percent (total 2,223) of the OS's permanent workforce, compared with 48.1 percent in the CLF. This group increased by 21 employees in FY 2020, a gain of 0.6 percent. The overall number of women in the permanent workforce of OS exceeded the benchmark since FY 2018.

White women occupied 28.4 percent (total 1,132) of the OS's permanent workforce, compared with 34.0 percent in the CLF. The overall number of White women in the permanent workforce of OS increased by 16 employees since the last annual reporting period and continues to remain below the benchmark of White women in the CLF.

Hispanic/Latino men occupied 3.2 percent (total 129) of the permanent workforce of OS, compared with 5.2 percent in the CLF. This group decreased by one employee in FY 2020. The number of Hispanic/Latino men in the permanent workforce of OS has slightly increased over the past three years; however, the overall number of Hispanic/Latino men in the permanent workforce of OS remains below the benchmark of Hispanic/Latino men the CLF.

Hispanic/Latino women occupied 5.4 percent (total 216) of the permanent workforce of OS, compared with 4.8 percent in the CLF. This group increased by eight employees in FY 2020. The number of Hispanic/Latino women in the permanent workforce of OS has risen steadily over the past three years. The overall number of Hispanic/Latino women in the permanent workforce of OS exceeded the benchmark of Hispanic/Latino women in the CLF.

Black or African American men occupied 4.5 percent (total 178) of the permanent workforce of OS, compared with 5.5 percent in the CLF. This group decreased by four employees in FY 2020, a loss of 2.2 percent in the current reporting cycle. The number of Black or African American men in the permanent workforce of OS remains below the benchmark of Black or African American men in the CLF and has steadily decreased over the last three years.

Black or African American women occupied 8.7 percent (total 345) of the permanent workforce of OS, compared with 6.5

**EXECUTIVE SUMMARY: WORKFORCE ANALYSES**

percent in the CLF. This group increased by sixteen employees in FY 2020. The number of Black or African American women employed with the OS has risen steadily for three consecutive years and exceeded the benchmark of Black or African American women in the CLF. This trend is consistent with other federal agencies that show steady increases in the employment of Black or African American women year after year.

Asian men occupied 2.2 percent (total 88) of the permanent workforce of OS, compared with 2.0 percent in the CLF. This group increased by nine employees, a gain of 11.4 percent. The number of Asian men in the permanent workforce of OS exceeded the benchmark of Asian men in the CLF. Over the past three years, Asian men have remained relatively steady increase in the labor force.

Asian women occupied 3.1 percent (total 122) of the permanent workforce of OS, compared with 1.9 percent in the CLF. This group decreased by one employee, a decline of 0.5 percent. The number of Asian women employed in the permanent workforce of OS has met the benchmark of Asian women in the CLF.

Native Hawaiian or Other Pacific Islander men occupied 0.5 percent (total 18) of the permanent workforce of OS, compared with 0.1 percent in the CLF. This group increased by one employee, a gain of 5.9 percent. The number of Native Hawaiian or Other Pacific Islander men employed in the permanent workforce of OS has met the benchmark of Asian men in the CLF.

Native Hawaiian or Other Pacific Islander women occupied 0.5 percent (total 18) of the permanent workforce of OS, compared with 0.1 percent in the CLF. The number of Native Hawaiian or Other Pacific Islander men employed in the permanent workforce of OS has met the benchmark of Asian women in the CLF.

American Indian/Alaska Native men occupied 4.3 percent (total 172) of the permanent workforce of OS, compared with 0.6 percent in the CLF. The number of American Indian/Alaska Native men employed in the permanent workforce of OS have met the benchmark of American Indian/Alaska Native men in the CLF. Over the past three years, American Indian/Alaska Native men had decreased from 201 employees in 2018 to 172 employees in 2020.

American Indian/Alaska Native women occupied 9.2 percent (total 367) of the permanent workforce of OS, compared with 0.6 percent in the CLF. The number of American Indian/Alaska Native women employed in the permanent workforce of OS has met the benchmark of American Indian/Alaska Native women in the CLF. Over the past three years, the number of American Indian/Alaska Native women has decreased from 423 employees in 2018 to 367 employees in 2020.

A summary of the FY 2018 to FY 2020 workforce demographic statistics is provided in Table 1:

TABLE 1: TOTAL OS PERMANENT WORKFORCE

2018  
2019  
2020  
CLF  
#  
%  
#  
%  
#

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%

%

White

Men

1,213

29.5%

1,162

29.3%

1,164

29.2%

38.33%

Women

1,182

28.8%

1,125

28.7%

1,132

28.4%

34.03%

Black/African

Men

176

4.3%

183

4.6%

178

4.5%

5.49%

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Women

327

8.0%

328

8.3%

345

8.7%

6.63%

Hispanic/Latino

Men

124

3.0%

128

3.2%

129

3.2%

5.17%

Women

213

5.2%

207

5.2%

216

5.4%

4.79%

Asian

Men

74

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1.8%  
79  
2.0%  
88  
2.2%  
1.97%  
Women  
124  
3.0%  
122  
3.1%  
122  
3.1%  
1.93%  
Native Hawaiian/Pacific Islander  
Men  
16  
0.4%  
17  
0.4%  
18  
0.5%  
0.07%  
Women  
17  
0.4%  
18  
0.5%

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19

0.5%

0.07%

American Indian/Alaska Native

Men

201

4.9%

180

4.5%

172

4.3%

0.55%

Women

423

10.3%

391

9.9%

367

9.2%

0.53%

Two/More Races

Men

9

0.2%

9

0.2%

15

0.4%



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0.26%

Women

10

0.2%

12

0.3%

23

0.6%

0.28%

Disability

Reportable Disability

409

10.0%

414

10.5%

539

10.0%

12.0%

Targeted Disability

82

2.0%

82

2.1%

1255

2.3%

2.0%

Total Workforce

Men

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1,813

44.1%

1,758

44.4%

1,764

44.2%

51.9%

Women

2,296

55.9%

2,203

55.6%

2,223

55.8%

48.1%

All

4,109

100.0%

3,961

100.0%

3,987

100.0%

During FY 2020, men represented 44 percent, and women represented 56 percent of the permanent workforce. The number of men and women employed with OS remained constant at 44 and 56 percent for three consecutive reporting periods, despite the number of hiring and separations occurring year over year.

NEW HIRES

The OS hired 499 new employees in its combined permanent and temporary workforces in FY 2020. The data revealed that all demographic groups by race and national origin were represented in the number of new employees hired by OS during the current reporting year.

**EXECUTIVE SUMMARY: WORKFORCE ANALYSES**

In comparing all demographic groups by race and national origin, Black or African American men, Hispanic or Latino men, Asian, and Native Hawaiian or Other Pacific Islander represented the lowest number of new employees hired by the OS compared to the availability of these groups in the CLF.

the availability of Black or African American men in the CLF was 5.5 percent, while the percentage of Black or African American men hired by the OS was 3.4 percent. The availability of Black or African American women in the CLF was 6.5 percent, while the percentage of Black or African American women hired by the OS was 11.8 percent.

In FY 2020, Hispanic/Latino men new hires were 2.0 percent below the federal benchmark of 5.1 percent. In addition, White men and women were all hired in the OS workforce below their federal benchmark. What is significant is that when reviewing applicant flow data, people of color were present in almost every position announced in DOI, which denotes that the recruitment efforts are effective.

Of the 499 new hires in OS, 68 (13.6 percent) were PWD, and 18 (3.6 percent) were PTWD. EEOC established an ongoing Affirmative Action goal to ensure an agency's workforce comprises twelve percent PWD and two percent PWTD in specific grade categories. The workplace has increased the number of PWD employed by OS, increasing from 12.0 percent in FY 2018 to 13.6 percent in FY 2020.

Likewise, the OS incrementally increased its hiring of PWTD, from 2.0 percent in FY 2018 to 3.6 percent position in FY 2020. A summary of the OS's hiring statistics for PWD and PWTD from FY 2018 to FY 2020 is provided in the following table.

Table 2: OS Hires, FY 2018-2020

New Hires

CLF 2010

%

FY

2018

FY

2019

FY

2020

Total Number

321

306

499

Total Men

51.8%

148 (46.1%)

EXECUTIVE SUMMARY: WORKFORCE ANALYSES

144 (47.1%)

215 (43.1%)

Total Women

47.3%

173 (53.9%)

162 (52.9%)

284 (56.9%%)

Hispanic Men

5.2%

11 (3.4%)

14 (4.5%)

10 (2.0%)

Hispanic Women

4.8%

13 (4.0%)

14 (4.5%)

35 (7.0%)

White Men

38.3%

99 (30.8%)

91 (29.7%)

149 (29.9%)

White Women

34.0%

95 (29.6%)

98 (32.0%\_

151 (30.3%)

Black Men

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5.5%

12 (3.7%)

17 (5.6%)

17 (3.4)

Black Women

6.5%

27 (8.4%)

28 (9.2%)

59 (11.8%)

Asian Men

2.0%

15 (4.7%)

9 (2.9%)

14 (2.8%)

Asian Women

1.9%

13 (4.0%)

10 (3.3%)

10 (2.0%)

Native Hawaiian/Other Pacific Island Men

0.1%

0 (0.0%)

1 (0.3%)

2 (0.4%)

Native Hawaiian/Other Pacific Island Women

0.1%

0 (0.0%)

1 (0.3%)

EXECUTIVE SUMMARY: WORKFORCE ANALYSES

2 (0.4%)

American Indian/Alaska Native Men

0.6%

10 (3.1%)

10 (3.3%)

21 (4.2%)

American Indian/Alaska Native Women

0.6%

23 (7.2%)

9 (2.9%)

16 (3.2%)

Two or More Races Men

0.3

1 (0.3%)

2 (0.7%)

2 (0.4%)

Two or More Races Women

0.3

2 (0.6%)

2 (0.7%)

11 (2.2%)

Persons with Disabilities (PWD)

12.0%

52 (16.2%)

51 (13.2%)

68 (13.6%)

Persons with Targeted Disabilities (PWTD)

2.0%

**EXECUTIVE SUMMARY: WORKFORCE ANALYSES**

10 (3.1%)

8 (2.1%)

18 (3.6%)

Notes: \* Data Source: Workforce Tables A8/B8.

Highlighted in red are groups that were hired at lower rates than their availability in the civilian labor population.

**MISSION-CRITICAL OCCUPATIONS (MCO)**

During FY 2020, there was an increase in people of color, women, and PWD in the Miscellaneous Administration and Program/0301, Miscellaneous Administration and Program/0301, General Attorney/0905, Information Technology Management/2210. People of color represent Hispanic men and women, African American men and women, American Indian/Alaska Native men and women, Native Hawaiian/Other Pacific Islander men and women, Asian men and women, all of which received slight increases in the number of individuals occupying mission critical occupations. Other groups with increases during the reporting year are White women, and employees with disabilities.

Some increases reflected participation rates that met or exceeded the Occupational Civilian Labor Force (OCLF) data for these occupations. The participation rates recalled American Indian/Alaska Native men who met or exceeded the OCLF in eight professions. American Indian/Alaska Native women met or exceeded the OCLF in seven of the occupations. African American women and Native Hawaiian/Other Pacific Islander men met or exceeded the OCLF in five occupations. Hispanic women, African American men, and Native Hawaiian/Other Pacific women met or exceeded the OCLF in four professions. Asian women met or exceeded the OCLF in three of the occupations. White women, Asian men, and Two or More Races men met or exceeded the OCLF in two occupations. White men and Two or More Races women met or exceeded the OCLF in one of the occupations.

**SENIOR EXECUTIVE SERVICE (SES)**

In FY 2020, OS employed 121 SES employees. Men occupied 80 positions, and women occupied 41 positions. The number of women in SES positions in OS increased from 34 in FY 2018 to 41 in FY 2020. Whatever the historical reasons for the lack of women representation, OS has demonstrated a steady increase in Senior Executive positions over the past two years. With that said, SES positions continued to be disproportionately occupied by men when comparing the number of women available in the federal benchmark for executive-level jobs. Women of color were less likely than White women to occupy SES positions. Respectively, women of color represented 15 percent of the SES, while white women represented 30 percent of the SES.

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

The table below displays the number of SES employees in DOI by fiscal year and demographic group. From FY 2018 to FY 2020, the number of women, Hispanic/Latino, Black/African American, Asian, and Persons with Targeted Disabilities (PWTD) in OS SES positions increased. The number of American Indians or Alaska Natives decreased from 14.3 percent in 2018 to 9.1 percent in 2020. A barrier analysis is needed to determine the root cause for the decrease for these groups in senior-level positions. When analyzing the workforce demographics for OS SES positions, there are several factors to consider. These factors include the length of tenure, availability of opportunities, and how applicants enter the SES. Other vital components are the training and development opportunities communicated and provided to all groups as essential for career progression to SES, as well as selection patterns for the SES Career Development Program (SES CDP) which shows that for three consecutive years, people of color were not routinely selected to participate in this career development opportunity. When selected, people of color were not placed into full-time SES positions when the opportunity became available after completing the program.

EXECUTIVE SUMMARY: WORKFORCE ANALYSES

Table 3: Senior Executive Service (SES) Snapshot

Group

FY 2018

FY 2019

FY 2020

Total Employees

105

112

121

Men

71 (67.6%)

75 (67.0%)

80 (63.6%)

Women

34 (32.4%)

37 (33.0%)

41 (36.4%)

Ethnicity

Hispanic/Latino

4 (3.9%)

2 (1.8%)

4(3.3%)

Race

White

77 (73.3%)

86 (76.8%)

91 (75.2%)

Black/African American



EXECUTIVE SUMMARY: WORKFORCE ANALYSES

6 (5.8%)

9 (8.0%)

10 (8.3%)

Asian

2 (1.9%)

2 (1.8%)

3 (2.5%)

Native Hawaiian/Other Pacific Islander

1 (1.0%)

1 (0.9%)

1 (0.8%)

American Indian or Alaska Native

15 (14.3%)

11 (9.8%)

11(9.1%)

Two or More Races

0 (0.0%)

1 (0.9%)

1 (4.6%)

Disabilities

Persons with Disabilities (PWD)

8 (7.6%)

4 (12.1%)

7 (8.1%)

Persons with Targeted Disabilities (PWTD)

0 (0.0%)

1 (3.0%)

2 (2.3%)

EXECUTIVE SUMMARY: WORKFORCE ANALYSES

Data Source: Workforce Table A4GSP

SEPARATIONS

In FY 2020, 436 total employees were separated from OS: 209 were death and or termination; 14 were removed; 58 resigned, and 155 retired. The number of Hispanic/Latino employees increased by 7.8 percent; Black or African American employees increased by 14.5 percent. The number of separations for PWD in FY 2020 was 8.0 percent, decreasing 12.1 percent compared to FY 2019.

The number of separations for PWTD in FY 2020 was 1.9 percent, a decrease of 2.4 percent compared to FY 2019.

Table 4: OS Separation Trends, FY 2018-2020

Group

FY 2018

FY 2019

FY 2020

Total Employees

379

496

436

Men

174 (45.9%)

223 (45.0%)

194 (44.5%)

Women

205 (54.1%)

273 (55.0)

242 (55.5%)

Ethnicity

Hispanic/Latino

23 (6.1%)

37 (7.5%)

33 (7.8%)

Race

EXECUTIVE SUMMARY: WORKFORCE ANALYSES

White

236 (62.3%)

314 (63.3%)

256 (58.7%)

Black/African American

43 (11.3%)

37 (7.5%)

63 (14.5%)

Asian

16 (4.2%)

20 (4.0%)

16 (3.7%)

Native Hawaiian/Other Pacific Islander

3 (0.8%)

2 (0.4%)

2 (0.5%)

American Indian or Alaska Native

54 (14.2%)

84 (16.9%)

64 (14.7%)

Two or More Races

4 (1.1%)

2 (0.4%)

2 (0.46)

Disabilities

Persons with Disabilities (PWD)

51 (13.5%)

60 (12.1%)

EXECUTIVE SUMMARY: WORKFORCE ANALYSES

1029 (8.0%)

Persons with Targeted Disabilities (PWTD)

11 (2.9%)

12 (2.4%)

250 (1.9%)

Data Source: Workforce Table A1-1

### SUMMARY ANALYSIS OF IDENTIFIED TRIGGERS

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

During FY 2020, the following triggers were identified when reviewing OS workforce statistics:

#### 1. **Black or African American Men Employment**

The first trigger indicating a possible barrier for Black or African men was found in Workforce Data Table A1. A review of the data revealed Black or African American men were underrepresented in the permanent workforce of OS; Black or African American men comprise 5.5 percent of the federal benchmark but account for just 4.5 percent of the permanent workforce of OS. The number of Black or African American men also decreased by four employees or 2.2 percent during this reporting period. There has been a steady decrease in the number of Black or African American men employed at the OS and the DOI year over year.

Another trigger for Black or African Americans was identified when reviewing the new hire data. Black or African American men were underrepresented in the percentage of new hires at OS; Black or African American men comprise 5.5 percent of the federal benchmark yet account for just 3.4 percent of new hires.

A barrier analysis must be conducted to determine if there are policies, practices, or procedures that may be creating impediments for the hiring, retention, or advancement of Black or African American men at OS.

EXECUTIVE SUMMARY: WORKFORCE ANALYSES

1. **White Employment**

The first trigger indicating a possible barrier for White employees in OS was found in Workforce Data Table A1. The data revealed that White men were below the federal benchmark in the permanent workforce of OS; White men comprise 29.2 percent of the federal benchmarks, but account for 29.2 percent of the workforce of OS. The number of White men in the permanent workforce of OS decreased by six employees, a loss of 0.5 percent during FY 2020. Within OS, White men were below the federal benchmark.

- a. data also revealed a trigger for White women. White women were below the federal benchmark in the permanent workforce of OS; White women comprise 34.0 percent of the federal benchmark, yet account for 28.4 percent of the permanent workforce of OS. The number of White women in the permanent workforce of OS increased by 16 employees, a gain of 1.4 percent. However, despite this increase, White women remain 34.0 percent below the federal benchmark. A barrier analysis must be conducted to determine if there are policies, practices, or procedures that may be creating impediments for the hiring, retention, or advancement opportunities for White women at OS.

1. **Hispanic/Latino Men Employment**

The first trigger indicating a possible barrier for Hispanic/Latino men in OS was Workforce Data Table A1. The data revealed that Hispanic/Latino men were below the federal benchmark compared to the permanent workforce of OS. Hispanic/Latino men comprise 5.1 percent of the federal benchmarks, but account for 3.2 percent of the workforce of OS.

Another trigger for Hispanic/Latino was identified when reviewing the new hire data. Hispanic/Latino men were underrepresented in the percentage of new hires at OS; Hispanic/Latino men comprise 5.1 percent of the federal benchmark yet account for just 2.4 percent of new hires at OS. A barrier analysis must be conducted to determine if there are policies, practices, or procedures that may be creating impediments for the hiring, retention, or advancement of Hispanic/Latino men at OS.

The same is true for employees within the Asian American and other Pacific Islander communities, the number of employees within the OS is below the federal benchmark and occupy a low number of employees in the new hire selections.

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**EXECUTIVE SUMMARY: ACCOMPLISHMENTS**

The Office of the Secretary (OS) is a second level reporting component within the U.S. Department of the Interior (DOI). The OS includes the Secretary's Immediate Office; offices of the Principal Deputy Assistant Secretary for Policy, Management and Budget; Office of Special Trustee; Office of Inspector General; and Office of the Solicitor. Throughout Fiscal Year (FY) 2020, the Department of the Interior, Office of the Secretary (OS) implemented a wide range of organizational initiatives designed to attract, develop, and advance employees within the DOI workforce. Some of those initiatives are highlighted below:

The Interior Business Center (IBC) continued consultation sessions with hiring managers and continues to offer refresher training sessions to hiring managers on the availability and use of other non-competitive hiring flexibilities. IBC encouraged managers across the OS and other bureaus in the Department to recruit and select Schedule A applicants based on a successful history of utilizing this hiring authority. IBC HR Staffing Specialists routinely offer one-on-one training sessions with employees across the department, including the OS, to help them understand the federal hiring process and to train them on how to write a resume when applying for vacancies and promotions.

All vacancy announcements launched from the Office of the Secretary, when applicable, are communicated broadly across the Department and to the Employee Organizations for dissemination. There is not an established plan or practice to ensure all Bureau opportunities are effectively communicated to all employees and more specifically to Hispanic/Latino employees. In January 2020, the Office of Diversity, Inclusion, and Civil Rights (ODICR) disseminated career opportunities through its diversity partners network with a request for these individuals to communicate the information among their constituents. ODICR's diversity network is comprised of nearly 1,000 employees from every Bureau and the OS.

ODICR and the Office of Human Capital (OHC) partnered to ensure joint messaging and knowledge sharing to the Civil Rights and Human Capital community to ensure consistency of effort for providing reasonable accommodation and actualizing disability employment initiatives within the Department. These efforts resulted in the Department issuing hiring goals for employing people with disabilities in line with Section 501 of the Rehabilitation act, which are to be used by the OS, and OHC designating a full-time employee to ensure the OS and other subcomponents of the Department comply with disability hiring.

ODICR hosted a series of facilitated listening sessions from August 2020 to September 2020 with the Department of the Interior (DOI/Department) Employee Resource Groups (ERGs), which represent employees in the OS and other Bureaus. The purpose of these sessions was to collect feedback and recommendations for improving Equity, Diversity, and Inclusion (EDI, now DEIA) in the DOI workplace. ODICR drafted a report that provides a summary of the issues and recommendations the OS and Bureaus should follow for making significant improvements on DEIA in the DOI workplace and becoming one of the best places to work.

For the first time, ODICR issued consistent Strategic Enforcement Plan (SEP) statements from the ODICR Director/Principal Diversity Officer over the course of the year.

ODICR conducted a series of listening sessions with diversity change agents, employee resource groups, and special emphasis program managers in three key locations across the United States. During each discussion, information was shared about the statutory requirements governing the DOI's obligation for a comprehensive program to eradicate prejudice and discrimination in its footprint and how each entity played a part in the DOI's collective success.

ODICR met with the Disability Board (Interior's largest disability advocacy group) and other disability Employee Resource Groups to outline the Department's Affirmative Action obligation for employing and advancing people with disabilities. Ninety percent of the group participants had not heard of the Affirmative Action requirement although the expectation was in effect for last four years. ODICR solicited input and solidified partnerships with this group to propel the Department's efforts to comply with statutory requirements and to improve working conditions for people with disabilities throughout the Department. This partnership is expected to include employees with disabilities in the OS.

ODICR increased the visibility of DEIA program through improved communication of the various special observance months and the creation of diversity and inclusion avenues for showcasing employee relevance and differences. The staff utilizes multiple platforms to honor nationally recognized observance months. For the first time in ODICR history, the ODICR Affirmative Employment Program (AEP) team created infographics to give historical facts/figures/and relevant information on the group being recognized for the month, as well as to high light through the dissemination of photos and fun facts about the various employees across the entire Department belonging to the group observed and who work to fulfill the DOI mission objectives.

DOI Office of the Secretary

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**EXECUTIVE SUMMARY: ACCOMPLISHMENTS**

The Director of ODICR and the Deputy Chief Human Capital Officer (DCHCO) established weekly meetings to discuss and collaborate on pertinent plans, policies, and practices to determine its impact on employees across the entire Department.

The ODICR AEP Division (Embrace) conducts monthly meetings with diversity partners throughout the Department to unify and standards DEIA efforts across the Department.

The Department instituted measures to comply with Section 501 of the Rehabilitation Act to ensure Affirmative Action measures were established for the Recruitment, Hiring, and Advancement of Individuals with Disabilities throughout the Department. In support of this endeavor, the Offices of ODICR and Human Capital collaborated and issued joint messaging to the workforce regarding the DOI-wide numerical goals (2 percent for persons with targeted disabilities and 12 percent for persons with disabilities).

All supervisors and managers across the Department have a critical element regarding EEO in their performance standards. Supervisors and managers are evaluated on compliance with these standards.

Office of Human Capital, Workforce Relations Divisions maintains the Reasonable Accommodation Community of Practice (CoP) monthly discussions. group convenes to obtain standardized knowledge and a unified approach to issuing accommodation solutions. Staff members from the ODICR AEP Division are active participants in the discussions and often provide key instruction to the group.

The ODICR coordinated with HR to communicate a consistent message on behalf of the DOI with providing guidance and direction to managers at the OS during the reasonable accommodation process.

As a best practice, ODICR continues to work with colleges and universities to encourage students to consider federal service as their "career of choice" and participate in the Department Pathways Program, in which the OS participates, as part of the Agency's overall recruitment efforts. The OS uses the Pathway Internship Program and the Presidential Management Fellows Program for acquiring new federal talent for their competitive hiring plans.

ODICR, in partnership with OHC and the Diversity Partners, hosted facilitated trainings designed to actualize results relating to two of the EEOC's Key Performance Indicators (KPIs) which were Demonstrated Commitment from Agency Leadership, and Management and Program Accountability for DEIA. The training events were well received and attended by employees throughout the Department.

The Department's Workplace Culture Transformation Advisory Council (WCTAC), which was comprised of Senate confirmed and Senior Executive Service leaders (to include OS senior executive leaders) were accountable for advancing culture change across the Department. The WCTAC convened three times in FY 2020 to assess the Department's progress towards eliminating discrimination and harassing conduct within DOI bureaus and offices. They reviewed the workforce to ascertain its efforts to improve employee engagement, the effectiveness of maintaining high ethical standards, and promoting recruitment and retention efforts to support the Department's aim to become one of the best places to work in the federal government. The assessment revealed that in FY 2020, the:

The Office of Human Capital and key stakeholders worked collaboratively to design a video to be used for onboarding new employees. This training video included a greeting from the Secretary of the Interior highlighting the core values of respect, collaboration, honesty, and fairness and the expectations, rights, roles and responsibilities for employees and managers as it relates to preventing and eliminating harassing conduct.

The Departmental ODICR and implemented several proactive initiatives to ensure the Department met the EEOC's statutory and regulatory requirements for timely complaints processing complaints and that practitioners were equipped to effectively manage the EEO program as expected. These initiatives ensured the Department consistently processed pre-complaints and formal complaints well within the regulatory complaints processing timeframes. The OS currently has a complaints processing program in place.

The Adjudication, Compliance & Equity Division (ACE) ensured that the OS complaint processing function remained neutral and was kept separate from the Department's legal defense arm. OS evaluated its complaint processes to improve the early resolution of complaints by analyzing processing data to develop solutions for continuously enhancing processing at all stages

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**EXECUTIVE SUMMARY: ACCOMPLISHMENTS**

of the complaints process.

Office of Collaborative Action and Dispute Resolution (CADR) served as an independent, impartial, informal, and confidential resource for employees. CADR ensured that employees had immediate access to an OMBUDS. y provided a safe, confidential space to discuss concerns, explore options to resolve work-related issues, and helped employees address conflict or other situations they experienced. CADR supported intra-organizational collaboration, dispute resolution, and engagement with external stakeholders on natural resources, public lands, and tribal issues.

In June 2020, the OHC completed the development of a standard Exit Survey System for use throughout the Department. It was designed to ascertain employee lifecycle experiences by demographic, disabilities, and their reasons for leaving. Key stakeholders from across the Department, to include officials from within the OS, actively participated in the exit survey design to ensure DOI collected relevant information. The results of the survey will be used as a standard across the Department to improve recruitment and employee retention, ensure accountability and fairness of employment practices, and enhance the quality of work life for current and future Department employees. This is a tremendous feat, for years there was not a standard collection of information for exiting employees, nor an OS overview of the process to determine the collective impact from each of the Bureaus.

In FY 2020 ODICR partnered with OHC and provided consistent messaging on the reasonable accommodation process and provided guidance and direction to managers and supervisors during the reasonable accommodation process. The Departments Reasonable Accommodation Coordinator met with the Bureaus and Offices to ensure the Department followed disability hiring compliance based on the hiring goals for employing people with disabilities were in line with Section 501 of the Rehabilitation Act.

The OHC's Special Placement Coordinator conducted podcasts 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. In addition, podcasts were conducted to educate hiring managers on the Workforce Recruitment Program (WRP) and encouraged them to utilize the WRP to obtain qualified talent and reduce the time to hire by using non-competitive appointments.

The Office of Chief Information Officer ensured the Department's commitment to making all electronic and information technology accessible to people with disabilities by the conducting of 28 training courses for Bureaus and OS Offices in creating Section 508 compliant electronic documents in various software applications. Section 508 training was also conducted and hosted by the DOI University. Additional training and webinars on making electronic and information technology accessible included:

"Inclusive Social Media: Making Images Accessible" training session 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.

"DOI Digital Week" Section 508 awareness training event. 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.

ODICR increased the overall training of its EEO practitioners by 40 percent by conducting five trainings to the overall DOI civil rights community of practitioners on Title VI, D&I, case law, complaints processing, reasonable accommodation. In addition, Departmental ODICR trained the entire DOI civil rights community - EEO Counselor Training- at a cost savings of over \$150K to the Department. Additionally, ODICR capitalized on monthly Diversity Partner meetings by providing training and tools to enhance practitioner knowledge and effectiveness in implementing DEIA program initiatives. FY 2020 topics included:

Accessing applicant flow data using USAStaffing.

Accessing exit survey data using the DOI exit survey system.

A demonstration of DOI Career Connections (a website that provides opportunities for employee details).

A lecture on the importance and how to Build Allies for EDI.



**EXECUTIVE SUMMARY: ACCOMPLISHMENTS**

Maximizing the use of the various analysis tools provided in the EEOC's Federal Sector EEO Portal (FedSEP).

Extracting data and building MD-715 data tables using OBIEE.

Experts from multiple Bureaus provided information on the available hiring authorities to bolster hiring opportunities from all groups.

The Office of Human Capital published and disseminated its "InHR" Quarterly Newsletter, which covers various topics relating to DEIA. Each InHR edition report trending issues, hot topics, workplace concerns, upcoming training, and events. The newsletter continues to receive positive feedback for its content and usefulness to the civil rights and HR communities across the entire Department.

The ACE Division conducted multiple training sessions for senior leadership throughout the Department regarding proactive strategies to prevent complaints. The training included:

Discussions with the entire Office of Chief Information Officer community throughout the Department on anti-harassment, micro aggressions, and implicit bias, and its impact in the workplace.

Educating mediators in the Conflict Resolution Plus (CORE Plus) Program on the requirements set forth in MD-110 for DEIA (EEO) and ADR processes.

To improve employee engagement, organizational effectiveness, and support the DOI leadership's goal of "improving the employee experience" DOI's Office Strategic Employee and Organizational Development (OSEOD) expanded learning and development needs for employees by delivering 525 courses and training 6,800 employees across the Department in FY 2020.

The U.S. Department of the Interior (DOI) employs a full-time Veteran Employment Program Manager, who manages the Departments Veteran Employment Program Office and executes the facilitation of veteran recruitment through bureau-level Veteran Employment Coordinators, and with bureau Servicing HR Offices (SHROs), including selecting officials. The various recruitment methods to employ disabled veterans include:

Bureau and OS collaboration with managers, ODICR, Equal Employment Opportunity Officers (EEO), Human Resources (HR) Representatives, Budget Officers, and the External Affairs Office to review and approve requests to fill vacancies, which included discussions on recruitment strategies, policies, and area of consideration to reach veterans (merit promotion and delegated examining), including disabled veterans.

**EXECUTIVE SUMMARY: PLANNED ACTIVITIES**

Appoint a DEI (EEO) Director who will report directly to Director of the Office of Diversity, Inclusion and Civil Rights, to oversee all DEI (EEO) functions for the OS.

Appoint an Affirmative Employment Program Manager to support performance of necessary functions related to MD-715 reporting for the OS.

Provide sufficient funding and staffing to OS DEIA (EEO) Director to ensure effective program management.

Increase collaboration between the OS DEIA (EEO) Office, OS Human Resources, and key stakeholders to identify triggers, conduct barrier analysis, and resolve deficiencies identified through the barrier identification and elimination process, including analysis of workforce data systems, and increased engagement with OS Offices.

Deliver a State of the Agency briefing to OS leadership on OS performance in each of the six elements of the model DEIA program.

Conduct a barrier analysis and report its progress to OS Executive leadership.

Develop and implement OS systems to accurately collect, monitor, and analyze recruitment activities and to regularly survey the OS workforce.

Establish an OS-wide plan to address identified deficiencies in Elements A, B, C, D, and E of this annual report.

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For period covering October 1, 2019 to September 30, 2020

**CERTIFICATION of ESTABLISHMENT of CONTINUING  
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS**

[Redacted] am the  
(Insert Name Above) (Insert official title/series/grade above)

Principal EEO Director/Official for

[Redacted]  
(Insert Agency/Component Name above)

The agency has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and, as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program, are included with this Federal Agency Annual EEO Program Status Report.

The agency has also analyzed its work force profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure or practice is operating to disadvantage any group based on race, national origin, gender or disability. EEO Plans to Eliminate Identified Barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.

I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.

\_\_\_\_\_  
Signature of Principal EEO Director/Official  
Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Agency Head or Agency Head Designee



\_\_\_\_\_  
Date

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Agency Self-Assessment Checklist





Essential Element: A Demonstrated Commitment From agency Leadership

| <br>Compliance Indicator |   | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report |
|--|---|----------------------|----|-----|--|
|  |   | Yes                  | No | N/A |  |
| <br>Measures             | 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)]   |                      | X  |     |  |
|  | 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)] If the EEO policy statement covers any additional bases (e.g., marital status, veteran status and political affiliation), please list them in the comments column. |                      | X  |     |  |

DOI Office of the Secretary

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Agency Self-Assessment Checklist

| <br>Compliance Indicator   |  | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report |
|--|--|----------------------|----|-----|--|
|  |  | Yes                  | No | N/A |  |
| <br>Measures               | 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)]   | X                    |    |     |  |
|  | A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]  |                      | X  |     |  |
|  | 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)]   | X                    |    |     |  |
|  | A.2.b.2. Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 CFR §1614.102(b)(5)]   | X                    |    |     |  |
|  | A.2.b.3. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.  | X                    |    |     | <a href="https://www.doi.gov/accesscenter/access">https://www.doi.gov/accesscenter/access</a>  |
|  | 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 and the means by which such training is delivered.   | X                    |    |     | Annually   |
|  | A.2.c.2. ADR process? [see MD-110, Ch. 3(II)(C)] If "yes", please provide how often.   | X                    |    |     | Annually   |
|  | A.2.c.3. Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If "yes", please provide how often.  | X                    |    |     | Annually   |
|  | 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.   | X                    |    |     | Annually   |
|  | 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.   | X                    |    |     | Annually   |
| <br>Compliance Indicator |  | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report |
| <br>Measures             | A.3. The agency assesses and ensures EEO principles are part of its culture.   | Yes                  | No | N/A |  |
|  | 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. . |                      | X  |     |  |
|  | 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]  | X                    |    |     |  |

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For period covering October 1, 2019 to September 30, 2020



Agency Self-Assessment Checklist

Essential Element: B Integration of EEO into the agency's Strategic Mission

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Agency Self-Assessment Checklist

|  Compliance Indicator |   | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report  |
|---|---|----------------------|----|-----|---|
|   |   | Yes                  | No | N/A |   |
|  Measures             | 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.  |                      |    |     |   |
|   | 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)]  |                      | X  |     | The Departmental (ODICR) Director is also listed as the OS EEO Director. The ODICR Director reports to the Assistant Secretary for Policy, Management & Budget (PMB), which is two levels down from the Secretary   |
|   | 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. | X                    |    |     | Assistant Secretary for Policy, Management & Budget (PMB),  |
|   | 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)]   |                      | X  |     | The Departmental (ODICR) Director is also designated as the OS EEO Director in the absence of a dedicated OS EEO Director. There is no defined reporting structure for the EEO Office. However, the ODICR Director reports to the Assistant Secretary for PMB, which is two levels down from the Secretary. |

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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]

X

The ODICR Director, who is also designated as the OS EEO Director in the absence of a dedicated OS EEO Director, reports to the Assistant Secretary for Policy, Management & Budget, who oversees OS, but not in the capacity of the OS EEO Director.

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.

X

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)]



X



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|  Compliance Indicator |  | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report                     |
|---|--|----------------------|----|-----|--|
|   |  | Yes                  | No | N/A |  |
|  Measures             | B.2. The EEO Director controls all aspects of the EEO program.   |                      |    |     |  |
|   | 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)] If not, identify the office with this authority in the comments column. |                      | X  |     | There were no affirmative employment program activities conducted specific to OS.  |
|   | B.2.b. Is the EEO Director responsible for overseeing the completion of EEO counseling? [see 29 CFR §1614.102(c)(4)]   | X                    |    |     | This activity is currently conducted by the Departmental (ODICR) EEO Director who is also designated as the OS EEO Director in the absence of a dedicated OS EEO Director. |
|   | 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.]  | X                    |    |     | This activity is currently conducted by the Departmental (ODICR) EEO Director in the absence of a dedicated OS EEO Director.   |
|   | B.2.d. Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]  | X                    |    |     | This activity is currently conducted by the Departmental (ODICR) EEO Director in the absence of a dedicated OS EEO Director.   |
|   | B.2.e. Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]   | X                    |    |     | This activity is currently conducted by the Departmental (ODICR) EEO Director in the absence of a dedicated OS EEO Director.   |

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|  |   |                             |    |     |  |
|--|---|-----------------------------|----|-----|--|
| 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)]   |   | X                           |    |     | This activity is currently conducted by the Departmental (ODICR) EEO Director in the absence of a dedicated OS EEO Director.   |
| 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); (c)(3)]  |   |                             |    | X   | Not applicable   |
|  <b>Compliance Indicator</b>   | B.3. The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions. | <b>Measure Has Been Met</b> |    |     | <b>For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b>  |
|  <b>Measures</b>   |   | Yes                         | No | N/A |  |
| 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)] |   |                             | X  |     | The Departmental (ODICR) EEO Director, who is designated as the OS EEO Director in the absence of a dedicated OS EEO Director, does not participate in agency meetings specific to OS workforce-related matters. |
| 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.   |   |                             | X  |     |  |

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|  Compliance Indicator |   | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report   |
|---|---|----------------------|----|-----|--|
|   |   | Yes                  | No | N/A |  |
|  Measures             | 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)]  |                      | X  |     |  |
|   | B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]  |                      | X  |     |  |
|   | B.4.a.11. to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]  |                      | X  |     |  |
|   | B.4.a.2. to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]  |                      | X  |     |  |
|   | 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)]  |                      | X  |     |  |
|   | 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. |                      | X  |     | Lack of sufficient budget and staffing to support the training The Departmental (ODICR) EEO Director, who is designated as the OS EEO Director in the absence of a dedicated OS EEO Director, does not participate in agency meetings specific to OS workforce-related matters |
|   | 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)]   |                      |    | X   | OS is a DOI subcomponent which does not have field offices.  |
|   | B.4.a.6. to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]   |                      | X  |     |  |

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|  |   |   |  |   |
|--|---|---|--|---|
| <p>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.</p> |   | X |  | <p>Lack of sufficient budget and staffing The Departmental (ODICR) EEO Director, who is designated as the OS EEO Director in the absence of a dedicated OS EEO Director, does not participate in agency meetings specific to OS workforce-related matters</p> |
| <p>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]</p>        |   | X |  |   |
| <p>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]</p>  | X |   |  |   |
| <p>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)]</p>   |   | X |  |   |
| <p>B.4.c. Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), &amp; 6(III)]</p>  |   | X |  |   |
| <p>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?</p>   | X |   |  |   |
| <p>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?</p>  | X |   |  |   |

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|  Compliance Indicator |   | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report |
|---|---|----------------------|----|-----|--|
|   |   | Yes                  | No | N/A |  |
|  Measures             | B.5. The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills   |                      |    |     |  |
|   | B.5.a. Pursuant to 29 CFR §1614.102(a)(5), have all managers and supervisors received orientation, training, and advice on their responsibilities under the following areas under the agency EEO program:                             |                      |    |     |  |
|   | B.5.a.1. EEO complaint process? [see MD-715(II)(B)]   | X                    |    |     | Newly appointed supervisors have received this training, which is offered on a quarterly basis.  |
|   | B.5.a.2. Reasonable Accommodation Procedures? [see 29 CFR § 1614.102(d)(3)]   |                      | X  |     |  |
|   | B.5.a.3. Anti-harassment policy? [see MD-715(II)(B)]  | X                    |    |     |  |
|   | 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)] |                      | X  |     | OS currently has insufficient staff and resources to train its employees and provide the necessary managerial support                                  |
|   | 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)]   |                      | X  |     |  |

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|  Compliance Indicator  |   | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report |
|--|---|----------------------|----|-----|--|
|  |   | Yes                  | No | N/A |  |
|  Measures  | B.6. The agency involves managers in the implementation of its EEO program. |                      |    |     |  |
| B.6.a. Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]  |   |                      | X  |     | Although OS has a complaints program, it does not have a staffed special emphasis program.   |
| B.6.b. Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]   |   |                      | X  |     | No barrier analysis has been conducted by the OS EEO Office.   |
| 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] |   |                      | X  |     | No barrier analysis has been conducted by the OS EEO Office.   |
| 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)]             |   |                      | X  |     |  |

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Essential Element: C Management and Program Accountability

|  Compliance Indicator |   | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report |
|---|---|----------------------|----|-----|--|
|   |   | Yes                  | No | N/A |  |
|  Measures             | C.1. The agency conducts regular internal audits of its component and field offices.  |                      |    | N/A |  |
|   | 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.                  |                      |    | X   | OS is a DOI subcomponent which does not have field offices.  |
|   | 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. |                      |    | X   | OS is a DOI subcomponent which does not have field offices.  |
|   | 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)]  |                      |    | X   | OS is a DOI subcomponent which does not have field offices.  |

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|  Compliance Indicator   |  Measures | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report |
|---|---|----------------------|----|-----|--|
|   |   | Yes                  | No | N/A |  |
| C.2. The agency has established procedures to prevent all forms of EEO discrimination.  |   |                      |    |     |  |
| 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)]  |   | X                    |    |     | The activity is performed by the OS HR Servicing Provider, DOI BSEE.   |
| 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]  |   | X                    |    |     |  |
| 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)]   |   | X                    |    |     | The activity is performed by the OS HR Servicing Provider, DOI BSEE.   |
| 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)]   |   | X                    |    |     |  |
| 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.]  |   | X                    |    |     |  |
| C.2.a.5. Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see Complainant v. Dep't of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Dep't of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column. |   | X                    |    |     |  |
| 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)]   |   |                      | X  |     |  |
| 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)]   |   |                      | X  |     |  |
| 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)]  |   | X                    |    |     |  |
| 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)]  |   | X                    |    |     |  |
| 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)]   |   | X                    |    |     |  |
| 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)]  |   | X                    |    |     |  |
| C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.   |   | X                    |    |     |  |
| 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)]   |   | X                    |    |     |  |



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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.



X

[https://  
www.doi.gov/  
accesscenter/  
accommodations](https://www.doi.gov/accesscenter/accommodations)

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|  Compliance Indicator |   | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report |
|---|---|----------------------|----|-----|--|
|   |   | Yes                  | No | N/A |  |
|  Measures             | C.3. The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.   |                      |    |     |  |
|   | 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? | X                    |    |     |  |
|   | 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]  | X                    |    |     |  |
|   | 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)]  | X                    |    |     |  |
|   | C.3.b.3. Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]  | X                    |    |     |  |
|   | 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]                                       | X                    |    |     | This is incorporated into the mandatory No FEAR training for all employees.  |
|   | C.3.b.5. Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]   | X                    |    |     |  |
|   | C.3.b.6. Provide disability accommodations when such accommodations do not cause an undue hardship? [ see 29 CFR §1614.102(a)(8)]   | X                    |    |     |  |
|   | C.3.b.7. Support the EEO program in identifying and removing barriers to equal opportunity?. [see MD-715, II(C)]  |                      | X  |     | OS EEO Office does not conduct barrier analysis.   |
|   | C.3.b.8. Support the anti-harassment program in investigating and correcting harassing conduct?. [see Enforcement Guidance, V.C.2]  | X                    |    |     |  |
|   | 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)]          | X                    |    |     |  |

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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)]

X

The Departmental (ODICR) EEO Director, who is designated as the OS EEO Director in the absence of a dedicated OS EEO Director, does not participate in agency meetings specific to OS workforce-related improvements, corrections or regarding remedial or disciplinary actions for managers or supervisors.

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)]



X

The Departmental (ODICR) EEO Director, who is designated as the OS EEO Director in the absence of a dedicated OS EEO Director, does not participate in agency meetings specific to OS workforce-related improvements, corrections or regarding remedial or disciplinary actions for managers or supervisors.

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|  Compliance Indicator |  | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report   |
|---|--|----------------------|----|-----|--|
|   |  | Yes                  | No | N/A |  |
|  Measures             | C.4. The agency ensures effective coordination between its EEO program and Human Resources (HR) program.   |                      |    |     |  |
|   | 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)]   |                      | X  |     | The Departmental (ODICR) EEO Director, who is designated as the OS EEO Director in the absence of a dedicated OS EEO Director, does not meet with the HR Servicing Agent, DOI BSEE, to assess OS-related programs. |
|   | 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] |                      | X  |     | The Departmental (ODICR) EEO Director, who is designated as the OS EEO Director in the absence of a dedicated OS EEO Director, has only remotely addressed OS complaints management.                               |
|   | C.4.c. Does the EEO office have timely access to accurate and complete data (e.g., demographic data for the workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]  |                      | X  |     | OS lacks the necessary resources and staff to conduct this activity  |
|   | C.4.d. Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]   |                      | X  |     | OS lacks the necessary resources and staff to conduct this activity  |
|   | 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)]   |                      | X  |     | The Departmental (ODICR) EEO Director, who is designated as the OS EEO Director in the absence of a dedicated OS EEO Director, has only remotely addressed OS complaints management.                               |

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|--|--|---|--|
| C.4.e.2. Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]         |  | X | The Departmental (ODICR) EEO Director, who is designated as the OS EEO Director in the absence of a dedicated OS EEO Director, has only remotely addressed OS complaints management. |
| C.4.e.3. Develop and/or provide training for managers and employees? [see MD-715, II(C)]         |  | X | The Departmental (ODICR) EEO Director, who is designated as the OS EEO Director in the absence of a dedicated OS EEO Director, has only remotely addressed OS complaints management. |
| C.4.e.4. Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)] |  | X | The Departmental (ODICR) EEO Director, who is designated as the OS EEO Director in the absence of a dedicated OS EEO Director, has only remotely addressed OS complaints management. |
| C.4.e.5. Assist in preparing the MD-715 report? [see MD-715, II(C)]                              |  | X | The Departmental (ODICR) EEO Director, who is designated as the OS EEO Director in the absence of a dedicated OS EEO Director, has only remotely addressed OS complaints management. |

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|  Compliance Indicator  |  | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report                               |
|--|--|----------------------|----|-----|--|
|  Measures              |  | Yes                  | No | N/A |  |
|  | C.5. Following a finding of discrimination, the agency explores whether it should take a disciplinary action.  |                      |    |     |  |
|  | C.5.a. Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR §1614.102(a)(6); see also Douglas v. Veterans Administration, 5 MSPR 280 (1981)]   | X                    |    |     |  |
|  | 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.  | X                    |    |     | 0  |
|  | 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 (e.g., post mortem to discuss lessons learned)? [see MD-715, II(C)]  | X                    |    |     |  |
|  Compliance Indicator |  | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report                               |
|  Measures            |  | Yes                  | No | N/A |  |
|  | C.6. The EEO office advises managers/supervisors on EEO matters.   |                      |    |     |  |
|  | 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. |                      | X  |     | The Departmental (ODICR) EEO Director, who is designated as the OS EEO Director in the absence of a dedicated OS EEO Director, has only remotely addressed OS complaints management. |
|  | C.6.b. Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [see MD-715 Instructions, Sec. I]   | X                    |    |     | The Departmental (ODICR) EEO Director, who is designated as the OS EEO Director in the absence of a dedicated OS EEO Director, has only remotely addressed OS complaints management. |

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Agency Self-Assessment Checklist



Essential Element: D Proactive Prevention

|  Compliance Indicator  |  | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report |
|--|--|----------------------|----|-----|--|
|  |  | Yes                  | No | N/A |  |
|  Measures  | D.1. The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year. |                      |    |     |  |
| D.1.a. Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]   |  |                      | X  |     | The OS EEO Office has no affirmative employment staff to address these issues.   |
| 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; and/or external special interest groups? [see MD-715 Instructions, Sec. I] |  |                      | X  |     | The OS EEO Office has no affirmative employment staff to address these issues.   |
| 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)]  |  | X                    |    |     | Exit surveys are conducted at the departmental level to include the Office of the Secretary.   |

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|  Compliance Indicator |   | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report |
|---|---|----------------------|----|-----|--|
|   |   | Yes                  | No | N/A |  |
|  Measures             | D.2. The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)   |                      |    |     |  |
|   | D.2.a. Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]  |                      | X  |     | The OS EEO Office has no affirmative employment staff to address these issues.   |
|   | 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)]   |                      | X  |     | The OS EEO Office has no affirmative employment staff to address these issues.   |
|   | 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)]   |                      | X  |     | The OS EEO Office has no affirmative employment staff to address these issues.   |
|   | 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, and/or external special interest groups? [see MD-715 Instructions, Sec. I] If "yes", please identify the data sources in the comments column. |                      | X  |     | The OS EEO Office has no affirmative employment staff to address these issues.   |



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Agency Self-Assessment Checklist

| <br>Compliance Indicator   |  | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report |
|--|--|----------------------|----|-----|--|
|  |  | Yes                  | No | N/A |  |
| <br>Measures               | D.3. The agency establishes appropriate action plans to remove identified barriers.  |                      |    |     |  |
|  | 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)]  |                      | X  |     | The OS EEO Office has no affirmative employment staff to address these issues.   |
|  | 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)]                        |                      | X  |     | The OS EEO Office has no affirmative employment staff to address these issues.   |
|  | D.3.c. Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]   |                      | X  |     | The OS EEO Office has no affirmative employment staff to address these issues.   |
| <br>Compliance Indicator |  | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report |
| <br>Measures             |  | Yes                  | No | N/A |  |
|  | D.4. The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.   |                      |    |     |  |
|  | 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.   |                      | X  |     | The OS EEO Office has no affirmative employment staff to address this issue.   |
|  | 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)]  | X                    |    |     |  |
|  | 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)]  | X                    |    |     |  |
|  | 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)] | X                    |    |     |  |

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Agency Self-Assessment Checklist

Essential Element: E Efficiency

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Agency Self-Assessment Checklist

|  Compliance Indicator  |   | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report |
|--|---|----------------------|----|-----|--|
|  |   | Yes                  | No | N/A |  |
|  Measures  | E.1. The agency maintains an efficient, fair, and impartial complaint resolution process. |                      |    |     |  |
| E.1.a. Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?  |   | X                    |    |     | In FY 2020 98.1% of all counseling's were completed in timely fashion.   |
| 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)?   |   | X                    |    |     |  |
| E.1.c. Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?  |   | X                    |    |     |  |
| E.1.d. Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments. |   |                      | X  |     |  |
| E.1.e. Does the agency ensure that 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)?               |   | X                    |    |     |  |
| E.1.f. Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?   |   | X                    |    |     | In FY 2020 OS completed 96.5% of its investigations in timely fashion, with an average of 137 days per investigation.                                  |
| 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)?           |   | X                    |    |     |  |
| E.1.h. When the complainant did not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?  |   | X                    |    |     |  |
| 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)?  |   | X                    |    |     |  |

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|   |   |  |  |   |    |     |  |
|---|---|--|--|---|----|-----|--|
| <p>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.</p>  | X   |  |  | <p>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 contractor for further development.</p> |    |     |  |
| <p>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)]</p>  | X   |  |  |   |    |     |  |
| <p>E.1.l. Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]</p>  | X   |  |  |   |    |     |  |
| <p> <b>Compliance Indicator</b></p>  | <p>E.2. The agency has a neutral EEO process.</p> |  |  | <b>Measure Has Been Met</b>   |    |     | <p><b>For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b></p> |
| <p> <b>Measures</b></p>   |   |  |  | Yes   | No | N/A |  |
| <p>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)] If "yes", please explain.</p>  | X   |  |  | <p>Employment and Labor Law Unit</p>  |    |     |  |
| <p>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.</p> | X   |  |  | <p>Employment and Labor Law Unit</p>  |    |     |  |
| <p>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)]</p>   | X   |  |  |   |    |     |  |
| <p>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)]</p>  | X   |  |  |   |    |     |  |
| <p>E.2.e. If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004)]</p>   | X   |  |  |   |    |     |  |

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|  Compliance Indicator |   | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report       |
|---|---|----------------------|----|-----|--|
|   |   | Yes                  | No | N/A |  |
|  Measures             | E.3. The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.   |                      |    |     |  |
|   | 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)] | X                    |    |     |  |
|   | 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)]                                      | X                    |    |     |  |
|   | E.3.c. Does the Agency encourage all employees to use ADR, where ADR is appropriate? [See MD-110, Ch. 3(IV)(C)]   | X                    |    |     |  |
|   | 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)]   | X                    |    |     |  |
|   | 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)]                   | X                    |    |     |  |
|   | E.3.f. Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]   |                      | X  |     | Although the Departmental ADR Program (CADR), which provides Department-wide ADR service, it reviews its program without input or review by the EEO program. |

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|  Compliance Indicator   |  | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report |
|---|--|----------------------|----|-----|--|
|   |  | Yes                  | No | N/A |  |
|  Measures   | E.4. The agency has effective and accurate data collection systems in place to evaluate its EEO program. |                      |    |     |  |
| E.4.a. Does the agency have systems in place to accurately collect, monitor, and analyze the following data:  |  |                      |    |     |  |
| E.4.a.1. Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]              |  | X                    |    |     |  |
| E.4.a.2. The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]   |  | X                    |    |     |  |
| E.4.a.3. Recruitment activities? [see MD-715, II(E)]  |  |                      | X  |     |  |
| 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)]  |  | X                    |    |     |  |
| E.4.a.5. The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(4)]  |  |                      | X  |     |  |
| 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] |  | X                    |    |     |  |
| 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]  |  |                      | X  |     | System exists but lacks sufficient resources to conduct on annual basis, as indicated in the reporting instructions                                    |

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|  Compliance Indicator   |   | Measure Has Been Met |    |     |  |
|---|---|----------------------|----|-----|--|
|  Measures   |   | Yes                  | No | N/A | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report |
| 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. | E.5. The agency identifies and disseminates significant trends and best practices in its EEO program. |                      | X  |     | The OS EEO Office has no affirmative employment staff to address these issues  |
| 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.      |   |                      | X  |     | The OS EEO Office has no affirmative employment staff to address these issues  |
| 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)]  |   |                      | X  |     | The OS EEO Office has no affirmative employment staff to address these issues  |

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Agency Self-Assessment Checklist

Essential Element: F Responsiveness and Legal Compliance



|  <b>Compliance Indicator</b>   |  | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report |
|--|--|----------------------|----|-----|--|
|  |  | Yes                  | No | N/A |  |
|  <b>Measures</b>               | F.1. The agency has processes in place to ensure timely and full compliance with EEOC orders and settlement agreements.  |                      |    |     |  |
|  | 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)]                      | X                    |    |     |  |
|  | 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)]  | X                    |    |     |  |
|  | F.1.c. Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]   | X                    |    |     |  |
|  | F.1.d. Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]  | X                    |    |     |  |
|  | 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)] | X                    |    |     |  |
|  <b>Compliance Indicator</b> |  | Measure Has Been Met |    |     | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report |
|  <b>Measures</b>             |  | Yes                  | No | N/A |  |
|  | F.2.a. Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]   | X                    |    |     |  |
|  | 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)]  | X                    |    |     |  |
|  | 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]                          | X                    |    |     |  |
|  | 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)]   | X                    |    |     |  |
|  | F.2.a.4. Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?  | X                    |    |     |  |



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|  Compliance Indicator |  | Measure Has Been Met |    |     |  |
|---|--|----------------------|----|-----|--|
|  Measures             |  | Yes                  | No | N/A | For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report |
|   | F.3. The agency reports to EEOC its program efforts and accomplishments.   |                      |    |     |  |
|   | 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)] | X                    |    |     |  |
|   | F.3.b. Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]                     | X                    |    |     |  |

Essential Element:  Other

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Plan to Attain Essential Elements

PART H.1

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

OS did not develop and disseminate a, Diversity, Equity, and Inclusion (EDI) Policy Statement.

Objectives for EEO Plan

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description   |
|----------------|-------------|---------------|----------------|---|
| 09/30/2018     | 03/30/2021  |               |                | Develop and disseminate a DEI (EEO) Policy Statement that addresses the Secretary's commitment to EDI in the workplace. |

Responsible Officials

| Title   | Name                                 | Standards Address the Plan? |
|---|--------------------------------------|-----------------------------|
| Director, Office of Diversity, Inclusion and Civil Rights   Principal Diversity Officer | Erica D. White-Dunston (or designee) | Yes                         |
| Principal Deputy Assistant Secretary, Policy, Management, and Budget                    | Rachael Taylor                       | Yes                         |
| DOI Secretary   | Deb Haaland                          | Yes                         |

Planned Activities

| Target Date | Planned Activity   | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|--|--------------------------------|---------------|-----------------|
| 09/30/2019  | Disseminate EDI (EEO) Policy Statement to all DOI employees, including those in OS | No                             | 03/30/2021    |                 |

Accomplishments

| Fiscal Year | Accomplishment   |
|-------------|--|
| 2019        | The Departmental ODICR developed the EDI (EEO) Policy Statement and disseminated it to key stakeholders for input. The stakeholders provided feedback. The policy went to Office of Policy, Management, and Budget (PMB) leadership for review but at the close of the fiscal year, it had not been signed.<br><br>In September 2019, DOI hired a permanent executive to lead the Departmental ODICR. The new Departmental ODICR Director reviewed and updated the existing draft EDI (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 Departmental ODICR was awaiting final approval and release. |
| 2020        | On June 9, 2020, the Departmental 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 Departmental ODICR is awaiting final approval from PMB leadership to officially release the document to the workforce, which will be adopted by the OS.   |

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Plan to Attain Essential Elements

PART H.2

|  |   |
|--|---|
| Brief Description of Program Deficiency: | 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)] If the EEO policy statement covers any additional bases (e.g., marital status, veteran status and political affiliation), please list them in the comments column. |
|--|---|

OS did not develop and disseminate a, Diversity, Equity, and Inclusion (EDI) Policy Statement.

Objectives for EEO Plan

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description   |
|----------------|-------------|---------------|----------------|---|
| 09/30/2018     | 03/30/2021  |               |                | Develop and disseminate a DEI (EEO) Policy Statement that addresses the Secretary's commitment to EDI in the workplace. |

Responsible Officials

| Title   | Name                                 | Standards Address the Plan? |
|---|--------------------------------------|-----------------------------|
| Director, Office of Diversity, Inclusion and Civil Rights   Principal Diversity Officer | Erica D. White-Dunston (or designee) | Yes                         |
| Principal Deputy Assistant Secretary, Policy, Management, and Budget                    | Rachael Taylor                       | Yes                         |
| DOI Secretary   | Deb Haaland                          | Yes                         |

Planned Activities

| Target Date | Planned Activity   | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|--|--------------------------------|---------------|-----------------|
| 09/30/2019  | Disseminate EDI (EEO) Policy Statement to all DOI employees, including those in OS | No                             | 03/30/2021    |                 |

Accomplishments

| Fiscal Year | Accomplishment   |
|-------------|--|
| 2019        | The Departmental ODICR developed the EDI (EEO) Policy Statement and disseminated it to key stakeholders for input. The stakeholders provided feedback. The policy went to Office of Policy, Management, and Budget (PMB) leadership for review but at the close of the fiscal year, it had not been signed.<br><br>In September 2019, DOI hired a permanent executive to lead the Departmental ODICR. The new Departmental ODICR Director reviewed and updated the existing draft EDI (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 Departmental ODICR was awaiting final approval and release. |
| 2020        | On June 9, 2020, the Departmental 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 Departmental ODICR is awaiting final approval from PMB leadership to officially release the document to the workforce, which will be adopted by the OS.   |

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Plan to Attain Essential Elements

PART H.3

Brief Description of Program Deficiency: A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]

OS DEI (EEO) Offices prominently post business contact information and written materials concerning the DEI (EEO) program, laws, policy statements, and the operation of the complaint process on their public websites.

Objectives for EEO Plan

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description   |
|----------------|-------------|---------------|----------------|---|
| 09/30/2021     | 09/30/2022  |               |                | 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. |

Responsible Officials

| Title                 | Name | Standards Address the Plan? |
|-----------------------|------|-----------------------------|
| OS DEI (EEO) Director | TBD  | Yes                         |

Planned Activities

| Target Date | Planned Activity   | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|--|--------------------------------|---------------|-----------------|
| 03/01/2022  | The OS DEI (EEO) Director and OS Office leads will meet to assess how DEI (EEO) program information is currently made available. | No                             |               |                 |
| 05/03/2021  | Identify and barriers and solutions for office and write an action plan to resolve the issues.                                   | No                             |               |                 |
| 09/30/2021  | Implement solutions for each office to resolve any identified issues and complete the posting of information on the website.     | No                             |               |                 |

Accomplishments

| Fiscal Year | Accomplishment  |
|-------------|---|
| 2020        | No activity during this period, due to the absence of an OS DEI (EEO) Director. |

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.4

Brief Description of Program Deficiency: 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. .  
OS did not provide recognition to employees, supervisors, managers, and offices that demonstrated superior accomplishments in DEI (EEO).

Objectives for EEO Plan

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description  |
|----------------|-------------|---------------|----------------|--|
| 09/30/2021     | 12/31/2022  |               |                | Develop and implement a program to provide recognition to employees, supervisors, managers, and offices. |

Responsible Officials

| Title   | Name            | Standards Address the Plan? |
|---|-----------------|-----------------------------|
| Associate Director, Human Resources, Interior Business Center | Julie Bednar    | No                          |
| OS DEI (EEO) Director   | TBD             | Yes                         |
| Chief, Administrative Services, BSSE                          | Patricia Callis | No                          |

Planned Activities

| Target Date | Planned Activity   | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|--|--------------------------------|---------------|-----------------|
| 01/31/2022  | Meet with key stakeholders to address the program deficiency and to establish a way forward. | No                             |               |                 |
| 12/31/2022  | Incorporate an EDI (EEO) award into the existing reward structure.                           | No                             |               |                 |
| 12/31/2021  | Implement the EDI (EEO) recognition program.   | No                             |               |                 |

Accomplishments

| Fiscal Year | Accomplishment  |
|-------------|---|
| 2020        | No activity during this period, due to the absence of an OS DEI (EEO) Director. |

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.5

Brief Description of Program Deficiency: B.5.a.2. Reasonable Accommodation Procedures? [see 29 CFR § 1614.102(d)(3)]

The OS DEI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement DEI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies, ensuring strategic plan alignment to DEI (EEO) principles, ensuring effective coordination with the OS Human Resources Program

Objectives for EEO Plan

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description   |
|----------------|-------------|---------------|----------------|---|
| 09/30/2021     | 09/30/2023  |               |                | Provide sufficient resources to OS DEI (EEO) Office to implement an effective DEI (EEO) program throughout the OS<br><br>Grant the OS EEI Director oversight and program responsibility for implementing an effective DEI (EEO) Program across the OS |

Responsible Officials

| Title   | Name            | Standards Address the Plan? |
|---|-----------------|-----------------------------|
| Chief, Administrative Services, BSSE                          | Patricia Callis | No                          |
| OS DEI (EEO) Directors  | TBD             | No                          |
| Associate Director, Human Resources, Interior Business Center | Julie Bednar    | No                          |

Planned Activities

| Target Date | Planned Activity  | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|---|--------------------------------|---------------|-----------------|
| 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 DEI (EEO) program across the OS | No                             |               |                 |
| 12/30/2022  | Administer special emphasis programs across the OS aligned with MD 715 Program objectives.                      | No                             |               |                 |
| 02/28/2022  | Prepare the OS FY 2021 MD-715 report  | No                             |               |                 |
| 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  | 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 DEI (EEO) Office   | No                             |               |                 |

Accomplishments

| Fiscal Year | Accomplishment  |
|-------------|---|
| 2019        | No activity during this period, due to the absence of an OS DEI (EEO) Director. |
| 2020        | No activity during this period, due to the absence of an OS DEI (EEO) Director. |

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.6

Brief Description of Program Deficiency:

B.6.a. Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]

OS performance plans for its 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.

Objectives for EEO Plan

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description  |
|----------------|-------------|---------------|----------------|--|
| 09/30/2020     | 06/30/2025  | 09/30/2021    |                | 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. |

Responsible Officials

| Title                 | Name | Standards Address the Plan? |
|-----------------------|------|-----------------------------|
| OS DEI (EEO) Director | TBD  | No                          |

Planned Activities

| Target Date | Planned Activity  | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|---|--------------------------------|---------------|-----------------|
| 11/30/2022  | Incorporate EDI (EEO) element in performance standards of all DOI leaders.                | No                             |               |                 |
| 12/31/2022  | Engage Senior Managers in the implementation of Special Emphasis Programs.                | No                             |               |                 |
| 12/31/2022  | Involve Senior Managers in the barrier analysis process.                                  | No                             |               |                 |
| 12/31/2022  | Solicit the participation of Senior Managers in developing agency EDI (EEO) action plans. | No                             |               |                 |

Accomplishments

| Fiscal Year | Accomplishment  |
|-------------|---|
| 2020        | No activity during this period, due to the absence of an OS DEI (EEO) Director. |

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.7

Brief Description of Program  
Deficiency:

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)]

The OS DEI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement DEI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies, ensuring strategic plan alignment to DEI (EEO) principles, ensuring effective coordination with the OS Human Resources Program



DOI Office of the Secretary

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Plan to Attain Essential Elements

PART H.8

Brief Description of Program  
Deficiency:

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)]

The OS DEI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement DEI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies, ensuring strategic plan alignment to DEI (EEO) principles, ensuring effective coordination with the OS Human Resources Program

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.9

Brief Description of Program  
Deficiency:

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)]

OS performance plans for its 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.

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.10

Brief Description of Program  
Deficiency:

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)]

The OS reporting structure does not include a principal DEI (EEO) official with appropriate authority and resources to effectively carry out a successful DEI (EEO) program.

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.11

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

The OS DEI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement DEI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies, ensuring strategic plan alignment to DEI (EEO) principles, ensuring effective coordination with the OS Human Resources Program

Objectives for EEO Plan

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description  |
|----------------|-------------|---------------|----------------|--|
| 09/30/2021     | 09/30/2023  |               |                | Provide sufficient resources to OS DEI (EEO) Office to implement an effective DEI (EEO) program throughout the OS. |

Responsible Officials

| Title   | Name            | Standards Address the Plan? |
|---|-----------------|-----------------------------|
| Associate Director, Human Resources, Interior Business Center | Julie Bednar    | No                          |
| OS DEI (EEO) Directors  | TBD             | Yes                         |
| Chief, Administrative Services, BSSE                          | Patricia Callis | No                          |

Planned Activities

| Target Date | Planned Activity  | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|---|--------------------------------|---------------|-----------------|
| 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 DEI (EEO) program across the OS | No                             |               |                 |
| 12/30/2022  | Administer special emphasis programs across the OS aligned with MD 715 Program objectives.                      | No                             |               |                 |
| 02/28/2022  | Prepare the OS FY 2021 MD-715 report  | No                             |               |                 |
| 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  | 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 DEI (EEO) Office   | No                             |               |                 |

Accomplishments

| Fiscal Year | Accomplishment  |
|-------------|---|
| 2019        | No activity during this period, due to the absence of an OS DEI (EEO) Director. |
| 2020        | No activity during this period, due to the absence of an OS DEI (EEO) Director. |

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.12

Brief Description of Program  
Deficiency:

B.6.b. Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]

OS performance plans for its 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.

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.13

Brief Description of Program  
Deficiency:

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]

OS performance plans for its 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.

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.14

Brief Description of Program Deficiency: 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)]

The OS reporting structure does not include a principal DEI (EEO) official with appropriate authority and resources to effectively carry out a successful DEI (EEO) program.

Objectives for EEO Plan

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description   |
|----------------|-------------|---------------|----------------|---|
| 09/30/2021     | 09/30/2022  |               |                | Appoint a DEI (EEO) Director for the Office of the Secretary.<br><br>Standardize reporting structure so that the OS DEI (EEO) Director reports to the head of the Office of the Secretary |

Responsible Officials

| Title   | Name                                 | Standards Address the Plan? |
|---|--------------------------------------|-----------------------------|
| Director, Office of Diversity, Inclusion and Civil Rights   Principal Diversity Officer | Erica D. White-Dunston (or designee) | No                          |
| Principal Deputy Assistant Secretary, Policy, Management, and Budget                    | Rachael Taylor (or designee)         | No                          |

Planned Activities

| Target Date | Planned Activity | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|------------------|--------------------------------|---------------|-----------------|
|             |                  |                                |               |                 |

Accomplishments

| Fiscal Year | Accomplishment |
|-------------|----------------|
|             |                |

Objectives for EEO Plan

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description  |
|----------------|-------------|---------------|----------------|--|
| 09/30/2021     | 09/30/2022  |               |                | Appoint a DEI (EEO) Director for the Office of the Secretary<br><br>Standardize reporting structure so that the OS DEI (EEO) Director reports to the head of the Office of the Secretary |

Responsible Officials

| Title   | Name                                 | Standards Address the Plan? |
|---|--------------------------------------|-----------------------------|
| Director, Office of Diversity, Inclusion and Civil Rights   Principal Diversity Officer | Erica D. White-Dunston (or designee) | No                          |
| Principal Deputy Assistant Secretary, Policy, Management, and Budget                    | Rachael Taylor (or designee)         | No                          |

Planned Activities

| Target Date | Planned Activity  | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|---|--------------------------------|---------------|-----------------|
| 09/30/2021  | Implement procedures to establish an OS DEI (EEO) Program in accordance with 29 CFR 1614.102(b)(4).   | No                             | 09/30/2022    |                 |
| 09/30/2021  | Institute a process that gives the OS DEI (EEO) Director oversight and input into the performance of OS EEO Program   | No                             | 09/30/2022    |                 |
| 09/30/2021  | Update the OS organizational chart to accurately define the reporting structure for the OS DEI(EEO) Director  | No                             | 09/30/2022    |                 |
| 09/30/2021  | Implement a process to ensure the EEO Director has regular and effective meetings with the OS head and other senior management officials to advise on the effectiveness, efficiency and legal compliance of the agency's EDI (EEO) program. | No                             | 03/30/2022    |                 |
| 09/30/2021  | Conduct the "State of the Agency" briefing for the Secretary and other senior leaders.  | No                             | 03/30/2022    |                 |

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

Accomplishments

| Fiscal Year | Accomplishment   |
|-------------|--|
| 2020        | No activity in this reporting period. This is a new Part H item. |



DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.15

Brief Description of Program  
Deficiency:

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]

The OS reporting structure does not include a principal DEI (EEO) official with appropriate authority and resources to effectively carry out a successful DEI (EEO) program.

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.16

Brief Description of Program  
Deficiency:

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.

The OS reporting structure does not include a principal DEI (EEO) official with appropriate authority and resources to effectively carry out a successful DEI (EEO) program.

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.17

Brief Description of Program  
Deficiency:

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)] If not, identify the office with this authority in the comments column.

The OS reporting structure does not include a principal DEI (EEO) official with appropriate authority and resources to effectively carry out a successful DEI (EEO) program.

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.18

Brief Description of Program  
Deficiency:

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)]

The OS reporting structure does not include a principal DEI (EEO) official with appropriate authority and resources to effectively carry out a successful DEI (EEO) program.

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.19

Brief Description of Program  
Deficiency:

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.

The OS DEI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement DEI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies, ensuring strategic plan alignment to DEI (EEO) principles, ensuring effective coordination with the OS Human Resources Program

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.20

Brief Description of Program  
Deficiency:

B.4.a.1. to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.21

Brief Description of Program  
Deficiency:

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

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.22

Brief Description of Program  
Deficiency:

B.4.a.2. to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]



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For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.23

Brief Description of Program  
Deficiency:

B.4.a.11. to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.24

Brief Description of Program  
Deficiency:

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)]

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Plan to Attain Essential Elements

PART H.25

Brief Description of Program  
Deficiency:

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)]

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.26

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.

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.27

Brief Description of Program  
Deficiency:

B.4.c. Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]

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Plan to Attain Essential Elements

PART H.28

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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Plan to Attain Essential Elements

PART H.29

Brief Description of Program  
Deficiency:

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.

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Plan to Attain Essential Elements

PART H.30

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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Plan to Attain Essential Elements

PART H.31

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)]

The OS has not established EEOC compliant systems in place to track reasonable accommodation requests

DOI Office of the Secretary

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Plan to Attain Essential Elements

PART H.32

Brief Description of Program Deficiency:

C.3.b.7. Support the EEO program in identifying and removing barriers to equal opportunity?. [see MD-715, II(C)]

OS performance plans for its 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.

Objectives for EEO Plan

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description  |
|----------------|-------------|---------------|----------------|--|
| 09/30/2020     | 06/30/2025  | 09/30/2021    |                | 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. |

Responsible Officials

| Title                 | Name | Standards Address the Plan? |
|-----------------------|------|-----------------------------|
| OS DEI (EEO) Director | TBD  | Yes                         |

Planned Activities

| Target Date | Planned Activity  | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|---|--------------------------------|---------------|-----------------|
| 11/30/2022  | Incorporate EDI (EEO) element in performance standards of all DOI leaders.                | No                             |               |                 |
| 12/31/2022  | Engage Senior Managers in the implementation of Special Emphasis Programs.                | No                             |               |                 |
| 12/31/2022  | Involve Senior Managers in the barrier analysis process.                                  | No                             |               |                 |
| 12/31/2022  | Solicit the participation of Senior Managers in developing agency EDI (EEO) action plans. | No                             |               |                 |

Accomplishments

| Fiscal Year | Accomplishment  |
|-------------|---|
| 2020        | No activity during this period, due to the absence of an OS DEI (EEO) Director. |

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For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.33

Brief Description of Program Deficiency: 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)]

The OS DEI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement DEI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies, ensuring strategic plan alignment to DEI (EEO) principles, ensuring effective coordination with the OS Human Resources Program

Objectives for EEO Plan

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description   |
|----------------|-------------|---------------|----------------|---|
| 09/30/2021     | 09/30/2023  |               |                | Provide sufficient resources to OS DEI (EEO) Office to implement an effective DEI (EEO) program throughout the OS |

Responsible Officials

| Title   | Name            | Standards Address the Plan? |
|---|-----------------|-----------------------------|
| Associate Director, Human Resources, Interior Business Center | Julie Bednar    | No                          |
| Chief, Administrative Services, BSSE                          | Patricia Callis | No                          |
| OS DEI (EEO) Directors  | TBD             | No                          |

Planned Activities

| Target Date | Planned Activity  | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|---|--------------------------------|---------------|-----------------|
| 09/30/2021  | Grant the OS EEI Director oversight and program responsibility for implementing an effective DEI (EEO) Program across the OS  | No                             | 09/30/2022    |                 |
| 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 practices for systemic barriers that may be impeding full participation in the program by all EEO groups | No                             |               |                 |
| 09/30/2021  | Ensure OS EEO Director has access to accurate and complete data required to prepare MD-715 workforce tables   | No                             | 09/30/2022    |                 |
| 09/30/2021  | Ensure HR servicing office provides OS EEO Director timely access to exit survey, grievance, and climate survey data upon request   | No                             | 09/30/2022    |                 |
| 09/30/2021  | Coordinate with HR to Implement the Affirmative Action Plan for Individuals with Disabilities   | No                             |               |                 |
| 09/30/2021  | Coordinate with OS HR to develop outreach and recruitment activities  | No                             | 09/30/2022    |                 |
| 09/30/2021  | Coordinate with OS HR to provide training for OS managers and employees   | No                             |               |                 |
| 09/30/2021  | Ensure HR collaborates with OS EEO Director in identifying and removing workforce barriers  | No                             | 09/30/2022    |                 |
| 09/30/2021  | Ensure OS HR assists OS EEO Director with preparing the OS MD-715 report  | No                             |               |                 |

Accomplishments

| Fiscal Year | Accomplishment  |
|-------------|---|
| 2019        | No activity during this period, due to the absence of an OS DEI (EEO) Director. |
| 2020        | No activity during this period, due to the absence of an OS DEI (EEO) Director. |

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.34

Brief Description of Program Deficiency:

C.4.e.5. Assist in preparing the MD-715 report? [see MD-715, II(C)]

The OS DEI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement DEI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies, ensuring strategic plan alignment to DEI (EEO) principles, ensuring effective coordination with the OS Human Resources Program

Objectives for EEO Plan

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description  |
|----------------|-------------|---------------|----------------|--|
| 09/30/2021     | 09/30/2022  |               |                | 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 full utilization and or promotional opportunities for all groups. |

Responsible Officials

| Title   | Name            | Standards Address the Plan? |
|---|-----------------|-----------------------------|
| OS DEI (EEO) Director   | TBD             | No                          |
| Associate Director, Human Resources, Interior Business Center | Julie Bednar    | No                          |
| Chief, Administrative Services, BSSE                          | Patricia Callis | No                          |

Planned Activities

| Target Date | Planned Activity  | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|---|--------------------------------|---------------|-----------------|
| 05/31/2022  | HR officials and OS DEI (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 leadership and Departmental OCR  | No                             |               |                 |

Accomplishments

| Fiscal Year | Accomplishment   |
|-------------|--|
| 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 deficiencies in its HR processes, and recommendations to mitigate those challenges. At the close of the FY, the contractor provided a DRAFT report on the current state of the program with recommendations for improvement.  |
| 2020        | In October 2019, the OHC hired a contractor to assess its HR operations Department-wide. The assessment focused on identifying major barriers within HR that are linked to inefficiencies and ineffectiveness in the Department's hiring processes.<br><br>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 USAStaffing across the Department, 3) Improve Classification, 4) Expand Executive Resources, 5) Improve process for Seasonal Hiring, 6) Increase Personnel Security, and 7) Reduce Delegated Examining Units (DEUs). OHC immediately initiated work to implement these recommendations.<br><br>There was no EEO Director in place for OS during this period to assess the OS's progress on addressing these areas of improvement in HR operations. |

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.35

Brief Description of Program  
Deficiency:

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]

The OS DEI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement DEI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies, ensuring strategic plan alignment to DEI (EEO) principles, ensuring effective coordination with the OS Human Resources Program

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.36

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)]

The OS DEI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement DEI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies, ensuring strategic plan alignment to DEI (EEO) principles, ensuring effective coordination with the OS Human Resources Program

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.37

|  |  |
|--|--|
| Brief Description of Program Deficiency: | 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. |
|--|--|

There is no process in place to ensure coordination between the OS Human Resources (HR) program and an OS DEI (EEO) program

Objectives for EEO Plan

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description  |
|----------------|-------------|---------------|----------------|--|
| 09/30/2021     | 09/30/2022  |               |                | 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 full utilization and or promotional opportunities for all groups. |

Responsible Officials

| Title | Name | Standards Address the Plan? |
|-------|------|-----------------------------|
|-------|------|-----------------------------|

Planned Activities

| Target Date | Planned Activity | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|------------------|--------------------------------|---------------|-----------------|
|-------------|------------------|--------------------------------|---------------|-----------------|

Accomplishments

| Fiscal Year | Accomplishment |
|-------------|----------------|
|-------------|----------------|

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.38

Brief Description of Program  
Deficiency:

C.4.e.4. Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]

The OS DEI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement DEI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies, ensuring strategic plan alignment to DEI (EEO) principles, ensuring effective coordination with the OS Human Resources Program



DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.39

Brief Description of Program  
Deficiency:

C.4.d. Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]

The OS DEI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement DEI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies, ensuring strategic plan alignment to DEI (EEO) principles, ensuring effective coordination with the OS Human Resources Program

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.40

Brief Description of Program  
Deficiency:

C.4.e.2. Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]

The OS DEI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement DEI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies, ensuring strategic plan alignment to DEI (EEO) principles, ensuring effective coordination with the OS Human Resources Program

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.41

Brief Description of Program Deficiency: C.4.c. Does the EEO office have timely access to accurate and complete data (e.g., demographic data for the workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]

The OS DEI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement DEI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies, ensuring strategic plan alignment to DEI (EEO) principles, ensuring effective coordination with the OS Human Resources Program

Objectives for EEO Plan

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description   |
|----------------|-------------|---------------|----------------|---|
| 09/30/2021     | 09/30/2023  |               |                | Provide sufficient resources to OS DEI (EEO) Office to implement an effective DEI (EEO) program throughout the OS<br><br>Grant the OS EEI Director oversight and program responsibility for implementing an effective DEI (EEO) Program across the OS |

Responsible Officials

| Title   | Name            | Standards Address the Plan? |
|---|-----------------|-----------------------------|
| Associate Director, Human Resources, Interior Business Center | Julie Bednar    | No                          |
| Chief, Administrative Services, BSSE                          | Patricia Callis | No                          |
| OS DEI (EEO) Directors  | TBD             | No                          |

Planned Activities

| Target Date | Planned Activity  | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|---|--------------------------------|---------------|-----------------|
| 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 DEI (EEO) program across the OS | No                             |               |                 |
| 12/30/2022  | Administer special emphasis programs across the OS aligned with MD 715 Program objectives.                      | No                             |               |                 |
| 02/28/2022  | Prepare the OS FY 2021 MD-715 report  | No                             |               |                 |
| 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  | 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 DEI (EEO) Office   | No                             |               |                 |

Accomplishments

| Fiscal Year | Accomplishment  |
|-------------|---|
| 2019        | No activity during this period, due to the absence of an OS DEI (EEO) Director. |
| 2020        | No activity during this period, due to the absence of an OS DEI (EEO) Director. |

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.42

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)]

The OS has not established EEOC compliant systems in place to track reasonable accommodation requests

Objectives for EEO Plan

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description   |
|----------------|-------------|---------------|----------------|---|
| 09/30/2018     | 12/30/2021  |               |                | Establish a tracking mechanism to account for and ensure timely responses to requests for reasonable accommodation. |

Responsible Officials

| Title  | Name                             | Standards Address the Plan? |
|--|----------------------------------|-----------------------------|
| Director, Workforce Relations Division                 | Ayanna Sears (or designee)       | No                          |
| Employee Relations Program Manager                     | Megan Castaneda                  | No                          |
| Director, Human Resources Information Systems Division | Christopher Lawson (or designee) | No                          |
| OS DEI (EEO) Director                                  | TBD                              | No                          |

Planned Activities

| Target Date | Planned Activity  | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|---|--------------------------------|---------------|-----------------|
| 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.                                     | No                             |               | 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                             |               |                 |

Accomplishments

| Fiscal Year | Accomplishment  |
|-------------|---|
| 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.          |

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.43

Brief Description of Program  
Deficiency:

C.4.e.3. Develop and/or provide training for managers and employees? [see MD-715, II(C)]

The OS DEI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement DEI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies, ensuring strategic plan alignment to DEI (EEO) principles, ensuring effective coordination with the OS Human Resources Program

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.44

Brief Description of Program  
Deficiency:

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)]

OS lacks the internal processes, resources and staffing to identify and eliminate barriers in the workplace and develop corrective action plans.

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.45

Brief Description of Program  
Deficiency:

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)]

OS lacks the internal processes, resources and staffing to identify and eliminate barriers in the workplace and develop corrective action plans.

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.46

Brief Description of Program Deficiency:

D.1.a. Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]

OS lacks the internal processes, resources and staffing to identify and eliminate barriers in the workplace and develop corrective action plans.

Objectives for EEO Plan

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description  |
|----------------|-------------|---------------|----------------|--|
| 09/30/2021     | 09/30/2022  |               |                | Establish internal process for OS DEI (EEO) Director to annually assess progress towards DEIA (EEO) at OS.<br><br>Establish a process for identifying barriers that exclude EEO groups in the workplace<br>Develop an action plan to eliminate identified workplace barriers in OS |

Responsible Officials

| Title   | Name            | Standards Address the Plan? |
|---|-----------------|-----------------------------|
| OS DEI (EEO) Director   | TBD             | No                          |
| Chief, Administrative Services, BSSE                          | Patricia Callis | No                          |
| Associate Director, Human Resources, Interior Business Center | Julie Bednar    | No                          |

Planned Activities

| Target Date | Planned Activity   | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|--|--------------------------------|---------------|-----------------|
| 09/30/2022  | Conduct assessment to identify the current internal processes for OS data collection and any challenges to accessing data.                   | No                             |               |                 |
| 12/30/2022  | Establish business rules to assess employment data on a recurring basis to identify triggers.  | No                             |               |                 |
| 12/20/2022  | Expand data collection and sources for trigger identification (applicant flow, exit surveys, climate surveys, focus groups, etc.).           | No                             |               |                 |
| 12/20/2022  | Develop action plans to address identified barriers and periodically review for effectiveness.   | No                             |               |                 |
| 12/20/2022  | Receive training and research methods that can be utilized for identifying triggers.   | No                             |               |                 |
| 12/20/2022  | Determine what reports, processes, procedures etc. should be looked at for inclusion in the trigger/barrier analysis identification process. | No                             |               |                 |
| 12/30/2022  | OS DEI (EEO) and OS HR offices work collaboratively to establish a structure for receiving and sharing employment data on a recurring basis. | No                             |               |                 |

Accomplishments

| Fiscal Year | Accomplishment   |
|-------------|--|
| 2019        | No activity during this period, due to the absence of an OS DEI (EEO) Director |
| 2020        | No activity during this period, due to the absence of an OS DEI (EEO) Director |



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Plan to Attain Essential Elements

PART H.47

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.

OS lacks the internal processes, resources and staffing to identify and eliminate barriers in the workplace and develop corrective action plans.

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.48

Brief Description of Program  
Deficiency:

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)]

OS lacks the internal processes, resources and staffing to identify and eliminate barriers in the workplace and develop corrective action plans.

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

**Plan to Attain Essential Elements**

**PART H.49**

|  |  |
|--|--|
| Brief Description of Program Deficiency: | 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; and/or external special interest groups? [see MD-715 Instructions, Sec. I] |
|--|--|

OS lacks the internal processes, resources and staffing to identify and eliminate barriers in the workplace and develop corrective action plans.

**Objectives for EEO Plan**

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description   |
|----------------|-------------|---------------|----------------|---|
| 09/30/2021     | 09/30/2022  |               |                | Establish internal process for OS DEI (EEO) Director to annually assess progress towards DEIA (EEO) at OS |

**Responsible Officials**

| Title | Name | Standards Address the Plan? |
|-------|------|-----------------------------|
|-------|------|-----------------------------|

**Planned Activities**

| Target Date | Planned Activity | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|------------------|--------------------------------|---------------|-----------------|
|-------------|------------------|--------------------------------|---------------|-----------------|

**Accomplishments**

| Fiscal Year | Accomplishment |
|-------------|----------------|
|-------------|----------------|

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.50

Brief Description of Program  
Deficiency:

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

OS lacks the internal processes, resources and staffing to identify and eliminate barriers in the workplace and develop corrective action plans.

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.51

Brief Description of Program  
Deficiency:

D.3.c. Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]

OS lacks the internal processes, resources and staffing to identify and eliminate barriers in the workplace and develop corrective action plans.

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.52

Brief Description of Program  
Deficiency:

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)]

OS lacks the internal processes, resources and staffing to identify and eliminate barriers in the workplace and develop corrective action plans.

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.53

Brief Description of Program Deficiency:

D.2.a. Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]

OS lacks the internal processes, resources and staffing to identify and eliminate barriers in the workplace and develop corrective action plans.

Objectives for EEO Plan

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description   |
|----------------|-------------|---------------|----------------|---|
| 09/30/2021     | 09/30/2022  |               |                | Establish a process for identifying barriers that exclude EEO groups in the workplace |

Responsible Officials

| Title   | Name            | Standards Address the Plan? |
|---|-----------------|-----------------------------|
| Chief, Administrative Services, BSSE                          | Patricia Callis | No                          |
| OS DEI (EEO) Director   | TBD             | No                          |
| Associate Director, Human Resources, Interior Business Center | Julie Bednar    | No                          |

Planned Activities

| Target Date | Planned Activity   | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|--|--------------------------------|---------------|-----------------|
| 09/30/2022  | Conduct assessment to identify the current internal processes for OS data collection and any challenges to accessing data.                   | No                             |               |                 |
| 12/30/2022  | Establish business rules to assess employment data on a recurring basis to identify triggers.  | No                             |               |                 |
| 12/20/2022  | Expand data collection and sources for trigger identification (applicant flow, exit surveys, climate surveys, focus groups, etc.).           | No                             |               |                 |
| 12/20/2022  | Develop action plans to address identified barriers and periodically review for effectiveness.   | No                             |               |                 |
| 12/20/2022  | Receive training and research methods that can be utilized for identifying triggers.   | No                             |               |                 |
| 12/20/2022  | Determine what reports, processes, procedures etc. should be looked at for inclusion in the trigger/barrier analysis identification process. | No                             |               |                 |
| 12/30/2022  | OS DEI (EEO) and OS HR offices work collaboratively to establish a structure for receiving and sharing employment data on a recurring basis. | No                             |               |                 |

Accomplishments

| Fiscal Year | Accomplishment   |
|-------------|--|
| 2019        | No activity during this period, due to the absence of an OS DEI (EEO) Director |
| 2020        | No activity during this period, due to the absence of an OS DEI (EEO) Director |

DOI Office of the Secretary

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Plan to Attain Essential Elements

PART H.54

Brief Description of Program Deficiency:

E.4.a.3. Recruitment activities? [see MD-715, II(E)]

OS does not have systems in place to accurately collect, monitor, and analyze recruitment activities and to regularly survey the workforce.

Objectives for EEO Plan

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description   |
|----------------|-------------|---------------|----------------|---|
| 02/06/2018     | 12/30/2025  | 12/30/2022    |                | Develop and implement Department-wide systems to accurately collect, monitor, and analyze recruitment activities and to regularly survey the workforce. |

Responsible Officials

| Title  | Name            | Standards Address the Plan? |
|--|-----------------|-----------------------------|
| OS DEI (EEO) Director  | TBD             | No                          |
| Associate Director, Human Resources, Interior Business Cente | Julie Bednar    | No                          |
| Chief, Administrative Services, BSSE                         | Patricia Callis | No                          |

Planned Activities

| Target Date | Planned Activity  | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|---|--------------------------------|---------------|-----------------|
| 09/30/2023  | Assess recruitment plans and schedules in the Bureaus and Offices to identify triggers  | No                             |               |                 |
| 09/30/2023  | Establish a process to partner with EDI (EEO) practitioners to develop recruitment plans.   | No                             |               |                 |
| 09/30/2023  | Create a recruitment goal in the plans to target historically underrepresented groups.  | No                             |               |                 |
| 09/30/2023  | Identify OS recruiters and train recruiters on diversity principles.  | No                             |               |                 |
| 09/30/2023  | Re-design OS Office websites to showcase DOIs commitment to a diverse, inclusive, and accessible workplace.   | No                             |               |                 |
| 12/30/2023  | The OS DEI (EEO) Director will meet with stakeholders to collaborate on the development of enterprise systems for recruitment activities and resurveying the workforce. | No                             |               |                 |

Accomplishments

| Fiscal Year | Accomplishment  |
|-------------|---|
| 2019        | No activity during this period due to the absence of an OS DEI (EEO) Director |
| 2020        | No activity during this period due to the absence of an OS DEI (EEO) Director |



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Plan to Attain Essential Elements

PART H.55

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]

The OS has not established EEOC compliant systems in place to track reasonable accommodation requests

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.56

Brief Description of Program  
Deficiency:

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.

OS does not compare its performance in the EEO Process to other agencies of similar size.

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.57

Brief Description of Program Deficiency: OS does not compare its performance in the EEO Process to other agencies of similar size.

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.

Objectives for EEO Plan

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description   |
|----------------|-------------|---------------|----------------|---|
| 09/30/2021     | 12/31/2022  |               |                | Conduct a comparative analysis to measure EEO process performance against similarly sized agencies. |

Responsible Officials

| Title                 | Name | Standards Address the Plan? |
|-----------------------|------|-----------------------------|
| OS DEI (EEO) Director | TBD  | No                          |

Planned Activities

| Target Date | Planned Activity  | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|---|--------------------------------|---------------|-----------------|
| 09/30/2022  | Monitor trends in the OS DEI (EEO) program to verify DOI is meeting its obligations under EEOC statutes.  | No                             |               |                 |
| 12/31/2022  | Review other agencies' best practices and adopt them, where appropriate, to improve the effectiveness of the OS DEI (EEO) program.                  | No                             |               |                 |
| 12/31/2022  | Compare OS performance in the EDI (EEO) process to other federal agencies of similar size.  | No                             |               |                 |
| 12/31/2022  | Develop a schedule to provide regular updates for OS senior executive leaders on significant trends and best practices in the OS EDI (EEO) program. | No                             |               |                 |

Accomplishments

| Fiscal Year | Accomplishment  |
|-------------|---|
| 2020        | No activity in this period, due to the absence of an OS DEI (EEO) Director. |

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.58

Brief Description of Program Deficiency:

E.4.a.5. The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(4)]

The OS has not established EEOC compliant systems in place to track reasonable accommodation requests

Objectives for EEO Plan

| Date Initiated | Target Date | Date Modified | Date Completed | Objective Description   |
|----------------|-------------|---------------|----------------|---|
| 09/30/2018     | 12/30/2021  |               |                | Establish a tracking mechanism to account for and ensure timely responses to requests for reasonable accommodation. |

Responsible Officials

| Title  | Name                             | Standards Address the Plan? |
|--|----------------------------------|-----------------------------|
| Director, Workforce Relations Division                 | Ayanna Sears (or designee)       | No                          |
| Employee Relations Program Manager                     | Megan Castaneda                  | No                          |
| Director, Human Resources Information Systems Division | Christopher Lawson (or designee) | No                          |

Planned Activities

| Target Date | Planned Activity   | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|--|--------------------------------|---------------|-----------------|
| 12/30/2018  | Secure an automated tracking system to account for timely issuance of reasonable accommodation solutions Department-wide | No                             |               |                 |
| 12/30/2020  | Secure funding to develop a Department-wide reasonable accommodation tracking system                                     | No                             |               |                 |

Accomplishments

| Fiscal Year | Accomplishment |
|-------------|----------------|
|             |                |

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.59

Brief Description of Program  
Deficiency:

E.1.d. Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments.

OS lacks a process to determine if it issues acceptance letters/dismissal decisions within a reasonable timeframe.

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.60

Brief Description of Program  
Deficiency:

E.3.f. Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]

OS lacks a process to determine if it issues acceptance letters/dismissal decisions within a reasonable timeframe.

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.61

Brief Description of Program  
Deficiency:

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)]

OS does not compare its performance in the EEO Process to other agencies of similar size.

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Eliminate Identified Barriers

PART I.1

| <b>Source of the Trigger:</b>   | Workforce Data (if so identify the table)   |              |   |  |  |
|---|---|--------------|---|--|--|
| <b>Specific Workforce Data Table:</b>   | Workforce Data Table - A1   |              |   |  |  |
| <b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b><br><br>Provide a brief narrative describing the condition at issue.<br><br>How was the condition recognized as a potential barrier? | Black or African American Employment The number of Black or African American men in OS's permanent workforce remains below the availability of Black or African American men (5.5%) in the Civilian Labor Force (CLF). In FY 2020 the total for this group was 4.35% The data revealed that since FY 2017, the number of new hires of Blacks or African American men remained at approximately 3.4%, which is below the federal benchmark of 8.9%. Specifically, Black or African American men have been the least racial group hired, promoted and awarded or recognized for performance or conduct as compared to any other racial category in the Office of the Secretary. An analysis must be conducted to determine if there are policies, practices, or procedures that impede the hiring, recruitment, retention, and advancement opportunities for Black or African American male employees at the Office of the Secretary. |              |   |  |  |
| <b>STATEMENT OF BARRIER GROUPS:</b>   | <i>Barrier Group</i><br>Black or African American Males   |              |   |  |  |
| <b>Barrier Analysis Process Completed?:</b>   | N   |              |   |  |  |
| <b>Barrier(s) Identified?:</b>  | N   |              |   |  |  |
| <b>STATEMENT OF IDENTIFIED BARRIER:</b><br><br>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"> <thead> <tr> <th>Barrier Name</th> <th>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   |
|----------------|-------------|--------------------------------|---------------|----------------|---|
| 09/30/2021     | 09/30/2023  | No                             |               |                | 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. |

Responsible Official(s)

| Title   | Name            | Standards Address The Plan? |
|---|-----------------|-----------------------------|
| OS EEO Director   | TBD             | Yes                         |
| Associate Director, Human Resources, Interior Business Center | Julie Bednar    | No                          |
| Chief, Administrative Services, BSSE                          | Patricia Callis | No                          |



DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Eliminate Identified Barriers

Planned Activities Toward Completion of Objective

| Target Date | Planned Activities  | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|---|--------------------------------|---------------|-----------------|
| 09/30/2021  | Appoint an OS DEI (EEO) Director  | Yes                            |               |                 |
| 03/30/2022  | 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 Office of the Secretary.                           | No                             |               |                 |
| 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 DOI ERGs to develop recruitment sources and pipelines for Black or African American applicants. | No                             |               |                 |

Report of Accomplishments

| Fiscal Year | Accomplishments  |
|-------------|--|
| 2020        | As of FY 2020, however, the Office of the Secretary does not have an independent and dedicated EEO Director, does not have an Affirmative Employment Program Manager to oversee the program and to conduct barrier analysis, and 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. |

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Eliminate Identified Barriers

PART I.2

| <b>Source of the Trigger:</b>   | Workforce Data (if so identify the table)  |              |   |  |  |
|---|--|--------------|---|--|--|
| <b>Specific Workforce Data Table:</b>   | Workforce Data Table - A1  |              |   |  |  |
| <b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b><br><br>Provide a brief narrative describing the condition at issue.<br><br>How was the condition recognized as a potential barrier? | Hispanic or Latino Male Employment The data revealed that Hispanic/Latino men were below the federal benchmark compared to the OS's permanent workforce. Hispanic/Latino men comprise 5.1 percent of the federal benchmarks, but account for 3.2 percent of the OS's workforce. Hispanic/Latino men were also underrepresented in the percentage of new hires at OS; Hispanic/Latino men comprise 5.1 percent of the federal benchmark yet account for just 2.4 percent of new hires at OS. An analysis must be conducted to determine if there are policies, practices, or procedures that may be creating impediments for the hiring, recruitment, retention, or advancement opportunities for Hispanic or Latino employees at OS. |              |   |  |  |
| <b>STATEMENT OF BARRIER GROUPS:</b>   | <i>Barrier Group</i><br>Hispanic or Latino Males   |              |   |  |  |
| <b>Barrier Analysis Process Completed?:</b>   | N  |              |   |  |  |
| <b>Barrier(s) Identified?:</b>  | N  |              |   |  |  |
| <b>STATEMENT OF IDENTIFIED BARRIER:</b><br><br>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"> <thead> <tr> <th>Barrier Name</th> <th>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 |
|----------------|-------------|--------------------------------|---------------|----------------|-----------------------|
|                |             |                                |               |                |                       |

Responsible Official(s)

| Title   | Name            | Standards Address The Plan? |
|---|-----------------|-----------------------------|
| Chief, Administrative Services, BSSE                          | Patricia Callis | No                          |
| OS DEI (EEO) Director   | TBD             | No                          |
| Associate Director, Human Resources, Interior Business Center | Julie Bednar    | No                          |

Planned Activities Toward Completion of Objective

| Target Date | Planned Activities   | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|--|--------------------------------|---------------|-----------------|
| 09/30/2021  | Appoint an OS DEI (EEO) Director and Affirmative Employment Program Manager. | No                             |               |                 |

DOI Office of the Secretary

For period covering October 1, 2019 to September 30, 2020

Plan to Eliminate Identified Barriers

Planned Activities Toward Completion of Objective

| Target Date | Planned Activities   | Sufficient Staffing & Funding? | Modified Date | Completion Date |
|-------------|--|--------------------------------|---------------|-----------------|
| 03/30/2022  | 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 Office of the Secretary.  | No                             |               |                 |
| 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 ERGs 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

| Fiscal Year | Accomplishments  |
|-------------|--|
| 2020        | As of FY 2020, however, the Office of the Secretary 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. |

**MD-715 – Part J**  
**Special Program 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.

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 PWTD  | 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 PWTD  | 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.gov |
| 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.doi.gov                                    |

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: 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 DOIs 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 |

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.

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 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.



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

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

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 PWTD for any level of the time-off awards, bonuses, or other incentives? If “yes”, please describe the trigger(s) in the text box.

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

During FY 2020, OS PWD employees (11.8%) and PWTD 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 PWTD were among employees who received time off awards of greater than 40 hours. Additionally, in FY 2020 OS PWD and PWTD employees received cash awards at all levels at a lower rate than employees without a disability.

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.

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 PWTB 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 (PWTB)

Answer Yes

b. New Hires to GS-15 (PWTB)

Answer Yes

c. New Hires to GS-14 (PWTB)

Answer Yes

d. New Hires to GS-13 (PWTB)

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 PWTB 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 (PWTB)

Answer Yes

ii. Internal Selections (PWTB)

Answer Yes

b. Managers

i. Qualified Internal Applicants (PWTB)

Answer Yes

ii. Internal Selections (PWTB)

Answer Yes

c. Supervisors

i. Qualified Internal Applicants (PWTB)

Answer Yes

ii. Internal Selections (PWTB)

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 PWTD 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 PWTD 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 V: 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 CFR § 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

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

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/eo/Public-Civil-Rights>.

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

In FY 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 PWT. 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 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?

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 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?

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



|   |   |                                       |  |                                    |   |
|---|---|---------------------------------------|--|------------------------------------|---|
| <b>Source of the Trigger:</b>   | Workforce Data (if so identify the table)   |                                       |  |                                    |   |
| <b>Specific Workforce Data Table:</b>   | Workforce Data Table - B1   |                                       |  |                                    |   |
| <b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b><br><br>Provide a brief narrative describing the condition at issue.<br><br>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. |                                       |  |                                    |   |
| <b>STATEMENT OF BARRIER GROUPS:</b>   | <i>Barrier Group</i><br>People with Disabilities<br>People with Targeted Disabilities   |                                       |  |                                    |   |
| <b>Barrier Analysis Process Completed?:</b>   | N   |                                       |  |                                    |   |
| <b>Barrier(s) Identified?:</b>  | N   |                                       |  |                                    |   |
| <b>STATEMENT OF IDENTIFIED BARRIER:</b><br><br>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.                | <b>Barrier Name</b>   |                                       | <b>Description of Policy, Procedure, or Practice</b> |                                    |   |
| <b>Objective(s) and Dates for EEO Plan</b>  |   |                                       |  |                                    |   |
| <b>Date Initiated</b>   | <b>Target Date</b>  | <b>Sufficient Funding / Staffing?</b> | <b>Date Modified</b>                                 | <b>Date Completed</b>              | <b>Objective Description</b>  |
| 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.                        |
| <b>Responsible Official(s)</b>  |   |                                       |  |                                    |   |
| <b>Title</b>  |   | <b>Name</b>                           |  | <b>Standards Address The Plan?</b> |   |
| 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                                |   |
| Managers and Supervisors  |   | Various Offices                       |  | No                                 |   |

**Planned Activities Toward Completion of Objective**

| <b>Target Date</b> | <b>Planned Activities</b>   | <b>Sufficient Staffing &amp; Funding?</b> | <b>Modified Date</b> | <b>Completion Date</b> |
|--------------------|---|---|----------------------|------------------------|
| 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**

| <b>Fiscal Year</b> | <b>Accomplishments</b>  |
|--------------------|---|
| 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>   |

|   |   |  |                      |                                    |   |
|---|---|--|----------------------|------------------------------------|---|
| <b>Source of the Trigger:</b>   | Workforce Data (if so identify the table)   |  |                      |                                    |   |
| <b>Specific Workforce Data Table:</b>   | Workforce Data Table - B14  |  |                      |                                    |   |
| <b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b><br><br>Provide a brief narrative describing the condition at issue.<br><br>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. |  |                      |                                    |   |
| <b>STATEMENT OF BARRIER GROUPS:</b>   | <i>Barrier Group</i>  |  |                      |                                    |   |
|   | People with Disabilities<br>People with Targeted Disabilities   |  |                      |                                    |   |
| <b>Barrier Analysis Process Completed?:</b>   | N   |  |                      |                                    |   |
| <b>Barrier(s) Identified?:</b>  | N   |  |                      |                                    |   |
| <b>STATEMENT OF IDENTIFIED BARRIER:</b><br><br>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.                | <b>Barrier Name</b>   | <b>Description of Policy, Procedure, or Practice</b> |                      |                                    |   |
| <b>Objective(s) and Dates for EEO Plan</b>  |   |  |                      |                                    |   |
| <b>Date Initiated</b>   | <b>Target Date</b>  | <b>Sufficient Funding / Staffing?</b>                | <b>Date Modified</b> | <b>Date Completed</b>              | <b>Objective Description</b>                    |
| 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. |
| <b>Responsible Official(s)</b>  |   |  |                      |                                    |   |
| <b>Title</b>  |   | <b>Name</b>  |                      | <b>Standards Address The Plan?</b> |   |
| 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 PWTB.   | No                             |               |                 |

**Report of Accomplishments**

| Fiscal Year | Accomplishments   |
|-------------|---|
| 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.<br>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 PWTB 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 PWTB regarding their employment experience. A further analysis is warranted to identify barriers to employment.