

Department of the Interior

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

PART A Department or Agency Identifying Information	1. Agency	1. Department of the Interior
	1.a 2nd level reporting component	
	2. Address	2. 1849 C Street, N.W.
	3. City, State, Zip Code	3. Washington, DC 20240
	4. Agency Code 5. FIPS code(s)	4. IN00 5. IN

PART B Total Employment	1. Enter total number of permanent full-time and part-time employees	1. 53676
	2. Enter total number of temporary employees	2. 12776
	3. TOTAL EMPLOYMENT [add lines B 1 through 2]	4. 66452

PART C	Title Type	Name	Title
Agency Official(s) Responsible For Oversight of EEO Program(s)	Head of Agency	Deb Haaland	Secretary
	Head of Agency Designee	Rachael Taylor	Senior Advisor to the Secretary, Exercising the Delegated Authority of the Assistant Secretary - Pol
	Principal EEO Director/Official	Erica D. White-Dunston	Director and Chief Diversity Officer
	Affirmative Employment Program Manager	Tyvonnia Ward	Director
	Complaint Processing Program Manager	Thomas Ziehnert	Director
	Diversity & Inclusion Officer	Erica D. White-Dunston	Director and Chief Diversity Officer
	Women's Program Manager (SEPM)	Acquanetta Newson	EEO Specialist
	Special Placement Program Coordinator (Individuals with Disabilities)	Angela Lennartson	Senior HR Policy Analyst (Staffing)
	Reasonable Accommodation Program Manager	Megan Castaneda	Employee Relations Program Manager
	ADR Program Manager	William Hall	Senior Advisor for Collaboration
	Compliance Manager	Alvin Dillings	Senior EEO Specialist
	Principal MD-715 Preparer	Kimberly Ly	Social Science Research Analyst
	Other EEO Staff	Tanisha M. Edmonds	Deputy EEO Director
Other EEO Staff	Tanisha M. Edmonds	Deputy Director and Deputy Chief Diversity Officer	

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PART D
List of Subordinate Components Covered in
This Report

Subordinate Component and Location (City/State)	Country	Agency Code
Department of the Interior Washington , DC	United States	IN06
Department of the Interior Washington, DC	United States	OTHER
Department of the Interior Washington, DC	United States	IN01
Department of the Interior Washington , DC	United States	IN05
Department of the Interior Washington, DC	United States	IN06
Department of the Interior Lakewood , CO	United States	IN07
Department of the Interior Reston , VA	United States	IN08
Department of the Interior Washington, DC	United States	IN10
Department of the Interior Arlington, VA	United States	IN15
Department of the Interior Washington, DC	United States	IN22
Department of the Interior Washington, DC	United States	IN26
Department of the Interior Washington, DC	United States	IN23

EEOC FORMS and Documents	Required	Uploaded
Alternative Dispute Resolution Procedures	Y	Y
Agency Strategic Plan	Y	Y
Anti-Harassment Policy and Procedures	Y	Y
Reasonable Accommodation Procedure	Y	Y
Personal Assistance Services Procedures	Y	Y
Organization Chart	Y	Y
EEO Policy Statement	Y	Y
Disabled Veterans Affirmative Action Program (DVAAP) Report	N	N
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	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 heritage for the benefit and enjoyment of the American people. It provides scientific and other information about resources, natural hazards to address societal challenges and honors the Nation's trust responsibilities or 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 refuge 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 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 invested in the organization's purpose and who can succeed in the sometimes remote or strenuous outdoor work environments. Through the majority of DOI mission objectives are accomplished. 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 diverse workforce serves as a competitive advantage in that it bolsters DOI's ability to maximize the local community's 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.

The eleven bureaus and many 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 Minerals; 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 has exclusive, but equally important work and missions that come together to serve the broader DOI mission. This structure represents Diversity, Equity, and Inclusion (DEI) in its broadest sense and the benefits accrued from diversity, equity and inclusion are priorities. 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, DEI 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 credibility for the Department as a model DEI employer. Building trust and leading change in the lives of the American people also depend 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 program.

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measures DOI instituted throughout Fiscal Year (FY) 2020 to actualize the tenets of DEI across the Department. Comparing DOI's FY 2020 activities to the Equal Employment Opportunity Commission's (EEOC) Key Performance Indicators (KPIs) of a "Model DEI Employer" there were notable successes and opportunities for improvements in performance elements of (1) Demonstrated Commitment from DOI Leadership for Ensuring DEI; (2) Integration of DEI into DOI's Overall Strategic Mission; (3) Management and Program Accountability for DEI; (4) Proactive Preventive Measures to effectuate DEI in DOI; (5) DEI Program Efficiency; and (6) Legal Compliance with statutory requirements for DEI.

The activities detailed in this annual report reflect a performance period during which the Department was led by the Administration of President Donald J. Trump. These activities align 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 2635 and the Government Performance Results Act- Modernization, Act, 2010, P.L. 111-352 (GPRA-MA). The strategic 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 DEI efforts in this annual report align with the FY 2018 DSP *Mission Area 6: Modernizing Our Organization and Infrastructure for the Next 100 Years, Goal #1: Align Organizational Structure to Improve Partnership Engagement and Mission Delivery, Strategy #2: Improve strategic planning and retention efforts to ensure mission-critical service delivery through data driven processes and increase employee engagement efforts.* As such, the accomplishments identified in this annual report measure: 1) DOI's progress in promoting workplace practices that create and enhance opportunities for all employees to achieve their fullest potential in the workplace; and 2) DOI's effectiveness in using DEI to successfully 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, bureau leadership across DOI demonstrated commitment to affirming DOI as a "Model DEI Employer." While there were instances whereby not all leaders championed and advanced DEI as a strategic business objective, there was recognition by a significant number of leaders that DEI is everyone's responsibility. DOI implemented performance objectives designed to hold employees, at all grade levels, accountable for maintaining a professional atmosphere by (1) fostering an environment where everyone is respected; (2) ensuring individuals were promoted, trained, and retained based on their experience, knowledge, skills, and abilities; (3) rewarding employees for their performance; and (4) creating a workplace culture that attracts, develops, and retains outstanding individuals who are coached, counseled, and motivated to reach their fullest potential. While DOI has implemented accountability measures in employee performance standards to ensure DEI, as a whole, the Department's deficiencies in this key performance indicator increased in FY 2020 as a result of a thorough review of bureau and office program execution.

This annual report outlines the Department's strategies to support DOI's continued commitment to its DEI program responsibilities under 29 C.F.R. § 1614.102. The activities undertaken by each of the bureaus achieved results that supported DOI's progress toward being a model DEI employer. 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.

Notable Highlights

EXECUTIVE SUMMARY: MISSION

While a comprehensive review and analysis of the Department's overall DEI program ensues, listed below are a few activities occurring in FY 2020:

- The Department's Workplace Culture Transformation Advisory Council (WCTAC), an entity comprised of Senate-confirmed and Senior Executive Service (SES) leaders from across the Department, convened quarterly to address the Department's progress towards eliminating harassing conduct, improving employee engagement, and maintaining high ethical standards to support the Department's aim to become a model employer.
- In early FY 2020, the Department launched the WCTAC website that serves as a dashboard to document DOIs' progress in addressing and eliminating harassment within every part of the organization. Consequently, several bureaus and offices implemented subsequent sites to funnel into the Departments' system of accountability.
- Anti-harassment Points of Contact in all bureaus and offices developed and implemented action plan goals and strategies to transform the workplace culture. These goals, strategies, and activities were briefed regularly to the WCTAC.
- DOI launched 112 free instructor-led virtual training sessions on *Bystander Intervention and Intergenerational Sensitivity* that reached 2,922 employees throughout the Department. The overarching goal was to provide employees with a variety of strategies to stop unwelcomed, inappropriate, and unprofessional behavior.
- The Offices of Diversity, Inclusion and Civil Rights (ODICR)[\[1\]](#) and Human Capital (OHC) embarked upon multiple joint endeavors to improve opportunities for people with disabilities and the issuance of reasonable accommodations across the Department. These efforts resulted in comprehensive consultative advice and guidance provided to leaders regarding the issuance of accommodation solutions which led to quicker, more effective solutions than in previous years.
- The lead Special Placement Coordinator (SPPC) for the Office of the Secretary, worked closely with each bureau human capital office to designate and prepare representatives to engage in intentional activities to increase employment in accordance with Section 501 of the Rehabilitation Act. The SPPCs established a charter with guidelines, joint messaging, and activities, and met monthly to record activities conducted during the month to meet employment goals.
- Each of the bureaus implemented some form of training, educational and awareness opportunities, and outreach initiatives to improve DEI in the workplace. These efforts resulted in managers and supervisors proactively serving as champions in planned events implemented throughout the year to improve employee engagement and inclusion. Several provided financial resources to implement comprehensive activities to influence inclusion.

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- DOI maintains more than 1,200 collateral duty diversity partners to help further its DEI message. Collateral duty diversity partners are comprised of Diversity Change Agents (DCA), Employee Resource Groups (ERG), and Special Emphasis Program (SEP) committees. During FY 2020, the Departmental ODICR hosted a series of discussions and facilitated trainings to unite and standardize the diversity partners to achieve intentional results which align with the EEOC's KPIs for establishing a model employer.
- The Department maintains an internal tracking system to monitor allegations of harassing conduct that results in disciplinary actions taken against supervisors or employees for conduct that contributed to or resulted in harassing conduct. It is important to note that each bureau has its own unique internal tracking system.^[2]

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 opportunity to assess its DEI program to determine if deficiencies exist to actualizing a "Model DEI" program. If deficiencies are noted, federal agencies are expected to take proactive steps to address and correct known challenges and submit a corrective action plan to the EEOC at the close of each fiscal year.

DOI's FY 2020 self-assessment results indicated that the Department has material deficiencies in five out of six Performance Indicators (KPIs) of a "Model DEI" program. The deficiencies exist in the areas of:

1. Demonstrated Commitment from Agency Leadership for Ensuring DEI;
2. Integration of DEI into DOI's Overall Strategic Mission;
3. Management and Program Accountability for DEI;
4. Proactive Prevention Measures to effectuate DEI throughout DOI; and
5. DEI Program Efficiency.

A comprehensive review of the Department's DEI efforts can be found on pages 15 through 57 of this report.

^[1] The Departmental Office of Civil Rights (OCR) was renamed the Office of Diversity, Inclusion and Civil Rights in January 2021.

^[2] DOI harassment complaint data is centrally tracked for all complaints that rise to the level of an investigation, resulting in a harassment and managerial discipline. Complaints that do not rise to the level of an investigation are not centrally tracked at this time and the harassment program does not include an appeals process.

EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

ESSENTIAL ELEMENT A:

DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP

The *KPI Demonstrated Commitment from DOI Leadership for ensuring DEI* contains 14 measures that examine a range of factors that considers the Department’s effectiveness in actively maintaining a discrimination-free workplace. The measures include, but are not limited to, the Secretary of the Interior (or Designee) issuing workplace policy statements annually to declare the Department’s position against discrimination and harassment, a support of Department-wide workplace diversity, equity and inclusion. The broad dissemination of such statements ensures all employees, volunteers, and contractors are informed and adhere to the principles of DEI, 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 DEI 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 established standards. The Office of the Secretary and multiple bureaus failed to comply with nine measures for this KPI. The Director and Chief Diversity Officer for the departmental Office of Diversity, Inclusion and Civil Rights (ODICR) and multiple bureau DEI Directors were not included in key decisions that impacted employment throughout the Department. Neither the ODICR Director nor the majority of the Bureau DEI Directors had regular and/or recurring means of advising the head of the agency or respective bureau head of, amongst other things, widespread impediments in employment that adversely impacted one or more groups of employees working in the Department. Below is a FY 2019 and FY 2020 snapshot, by bureau and the Office of the Secretary (OS), showing the program 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
BIA	14	14	0	0
BFTA*	New Bureau	New Bureau	No Data	No Data
BLM*	Not Reported	14	Not Reported	0
BOEM	8	11	6	3
Reclamation	14	14	0	0

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BSEE	8	11	6	3
FWS	14	14	0	0
NPS	14	14	0	0
OSMRE	14	13	0	1
USGS	14	14	0	0
OS*	13	5	1	9

***Special Note:** There were three issues of specific note that impacted the FY 2020 MD-715 performance for this First, during FY 2020, the Bureau of Land Management (BLM) underwent an organizational move to Grand Junction, Colorado. Rather than relocate, several of the key officials, including the Bureau DEI Director, within the BLM Office of Civil Rights vacated their positions. To date, the majority of the positions remain vacant. As a result, at the close of FY 2020, BLM had not completed its MD-715 report, which should be rolled into the Department’s overarching report. Second, the Office of the Secretary (OS) does not have an independently-assigned DEI Director nor Affirmative Action Employment Manager to oversee the operational and proactive prevention efforts conducted within the offices and divisions assigned to the OS to ensure the tenets of the MD-715 program were actualized during FY 2020. Lastly, the Bureau of Trust Fund Administration was established in late FY 2020, at the close of the reporting year. Therefore, the bureau does not have staff allocated to meet its statutory requirements for EEO in the workplace.

Successes:

In FY 2020, leaders across the Department implemented several initiatives that ensured internal accountability, improved work-life balance, instilled greater professionalism, and increased focus on the early resolution of workplace conflicts. These initiatives have served to enhance DOI’s overall performance. 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. SPCCs were designated within the OS and each bureau to engage in intentional activities to increase employment, training, development, and the employment experiences of the disabled community.
- 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.

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Areas Requiring Improvement:

The leadership at every level of DOI must take proactive steps to ensure the principles of DEI are readily a part of the respective workforce culture, and consistently applied throughout DOI. Most importantly, leadership at every level of DOI must take proactive steps to ensure that disciplinary actions are consistently taken and fairly applied against inappropriate workplace behaviors that violate established policies.

- 64 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 DOI for six consecutive years. In FY 2020, retaliation was the leading basis in complaint activity and harassment was the leading issue raised in complaint activity throughout the Department. Specifically, approximately 789 formal complaints of discrimination were filed against the Department. Of the 789 formal complaints, 124 involved allegations of harassment and 141 involved allegations of retaliation.
- Over the past few years, there have been numerous findings of discrimination against DOI for failure to provide reasonable accommodations (RA). For four consecutive years, disability was among the top bases of discrimination complaints throughout the Department and is trending upward. 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 the US EEOC, ODICR has not been funded to provide this necessary training. Moreover, officials within the OS and multiple bureaus have not considered reasonable accommodation training as a necessary aspect of new, newly appointed, or recurring supervisor training to avert the recurring issues negatively impacting the DOI community of employees with disabilities.
- Standardize the use of Schedule A Hiring for People with Disabilities throughout the Department. Some bureaus utilize the appointing authority as intended by OPM and are effective in increasing employment opportunities for this targeted groups. However, other bureaus are sporadic in its use, require unnecessary extra steps and approaches for applicants with disabilities to follow when attempting to utilize this benefit of employment, resulting in dissuaded applicants and the infrequent use of the hiring authority.

The Secretary of the Interior (or Designee) can correct this deficiency by establishing and disseminating a departmental (EEO) policy statement and enacting proactive measures to hold DOI's leaders accountable for promoting and implementing DEI (EEO) in their organizations.

Recommendations for Improvement:

1. Develop and issue comprehensive policy statements for DEI (EEO), the use of Schedule A Appointing Authority, and ensure broad dissemination and accountability for said policies.
2. Acknowledge and reward organizational leaders and offices that exhibit the behaviors that foster DEI (EEO) in the workplace. Prominently highlight on multiple DOI platforms those leaders and employees that exemplify DOI as a "Model DEI (EEO) Employer."

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3. Make promoting and implementation of DEI (EEO) a factor for bonuses, promotions, key assignments, and the like.
4. Ensure all bureau 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.
5. Establish procedures for new supervisors and newly promoted supervisors to understand their roles and responsibilities for providing reasonable accommodations.

ESSENTIAL ELEMENT B:

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

The KPI *Integration of DEI (EEO) into DOI's Overall Strategic Mission* requires DOI and its leaders to view DEI as an integral part of its strategic plan and operate from the perspective that the success of transforming the work culture, increasing employee engagement, and achieving optimal employee performance rests in DOI's embrace and utilization of DEI (EEO) as a foundational ingredient for mission success. Additionally, success in this KPI is enhanced when the Department organizes and structures its DEI (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 overall DOI 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 DEI (EEO) as a strategic focus in DOI is ineffective or non-existent. In FY 2020, the Departmental ODICR sent an audit team to each bureau to conduct a line-by-line assessment of its DEI (EEO) program. The audit revealed nine additional program deficiencies for this KPI from FY 2019 to FY 2020. In addition, the lack of resources allocated to the program throughout the Department rendered the overseers of the program ineffective in ensuring compliance with the measures in this KPI. Only one bureau, the Fish and Wildlife Service (FWS), met all measures for this KPI.

It is also important to note that the Departmental ODICR does not have management control over the bureau DEI programs, each of the bureaus has the autonomy to carry out the program performance without concern for Departmental approach or focus for actualizing DEI and its consistent application across the Department for standard performance in each of the KPIs.

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Bureau	Met Measures FY 2019	Met Measures FY 2020	Unmet Measures FY 2019	Unmet Measures FY 2020
BIA	32	34	7	5
BFTA*	New Bureau	New Bureau	No Data	No Data
BLM*	Not Reported	29	Not Reported	10
BOEM	31	34	8	5
Reclamation	31	35	8	4
BSEE	31	34	8	5
FWS	39	39	0	0
NPS	34	36	5	3
OSMRE	36	35	3	4
USGS	34	34	5	5
OS*	Not Reported	11	Not Reported	28

The reporting structure for an effective DEI (EEO) program provides the principal DEI (EEO) official with the appropriate authority and resources to effectively operate a successful enterprise DEI (EEO) program. The EEO Director serves in direct report to the bureau head in seven out of ten bureaus and the majority of the EEO Offices, to include ODICR, have sufficient monetary or staffing resources to support successful operations of their programs to meet the article requirements listed as MD-715 KPIs.

The Departmental ODICR and multiple DEI (EEO) Directors are not consistently included in discussions with leadership, SOL, or HR regarding decisions that impact recruitment, training, career development, succession planning, field office closures and any other significant change occurring within their respective bureaus. Moreover, neither the Departmental ODICR nor bureau DEI offices are consulted for an impact analysis/es or strategic recommendations. This does not consider the risk impact of to mitigate risk. The lack of inclusion of DEI (EEO) staff in critical organizational discussions not only directly contradicts the clearly articulated participation by DEI leadership, but also places the Department in a position of making decisions without understanding the full impact its decisions have on the entire workforce population, often resulting in an adverse impact on employees in the workforce.

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Successes:

- The BOR DEI (EEO) program received three additional full-time employees in its complaints' management program. These additional resources alleviated the recurring untimely processing issues. Additionally, BOR instituted bureau-wide procedures to ensure the timely processing of complaints for its subordinate EEO complaints management programs.
- The Assistant Secretary for Policy, Management, and Budget (PMB) allocated three additional full-time equivalent (FTE) positions to the Departmental ODICR to meet critical program performance. As a result, the ODICR Director realigned staff for enhanced execution of roles, responsibilities and priorities.
- Multiple bureau DEI (EEO) staff conducted reviews of bureau-level policies, programs, and practices to assess for employment barriers. FWS, USGS, and NPS established barrier analysis teams championed by senior managers. The leadership authorized staffing, contractors, and other resources to implement thorough analyses.
- The Department's FY 2018 to 2022 Strategic Plan established goals, objectives, and performance measures to ensure DOI attracts, develops, and retains a talented and diverse workforce to protect and manage the natural resources and cultural heritage over which the Agency has stewardship. The strategic plan also holds leadership accountable for guiding efforts to ensure a workplace environment within the Department that is safe, fair, and conducive to employee productivity.
- At the close of FY 2020, OHC received funding to develop a Department-wide reasonable accommodation tracking system. A contractor is working to complete the system in FY 2021.
- Managers and supervisors support employee engagement as a resource to gain more context about employee perspectives and ideas to improve the workplace environment. DOI gathers employee opinions through tools including the OPM Federal Employee Viewpoint Survey (FEVS), and other documents that annually report employee engagement, such as the Partnership for Public Service Best Places to Work in the federal government rankings. The Department utilized an internal website to provide employees access to survey results.
- The U.S. Fish and Wildlife Service (FWS) Executive Diversity Committee (EDC) provides oversight and guidance for the planned activities in the FWS Five-Year Strategic Diversity and Inclusion Implementation Plan (DIIP) FY 2020 - FY 2024. The FWS FY 2020 – FY 2024 DIIP has a strong focus on accountability. The FWS DIIP sets forth strategic objectives to engage employees at all levels of the organization and to communicate the roles and responsibilities each employee has in ensuring a diverse and inclusive workforce.
- The Bureau of Land Management (BLM) Inspire Program (an affiliate of the OPM Pathways Student and Recent Graduate Program) assisted in the recruitment of BLM mission-critical occupations, including Science, Technology, Engineering, and Math (STEM) career fields.

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- Throughout FY 2020, the Departmental ODICR Director conducted multiple meetings with the Principal Deputy Assistant Secretary for Policy, Management and Budget (PMB) regarding the appropriate alignment of the DEI (EEO) program officials to comport with statutory requirements set forth by the EEOC.
- The Departmental ODICR Director and Deputy Director met with the BOR Director to discuss the appropriate alignment of the DEI (EEO) program. At the close of FY 2020, talks were still ongoing as to the appropriate placement of the program.
- The Departmental ODICR Director conducts bi-weekly meetings with bureau DEI (EEO) Directors to provide regular updates, including data on compliance statistics for each of their respective programs, to strategize and standardize DEI (EEO) efforts, and other DEI (EEO)-related functions.
- The Departmental ODICR Director and the 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.
- The Departmental ODICR Affirmative Employment Programs Division conducts monthly meetings with diversity partners throughout the Department to unify and standardize DEI (EEO) efforts.
- The Departmental ODICR Director conducted extensive discussions with the Principal Deputy Assistant Secretary for PMB and other senior leaders to ensure program compliance. The Departmental ODICR Director also conducted numerous one-one-one discussions with Senior Executives within the Office of the Secretary and bureau executive teams to outline DOI's DEI (EEO) program obligations, effectiveness, and plan of action. As a result, the Departmental ODICR received recurring invites, prior to permanent inclusion as an attendee, at the Workforce Culture Transformation Advisory Council and the Management Information Team meetings. Both meetings include Senior Executive Service level discussions concerning organizational impacts, effectiveness, and Departmental compliance.

Areas Requiring Improvement:

As previously stated, the essential element of Integration of DEI (EEO) into DOI's overall Strategic Plan has a set 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 Office of the Secretary and multiple bureaus.

Multiple bureau DEI (EEO) offices and the Departmental ODICR lacked sufficient staffing and funding to ensure efficient and successful operation of the Department's overall DEI (EEO) program. With the exception of FWS, USGS, and NPS, none of the bureaus' DEI (EEO) offices had staff or budgets to conduct a thorough barrier analysis to proactively identify barriers and institute measures to foster inclusion and avert discriminatory practices. For instance, eight out of ten bureaus and the Departmental ODICR did not have a designated Disability Program Manager or other Special Employment Program Managers with oversight of disability employment, employment of specifically identified underrepresented groups, barrier identification and elimination of practices or policies that prevent these groups from full inclusion in the workforce, equitable promotional and training opportunities, and to ensure the employment experiences of these groups are a ta

EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

focuses throughout the Department.

For five or more consecutive years, the DEI (EEO) program in the Departmental ODICR and multiple bureau DEI (EEO) Offices were relegated to "reactive complaints management." Eighty percent or more of the staff and funding allocated to the Departmental ODICR and bureau DEI (EEO) Offices are designated for processing complaints of discrimination, reacting to findings of discrimination by oversight and adjudicatory agencies including the EEOC, the Merit System Protection Board, and the Office of Special Counsel. Insufficient staffing and funding meant that the Departmental ODICR and multiple bureau DEI (EEO) Offices were unable to focus on proactive prevention measures to minimize risks, reduce waste, eliminate abuse, and help the Department establish a culture that fosters diversity, equity, inclusion, accessibility, and employee preparedness.

The inability of the Departmental ODICR and bureau DEI (EEO) offices to focus staffing and resources on proactive prevention measures, diversity, equity, inclusion, accessibility and outreach is evidenced by the low overall number of employees participating in the OPM FEVS administered each year, exit survey data obtained from departing employees, and the sharp decline in the diversity of the workforce based on the population of diverse employees separating from the workforce year after year. For example, Black or African American men and women, Asian men and women, Hispanic or Latino men and women, employees identifying with two or more races, and employees with disabilities are leaving at an equal or greater rate than DOI is onboarding these groups to the workforce.

Recommendations for Improvement:

1. Standardize the reporting structure for the Departmental ODICR Director and bureau DEI (EEO) Directors to ensure each leader is appropriately aligned in accordance with statutory requirements.
1. Establish an Executive Council to oversee and maintain leadership focus on DEI (EEO) throughout the Department.
1. Establish an internal process that gives the Departmental ODICR Director responsibility for providing performance input and/or performance feedback to bureau heads regarding each bureau's DEI (EEO) office to ensure standardized implementation of DEI (EEO) strategic priorities and statutory/regulatory requirements throughout the Department.
1. Provide sufficient staffing and funding to the Departmental ODICR and each bureau DEI (EEO) office to ensure adequate resources are available to carry out DEI (EEO) strategic priorities and statutory/regulatory requirements.

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1. Appoint full-time Disability Program Managers and other Special Emphasis Program Managers to the Departmental ODICR and each bureau DEI (EEO) office. Realign the Department's Employee Resource Groups' operational activities under the Departmental ODICR and bureau DEI (EEO) Offices to ensure consistency of utilization of ERGs aligned with the Department's strategic goals.
1. 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.
1. Establish a mechanism to track, process and ensure timely response to requests for reasonable accommodation.
1. Implement Department-wide measures that track senior manager's progress in establishing and implementing DEI (EEO) strategic priorities.

ESSENTIAL ELEMENT C:

MANAGEMENT AND PROGRAM ACCOUNTABILITY FOR DEI

The KPI *Management and Program Accountability for DEI* requires the Secretary of the Interior and each bureau to hold all managers, supervisors, and program officials responsible for the effective implementation of DOI's DEI 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; 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 DEI (EEO) are either ineffective or nonexistent. Below is a breakout by bureau and office of the total measures met and unmet in this KPI during FY 2019 and FY 2020.

Bureau	Met Measures	Met Measures	Unmet Measures	Unmet Measures
	FY 2019	FY 2020	FY 2019	FY 2020
BIA	39	38	5	6

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BFTA	New Bureau	New Bureau	No Data	No Data
BLM*	Not Reported	36	Not Reported	8
BOEM	39	39	5	5
Reclamation	41	42	3	2
BSEE	39	39	5	5
FWS	44	44	0	0
NPS	43	40	1	4
OSMRE	44	44	0	0
USGS	43	40	1	4
OS*	Not Reported	18	Not Reported	26

Successes:

- In FY 2020, the assessment of HR operations Department-wide was completed. 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 bureau 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 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.

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- 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. The Departmental ODICR Director is evaluated in part on the Department's compliance with anti-harassment and anti-discrimination obligations.
- In FY 2020, the Departmental ODICR assessed the bureau DEI Programs to ascertain shortfalls and deficiencies.

ESSENTIAL ELEMENT D:

PROACTIVE PREVENTION MEASURES TO EFFECTUATE DEI IN DOI

The KPI *Proactive Prevention Measures to Effectuate DEI in DOI* requires the Secretary of the Interior or Designee 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 Department proactively assesses its internal processes, policies and procedures on a recurring basis to determine where impediments may operate to exclude any group and develop strategies and plans to eliminate identified barriers.

An assessment of the overall DOI program revealed that a combination of deficiencies exists in this KPI that raise a reasonable possibility that the Department's operational controls for Proactive Prevention efforts are ineffective. The Department's lack of progress in eliminating the ineffectiveness is largely due to insufficient staffing and funding of Departmental ODICR and bureau DEI (EEO) offices which hinders the ability to take systematic and consistent approaches to eradicate prejudice, harassment and discrimination across the Department. This lack of staffing and funding means that the Departmental ODICR and bureau DEI (EEO) have relegated their preventative services to reacting to findings of discrimination issued against the Department and/or to multiple complaints of discrimination initiated within a certain area deemed "hot spots" rather than operate from a preventative stance to help DOI positions to operate equitably and inclusively.

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

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process or to the Departmental ODICR. Moreover, employees have also reported they were unaware of the ability to 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 by bureau and office of the total measures met and unmet 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
BIA	9	10	5	4
BLM*	Not Reported	14	Not Reported	0
BFTA*	New Bureau	New Bureau	No Data	No Data
BOEM	7	8	7	6
Reclamation	7	14	7	0
BSEE	7	8	7	6
FWS	14	14	0	0
NPS	12	13	2	1
OSMRE	12	13	2	1
USGS	11	11	3	3
OS*	Not Reported	2	Not Reported	12

Successes:

DOI has a diverse and competitive workforce, with employees serving in a variety of mission-critical occupations including Scientists, Park Rangers, Ranger Technicians, Hydrologists, Engineers, Geologists, Foresters, Geophysicists, Compliance Officers, and Environmental Specialists. 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 onboarding, which thwarted the Department's recruitment efforts. A root cause analysis is needed to determine the reason(s) for frequent turnover.

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- In FY 2020, the Departmental ODICR capitalized on monthly MD-715 Program Manager and Diversity Partner meetings by providing training and tools to enhance practitioner knowledge and effectiveness in implementing DEI (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 DEI;
 - 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; and
 - Experts from multiple bureaus provided information on the available hiring authorities to bolster hiring opportunities from all groups.
- 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 DOI. Although there is no penalty for managers who fail to report harassment, the Department continues to be vigilant in taking prompt and immediate steps to address all allegations of discrimination, retaliation, and 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.
- DOI 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 DOI employees, applicants, and visitors.
- The Selective Placement Program Coordinators (SPPC) throughout the DOI help managers and supervisors recruit, hire, and accommodate individuals with disabilities. Throughout the reporting year, the OS SPPC worked collaboratively with each of the designated bureau SPPCs to expand its efforts to appropriately align the program to respond to job seekers requiring assistance. In addition, OPM updated its federal government agency-wide SPPC Directory to include DOI SPPCs.

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Areas Requiring Improvement:

A review of DOI’s FY 2020 performance against this KPI, revealed that 85 percent of the required actions in performance element were not met during the FY. The area of Proactive Prevention is the element that poses the greatest risk for DOI because the lack of success in this element impedes employee productivity and the retention of quality 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 DEI employer. Consequently, creating an organizational culture and environment where employees whereby equity, diversity, acceptance, accessibility and inclusion are encouraged dissuades discrimination which is critical for continued organizational and mission success.

Recommendations for Improvement:

1. Develop strategic plans to track and analyze recruitment processes and procedures to identify potential barriers.
1. 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 Department.
1. Develop guidance for use by leaders at all levels across the Department 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

DEI PROGRAM EFFICIENCY

The KPI *DEI Program Efficiency* requires the Secretary of the Interior 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.

This KPI consists of 32 measures to determine the Department’s compliance with establishing an efficient DEI program. Below is a breakout by bureaus 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
BIA	33	33	0	0

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BLM*	Not Reported	32	Not Reported	1
BFTA*	New Bureau	New Bureau	No Data	No Data
BOEM	32	33	1	0
Reclamation	33	33	0	0
BSEE	32	33	1	0
FWS	33	33	0	0
NPS	33	33	0	0
OSMRE	32	33	1	0
USGS	32	32	1	1
OS*	Not Reported	21	Not Reported	12

DOI maintains an effective complaints management program that ensures complaints of discrimination are fairly and thoroughly investigated and final actions are taken in a timely manner. The Departmental ODICR and bureau DEI (and other) offices 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 processes informal complaints and formal complaints well within the regulatory complaints processing timeframes. The Departmental ODICR ensures that its complaint processing function has adequate staffing and funding to remain vigilant, neutral and is kept separate from the Department's legal defense arm. The Departmental ODICR continues to evaluate its complaint processing function to improve early resolution of complaints and analyze processing data to develop solutions for continuously improving processing times at all stages of the complaints process.

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.

Discussions with managers and supervisors within the U.S. Park Police on recurring complaint activity and strategies to mitigate risks.

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

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- The Affirmative Employment Program (AEP) Division published and disseminated Department-wide, an article relating to employment of women in senior executive positions and actions that dissuade full participation by all women. The Interior Business Center AEP published the Connections Magazine each month that spoke to the value and influence each ethnic group, race, and gender of American society has contributed to the success of the United States and DOI.
- OHC completed the move of all bureaus to USAStaffing to centralize and standardize the Department with one recruitment and hiring system. OHC coordinated with the Office of Personnel Management (OPM) to grant access to Applicant Flow Data for the HR and DEI (EEO) practitioners and trained the staff on how to use the system to extract the data. A more detailed training for MD-715 practitioners is scheduled for second quarter FY 2021.

Areas Requiring Improvement:

At the close of FY 2020, there were 12 deficiencies identified for this KPI. These deficiencies are recurring and are actively addressed by the Department's OHC, in collaboration with the Departmental ODICR and bureau DEI offices. The deficiencies are: (1) complete a comprehensive tracking system for reasonable accommodations; (2) update Reasonable Accommodation Procedures to align with Section 501 of the Rehabilitation Act; (3) establish various announcements for training, development, and career advancements opportunities in such a way that people with disabilities and targeted disabilities and underrepresented groups will be made aware of and be encouraged to apply for opportunities; (4) issue acceptance letters/dismissal decisions, investigations, final agency decisions, and final actions within a reasonable timeframe; (5) encourage all employees to use Alternative Dispute Resolution (ADR) and evaluate the effectiveness of the ADR program; (6) establish systems to accurately collect, monitor, and analyze recruitment activities, especially those in which people with disabilities and targeted disabilities were not selected; (7) regularly survey the workforce, especially those with disabilities and targeted disabilities and underrepresented groups to access employment experiences; and (8) identify and distribute significant trends and best practices in its DEI (EEO) program to senior executive leaders.

Recommendations for Improvement:

1. 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.
1. Update and disseminate reasonable accommodation procedures that align with the revisions set forth by Section 501 of the Rehabilitation Act. Equip managers and employees to respond proactively to satisfy the standard to improve employment experience of people with disabilities and targeted disabilities.
1. Provide adequate staffing levels and authority for the Departmental ODICR and each bureau DEI (EEO) offices to ensure their successful and effective operation and reasonable efforts are made to identify and remove workplace practices, policies, or procedures that impede maximum utilization of its diverse employees.

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1. Identify and disseminate significant trends and best practices in the DOI DEI (EEO) program.
 1. 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.
 1. Encourage all employees to use ADR and annually evaluate the effectiveness of the program.
 1. Issue acceptance letters/dismissal decisions, investigations, final agency decisions and final actions, within a reasonable timeframe.
- Effective reasonable accommodation procedures were made available on web pages as well as in-person by the bureau Reasonable Accommodation Coordinator (RAC) or designee. Leaders had frequent contact with HR practitioners when engaging in the reasonable accommodation process to ensure that DOI continuously reviewed requests and made decisions to act on requests for accommodations consistent timely and within the established DOI policy and procedures.
 - Bureau DEI (EEO) program officials provide advice, guidance, feedback, and technical assistance to bureau leadership in making informed decisions regarding recruitment and retention of each bureau's diverse workforce population. Some bureaus provided recurring demographic updates to organizational leaders throughout the year regarding the bureau's diversity management and inclusion objectives. Management officials strive to complete all mandatory training requirements and ensure subordinate staff complete training requirements within the specified timeframes.
 - 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 ODICR ensured practitioners across the Department 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.
 - Bureau HR Specialists provided multiple training sessions to managers and supervisors regarding the use of the special hiring authorities for hiring and placement of PWD and PWTD. Bureau HR Specialists provided deskside training to leaders as requests for reasonable accommodation arose throughout the year.

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- 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.
- The U.S. Geological Survey (USGS) conducted barrier analysis with “The Roadmap to Inclusion (TRI)” endeavor, which examined policies, programs, and practices within USGS offices to determine whether program deficiencies exist, where found, the team worked collaboratively with key stakeholder to remove impediments.
- 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 DEI initiatives. The newsletter continues to receive positive feedback for its content and usefulness to the DEI and HR communities.
- For the fourth year, the U.S. Fish and Wildlife Service (FWS) established an organization-wide FWS Barrier Analysis Team to help identify and eliminate barriers to equal employment opportunity within FWS. The team conducted an in-depth examination of barriers pertaining to the recruitment, hiring, and retention of women, minorities, and persons with disabilities.
- The WCTAC launched a website to inform employees about the progress of actions taken to prevent and respond to harassing conduct. Additionally, several bureaus and offices created publicly accessible “Prevention and Elimination of Harassing Conduct” webpages to reinforce DOI’s commitment to preventing and eliminating 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 DEI (EEO) practitioners on how to use the system to extract the data. A more detailed training for MD-715 practitioners is scheduled for second quarter FY 2021.

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Areas Requiring Improvement:

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

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

1. 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 bureaus and the OS serves as an impediment for full inclusion and maximized performance for all DOI employees.

1. 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:

1. Establish procedures to ensure personnel policies regarding Schedule A Hiring for people with disabilities are clear and consistently applied throughout the Department.

1. Develop processes and procedures to ensure OS and all Bureaus regularly assess their organizations, including regional and field Offices for possible program shortfalls and deficiencies.

1. Ensure senior managers and supervisors actively partner with the Departmental ODICR and OHC to identify and remove barriers to equal employment opportunity.

1. Complete the tracking system and review process to ensure all requests for reasonable accommodations are processed within the established timeframes in the Department's policy and procedures for reasonable accommodation.

1. 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.

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1. 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.
1. Train managers and supervisors on the requirements of the Department's Affirmative Action responsibilities for people with disabilities.
1. Actively involve managers and supervisors in removing employment barriers for people with disabilities, as well other underrepresented groups.
1. Establish consistent procedures throughout the Department 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 penalty for engaging in discriminatory behavior or engaging in prohibited personnel actions.

1. Establish partnerships and timetables to review OS and bureau 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.
1. Establish internal procedures to ensure all bureau DEI (EEO) Directors and HR Directors meet regularly to assess whether personnel programs, policies, and procedures conform to employment laws and regulations.

Complaint Activity

Findings of Discrimination

In FY 2020, there were seven findings of discrimination issued against DOI, resulting in substantial monetary and non-monetary remedies. Five of the substantiated cases against DOI were because leaders within DOI discriminated against employees and or applicants for employment who were disabled. Discrimination against people with disabilities and targeted disabilities is a recurring activity for four consecutive years.

Four of the substantiated decisions were Final Agency Decisions (FAD) found by the Departmental ODICR that determined DOI discriminated in the following areas:

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- The first finding of discrimination held that the Department subjected the complainant to disparate treatment based on race, sex, color, and national origin.
- The second finding against the Department held that the Department subjected the complainant to reprisal and disparate treatment based upon disability.
- The third finding against the Department held that the Department subjected the complainant to reprisal and disparate treatment based upon disability.
- The fourth finding against the Department held that the Department subjected the complainant to reprisal.

Three of the substantiated decisions were issued against the Department from an EEOC Administrative Judge (AJ) who they found DOI discriminated against employees in the following areas:

- The first, an AJ held that the Department subjected the complainant to a hostile work environment and disparate treatment based on sex, age, and disability.
- The second, an AJ held that the Department subjected the complainant to a hostile work environment based upon disability.
- The third, an AJ held that the Department subjected the complainant to disability-based discrimination for failing to engage in the interactive process and improperly denying the complainant a reasonable accommodation.

Efficiency of Complaints Processing:

- 96.8 percent of DOI's 439 pre-complaints were counseled in a timely manner, slightly above the federal sector average of 94.4 percent;
- 92.6 percent of investigations were timely completed, well above the federal sector average of 73 percent.

Formal Complaints

Regarding formal complaints, reprisal was the most frequently alleged basis, followed by disability, sex, and Harassment was by far the most frequently alleged issue, followed by disciplinary actions, terms/conditions of employment, assignment of duties, reasonable accommodation, and appointment/hire.

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The resource of this report item is not reachable.

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DOI Unified Regions 1 and 7 had the most formal complaint activity in FY 2020. Furthermore, this trend is consistent across the last four fiscal years, from FY 2016 through FY 2020.

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Monetary Cost in Settlements

In FY 2020, DOI paid out \$1,894,336 monetary settlements in the formal complaint stage, which is down from \$2,09 in FY 2019. When adding the monetary benefits provided in pre-complaint settlements which was \$256,499, the monetary cost of settlements in the pre-complaint and formal stage becomes \$2,150,835.

Anti-Harassment

In FY 2020, NPS and BOR had the largest number of formal EEO complaints alleging harassment followed by the Of the Secretary (OS) and the BLM.

Closures

DOI saw 296 closures. This represents a 20 percent decrease from FY 2019 and accounts for 21 withdrawals during formal stage, 95 settlements, Final Agency Actions, 180 Final Agency Decisions (FADs) without an Administrative (AJ) Decision (which includes FAD procedural dismissals) and 81 Final Agency Orders with an AJ Decision.

As referenced above, there were four FAD findings of discrimination and three findings of discrimination with Decision. Less than 1 percent of all DOI Final Agency Actions were remanded by the EEOC Office of Federal Open (OFO).

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The resource of this report item is not reachable.

Resolution

In FY 2020, 133 pre-complaints were counseled with ADR during the pre-complaint stage. Fifty-five of those complaints (41 percent) were resolved in ADR, either through a settlement with benefits or because no formal complaint was filed. DOI had a 41 percent ADR resolution rate in the pre-complaint stage, which is well below the federal average of 64.4 percent. Four percent of pre-complaints were settled (ADR and non-ADR) during the pre-complaint stage. This is also well below the federal sector average of 14.6 percent. During the pre-complaint stage, DOI had an ADR resolution rate of 86.7 percent, which is consistent with the federal sector rate of 86.8 percent. However, DOI had an ADR acceptance rate of 34.9 percent, well below the federal sector rate of 53 percent.

The resource of this report item is not reachable.

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In FY 2020, 42 formal complaints were counseled with ADR during the formal stage. Nineteen of those formal complaints (45 percent) were resolved in ADR, either through a settlement with benefits or because no formal complaint was filed. During the formal stage, DOI had an ADR acceptance rate of 34 percent. DOI outperforms the federal sector average of 28 percent in this regard. However, DOI had an ADR resolution rate of 45 percent in the formal stage. This was well above the federal sector average of 54.6 percent.

ESSENTIAL ELEMENT F:

LEGAL COMPLIANCE WITH STATUTORY REQUIREMENTS FOR DEI (EEO) IN THE WORKPLACE The essential element *Legal Compliance with Statutory Requirements for DEI (EEO) in the Workplace* requires the Secretary of the Interior to have processes in place to ensure timely and full compliance with EEOC orders and settlement agreements. All 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:

- DOI maintains a system of management controls to ensure timely, accurate compliance with resolutions/settlement agreements.
- The Department's 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 DEI (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.
- DOI 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.
- The Departmental ODICR, ACE Division conducted training to bureau offices on the informal and formal DEI (EEO) process, including the roles and responsibilities of complainants, managers/supervisors, and Counselors and Mediators in the DEI (EEO) process.

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Areas Requiring Improvement:

- The Departmental ODICR continues to analyze its internal processing standards and timeframes to increase its timeliness rate on the issuance of FADs. Establish additional quality control measures within the Departmental ODICR to strengthen the quality of FADs while improving the timely issuance rate of FADs.
- Increase the number of employees utilizing Alternative Dispute Resolution (ADR) to resolve both pre-complaints and formal complaints of discrimination filed against the Department.
- The Departmental MD 715 program objectives routinely have extended timelines for correcting noted deficiencies with no progress year after year towards bringing elements into compliance with EEOC standards. Establish procedures to bring the program into compliance, issue policy statements for EEO and Inclusion, conduct a barrier analysis to determine root causes to known deficiencies, and improve employment experiences for underrepresented groups and people with disabilities and targeted disabilities.

[\[1\]](#) EEOC Part G Self-Assessment Check List

EXECUTIVE SUMMARY: WORKFORCE ANALYSES

The workforce profile data represents the DOI workforce by race, sex, and disability and was retrieved from the F Personnel/Payroll System (FPPS). DOI uses the federal benchmark of the Civilian Labor Force (CLF) from the Census, to analyze compare its workforce. At the close of FY 2020, DOI's total workforce population was 6 employees. The overall number of employees has decreased steadily over the last five years, as can be seen in the below. All groups experienced a decline over the years. Some groups more than others were impacted, but all groups declines in their overall representation in the workforce.

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

1. Persons with Disabilities (PWD) occupied 12.9 percent (total 2,087) of all GS-1 to GS-10 permanent positions in the Department's workforce in FY 2020. The percentage of PWD employed by the Department increased by 0.8 percent from FY 2019. The increase brings DOI into compliance with the EEOC's hiring goal mandated to all federal agencies to ensure 12 percent of lower graded positions re comprised of PWD.
1. Persons with Disabilities (PWD) occupied 8.4 percent (total 2,612) of GS-11 to SES permanent positions in the Department's 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 Affirmative Action goals.
1. Persons with Targeted Disabilities (PWTD) occupied 3.3 percent (total 528) of all GS-1 to GS-10 positions in the Department's workforce in FY 2020, exceeding the federal hiring goal for PWTD to occupy two percent of all positions within these grade distributions.

EXECUTIVE SUMMARY: WORKFORCE ANALYSES

2. Persons with Targeted Disabilities (PWTD) occupied 1.9 percent (total 583) of all GS-11 to SES positions in FY 2020, which is slightly lower than the federal hiring mandate of two percent. While this number is laudable and shows an attempt with compliance, the percentage of PWTD in the Department's workforce did not change since the last annual reporting period and remains out of compliance.

1. Women occupied 39.5 percent (total 21,208) of the Department's permanent workforce, compared with 48.1 percent in the CLF. This group increased by 353 employees in FY 2020, a gain of 1.7 percent. The overall number of women in the Department's permanent workforce remained below the benchmark since FY 2017.

1. White women occupied 26.6 percent (total 14,308) of the Department's permanent workforce, compared with 34.0 percent in the CLF. The overall number of White women in the Department's permanent workforce increased by 198 employees since the last annual reporting period and continues to remain below the benchmark of white women in the CLF.

1. Hispanic/Latino Men occupied 3.8 percent (total 2,070) of the Department's permanent workforce, compared with 5.2 percent in the CLF. This group increased by 16 employees in FY 2020. The number of Hispanic/Latino men in the Department's permanent workforce has steadily increased over the past five years; however, the overall number of Hispanic/Latino men in the Department's permanent workforce continues to remain below the benchmark of Hispanic/Latino men in the CLF.

1. Hispanic/Latino women occupied 2.9 percent (total 1,532) of the Department's permanent workforce, compared with 4.8 percent in the CLF. This group increased by 58 employees in FY 2020. The number of Hispanic/Latino women in the Department's permanent workforce has steadily increased over the past five years. However, despite the increases, the overall number of Hispanic/Latino women in the Department's permanent workforce remains below the benchmark of Hispanic/Latino women in the CLF.

1. Black or African American men occupied 2.7 percent (total 1,432) of the Department's permanent workforce, compared with 5.5 percent in the CLF. This group increased by 11 employees in FY 2020, a gain of 0.8 percent in the current reporting cycle. Despite the increase, the number of Black or African American men in the Department's permanent workforce remains below the benchmark of Black or African American men in the CLF and has steadily decreased over the last four years. This trend is inconsistent with other federal agencies that are showing increases in the employment of Black or African American men year after year.

1. Black or African American women occupied 2.8 percent (total 1,513) of the Department's permanent workforce, compared with 6.5 percent in the CLF. This group decreased by 20 employees in FY 2020. The number of Black or African American women employed with the Department has steadily decreased for five consecutive years and remains below the benchmark of Black or African American women in the CLF. This trend is inconsistent with other federal agencies that show incremental increases in the employment of Black or African American women year after year.

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1. Asian men occupied 1.5 percent (total 807) of the Department's permanent workforce, compared with 2.0 percent in the CLF. This group increased by 21 employees, a gain of 0.2 percent. Despite the increase, the number of Asian men in the Department's permanent workforce remained below the benchmark of Asian men in the CLF.
1. Asian women occupied 1.4 percent (total 734) of the Department's permanent workforce, compared with 1.9 percent in the CLF. This group increased by 27 employees, a gain of 0.4 percent. Despite the increase, the number of Asian women employed in the Department's permanent workforce has remained below the benchmark of Asian women in the CLF.

GROUP		2016		2017		2018
		#	%	#	%	#
White	Men	25,526	46.8%	25,646	46.8%	31,006
	Women	14,710	27.0%	14,766	26.9%	18,034
Black/African	Men	1,487	2.7%	1,498	2.7%	1,595
	Women	1,640	3.0%	1,617	2.9%	1,647
Hispanic/ Latino	Men	1,917	3.5%	1,973	3.6%	2,375
	Women	1,471	2.7%	1,466	2.7%	1,665
Asian	Men	722	1.3%	746	1.4%	891
	Women	701	1.3%	707	1.3%	802
Native Hawaiian/ Pacific Islander	Men	193	0.4%	193	0.4%	251
	Women	111	0.2%	114	0.2%	145
American Indian/ Alaska Native	Men	3,032	5.6%	3,034	5.5%	3,977
	Women	2,906	5.3%	2,879	5.3%	4,577
Two/More Races	Men	94	0.2%	108	0.2%	141
	Women	71	0.1%	84	0.2%	109
Total	Men	32,971	60.4%	33,198	60.5%	40,236
	Women	21,610	39.6%	21,633	39.5%	26,979

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All	54,581	100.0%	54,831	100.0%	67,215
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A summary of the FY 2016 to FY 2020 workforce demographic statistics are provided in the following table.

During FY 2020, men represented 60 percent, and women represented 40 percent of the permanent workforce. The number of men and women employed with DOI remained constant at 60 and 40 percent over the past five reporting periods. Despite hiring efforts, the number of women employed within the agency remained below the 46.8% federal benchmark.

Chart, bar chart

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NEW HIRES

The Department hired a total of 14,906 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 employees hired by DOI during the FY 2020 reporting year.

Of the 5,047 permanent employees, men represented 2,882 (57.1 percent) of new employees, and women represented

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(42.9 percent) of new employees hired. The Department hired 9,859 temporary employees, of which 6,186 (62.7 percent) were men, and 3,673 (37.6 percent) were women. Since, FY 2017, DOI increased the number of temporary employees to accomplish its mission by 5,097, going from 4,762 temporary employees to 9,859 temporary employees hired in FY 2020.

In comparing all demographic groups by race and national origin, Black or African American men and women represent the lowest number of new employees hired by the Department when compared to the availability of these groups in the CLF. Respectively, the availability of Black or African American men in the CLF was 4.3%, while the percentage of Black or African American men hired by the Department was 2.9%. The availability of Black or African American women in the CLF was 4.7%, while the percentage of Black or African American women hired by the Department was 3.0%. These numbers are significant because the hiring patterns for these groups within DOI are inconsistent with other federal agencies and the trends have occurred over multiple years.

In FY 2020, Hispanic/Latino women new hires were 2.4 percent below the federal benchmark of 4.8 percent. In addition, Hispanic/Latino men, White women, and Asian men and women were all hired in the DOI workforce below their respective federal benchmark. What is significant is that when reviewing applicant flow data, Hispanic/Latino men and women were present in almost every position announced in DOI which denotes that the recruitment efforts are effective.

Of the Department's 5,047 permanent new hires, 1,212 (8.1 percent) were PWD, and 299 (2.0 percent) were PTWD. The Department has established an ongoing Affirmative Action goal to ensure an agency's workforce is comprised of twelve percent PWD and two percent PTWD in specific grade categories. Year after year, the Department has steadily increased the number of PWD employed by DOI overall, increasing from 8.0 percent in FY 2013 to 12.7 percent in FY 2020. Likewise, the Department incrementally increased its hiring of PTWD, from 1.5 percent in FY 2013 to 2.0 percent in FY 2020. A summary of the Department's hiring statistics for PWD and PTWD from FY 2017 to FY 2020 is provided in the following table.

New Hires for Permanent Employees

--	--

Total Number

--	--

Hispanic Men

--	--

Hispanic Women

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White Men

White Women

Black Men

Black Women

Asian Men

Asian Women

Native Hawaiian/Other Pacific Island Men

Native Hawaiian/Other Pacific Island Women

American Indian/Alaska Native Men

American Indian/Alaska Native Women

Two or More Races Men

Two or More Races Women

Persons with Disabilities (PWD)

Persons with Targeted Disabilities (PWTD)

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

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

MISSION-CRITICAL OCCUPATIONS (MCO)

At the end of FY 2020, over 300 occupations were represented in the DOI workforce. For the purposes of this annual and corresponding workforce and barrier analyses, the EEOC requires that agencies identify “mission-critical” occupations (MCO). Overall, ninety-one percent of the DOI’s workforce was employed in sixteen mission-critical occupations Department.

- Year after year, there were a low number of women and people of color occupying mission-critical occupations in the Department. The data revealed that the number of people of color and women occupying mission-critical occupations continuously remained below their availability in the federal benchmark for five consecutive years (FY 2016 to FY 2020).
- Year after year, the data revealed that people of color, women, and PWD are clustered in six out of the 16 mission-critical occupations within DOI. The six MCOs are Park Ranger, General Biology, Wildlife Biology, Civil Engineering, Hydrology, and Geology occupations. During FY 2020, there was an increase in the number of people of color, women, and PWD in these six mission-critical occupations. The table on the next page summarizes these demographic statistics.

2020 DOI Mission-Critical Occupations Compared to
Occupational Civilian Labor Force (CLF)

Series

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0025

0028

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0080

0085

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0401

0455

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0462

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0810

0802

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0881

1313

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1315

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1350

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1801

1811

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2151

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Data Source: Workforce Table A6. Attached in Appendix.

Demographic Statistics for Mission-Critical Occupations

Park Ranger: 0025 Series

- Park Rangers represented the largest occupation at DOI for the last five years.

Men occupy majority of Park Ranger positions year after year. Currently, 2,101 are men and 1,179 are women employed throughout the Department.
- Male Park Rangers are overrepresented in DOI Park Ranger positions in comparison to the federal benchmark. Whereby, men comprise 46.6 percent of individuals in similar jobs in the CLF but account for 64.1 percent of employees in Park Ranger positions at DOI.
- Black or African American men and women are underrepresented in DOI Park Ranger positions in comparison to the percentage of Black or African American men and women in similar jobs in the federal benchmark.
- Overall, the number of people of color in DOI Park Ranger positions has increased incrementally for five consecutive years. Other groups, Asian and Pacific Islander, American Indian/Alaskan Native, and Hispanic are comparable to the federal benchmark for employment in this job series.

Environmental Protection Specialist: 0028 Series

- Women in Environmental Protection Specialist positions at DOI slightly outnumbered men; women occupied 164 positions and men occupied 162 positions.
- PWD, PWTD, Hispanic men and women, White women, Black or African American women, Asian women, American Indian/Alaska Natives, and Two or More Races men and women are overrepresented in DOI Environmental Protection Specialist positions at DOI in comparison to the percentage of individuals in these demographic groups in similar jobs in the CLF.
- White men, Black or African American men, Asian men, and Native Hawaiian/Other Pacific Islanders men and women are underrepresented in DOI Environmental Protection Specialist positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the federal benchmark.

Security Administration: 0080 Series

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- Men in Security Administration positions at DOI outnumbered women; men occupied 81 positions and women occupied 58 positions.
- White men in DOI Security Administration positions are overrepresented at DOI in comparison to the percentage of white men in similar jobs in the federal benchmark.
- Hispanic/Latinos men and women, White women, Asian men and women, and Native Hawaiian/Other Pacific Islanders women are underrepresented in DOI Security Administration positions in comparison to the percentage of individuals in this demographic group in similar jobs in the federal benchmark.

Security Guard: 0085 Series

- This mission-critical occupation is predominantly occupied by men. Women are underrepresented in DOI Security Guard positions in comparison to the federal benchmark; women comprise 22.8 percent of individuals in similar jobs in the federal benchmark but account for just 4.4 percent of employee in Security Guard positions at DOI.
- White men outnumbered all people of color (men and women) in DOI Security Guard positions; men occupied 90 positions and people of color occupied 30 positions.
- Hispanic/Latinomen and women, White women, and Black or African American women are underrepresented in DOI Security Guard positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the CLF.
- Hispanic/Latino women, Asian women, Native Hawaiian/Other Pacific Islander women, American Indian/Alaska Natives women, and “Two or More Races” men and women were not employed in DOI Security Guard positions.

General Natural Resources Mgmt. & Bio Sciences: 0401 Series

- Men outnumbered women in DOI General Natural Resources Mgmt. and Bio Sciences positions; men occupied 2,116 positions and women occupied 1,381 positions.
- Hispanic/Latinomen, White men, Native Hawaiian/Other Pacific Islanders men and women, and American Indian/Alaska Natives men and women are overrepresented in DOI General Natural Resources Mgmt. and Bio Sciences positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the federal benchmark.
- Hispanic/Latino women, Black or African American women, and Asians are underrepresented in DOI General Natural Resources Mgmt. and Bio Sciences positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the federal benchmark.
- The data remains unchanged over the past five consecutive years for FY 2016 - FY 2020.

Ranger Technician: 0455 Series

- Men outnumbered women in DOI Ranger Technician positions; men occupied 223 positions and women occupied 56 positions.

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- Hispanic men, White men, and American Indian/Alaska Natives were overrepresented in DOI Ranger Technician positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the federal benchmark.
- Hispanic/Latino women, White women, Black or African Americans men, Asian men, and Two or More Races men are underrepresented in DOI Ranger Technician positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the federal benchmark.
- Black or African Americans women, Asian women, Native Hawaiian/Other Pacific Islander women, and Two or More Races women are not represented in DOI Ranger Technician positions.
- The data remains unchanged over the past five consecutive years for FY 2016 - FY 2020.

Forestry Technician: 0462 Series

- Men outnumbered women in DOI Forestry Technician positions; men occupied 1,444 positions and women occupied 166 positions.
- Hispanic/Latinomen, White men, and American Indian/Alaska Native men are overrepresented in DOI Forestry Technician positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the federal benchmark.
- The data remains unchanged over the past five consecutive years for FY 2016 - FY 2020.

Civil Engineering: 0810 Series

- Men outnumbered women in DOI Civilian Engineering positions; men occupied 814 positions and women occupied 233 positions.
- Hispanic/Latino men and women, White men and women, Native Hawaiian/Other Pacific Islander men, and American Indian/Alaska Native men and women are overrepresented in DOI Civil Engineering positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the federal benchmark.
- Black or African Americans men and women, Asian men and women, and “Two or More Races” women are underrepresented in DOI Civil Engineering positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the CLF.
- Native Hawaiian/Other Pacific Islander women are represented in DOI Civil Engineering positions.

Petroleum Engineering Technician: 0802 Series

- Men outnumbered women in DOI Petroleum Engineering Technician positions; men occupied 192 positions and women occupied 30 positions.
- Hispanic/Latinomen, White men, and American Indian/Alaska Native men are overrepresented in DOI Petroleum Engineering Technician positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the CLF.
- Hispanic women, White men, Black or African Americans women, American Indian/Alaska Native men, and “Two or More Races” men occupied positions are underrepresented in DOI Petroleum Engineering positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the federal benchmark.
- Asian women, Hawaiian/Other Pacific Islanders men and women, American Indian/Alaska Native men, and “Two or More Races” women were not represented in DOI Petroleum Engineering positions.

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- The data remains unchanged over the past five consecutive years for FY 2016 - FY 2020.

Petroleum Engineering: 0881 Series

- Men outnumbered women in DOI Petroleum Engineering positions; men occupied 257 positions and women occupied 65 positions.
- White women, Black or African Americans men and women, Asian men, and American Indian/Alaska Native men were overrepresented in DOI Petroleum Engineering positions in comparison to the percentage of individuals in these demographic groups in the federal benchmark.
- Native Hawaiian/Other Pacific Islander women and “Two or More Races” were not represented in DOI Petroleum Engineering positions.
- The data remains unchanged over the past five consecutive years for FY 2016 - FY 2020.

Geophysics: 1313 Series

- Men outnumbered women in DOI Geophysics positions; men occupied 175 positions and women occupied 88 positions.
- Whites outnumbered all people of color in DOI Geophysics positions; (whites occupied 234 positions and people of color occupied 29 positions).
- Hispanic/Latinos men, and Black or African Americans men and women were underrepresented in DOI Geophysics positions in comparison to the percentage of individuals in these demographic groups in the federal benchmark.
- Asian men and women and Native Hawaiian/Other Pacific Islanders men were overrepresented in DOI Geophysics positions in comparison to the percentage of individuals in these demographic groups in the federal benchmark.

Hydrology: 1315 Series

- Men outnumbered women in DOI Hydrology positions; men occupied 842 positions and women occupied 355 positions.
- White men and women, Hawaiian/Other Pacific Islander men and women, and American Indian/Alaska Natives men were overrepresented in DOI Hydrology positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the federal benchmark.
- Hispanic/Latinos men and women, Black or African Americans men and women, and Asians men and women were underrepresented in DOI Hydrology positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the federal benchmark.

Geology: 1350 Series

- Men outnumbered women in DOI Geology positions; men occupied 491 positions and women occupied 240 positions.
- Whites outnumbered people of color in DOI Geology positions; whites occupied 675 positions and people of color combined occupied 56 positions.

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- Hispanic/Latinos men and women, Black or African Americans men and women, Asian, and American Indian/Alaska Natives men and women were underrepresented in DOI Geology positions in comparison to the percentage of individuals in these demographic groups in similar jobs in the federal benchmark.
- “Two or More Races” men and women were not represented DOI Geology positions.

General Inspection, Investigator, Enforcements, & Compliance: 1801 Series

- Men outnumbered women in DOI General Inspection, Investigator, Enforcement and Compliance positions; men occupied 679 positions and women occupied 138 positions.
- Hispanic/Latinomen, White men, Hawaiian/Other Pacific Islander men, American Indian/Alaska Natives men and women, and “Two or More Races” women were overrepresented in DOI General Inspection, Investigator, Enforcement and Compliance positions in comparison to the percentage of individuals in these demographic groups in the federal benchmark.
- The data slightly changed over the past five consecutive years for FY 2016 - FY 2020.

Criminal Investigation: 1811 Series

- Men outnumbered women in DOI Criminal Investigation positions; men occupied 485 positions and women occupied 73 positions.
- White men, Asian women, Hawaiian/Other Pacific Islander men and women, American Indian/Alaska Natives men and women, and “Two or More Races” men were overrepresented in DOI Criminal Investigation positions in comparison to the percentage of individuals in these demographic groups in the federal benchmark
- Hispanic/Latinos men and women, White women, Black or African Americans men and women, Asian men, and “Two or More Races” women were underrepresented in DOI Criminal Investigation positions in comparison to the percentage of individuals in these demographic groups in the federal benchmark.

Dispatching: 2151 Series

- Women outnumbered men in DOI Dispatching positions; women occupied 153 positions and men occupied 125 positions.
- White women, Hawaiian/Other Pacific Islanders men and women, and American Indian/Alaska Natives men and women were overrepresented in the DOI Dispatching positions in comparison to the percentage of individuals in these demographic groups in the federal benchmark.
- Hispanic/Latinos men and women, White men, Black or African Americans men and women, Asian men and women, and “Two or More Races” men and women were underrepresented in DOI Dispatching positions in comparison to the percentage of individuals in these demographic groups in the federal benchmark.

SENIOR EXECUTIVE SERVICE (SES)

In FY 2020, DOI employed 249 SES employees. Men occupied 163 positions and women occupied 86 positions. The number of women in SES positions in DOI increased from 77 in FY 2019 to 86 in FY 2020. Whatever the historic reason for the lack of women representation, DOI has demonstrated a steady increase of women leaders 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 positions. Women of color are less likely than White women to occupy SES positions. Respectively, women of color represented 11 percent of the

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while white women represented 25 percent of the SES.

When comparing all RNO groups to their availability in executive positions in the CLF, with the exception of White men and women and American Indian or Alaska Native men and women, all other demographic groups are underrepresented in SES positions in DOI. The number of American Indian and Alaskan Natives occupying executive-level positions in DOI is well above the government-wide average and the CLF. The employment pattern is a positive testament to the preferences used by DOI 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 2015 to FY 2020, the number of women, Hispanic/Latino, Asian, and American Indian or Alaska Natives in DOI SES positions decreased. A barrier analysis is needed to determine the root cause for the decrease for these groups in senior executive positions. When analyzing the workforce demographics for DOI 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 key 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 several 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. The successful completion of the program.

Snapshot of the Senior Executive Service (SES)

Group

Total SES Employees

Men

Women

Hispanic/Latino

White

Black/African American

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Asian

Native Hawaiian/Other Pacific Islander

American Indian or Alaska Native

Two or More Races

Persons with Disabilities (PWD)

Persons with Targeted Disabilities (PWTD)

Data Source: Workforce Table A4GSP

SEPARATIONS

In FY 2020, 4,171 total employees separated from DOI: 4,434 voluntarily vacated DOI; 169 were removed; 913 resigned; 1,906 retired; and three underwent reduction in force (RIF). The number of Hispanic/Latino employees decreased by 1.1 percent; the number of Black or African American employees decreased by 6.6 percent; the number of American Indian or Alaska Native employees decreased by 11.1 percent; and the number of Two or More Races employees decreased by 1.1 percent. The number of voluntary and involuntary separations for PWD in FY 2020 was 22.2 percent, an increase of 1.0 percent compared to FY 2019. The number of voluntary and involuntary separations for PWTD in FY 2020 was 1.3 percent, a decrease of 4.3 percent compared to FY 2019.

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 DEI such as an agency’s policies, procedures, or practices that limits or tends to limit employment opportunities for members of a particular EEO protected group on their sex, race, ethnic background, or disability status. It is the expectation of the EEOC 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 DOI employees.

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

1. **Black or African American Employment**

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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 Department's permanent workforce; Black or African American men comprise 5.5 percent of the federal benchmark but account for just 2.7 percent of the permanent workforce. The number of Black or African American men also decreased by 10 employees or 0.6 percent during FY 2020.

A second trigger was identified when reviewing the data for Black or African American women. A review of the data revealed that Black or African American women were underrepresented in the Department's workforce; Black or African American women comprise 6.5 percent of the federal benchmark but account for just 2.8 percent of DOI's permanent workforce. A review of the data revealed similar trends for previous fiscal years for these groups, which resulted in Black or African American employees leaving the Department at high rates.

Another trigger for Black or African Americans was identified when reviewing the new hire data. Black or African Americans were underrepresented in the percentage of new hires at DOI; Black or African Americans comprise 9.0 percent of the federal benchmark, yet account for just 2.9 percent of new hires at DOI. An 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 employees at DOI.

1. **Asian American Employment**

The first trigger indicating a possible barrier for Asian American employees in DOI was found in Workforce Data Table A1. The data revealed that Asian men were below the federal benchmark in the Department's permanent workforce; Asian men comprise 2.0 percent of the federal benchmarks, but account for 1.4 percent of the Department's workforce. The number of Asian men in the Department's permanent workforce increased by 16 employees, a gain of 1.7 percent during FY 2020. However, despite this increase, Asian men remain 0.6 percent below the federal benchmark.

The data also revealed a trigger for Asian women. Asian women were below the federal benchmark in the Department's permanent workforce; Asian women comprise 1.9 percent of the federal benchmark, yet account for 1.3 percent of the Department's permanent workforce. The number of Asian women in DOI's permanent workforce increased by 16 employees, a gain of 2.8 percent. However, despite this increase, Asian women remain 0.6 percent below the federal benchmark.

Another trigger for Asians was identified when reviewing the new hire data. Asians were underrepresented in the percentage of new hires at DOI; Asians comprise 4.9 percent of the available federal benchmarks, yet account for only 2.4 percent of the new hires at DOI. An 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 Asian employees at DOI.

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1. Hispanic/Latino Employment

The first trigger indicating a possible barrier for Hispanic/Latino employees (men and women) in DOI was found in Workforce Data Table A1. The data revealed that Hispanic/Latino employees were below the federal benchmark compared to the Department's permanent workforce. Hispanic/Latino employees comprise 9.9 of the federal benchmark but account for 6.3 percent of the Department's workforce. The number of Hispanic/Latino employees in the Department's permanent workforce increased by 74 employees, a gain of 4.7 percent during FY 2020. However, despite this increase, Hispanic/Latino employees remain 3.6 percent below the federal benchmark.

The data also revealed a second trigger in Workforce Data Table A4 based on the low number of Hispanic/Latino employees occupying positions at the GS-12 through GS-13 grade level throughout DOI's workforce. Hispanic/Latino employees comprise 6.6 percent of the GS-12 positions in the DOI workforce, and 5.7 percent of the GS-13 positions. Further analysis is warranted to identify any impediments that Hispanic/Latino employees are having at the Department in being hired for GS-12 and GS-13 positions.

1. Potential Blocked Pipelines and Glass Ceilings

The first trigger indicating a possible barrier for people of color and women in DOI was found in Workforce Data Table A3.1 and A1. For five consecutive years, people of color and women were below their availability in the federal benchmark for higher graded positions. In particular, the data revealed that women overall, Asians, Black or African American, Hispanic/Latinos, Native Hawaiian or Pacific Islanders, American Indian or Alaska Natives, PWDs, and PWTs occupied the least number of senior level permanent positions in DOI for multiple years. The data for these same demographic groups revealed that these groups are available in the immediate pipelines and are not being hired in leadership roles based on their availability at DOI and in comparison, to the federal benchmark.

The data revealed that people of color and women were below their availability in the permanent workforce for GS-13 to SES. People of color occupied 24 percent of GS-13 and GS-14 positions; 21 percent of GS-15 positions; and 18 percent of SES positions. The data revealed that women overall occupied 40 percent of GS-13 positions; 21 percent of GS-14 positions; 8 percent of GS-15 positions; and 1 percent of SES positions. The data also revealed that women of color occupied 30 percent of GS-13; 30 percent of GS-14 positions; 26 percent of GS-15 positions; and 34 percent of SES positions. An analysis must be conducted to determine if there are policies, practices, or procedures that may be creating impediments for people of color and women in being selected for higher graded positions. When identifying "women of color" or "people of color" it is meant that all groups, Asians/Pacific Islander, Black/African American, Hispanic/Latino, and Native American/Alaskan Natives are considered in the total number.

1. Disability Employment

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In FY 2020, there were two triggers identified for persons with disabilities (PWD) at DOI. First, PWD are underrepresented in GS-11 to SES permanent positions throughout DOI in comparison to the EEOC's affirmative action goal of 12 percent for PWD. PWD accounted for just 8.4 percent of DOI employees in GS-11 to SES permanent positions in DOI. While this group remains lower than the federal hiring goal, there has been an increase of 0.8% over the last three years. More effort is required to ensure DOI fulfills the statutory requirement to intentionally improve representation of this group in GS-11 through SES positions in DOI.

The second trigger revealed that Persons with Targeted Disabilities (PWTD) are underrepresented in DOI compared to the federal benchmark. PWTD accounted for just 1.9 percent of DOI employees in GS-11 to SES permanent positions in DOI. There was a 0.3% increase from FY 2018 to FY 2020, however, the Department remains out of compliance with the federally mandated employment goal to ensure two percent of senior level positions are occupied by PWTD.

The third trigger revealed that PWD and PWTD are voluntarily separating at the same level of their onboarding to the workforce, this is cause for concern as a potential retention issue, specifically because the separation of this group appears to thwart the recruitment initiative underway to meet the federally mandated hiring goal. Further analysis is needed to identify any potential barriers that prevent PWD and PWTD from experiencing fulfilled employment throughout the Department which has led to these groups separating more frequently than other groups.

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Diversity Recruitment Efforts

DOI is actively engaged in developing new relationships with schools, communities, and other organizations; establishing new partnerships; and meeting with managers and supervisors to discuss recruitment and outreach events. DOI's bureau and Field Office national recruitment teams-maintained relationships with professional organizations through attendance at regional and national conferences. In FY 2020, DOI participated in the following events:

Minorities in Agricultural & Natural Resources Related Sciences (MANRRS);

League of United Latin American Citizens (LULAC);

American Indian Society for Engineering and Sciences (AISES);

Society of Asian Scientists & Engineers (SACE);

Society for Advancement of Chicanos/Hispanics and Native Americans in Science (SACNAS);

Conference on Asian Pacific American Leadership (CAPAL);

Hispanic Association of Colleges and Universities (HACU); and

National Association for Equal Opportunity (NAFEO).

DOI continued its support of the White House Initiatives that mandate that federal agencies provide assistance to and partner with Historically Black Colleges & Universities (HBCU-Executive Order 12876), the Hispanic Association of Colleges & Universities (HACU-Executive Order 12900), and Tribal Affiliated Colleges & Universities (TACU-Executive Order 13270) with respect to a variety of areas, including research opportunities, internships, fellowships, grants,

curricula development, and equipment donation.

DOI's bureaus continue to focus on providing learning and hands-on opportunities to young people from grade school through graduate school. Of note, the NPS works with nearly 10,000 youth through partnerships. The primary goal of the youth programs is to introduce young people to career opportunities within DOI. It awarded \$10 million federal funds to minority serving institutions.

In FY 2020, the FWS formed a National Targeted Recruitment Team made up of employees representing each region and program. The team's purpose is to increase participation among managers and employees throughout the agency in outreach activities, and to cultivate relationships with minority-serving academic institutions.

The FWS sponsored the annual DFP, which allows hiring flexibility. The DFP consists of fellowship opportunities for undergraduate rising seniors and graduate students to participate in 11-week scientifically rigorous projects in biological science/natural resource management or related fields. Candidates who complete all internship and school requirements may be eligible for a direct appointment with the FWS. The demographics of the DFP cohort were: 70% women and 30% minorities. The FWS collaborated with the Hispanic Access Foundation, Student Conservation Association, the Greening Youth Foundation and the American Conservation Experience to administer the program.

The FWS actively participated on the leadership board of the Diversity Joint Venture (DJV), a partnership of 34 federal and state agencies, universities, non-governmental organizations, foundations, and professional societies, working in collaboration to increase the number of women and minorities in the conservation workforce.

Additionally, the FWS furthered its diversity and inclusion goals through proactive partnerships with organizations such as Corazon Latino, Environment for the Americas, Green Latinos, Greening Youth Foundation, Hispanic Access Foundation, Hispanics Enjoying Camping, Hiking and the Outdoors, Hispanic Prosperity Initiative, Honored American Veterans Afield,

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Latino Outdoors, League of United Latin American Citizens, Phi Beta Sigma Fraternity, Rivers of Recovery, SODAS LIFE, Urban American Outdoors, Urban American Outdoors, White House Initiative on Historically Black Colleges and Universities, and Zeta Phi Beta Sorority.

DOI's bureaus continue to expand internship and apprenticeship programs to ensure students develop the knowledge, skills, and abilities needed for a career in the Department. Current programs include:

Historically Black Colleges & Universities Internship Program (HBCUI). HBCUI connects approximately 23 undergraduate and graduate students attending historically black colleges and universities to NPS parks and units in the fields of health, recreation, and natural and cultural resource conservation. The Greening Youth Foundation serves as the partner organization. At the close of the FY 2020, three HBCUI students were hired into permanent full-time positions after concluding the program.

Historic Preservation Training Center (HPTC) Apprenticeship Program. HPTC provides a 26-week vocational training opportunity to young adults and returning veterans in the skilled historic preservation crafts (brick masonry and carpentry). Upon completion, participants are eligible for special hiring into NPS positions or opportunities with private sector trade unions.

Ancestral Lands Conservation Corps Program (ALCCP). ALCCP supports employment opportunities for over 70 young people living on tribal lands that border national parks and supports educational and recreational opportunities for an additional 240 participants. Projects include river restoration, invasive vegetation inventory and monitoring, fuel mitigation, trail construction, preservation, and cultural/language immersion. Conservation Legacy serves as the partner organization.

American Sign Language Conservation Crew Program (ASLCCP). ASLCCP is a collaborative partnership with the Northwest Conservation Corps to provide employment opportunities for deaf and/or hard-of-hearing individuals to support projects focused on natural resource restoration. Over 70 percent of the participants came from racially and ethnically diverse backgrounds.

Latino Heritage Internship Program (LHIP). LHIP provides internship opportunities to over 70 undergraduate and graduate students at 45 NPS sites. LHIP positions include the fields of archeology, historic preservation, interpretation and education, and community outreach. NPS utilizes the Hispanic Access Foundation and Environment for the Americas as partner organizations.

Hawaii Island Youth Ranger Internship Program (HIYRIP). HIYRIP addresses the lack of representation of employees from the Asian American and Pacific Islander community. The Youth Ranger Internship Program trains up to 75 high school students in natural and cultural resources interpretation, environmental education, administration, protection (law enforcement), and park maintenance. Upon completion of training, students may be hired at a GS-1, WG-1 or equivalent salary to work during the summer.

Employee Development

The Department's commitment to ensuring employees have the opportunity to understand and explore career progression opportunities within and across career fields, and, within and across bureaus is evidenced by the Department's DOI Careers website. DOI's 66,452 employees occupy over 350 distinct occupations and serve in both permanent and seasonal capacities in over 2,300 operation locations across the country. The website provides information on mission-critical and densely populated occupations, which represent almost 30,000 current employees. DOI continued to add information on additional occupations and will continue to expose connections between competencies that cross occupations to provide a broader view of career opportunities to explore. For each occupation, the DOI Careers website provides an overall description, the typical workplace environment, videos from DOI employees sharing their career stories, and information on strengths required at varying levels of seniority.

DOI conducted orientation training to ensure employees understood DOI's mission, values, and expectations related to workplace conduct and that everyone has a role in preventing and elimination of harassing conduct. Employees within the bureaus and some offices within the Office of the Secretary were invited to share ideas and successes at transformdoi@doi.gov.

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DOI's Office Strategic Employee and Organizational Development (OSEOD) works to create a collaborative community among DOI learning professionals to improve employee engagement, organizational effectiveness, and support the leadership's goal of "improving the employee experience." OSEOD expanded learning and development needs for employees by delivering 525 courses and training 6,800 employees in FY 2020. DOI University (DOIU) transitioned its courses to virtual instructor led courses and developed four courses for online training, to include the new "Welcome to DOI" course. Free coaching for junior and mid-grade employees was also made available through the newly launched DOI's Interior Coach Training Program. More improvements and innovations are anticipated after the completion of a review of mandatory training and a training needs assessment that is underway to learn more about the training needs of DOI employees.

DOI's automated performance plan, brings better clarity, transparency, organization, and accountability to the documentation requirements of the performance management program. This is the second year that DOI employees successfully used DOI Talent to conduct performance appraisals and complete the DI-3100 and DI-3100S employee and supervisor appraisal forms.

DOI Career Connection (DCC) is an online portal for sharing short-term projects, details, and lateral opportunities across DOI. The DCC facilitates opportunities to broaden employees' experiences, address staffing needs, and build a highly skilled workforce. DOI partnered with the Office of Personnel Management's Open Opportunities platform to bring DOI Career Connection to the workforce. The DCC also offers increased functionality and integration with USA JOBS.

Special Emphasis Program (SEP)

The Departmental ODICR collaborated with several bureaus to conduct special observance programs for Black History, Women's History, Asian-American/Pacific Islander, Hispanic Heritage Month, and Women's Equality Day. The Departmental ODICR launched two department-wide initiatives - Denim Day and DEI (EEO) Conversations, both initiatives actively engaged senior leadership from across the department. The visibility and voice of DOI's Executive Leadership team invoked a spirit of involvement from middle and lower management to champion and allow increased participation within their respective workforces. The Departmental ODICR provided training specifically to the collective Department's Diversity Advocates and Employee Resource Groups (ERGs) on DEI initiatives. Training on preparation of the MD-715 report remains a popular request for training programs coordinated by the Departmental ODICR. The teams conducted a series of listening sessions with ERGs and their respective communities to ascertain sticking points in employment. The information gleaned was the source of planned activities occurring in DOI's FY 2021 training and development year. The communities communicated that it was the first time the Department's senior leaders took time to hear their concerns and actively seek to understand impediments to employment.

The FWS partnered with the OPM to conduct employee focus groups to identify workforce-related issues and potential barriers to equal employment for low-participation groups. The focus groups consisted of 85 participants from the diverse demographic groups. The focus groups discussed topics such as career development, work-life programs, fair and equal treatment, psychological and physical safety, and mentorship opportunities. The Barrier Analysis Team used the results to inform agency-wide recommendations in eliminating barriers.

Promoting a Workplace Free of Harassment

It is DOI's policy to treat all employees equitably regardless of race, color, national origin, sex (including pregnancy and gender identity), sexual orientation, age, disability, genetic information (including family medical history), status as a parent, marital status, and political affiliation. It is the Department's policy that employees and applicants be free from reprisal or harassment in the Department's workplaces.

According to EEOC's MD-715 guidance, all federal managers, supervisors, human resources professionals, and DEI (EEO) officials are held accountable for the effective implementation of DOI's anti-harassment policy to achieve a model DEI program. Managers and supervisors are held accountable for anti-harassment program implementation and compliance in their performance standards to support DOI's effort to create and maintain a workplace free of harassment.

Public Civil Rights (PCR) Program

For numerous years, the Departmental ODICR, Public Civil Rights (PCR) Division maintained an ongoing collaborative effort between key senior executives in the bureaus, the Departmental ODICR, and OHC to improve access to public lands for

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people with disabilities. In FY 2020, this collaborative effort focused on ensuring the bureaus provide access for persons with disabilities with respect to the use of Electric Bikes on public lands managed by the Department. This reporting period PCR partnered with the Bureau of Indian Education (BIE) and Bureau of Indian Affairs (BIA) to make accessibility improvements in BIE operated schools and colleges by better complying with the Department's obligations with respect to Section 504 of the Rehabilitation Act of 1973.

Accessibility of Electronic Documents

Section 508 of the Rehabilitation Act of 1973 was enacted to eliminate barriers in information technology, to make available new opportunities for people with disabilities, and to encourage development of technologies that will help achieve these goals. The Department is committed to making all electronic and information technology accessible to people with disabilities. In FY 2020, the Department conducted 28 training courses for bureaus and offices in creating Section 508 compliant electronic documents for Excel, Adobe, Word, and other electronic documents. Section 508 training was also conducted in 12 contracting and acquisition courses hosted by the DOIU.

The Department hosted the training "Inclusive Social Media: Making Images Accessible" as a virtual webinar in August 2020. The session 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.

The Department hosted a DOI Digital Week Event, that included Section 508 awareness training. 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 will be posted on the DOI Digital Event SharePoint site.

Diversity Events, Programs and Initiatives

In FY 2020, the Department's enhanced diversity outreach efforts were consistent with the Department's overall Diversity, Equity, and Inclusion Strategic Plan. Some of the trends and best practices the Department implemented included working with colleges and universities to encourage students to consider federal service as their "career of choice" and participate in DOI's Pathways Program. DOI uses the Pathway Internship Program and the Presidential Management Fellows Program for acquiring new federal talent for their competitive hiring plans.

DOI's Diversity Change Agent (DCA) Program includes over 1,200 employees who are trained to assist in efforts to educate the workforce and position DEI as a mission-critical imperative. The DCAs represent the voices of employees and they work tirelessly to aid the Department in delivering the message of the power of diverse thinking to influence the inclusive workplaces of the future. Many participants in the program are influential leaders who have enormous credibility from a mission standpoint, including senior executives, managers, supervisors, and non-supervisory permanent employees. DCAs can be found at every level of the organization. The primary objectives of the DCA program are to diplomatically draw DOI's workforce into the inclusivity conversation; serve as catalysts for change; and encourage managers, supervisors, and non-supervisory employees to embrace diversity and inclusion as strategic opportunities.

Employee Resource Groups

People are DOI's greatest asset. Creating and maintaining an inclusive workplace where employees feel empowered to be their authentic selves is a crucial driver to attracting and retaining talent. Employee resource groups (ERGs) are one way for organizations to build community while amplifying DOI's values and promoting DEI. All Department employees are encouraged to participate in ERGs. ERGs provide networking, mentoring, and outreach opportunities to interested employees, sponsor cultural and educational programs, and support DOI's DEI efforts.

Building an active and visible ERG program is a positive way for DOI to demonstrate its investment in its employee's growth, development, and systematic development of the surrounding communities. In late FY 2020, the ODICR assumed responsibility for the Department's vast employee organizations' development and direction, including ERGs. The OHC maintained the compliance aspect to ensure each established organization met a chartered organization's program responsibility. At the same time, ODICR provided direction to the groups to actualize DEI in the workplace and a central focus on ensuring collaborative partnerships with organizational leaders and the subsequent communities to increase inclusion at all

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levels in the workplace.

The Departmental 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. The team met with over 300 employees and members of the community. 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. The participants conveyed potential impediments in employment and an increased commitment to work collaboratively with similar organizations at other bureaus to improve employment experiences for DOIs diverse workforce population.

Veterans Employment Program

DOI is committed to increasing the employment of Veterans within the workforce. In FY 2020, DOI continued to actively recruit disabled veteran candidates through the veteran-specific job candidate programs and other resources and authorities, including:

Veterans Recruitment Authority (VRA)

30 Percent or More disabled

Veteran Employment Opportunities Act (VEOA)

Schedule A Hiring Authority

Warrior Transition Battalions (WTB)

Operation Warfighter Program

Paralyzed Veterans

Team Rubicon

Military Spouse Employment Partnership.

DOI bureaus and field offices conducted hiring initiatives such as the National Hiring for the Scientific Job Series 401, 402, 485, and 486, and a Wildland Firefighting Recruitment Event with over 100 selections. DOI also established a Memorandum of Understanding with the Veterans Affairs Vocational Rehabilitation Employment Program (VBAVACO) to provide work experience and on-the-job-training for disabled veterans participating in the Nonpaid Work Experience (NPWE) program. The Department onboarded a number of new hires as a result of this program. Intra-Bureau Expert Team (IBET) meetings were held regularly by the Department to facilitate the exchange of best practices and to problem solve across bureaus regarding hiring programs for veterans.

Employment Programs for Individuals with Disabilities

The DOI is committed to increasing the employment of persons with disabilities within the workforce. In FY 2020, DOI continued to partner with groups including the Federal Exchange on Employment with Disabilities (FEED) and the Employee Assistance and Resource Network (EARN). The Department regularly held Interior Bureau Expert Team (IBET) meetings to facilitate the exchange of best practices and to problem solve across bureaus regarding hiring programs for persons with disabilities.

Exit Survey System

In June 2020, OHC completed the development of a standard Exit Survey System for the Department. The survey is intended for employees departing their position with DOI. It is designed so that DOI can better understand employees' experiences working within the Department and their reasons for leaving. Participation in the survey is voluntary and takes around 20 to 30

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minutes to complete. The results of the survey will be used throughout 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. Responses will be analyzed by OHC, the Departmental ODICR, and bureau or office human resources specialists. All information provided will be treated confidentially and no data will be disclosed that could be used to identify specific individuals.

Applicant Flow Data

In July 2020, OHC in partnership with OPM worked to ensure all bureaus and offices were given access to Applicant Flow Data (AFD) in the USA jobs federal application system. Office of Personnel Management provided onsite training to members of the HR and DEI community on how to download the data for use in our annual analysis. This is a tremendous endeavor because prior to FY 2020, the data was not available to DOI, and its bureaus and offices were not able to access a central system to account for our recruitment and selection activities. Bureaus and offices now have full to access AFD and the knowledge on how to retrieve and correctly analyze the data to improve recruitment, accountability, and fairness of employment practices.

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EXECUTIVE SUMMARY: PLANNED ACTIVITIES

Increase collaboration between the Departmental ODICR, OHC, 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 bureaus and field offices.

Analyze and improve resources (personnel, training, data systems, funding, and administrative support) for the Department's DEI program.

Train Employee Organizations on Barrier Identification and Elimination, and Special Emphasis Programs to ensure consistency of application across the Department.

Deliver a State of the Agency briefing to Departmental leadership on the Department's performance in each of the six elements of the model DEI program.

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

Identify and disseminate trends in employment, best practices in the DOI DEI (EEO) program, and utilize DEI groups to enhance program outputs for the betterment of the DOI workforce.

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

Encourage all employees to use ADR and annually evaluate the effectiveness of the program;

Issue acceptance letters/dismissal decisions, investigations, final agency decisions and final actions, within a reasonable timeframe;

Implement new automated data systems and enhance current IT systems; and

Collectively work to address identified deficiencies in Elements A, B, C, D, and E of this annual report.

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**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

 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	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		

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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	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		There is not a Department-wide approach to ensure all employees receive the reasonable accommodation procedures.
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			https://www.doi.gov/pmb/eo/disability-and-religious-accommodations
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		There is not a consistent approach to ensuring all employees are notified. Although the Departmental ODICR and Bureaus disseminates this information to new supervisors.

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Agency Self-Assessment Checklist

<p>A.2.c.2. ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.</p>		<p>X</p>	<p>There is not a consistent approach to ensuring all employees are notified. Although the Departmental ODICR and Bureaus disseminates this information to new supervisors.</p>
<p>A.2.c.3. Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.</p>		<p>X</p>	<p>There is not a consistent approach to ensuring all employees are notified. Although the Departmental OCR and Bureaus disseminates this information to new supervisors.</p>
<p>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.</p>	<p>X</p>		<p>Information is provided during on-boarding, new employee orientation, and supervisor training. Every Bureau provides feedback to the Departmental Anti-Harassment Program on steps taken to prevent harassment. This information is also found on the websites.</p>
<p>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.</p>	<p>X</p>		<p>Every two weeks during on-boarding and monthly Bureau updates.</p>

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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	A.3. The agency assesses and ensures EEO principles are part of its culture.				
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		The Department does not recognize employees or leaders for superior accomplishments in EDI (EEO).
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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Agency Self-Assessment Checklist



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

 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		Multiple Bureaus as well as the Departmental ODICR do not report to the head of the Agency.
	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		
	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 and multiple Bureaus are not clearly defined in the organizational chart.
	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 Departmental ODICR EEO Director does not have direct access to the Secretary of the Interior.
	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		The Departmental ODICR, BOEM, BLM, and BSEE did not conduct the "State of the Agency" briefing.
	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		Neither the Departmental ODICR nor Reclamation EDI (EEO) regularly participate in senior level staff meetings.

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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.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			
	B.2.b. Is the EEO Director responsible for overseeing the completion of EEO counseling? [see 29 CFR §1614.102(c)(4)]	X			
	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			
	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			
	B.2.e. Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	X			
	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		The Departmental ODICR does not have authority to evaluate each Bureau EDI (EEO) program.
	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		Neither the Departmental ODICR nor Reclamation have met this measure.

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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
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 and multiple Bureaus are not involved in workforce planning meetings.
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		The Departmental strategic plan does not reference EDI (EEO) principles.

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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	
	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		The Departmental ODICR and multiple Bureaus have limited staffing and/or funding to run an efficient program.
	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		The Departmental ODICR and multiple Bureaus have limited staffing and/or funding to run an efficient program.
	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		The Departmental ODICR and multiple Bureaus have limited staffing and/or funding to run an efficient program.
	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		The Department has not allocated resources to ensure reasonable accommodation (religious or disability), ADR or retaliation is uniformly provided throughout the Department.
	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		The Departmental ODICR and multiple Bureaus do not have sufficient staffing and/or budgets to conduct field office audits.

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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	The Departmental ODICR and multiple Bureaus do not have sufficient staffing and/or funding.
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.		X	The iComplaints systems does not have sufficient funding to support electronic case filing as required.
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]		X	Neither the Departmental ODICR nor NPS have met this measure.
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]	X		
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)]	X		
B.4.c. Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]		X	The Departmental ODICR EEO Director’s position does not clearly define the responsibilities as required.
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?	X		
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?	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		
	B.5.a.2. Reasonable Accommodation Procedures? [see 29 CFR § 1614.102(d)(3)]		X		NPS has not yet met this measure.
	B.5.a.3. Anti-harassment policy? [see MD-715(II)(B)]	X			The Anti-Harassment Policy and procedures are frequently communicated in on-boarding, managerial training, etc. throughout the Department.
	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		
	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		Leaders throughout the Department and in multiple Bureaus are not involved in Special Emphasis Programs.
B.6.b. Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]			X		Leaders throughout the Department and in multiple Bureaus are not involved in barrier identification and elimination process.
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		Leaders throughout the Department and in multiple Bureaus are not involved in barrier identification and elimination process.
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		Leaders throughout the Department and in multiple Bureaus are not involved in the development of EDI (EEO) action plans.

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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.				
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		The Departmental ODICR and multiple Bureaus do not regularly assess field offices for EDI (EEO) program deficiencies.
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		The Departmental ODICR and multiple Bureaus do not regularly assess field offices on their efforts to remove barriers from the workplace.
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		The Departmental ODICR and multiple Bureaus have not conducted assessments of its field office EDI (EEO) programs.

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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			
	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			
	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		The Departmental ODICR and multiple Bureaus have not established a systematic approach to notifying the anti-harassment program officials of EEO harassment complaints.
	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		There is not a consistent application in the use of the Departmental anti-harassment tracking system. There is not complete data available for the percentage of timely-processed inquiries.
	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		The Departmental Reasonable Accommodation procedures have not been updated to align with the final rule.

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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		The Department does not have an agency-wide tracking system in place to account for timely issuance of reasonable accommodation solutions. Unable to determine the percentage of timely-processed requests.
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			
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/accomodations

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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		There is no concrete evidence that senior executives are held accountable for ensuring EDI (EEO) in the workplace.
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		
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		Leaders are not accountable for working with the Departmental or multiple Bureau EDI (EEO) programs to remove barriers to equal opportunity.
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 does not have direct access to the Secretary of the Interior, nor do multiple Bureaus have access to agency heads to make recommendation.

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

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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 and multiple Bureaus do not meet regularly with the HR Director to assess whether HR policies conform with EDI (EEO) laws, instructions, or management directives.
	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 Department has not established schedules to review HR policies, procedures, and practices for systemic barriers for EEO groups.
	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			
	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		There is not a systematic approach throughout DOI for the Departmental ODICR and the Bureaus to consistently receive this data
	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 and multiple Bureaus do not have sufficient resources to ensure this happening.

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C.4.e.2. Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]			X		Collaborative meetings are not occurring consistently across the Department.
C.4.e.3. Develop and/or provide training for managers and employees? [see MD-715, II(C)]			X		
C.4.e.4. Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]			X		
C.4.e.5. Assist in preparing the MD-715 report? [see MD-715, II(C)]			X		The Departmental ODICR and multiple Bureaus do not collaborate with HR regarding the MD-715 report and program as a shared responsibility
	Compliance Indicator	C.5. Following a finding of discrimination, the agency explores whether it should take a disciplinary action.	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	
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	This is an actionable item in Part H because the Departmental ODICR and multiple Bureaus do not have direct access or reoccurring receipt of this data to determine if the agency is complying.
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		

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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.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 does not provide regular EDI (EEO) updates to managers and supervisors, nor do multiple Bureaus.
	C.6.b. Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [see MD-715 Instructions, Sec. I]	X			

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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 Departmental ODICR and multiple Bureaus do not have sufficient resources to consistently identify triggers.
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		Conducted once a year, however, there is no follow-up due to lack of sufficient resources.
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			The OHC established an internal process to ensure consistency across the Department. See accomplishment in Part H.

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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		
	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 Departmental ODICR and multiple Bureaus do not have sufficient resources to consistently identify and resolve triggers
	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		DOI does not conduct impact analysis prior to decisions to re-align or re-organize its Department.
	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		ODICR and multiple Bureaus do not have sufficient resources to regularly review data sources to conduct barrier analysis.

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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.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		
	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 Departmental ODICR and multiple Bureaus have not conducted a barrier analysis.
	D.3.c. Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]		X		BIA has not yet met this measure.

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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.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		Multiple Bureaus do not have the affirmative action plans posted. The DOI affirmative action plan is located at: https://www.doi.gov/pmb/eo/management-directive-715-md-715-reports
	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		The Department does not have a standard process to encourage qualified people with disabilities to apply for jobs
	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	The Department has established HR points of contact for affirmative action, however there is ambiguity in terms of its application across the Department. There is a part H established.
	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		The Department does not have a defined process to ensure all Bureaus and Offices are taking reasonable steps to increase the number of persons with disabilities in the workforce.

Department of the Interior

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Agency Self-Assessment Checklist

Essential Element: E Efficiency

Department of the Interior

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

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			
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		
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		The Departmental ODICR has insufficient staffing to ensure adequate quality control.
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		The Departmental ODICR has insufficient staffing to ensure adequate quality control.

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Agency Self-Assessment Checklist

<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>	<p>X</p>			<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>	<p>X</p>			
<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>	<p>X</p>			

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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.2. The agency has a neutral EEO process.				
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.		X			The Departmental ODICR have established a clear separation between EEO complaint program and its defensive function.
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.		X			The Departmental ODICR and multiple Bureaus have their own attorneys and/or other experts within the EDI (EEO) Offices to conduct sufficiency reviews. For sensitive or complex matters the Bureaus will send documentation to the Departmental ODICR for its sufficiency review.
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)]				X	Yes, there is a firewall between the reviewing attorney and the Employment and Labor Law Unit YesNoN/A N/A
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)]		X			
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)]				X	Employment and Labor Law Unit

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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.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		The Department does not have an established process in place to ensure employees are encouraged to use ADR.
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		The Department does not annually evaluate the effectiveness of its ADR program.

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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.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		Neither the Departmental ODICR nor multiple Bureaus have systems in place to monitor recruitment activities.
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		Neither the Departmental ODICR nor multiple Bureaus have systems in place to monitor reasonable accommodation requests.
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		Neither the Departmental ODICR nor multiple Bureaus have systems in place to re-survey the workforce on a regular basis.

Department of the Interior

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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.5. The agency identifies and disseminates significant trends and best practices in its EEO program.				
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.			X		Neither the Departmental ODICR nor multiple Bureaus monitor trends and best practices due to insufficient staffing.
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		Neither the Departmental ODICR nor multiple Bureaus monitor and adopt other agencies' best practices for EDI (EEO) programs.
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		There is inconsistency across the Bureaus in comparing performance.

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Agency Self-Assessment Checklist



Essential Element: F Responsiveness and Legal Compliance

 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	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			
 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	
	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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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	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.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. .
DOI did not provide recognition to employees, supervisors, managers, and offices that demonstrated superior accomplishments in EDI (EEO).

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
09/30/2019	12/31/2021			Develop and implement a Department-wide program to provide recognition to employees, supervisors, managers, and offices.

Responsible Officials

Title	Name	Standards Address the Plan?
Director, Workforce Relations Division	Ayana Sears (or designee)	Yes
Departmental Lead MD-715 Program Manager	Julia Bumbaca	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
01/31/2021	Meet with key stakeholders to address the program deficiency and to establish a way forward.	No		06/25/2020
12/31/2021	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
2019	This is a new Plan H, no action taken.
2020	In June 2020, the Departmental ODICR and the Office of Human Capital (OHC) met to discuss the deficiency. At the close of the FY, a subsequent meeting was set for senior leaders to establish a plan for FY 2021.

Department of the Interior

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Plan to Attain Essential Elements

PART H.2

Brief Description of Program
Deficiency:

A.2.c.2. ADR process? [see MD-110, Ch. 3(II)(C)] If "yes", please provide how often.

DOI does not have established procedures for new supervisors and newly promoted supervisors to understand their roles and responsibilities for providing reasonable accommodations

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Plan to Attain Essential Elements

PART H.3

Brief Description of Program Deficiency: 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.

DOI does not have established procedures for new supervisors and newly promoted supervisors to understand their roles and responsibilities for providing reasonable accommodations.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
09/30/2018	04/01/2019	04/30/2021		Ensure new managers and supervisors throughout the Department understand their roles and responsibilities for providing reasonable accommodations.

Responsible Officials

Title	Name	Standards Address the Plan?
Chief Learning Officer and Director Office of Strategic Employee and Organizational Development	Dr. Vicki A. Brown (or designee)	No
Senior Program Manager for Workers' Compensation and Reasonable Accommodation	Debbie Pfaff and Megan Castaneda	Yes
Director, Adjudication, Compliance and Equity Division	Thomas Ziehnert (or designee)	Yes
Human Resource Officer/Deputy Human Capital Officer	Jennifer Ackerman (or designee) and bureau HROs	Yes
Director, Workforce Relations Division	Ayanna Sears (or designee)	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/31/2020	Meet with stakeholders in the Office of the Secretary to discuss the deficiency and initiate a training plan for new managers and supervisors to understand their roles and responsibilities for providing reasonable Accommodations	No	06/30/2021	
07/30/2021	Draft Department-wide training plan and circulate to Offices and Bureaus for feedback.	No	12/30/2021	
09/30/2021	Finalize and execute the training plan Department-wide to ensure all new managers and supervisors receive reasonable accommodation training.	No	12/30/2021	
04/30/2021	Develop a consistent approach to ensuring all employees are notified of the complaint process.	No		
04/30/2021	Develop a consistent approach to ensuring all employees are notified of the EEO ADR process.	No	12/30/2021	

Accomplishments

Fiscal Year	Accomplishment
2019	No action taken.
2020	The Office of Strategic Employee and Organizational Development (OSEOD) developed an onboarding video to be used department-wide. Officials within the Office of Diversity, Inclusion and Civil Rights (ODICR) provided substantive feedback that incorporates employees' rights and responsibilities regarding EEO complaints within DOI. OSEOD subsequently accepted and incorporated the recommended language in its materials and implemented said onboarding materials across the department. In addition, representatives from the Adjudication, Compliance and Equity (ACE) Division of ODICR provides EEO updates to new employees during the OSEOD department-wide new supervisory training.

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Plan to Attain Essential Elements

PART H.4

Brief Description of Program
Deficiency:

A.2.c.3. Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If "yes", please provide how often.

DOI does not have established procedures for new supervisors and newly promoted supervisors to understand their roles and responsibilities for providing reasonable accommodations.

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Plan to Attain Essential Elements

PART H.5

Brief Description of Program Deficiency:

A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]

DOI does not have established procedures for new supervisors and newly promoted supervisors to understand their roles and responsibilities for providing reasonable accommodations.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
09/30/2018	04/01/2019	04/30/2021		Ensure new managers and supervisors throughout the Department understand their roles and responsibilities for providing reasonable accommodations

Responsible Officials

Title	Name	Standards Address the Plan?
Adjudication, Compliance and Equity Division	Thomas Ziehnert (or designee)	Yes
Director, Workforce Relations Division	Ayanna Sears (or designee)	Yes
Human Resource Officer/Deputy Human Capital Officer	Jennifer Ackerman (or designee) and bureau HROs	Yes
Chief Learning Officer and Director Office of Strategic Employee and Organizational Development	Dr. Vicki A. Brown (or designee)	No
Senior Program Manager for Workers' Compensation and Reasonable Accommodation	Debbie Pfaff and Megan Castaneda	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/31/2020	Meet with stakeholders in the Office of the Secretary to discuss the deficiency and initiate a training plan for new managers and supervisors to understand their roles and responsibilities for providing reasonable Accommodations.	No		
07/30/2021	Draft Department-wide training plan and circulate to Offices and Bureaus for feedback.	No		
09/30/2021	Finalize and execute the training plan Department-wide to ensure all new managers and supervisors receive reasonable accommodation training.	No		
07/30/2021	Draft Department-wide training plan and circulate to Offices and Bureaus for feedback. approach to ensuring all employees are notified of the complaint process.	No		
04/30/2021	Develop a consistent approach to ensuring all employees are notified of the complaint process.	No	12/30/2021	06/30/2020

Accomplishments

Fiscal Year	Accomplishment
2019	No action taken.
2020	The Office of Strategic Employee and Organizational Development (OSEOD) developed an onboarding video to be used department-wide. Officials within the Office of Diversity, Inclusion and Civil Rights (ODICR) provided substantive feedback that incorporates employees' rights and responsibilities regarding EEO complaints within DOI. OSEOD subsequently accepted and incorporated the recommended language in its materials and implemented said onboarding materials across the department. In addition, representatives from the Adjudication, Compliance and Equity (ACE) Division of ODICR provides EEO updates to new employees during the OSEOD department-wide new supervisory training.

Department of the Interior

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Plan to Attain Essential Elements

PART H.6

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)]
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DOI did not develop and disseminate an Equity, Diversity, and Inclusion (EDI) Policy Statement.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
09/30/2018	12/30/2025	03/30/2021		Develop and disseminate an EDI (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 and Chief Diversity Officer	Erica D. White-Dunston (or designee)	No
DOI Secretary	Debra A. Haaland	No
Senior Advisor to the Secretary, Exercising the Delegated Authority of the Assistant Secretary - Policy, Management and Budget	Rachael Taylor	No

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.	Yes	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. 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.

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Plan to Attain Essential Elements

PART H.7

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.
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DOI did not develop and disseminate an Equity, Diversity, and Inclusion (EDI) Policy Statement

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
09/30/2018	12/30/2025	03/30/2021		Develop and disseminate an EDI (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 and Chief Diversity Officer	Erica D. White-Dunston (or designee)	No
Senior Advisor to the Secretary, Exercising the Delegated Authority of the Assistant Secretary - Policy, Management and Budget	Rachael Taylor (or designee)	No
DOI Secretary	Deb Haaland (or designee)	No

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.	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. 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.

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Plan to Attain Essential Elements

PART H.8

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]

The Departmental ODICR and multiple Bureau EDI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement EDI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies.

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Plan to Attain Essential Elements

PART H.9

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)]
The Departmental ODICR and multiple Bureau EDI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement EDI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies.	

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
09/30/2018	09/30/2025			Get managers involved in the barrier analysis process.

Responsible Officials

Title	Name	Standards Address the Plan?
Human Capital Officers	Various Personnel	Yes
Director, Office of Civil Rights and Chief Diversity Officer	Erica D. White-Dunston	Yes
Bureau EEO Officers	Various Personnel	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
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Accomplishments

Fiscal Year	Accomplishment
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Department of the Interior

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Plan to Attain Essential Elements

PART H.10

Brief Description of Program
Deficiency:

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)]

The Departmental ODICR and multiple Bureau EDI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement EDI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies.

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Plan to Attain Essential Elements

PART H.11

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]
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The Departmental ODICR Director and multiple Bureau EDI (EEO) Directors do not 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 Department's EDI (EEO) program.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
12/03/2020	03/30/2021			The Departmental ODCR Director and all Bureau EDI (EEO) Directors regularly participate in meetings to advise the agency head and senior management of the legal compliance and effectiveness of the EDI (EEO) program.

Responsible Officials

Title	Name	Standards Address the Plan?
DOI Secretary	Deb Haaland (or designee)	No
Senior Advisor to the Secretary, Exercising the Delegated Authority of the Assistant Secretary - Policy, Management and Budget	Rachael Taylor (or designee)	No
Director, Office of Diversity, Inclusion and Civil Rights and Chief Diversity Officer	Erica D. White-Dunston (or designee)	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
03/30/2021	Implement a process to ensure the Departmental ODICR Director has regular and effective meetings with the agency head and other senior management officials to advise on the effectiveness, efficiency and legal compliance of the agency's EDI (EEO) program.	No		
03/30/2021	Conduct the "State of the Agency" briefing for the Secretary and other senior leaders.	No		

Accomplishments

Fiscal Year	Accomplishment
2019	This is a new Part H, no action taken.
2020	The Departmental ODICR Director conducted extensive discussions with the Assistant Secretary for PMB and other senior leaders to ensure program compliance. The Departmental ODICR Director also conducted numerous one-one-one discussions with Senior Executives within the Office of the Secretary and Bureau Executive teams to outline DOIs EDI (EEO) program obligations, effectiveness, and plan of action. As a result, the Departmental ODICR received recurring invites to attend the Workforce Culture Transformation Advisory Council and the Management Information Team meetings. Both meetings include Senior Executive Service level discussions concerning organizational impacts, effectiveness, and departmental compliance.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.12

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)]

The Departmental ODICR and multiple Bureau EDI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement EDI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
02/06/2018	12/30/2025	12/30/2022		Provide sufficient resources to the Departmental ODICR and in each of the Bureaus to implement an effective EDI (EEO) program throughout the Department.

Responsible Officials

Title	Name	Standards Address the Plan?
Principal Deputy Assistant Secretary, Policy, Management, and Budget	Rachael Taylor (or designee)	No
Bureau Heads	Various Personnel	No
Director, Office of Civil Rights and Chief Diversity Officer	Erica D. White-Dunston (or designee)	No
Deputy Assistant Secretary - Human Capital and	Raymond Limon (or designee)	No
EDI (EEO) Directors	Various Personnel	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
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Accomplishments

Fiscal Year	Accomplishment
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Department of the Interior

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

Plan to Attain Essential Elements

PART H.13

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.

The Departmental ODICR and multiple Bureau EDI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement EDI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.14

Brief Description of Program
Deficiency:

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

The Departmental ODICR and multiple Bureau EDI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement EDI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.15

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)]

The Departmental ODICR and multiple Bureau EDI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement EDI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.16

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 Department doesn't have a tracking mechanism to account for and ensure timely issuance of requests for reasonable accommodation

Department of the Interior

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

Plan to Attain Essential Elements

PART H.17

Brief Description of Program
Deficiency:

B.5.a.1. EEO complaint process? [see MD-715(II)(B)]

The Department doesn't have a tracking mechanism to account for and ensure timely issuance of requests for reasonable accommodation.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.18

Brief Description of Program Deficiency: 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)]

The Departmental OCR Director does not report to the Secretary of the Interior and not all Bureau EDI (EEO) Directors report directly to the Heads of the Bureaus. (This program deficiency has been identified by the EEOC as an area of concern in their feedback notices to the Department in FY 2013, FY 2018, and FY 2019).

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
02/06/2018	12/30/2028	12/30/2022		Standardize reporting structure so that the Departmental ODICR Director reports to the Secretary of the Interior and all Bureau EDI (EEO) Directors report directly to the Heads of the Bureaus. Bureau EDI (EEO) Directors have control over field office locations for the EDI (EEO) program.

Responsible Officials

Title	Name	Standards Address the Plan?
DOI Secretary	Deb Haaland (or designee)	No
Senior Advisor to the Secretary, Exercising the Delegated Authority of the Assistant Secretary - Policy, Management and Budget	Rachael Taylor (or designee)	No
Director, Office of Diversity, Inclusion and Civil Rights and Chief Diversity Officer	Erica D. White-Dunston (or designee)	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/30/2020	Implement procedures to realign the Departmental ODICR Director to comply with 29 CFR 1614.102(b)(4).	Yes	09/30/2021	
09/30/2021	Institute a process that gives the Departmental ODICR oversight and input into the performance of Bureau EDI (EEO) Directors and programs.	No		
12/30/2021	Update the Departmental organizational chart to accurately define the reporting structure for the Departmental ODICR.	No		
12/30/2022	Reduce the number of reporting levels between the Departmental ODICR Director and the Secretary of the Interior.	No		
12/30/2022	Realign field office locations to report directly to the Bureau EDI (EEO) Director.	No		

Accomplishments

Fiscal Year	Accomplishment
2019	All Bureaus have met this measure except Reclamation, BOEM, and BSEE. Effective March 4, 2019, the Departmental ODICR was realigned to report directly to the Principal Deputy Assistant Secretary for Policy, Management, and Budget. While the realignment did allow the Departmental ODICR to have a voice among senior staff, it did not establish the Departmental ODICR as an independent reporting arm to the Secretary. More work needs to be done in order for the Departmental ODICR Director to exercise a greater and more appropriate degree of independence and allow the office the opportunity to directly advise the Secretary of the Interior on matters related to EDI (EEO).
2020	Throughout FY 2020, the Departmental ODICR Director conducted multiple meetings with the Assistant Secretary, PMB regarding the appropriate alignment of the EDI (EEO) program officials to comport with statutory requirements set forth by the EEOC. The Departmental ODICR Director and Deputy Director met with the Bureau Director for Reclamation to discuss the appropriate alignment of the EDI (EEO) program. At the close of the FY, talks were ongoing as to the appropriate placement of the program. During the reporting year, leadership within the Bureau of Land Management (BLM) realigned its EDI (EEO) office to report to the BLM Department head.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.19

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 Department doesn't have a tracking mechanism to account for and ensure timely issuance of requests for reasonable accommodation

Department of the Interior

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

Plan to Attain Essential Elements

PART H.20

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 Departmental OCR Director does not report to the Secretary of the Interior and not all Bureau EDI (EEO) Directors report directly to the Heads of the Bureaus. (This program deficiency has been identified by the EEOC as an area of concern in their feedback notices to the Department in FY 2013, FY 2018, and FY 2019).

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
12/30/2022	12/30/2022			Bureau EDI (EEO) Directors have control over field office locations for the EDI (EEO) program.

Responsible Officials

Title	Name	Standards Address the Plan?
Senior Advisor to the Secretary, Exercising the Delegated Authority of the Assistant Secretary - Policy, Management and Budget	Rachael Taylor (or designee)	No
DOI Secretary	Deb Haaland (or designee)	No
Director, Office of Diversity, Inclusion and Civil Rights and Chief Diversity Officer	Erica D. White-Dunston (or designee)	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/30/2020	Implement procedures to realign the Departmental ODICR Director to comply with 29 CFR 1614.102(b)(4).	Yes	09/30/2021	
09/30/2021	Institute a process that gives the Departmental ODICR oversight and input into the performance of Bureau EDI (EEO) Directors and programs.	No		
12/30/2021	Update the Departmental organizational chart to accurately define the reporting structure for the Departmental ODICR.	No		
12/30/2022	Reduce the number of reporting levels between the Departmental ODICR Director and the Secretary of the Interior.	No		
12/30/2022	Realign field office locations to report directly to the Bureau EDI (EEO) Director	No		

Accomplishments

Fiscal Year	Accomplishment
2019	All Bureaus have met this measure except Reclamation, BOEM, and BSEE. Effective March 4, 2019, the Departmental ODICR was realigned to report directly to the Principal Deputy Assistant Secretary for Policy, Management, and Budget. While the realignment did allow the Departmental ODICR to have a voice among senior staff, it did not establish the Departmental ODICR as an independent reporting arm to the Secretary. More work needs to be done in order for the Departmental ODICR Director to exercise a greater and more appropriate degree of independence and allow the office the opportunity to directly advise the Secretary of the Interior on matters related to EDI (EEO).
2020	Throughout FY 2020, the Departmental ODICR Director conducted multiple meetings with the Assistant Secretary, PMB regarding the appropriate alignment of the EDI (EEO) program officials to comport with statutory requirements set forth by the EEOC. The Departmental ODICR Director and Deputy Director met with the Bureau Director for Reclamation to discuss the appropriate alignment of the EDI (EEO) program. At the close of the FY, talks were ongoing as to the appropriate placement of the program. During the reporting year, leadership within the Bureau of Land Management (BLM) realigned its EDI (EEO) office to report to the BLM Department head.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.21

Brief Description of Program Deficiency: 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)]

The Departmental ODICR Director and multiple Bureau EDI (EEO) Directors do not 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 Department's EDI (EEO) program.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
12/03/2020	03/30/2021			The Departmental ODCR Director and all Bureau EDI (EEO) Directors regularly participate in meetings to advise the agency head and senior management of the legal compliance and effectiveness of the EDI (EEO) program.F

Responsible Officials

Title	Name	Standards Address the Plan?
Senior Advisor to the Secretary, Exercising the Delegated Authority of the Assistant Secretary - Policy, Management and Budget	Rachael Taylor (or designee)	No
DOI Secretary	Deb Haaland (or designee)	No
Director, Office of Diversity, Inclusion and Civil Rights and Chief Diversity Officer	Erica D. White-Dunston (or designee)	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
03/30/2021	Implement a process to ensure the Departmental OCR Director has regular and effective meetings with the agency head and other senior management officials to advise on the effectiveness, efficiency and legal compliance of the agency's EDI (EEO) program.	No		
03/30/2021	Conduct the "State of the Agency" briefing for the Secretary and other senior leaders.	No		

Accomplishments

Fiscal Year	Accomplishment
2019	This is a new Part H, no action taken.
2020	The Departmental ODICR Director conducted extensive discussions with the Assistant Secretary for PMB and other senior leaders to ensure program compliance. The Departmental ODICR Director also conducted numerous one-one-one discussions with Senior Executives within the Office of the Secretary and Bureau Executive teams to outline DOIs EDI (EEO) program obligations, effectiveness, and plan of action. As a result, the Departmental ODICR received recurring invites to attend the Workforce Culture Transformation Advisory Council and the Management Information Team meetings. Both meetings include Senior Executive Service level discussions concerning organizational impacts, effectiveness, and departmental compliance.

Department of the Interior

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.6. to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)?
[see MD-715, II(B)]

The Departmental ODICR and multiple Bureau EDI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement EDI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.23

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 Departmental ODICR Director and multiple Bureau EDI (EEO) Directors do not 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 Department's EDI (EEO) program.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.24

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 Departmental ODICR and multiple Bureau EDI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement EDI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
02/06/2018	12/30/2025	12/30/2022		Provide sufficient resources to the Departmental ODICR and in each of the Bureaus to implement an effective EDI (EEO) program throughout the Department. Grant the Departmental ODICR Director oversight and program responsibility for implementing an effective EDI (EEO) Program across the Department.

Responsible Officials

Title	Name	Standards Address the Plan?
Senior Advisor to the Secretary, Exercising the Delegated Authority of the Assistant Secretary - Policy, Management and Budget	Rachael Taylor (or designee)	No
EDI (EEO) Directors	Various Personnel	No
Bureau Heads	Various Personnel	No
Deputy Assistant Secretary - Human Capital and	Raymond Limon (or designee)	No
Director, Office of Diversity, Inclusion and Civil Rights and Chief Diversity Officer	Erica D. White-Dunston (or designee)	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/30/2022	Conduct a thorough barrier analysis across the Department.	No		
12/30/2022	Train all supervisors and employees on their roles and responsibilities for the EDI (EEO) program across the Department.	No		
12/30/2022	Develop quality control measures to ensure timely, thorough, and fair complaints processing	No		
12/30/2022	Conduct field audits of EDI (EEO) programs across the Department.	No		
12/30/2022	Administer special emphasis programs across the Department aligned with MD 715 Program objectives.	No		
12/30/2022	Allocate funding to iComplaints system to implement electronic case filing.	No		
12/30/2022	Revise the position description of the Department ODICR Director to clearly define the duties and responsibilities of this position to oversee the effectiveness of the Department-wide EDI (EEO) program.	No		

Accomplishments

Fiscal Year	Accomplishment
2019	No action taken.
2020	The Departmental ODICR Director regularly participated in some senior executive meetings throughout the reporting period with OHC, the Workforce Culture Transformation Advisory Council, and others. The Reclamation EDI (EEO) program received three additional full-time employees in its complaint's management program. These additional resources alleviated the recurring untimely processing issues. Additionally, Reclamation instituted Bureau-wide procedures to ensure the timely processing of complaints.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.25

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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The Departmental ODICR and multiple Bureau EDI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement EDI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.26

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]

Involve managers and supervisors in removing employment barriers for people with disabilities.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.27

Brief Description of Program Deficiency: 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.

The Departmental OCR Director does not report to the Secretary of the Interior and not all Bureau EDI (EEO) Directors report directly to the Heads of the Bureaus. (This program deficiency has been identified by the EEOC as an area of concern in their feedback notices to the Department in FY 2013, FY 2018, and FY 2019).

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
02/06/2018	12/30/2028	12/30/2022		Standardize reporting structure so that the Departmental OCR Director reports to the Secretary of the Interior and all Bureau EDI (EEO) Directors report directly to the Heads of the Bureaus.

Responsible Officials

Title	Name	Standards Address the Plan?
DOI Secretary	Deb Haaland (or designee)	No
Senior Advisor to the Secretary, Exercising the Delegated Authority of the Assistant Secretary - Policy, Management and Budget	Rachael Taylor (or designee)	No
Director, Office of Civil Rights and Chief Diversity Officer	Erica D. White-Dunston (or designee)	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/30/2020	Implement procedures to realign the Departmental ODICR Director to comply with 29 CFR 1614.102(b)(4). Institute a process that gives the Departmental ODICR oversight and input into the performance of Bureau EDI (EEO) Directors and programs.	Yes	09/30/2021	
12/30/2021	Update the Departmental organizational chart to accurately define the reporting structure for the Departmental ODICR	No		
09/30/2021	Institute a process that gives the Departmental ODICR oversight and input into the performance of Bureau EDI (EEO) Directors and programs.	No		
12/30/2022	Reduce the number of reporting levels between the Departmental ODICR Director and the Secretary of the Interior.	No		
12/30/2022	Realign field office locations to report directly to the Bureau EDI (EEO) Director.	No		
12/30/2022	Realign field office locations to report directly to the Bureau EDI (EEO) Director.	Yes		

Accomplishments

Fiscal Year	Accomplishment
2019	All Bureaus have met this measure except Reclamation, BOEM, and BSEE. Effective March 4, 2019, the Departmental ODICR was realigned to report directly to the Principal Deputy Assistant Secretary for Policy, Management, and Budget. While the realignment did allow the Departmental ODICR to have a voice among senior staff, it did not establish the Departmental ODICR as an independent reporting arm to the Secretary. More work needs to be done in order for the Departmental ODICR Director to exercise a greater and more appropriate degree of independence and allow the office the opportunity to directly advise the Secretary of the Interior on matters related to EDI (EEO).
2020	Throughout FY 2020, the Departmental ODICR Director conducted multiple meetings with the Assistant Secretary, PMB regarding the appropriate alignment of the EDI (EEO) program officials to comport with statutory requirements set forth by the EEOC. The Departmental ODICR Director and Deputy Director met with the Bureau Director for Reclamation to discuss the appropriate alignment of the EDI (EEO) program. At the close of the FY, talks were ongoing as to the appropriate placement of the program. During the reporting year, leadership within the Bureau of Land Management (BLM) realigned its EDI (EEO) office to report to the BLM Department head

Department of the Interior

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Plan to Attain Essential Elements

PART H.28

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.
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The Departmental ODICR Director and multiple Bureau EDI (EEO) Directors do not 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 Department's EDI (EEO) program.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
12/03/2020	03/30/2021			The Departmental ODCR Director and all Bureau EDI (EEO) Directors regularly participate in meetings to advise the agency head and senior management of the legal compliance and effectiveness of the EDI (EEO) program.

Responsible Officials

Title	Name	Standards Address the Plan?
DOI Secretary	Deb Haaland (or designee)	No
Senior Advisor to the Secretary, Exercising the Delegated Authority of the Assistant Secretary - Policy, Management and Budget	Rachael Taylor (or designee)	No
Director, Office of Diversity, Inclusion and Civil Rights and Chief Diversity Officer	Erica D. White-Dunston (or designee)	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
03/30/2021	Implement a process to ensure the Departmental ODICR Director has regular and effective meetings with the agency head and other senior management officials to advise on the effectiveness, efficiency and legal compliance of the agency's EDI (EEO) program.	No		
03/30/2021	Conduct the "State of the Agency" briefing for the Secretary and other senior leaders.	No		

Accomplishments

Fiscal Year	Accomplishment
2019	This is a new Part H, no action taken.
2020	The Departmental ODICR Director conducted extensive discussions with the Assistant Secretary for PMB and other senior leaders to ensure program compliance. The Departmental ODICR Director also conducted numerous one-one-one discussions with Senior Executives within the Office of the Secretary and Bureau Executive teams to outline DOIs EDI (EEO) program obligations, effectiveness, and plan of action. As a result, the Departmental ODICR received recurring invites to attend the Workforce Culture Transformation Advisory Council and the Management Information Team meetings. Both meetings include Senior Executive Service level discussions concerning organizational impacts, effectiveness, and departmental compliance.

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Plan to Attain Essential Elements

PART H.29

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.

The Departmental ODICR and multiple Bureau EDI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement EDI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies.

Department of the Interior

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Plan to Attain Essential Elements

PART H.30

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)]
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The Departmental ODICR Director does not report to the Secretary of the Interior and not all Bureau EDI (EEO) Directors report directly to the Heads of the Bureaus. (This program deficiency has been identified by the EEOC as an area of concern in their feedback notices to the Department in FY 2013, FY 2018, and FY 2019).

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
02/06/2018	12/30/2028	12/30/2022		Standardize reporting structure so that the Departmental ODICR Director reports to the Secretary of the Interior and all Bureau EDI (EEO) Directors report directly to the Heads of the Bureaus.

Responsible Officials

Title	Name	Standards Address the Plan?
Director, Office of Diversity, Inclusion, and Civil Rights and Chief Diversity Officer	Erica D. White-Dunston (or designee)	No
Senior Advisor to the Secretary, Exercising the Delegated Authority of the Assistant Secretary - Policy, Management and Budget	Rachael Taylor (or designee)	No
DOI Secretary	Deb Haaland (or designee)	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/30/2020	Implement procedures to realign the Departmental ODICR Director to comply with 29 CFR 1614.102(b)(4).	Yes	09/30/2021	
09/30/2021	Institute a process that gives the Departmental ODICR oversight and input into the performance of Bureau EDI (EEO) Directors and programs.	No		
12/30/2021	Update the Departmental organizational chart to accurately define the reporting structure for the Departmental ODICR.	No		
12/30/2022	Reduce the number of reporting levels between the Departmental ODICR Director and the Secretary of the Interior.	No		
12/30/2022	Realign field office locations to report directly to the Bureau EDI (EEO) Director.	No		

Accomplishments

Fiscal Year	Accomplishment
2019	All Bureaus have met this measure except Reclamation, BOEM, and BSEE. Effective March 4, 2019, the Departmental ODICR was realigned to report directly to the Principal Deputy Assistant Secretary for Policy, Management, and Budget. While the realignment did allow the Departmental ODICR to have a voice among senior staff, it did not establish the Departmental ODICR as an independent reporting arm to the Secretary. More work needs to be done for the Departmental ODICR Director to exercise a greater and more appropriate degree of independence and allow the office the opportunity to directly advise the Secretary of the Interior on matters related to EDI (EEO).
2020	Throughout FY 2020, the Departmental ODICR Director conducted multiple meetings with the Assistant Secretary, PMB regarding the appropriate alignment of the EDI (EEO) program officials to comport with statutory requirements set forth by the EEOC. The Departmental ODICR Director and Deputy Director met with the Bureau Director for Reclamation to discuss the appropriate alignment of the EDI (EEO) program. At the close of the FY, talks were ongoing as to the appropriate placement of the program. During the reporting year, leadership within the Bureau of Land Management (BLM) realigned its EDI (EEO) office to report to the BLM Department head.

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Plan to Attain Essential Elements

PART H.31

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 Departmental ODICR and multiple Bureau EDI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement EDI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.32

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]

DOI 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
09/30/2018	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?
Deputy Assistant Secretary - Human Capital and Chief Human Capital Officer	Raymond Limon (or designee)	No
Director, Office of Civil Rights and Chief Diversity Officer	Erica D. White-Dunston (or designee)	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
03/30/2025	Incorporate EDI (EEO) element in performance standards of all DOI leaders.	No	11/30/2022	
12/31/2022	Incorporate EDI (EEO) element in performance standards of all DOI leaders.	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
2019	Two of the ten DOI Bureaus established action plans to assist Senior Managers in eliminating employment barriers within their respective organizations. Revised the mandatory critical element in the performance plans of all non-SES/SL/ST employees to better reflect their responsibilities to ensure harassment and discrimination free work environments. The Fully Successful standard for all covered supervisors now reads, in relevant part: "Consistently demonstrates commitment and adherence to equal employment opportunity laws, regulations and policy; responds to reasonable accommodation requests and reports of potential discrimination, harassing conduct, or retaliation timely and consistent with DOI policies and procedures; and addresses any findings of misconduct, taking steps to timely correct employee behavior."
2020	FWS and NPS established barrier analysis teams championed by senior managers. The leadership authorized staffing, contractors, and other resources to implement a thorough analysis. The Departmental ODICR on-boarded a MD-715 Program Manager Team Lead to conduct a Department-wide barrier analysis.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.33

Brief Description of Program
Deficiency:

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

Involve managers and supervisors in removing employment barriers

Department of the Interior

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

Plan to Attain Essential Elements

PART H.34

Brief Description of Program
Deficiency:

B.5.a.2. Reasonable Accommodation Procedures? [see 29 CFR § 1614.102(d)(3)]

The Department doesn't have a tracking mechanism to account for and ensure timely issuance of requests for reasonable accommodation.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.35

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)]

Involve managers and supervisors in removing employment barriers for people with disabilities.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.36

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)]

The Departmental ODICR and multiple Bureau EDI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement EDI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
02/06/2018	12/30/2025	12/30/2022		Provide sufficient resources to the Departmental ODICR and in each of the Bureaus to implement an effective EDI (EEO) program throughout the Department.

Responsible Officials

Title	Name	Standards Address the Plan?
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Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
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Accomplishments

Fiscal Year	Accomplishment
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Department of the Interior

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

Plan to Attain Essential Elements

PART H.37

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]
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The HR and EDI (EEO) Directors and communities do not meet regularly to assess for systemic barriers. Effective communication and collaborative action between both the EDI (EEO) and HR programs are warranted.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
09/30/2018	12/30/2024			Establish partnerships and time-tables to review the Agency/Bureau 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?
Director, Strategic Talent Management Programs	Martin Pursley	Yes
Director, Strategic Human Capital Planning and Evaluation (SHCPE) Division	Kermit Howard	Yes

Planned Activities

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

Accomplishments

Fiscal Year	Accomplishment

Department of the Interior

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.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 HR and EDI (EEO) Directors and communities do not meet regularly to assess for systemic barriers. Effective communication and collaborative action between both the EDI (EEO) and HR programs are warranted.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
09/30/2018	12/30/2024			Establish partnerships and time-tables to review the Agency/Bureau 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?
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Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
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Accomplishments

Fiscal Year	Accomplishment
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Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
09/30/2018	12/30/2024	09/30/2021		Establish partnerships and timetables to review the Agency/Bureau 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?
Director, Strategic Human Capital Planning and Evaluation (SHCPE) Division	Kermit Howard (or designee)	No
Director, Affirmative Employment Program Division	Tyvonnia Ward (or designee)	No
Director, Strategic Talent Management Programs Division	Landon Mock (or designee)	No
Bureau EDI (EEO) Directors	Various Personnel	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
04/30/2024	Train EDI (EEO) Staff on HR policies and processes.	Yes	04/30/2022	
05/31/2024	HR and Departmental ODICR and OHC to jointly establish timetables to review policies and procedures.	No	05/31/2022	
09/30/2024	Draft a report, identify impediments, and recommend solutions.	No		
12/30/2024	Provide findings to OHC and the Departmental ODICR.	No		

Department of the Interior

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

Plan to Attain Essential Elements

Accomplishments

Fiscal Year	Accomplishment
2019	<p>OHC hired Deloitte Consulting LLC to assess its HR operation functions to ensure consistency throughout the Department. 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.</p> <p>There was no action on the completion of the Strategic Human Plan (OHC finalized the Human Capital Operations Plan), Affirmative Action Plan for People with Disabilities, and the Diversity</p>
2020	<p>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.</p> <p>The assessment of HR operations was completed. The report of findings revealed the following key areas required improvement: 1) Establish an HR Governance and Policy Review Board, 2) Implement USA Staffing across the Department, 3) Improve Classification, 4) Expand Executive Resources, 5) Improve process for Seasonal Hiring, 6) Increase Personnel Security, and 7) Reduce Delegated Examining Units (DEUs). OHC immediately initiated work to implement these recommendations</p>

Department of the Interior

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

Plan to Attain Essential Elements

PART H.39

Brief Description of Program Deficiency:	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.
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The Departmental ODICR and multiple Bureau EDI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement EDI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
02/06/2018	12/30/2025	12/30/2022		Provide sufficient resources to the Departmental ODICR and in each of the Bureaus to implement an effective EDI (EEO) program throughout the Department. Grant the Departmental ODICR Director oversight and program responsibility for implementing an effective EDI (EEO) Program across the Department

Responsible Officials

Title	Name	Standards Address the Plan?
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Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
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Accomplishments

Fiscal Year	Accomplishment
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Department of the Interior

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

Plan to Attain Essential Elements

PART H.40

Brief Description of Program
Deficiency:

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

The Department doesn't have a tracking mechanism to account for and ensure timely issuance of requests for reasonable accommodation.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.41

Brief Description of Program
Deficiency:

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?

DOI 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.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.42

Brief Description of Program
Deficiency:

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)]

DOI 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.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.43

Brief Description of Program
Deficiency:

C.3.b.5. Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]

DOI 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.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.44

Brief Description of Program
Deficiency:

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)]

DOI 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.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.45

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 HR and EDI (EEO) Directors and communities do not meet regularly to assess for systemic barriers. Effective communication and collaborative action between both the EDI (EEO) and HR programs are warranted.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.46

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.

The Departmental ODICR and multiple Bureau EDI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement EDI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.47

Brief Description of Program
Deficiency:

C.3.b.1. Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]

DOI 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.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.48

Brief Description of Program
Deficiency:

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]

DOI 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.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.49

Brief Description of Program Deficiency: 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)]

DOI 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
09/30/2018	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?
Director, Office of Civil Rights and Chief Diversity Officer	Erica D. White-Dunston (or designee)	No
Deputy Assistant Secretary - Human Capital and Chief Human Capital Officer	Raymond Limon (or designee)	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
03/30/2025	Incorporate EDI (EEO) element in performance standards of all DOI leaders.	No	11/30/2022	
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
2019	Two of the ten DOI Bureaus established action plans to assist Senior Managers in eliminating employment barriers within their respective organizations. Revised the mandatory critical element in the performance plans of all non-SES/SL/ST employees to better reflect their responsibilities to ensure harassment and discrimination free work environments. The Fully Successful standard for all covered supervisors now reads, in relevant part: "Consistently demonstrates commitment and adherence to equal employment opportunity laws, regulations and policy; responds to reasonable accommodation requests and reports of potential discrimination, harassing conduct, or retaliation timely and consistent with DOI policies and procedures; and addresses any findings of misconduct, taking steps to timely correct employee behavior."
2020	FWS and NPS established barrier analysis teams championed by senior managers. The leadership authorized staffing, contractors, and other resources to implement a thorough analysis. The Departmental ODICR on-boarded a MD-715 Program Manager Team Lead to conduct a Department-wide barrier analysis.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.50

Brief Description of Program
Deficiency:

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

Managers and supervisors are unaware of the requirements of the Affirmative Action Plan for persons with disabilities.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.51

Brief Description of Program Deficiency:	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)]
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The Departmental ODICR and multiple Bureau EDI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement EDI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
02/06/2018	12/30/2025	12/30/2022		Provide sufficient resources to the Departmental ODICR and in each of the Bureaus to implement an effective EDI (EEO) program throughout the Department. Grant the Departmental ODICR Director oversight and program responsibility for implementing an effective EDI (EEO) Program across the Department.

Responsible Officials

Title	Name	Standards Address the Plan?
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Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
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Accomplishments

Fiscal Year	Accomplishment
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Department of the Interior

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

Plan to Attain Essential Elements

PART H.52

Brief Description of Program
Deficiency:

C.3.b.3. Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]

DOI 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.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.53

Brief Description of Program
Deficiency:

C.3.b.6. Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]

DOI 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.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.54

Brief Description of Program Deficiency: 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.

The Departmental ODICR and multiple Bureau EDI (EEO) programs do not have sufficient resources (budget or staffing) or authority to successfully implement EDI (EEO) program objectives, including conducting a self-assessment to eliminate program deficiencies.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
02/06/2018	09/30/2022			Provide sufficient resources to the Departmental ODICR and in each of the Bureaus to implement an effective EDI (EEO) program throughout the Department. Grant the Departmental ODICR Director oversight and program responsibility for implementing an effective EDI (EEO) Program across the Department

Responsible Officials

Title	Name	Standards Address the Plan?
Principal Deputy Assistant Secretary, Policy, Management, and Budget	Rachael Taylor (or designee)	No
Bureau Heads	Various Personnel	No
Deputy Assistant Secretary Human Capital Officer	Raymond Limon (or designee)	No
Director, Office of Civil Rights and Chief Diversity Officer	Erica D. White-Dunston (or designee)	No
EDI (EEO) Directors	Various Personnel	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/30/2022	Conduct a thorough barrier analysis across the Department.	No		
12/30/2022	Train all supervisors and employees on their roles and responsibilities for the EDI (EEO) program across the Department.	No		
12/30/2022	Develop quality control measures to ensure timely, thorough, and fair complaints processing.	No		
12/30/2022	Conduct field audits of EDI (EEO) programs across the Department.	No		
12/30/2022	Administer special emphasis programs across the Department aligned with MD 715 Program objectives.	No		
12/30/2022	Allocate funding to iComplaints system to implement electronic case filing.	No		
12/30/2022	Revise the position description of the Department ODICR Director to clearly define the duties and responsibilities of this position to oversee the effectiveness of the Department-wide EDI (EEO) program.	No		

Accomplishments

Fiscal Year	Accomplishment
2019	No action taken.
2020	The Departmental ODICR Director regularly participated in some senior executive meetings throughout the reporting period with OHC, the Workforce Culture Transformation Advisory Council, and others. The Reclamation EDI (EEO) program received three additional full-time employees in its complaint's management program. These additional resources alleviated the recurring untimely processing issues. Additionally, Reclamation instituted Bureau-wide procedures to ensure the timely processing of complaints.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.55

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 HR and EDI (EEO) Directors and communities do not meet regularly to assess for systemic barriers. Effective communication and collaborative action between both the EDI (EEO) and HR programs are warranted.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
09/30/2018	12/30/2024	09/30/2021		Establish partnerships and timetables to review the Agency/Bureau 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?
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Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
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Accomplishments

Fiscal Year	Accomplishment
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Department of the Interior

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

Plan to Attain Essential Elements

PART H.56

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 Department doesn't have a tracking mechanism to account for and ensure timely issuance of requests for reasonable accommodation.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
09/30/2018	12/30/2021	12/30/2025		Establish a tracking mechanism to account for and ensure timely issuance of request for reasonable accommodations.

Responsible Officials

Title	Name	Standards Address the Plan?
Director, Workforce Relations Division	Ayanna Sears	Yes
Director, Human Resources Information Systems Division	Christopher Lawson	Yes
Managers and Supervisors	Various Personnel	Yes
Employee Relations Program Manager	Megan Castaneda	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2018	Discuss issue at monthly Reasonable Accommodation Community of Practice meetings and ensure Reasonable Accommodation Annual reports monitor and track timeliness.	Yes		09/30/0020
09/30/2018	Meet with Director, OCR and Director, Workforce Relations Division to discuss the necessity for a reasonable accommodation tracking system.	Yes		09/30/2019
12/30/2018	Conduct market research on potential GSA vendor's reasonable accommodation tracking and reporting systems.	Yes		09/22/2019
12/30/2018	Provide justification to Director, Workforce Relations Division to secure reasonable accommodation tracking system.	Yes		07/30/2019
12/30/2018	Secure a new automated reasonable accommodation tracking system to improve the processing of reasonable accommodations in accordance with the guidelines set forth in the Department's Reasonable Accommodation policy and procedures.	Yes		

Accomplishments

Fiscal Year	Accomplishment
2019	The Office of Human Capital requested funding to create a Department-wide reasonable accommodation tracking system. Once funding has been secured, the Office of Human Capital, in partnership with the Office of Civil Rights and Bureau representatives, will work with an established vendor to develop the system to meet both human resources and equal employment opportunity needs. In the absence of a Department-wide tracking system, DOI will issue data calls to the bureaus for this information.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.57

Brief Description of Program
Deficiency:

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

The HR and EDI (EEO) Directors and communities do not meet regularly to assess for systemic barriers. Effective communication and collaborative action between both the EDI (EEO) and HR programs are warranted.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.58

Brief Description of Program Deficiency:	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.]
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Develop internal procedures to ensure all employees, managers, and supervisors are aware of the penalties for engaging in discriminatory behavior or taking personnel actions based upon prohibited bases.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
02/06/2018	12/30/2025	12/30/2022		Provide sufficient resources to the Departmental ODICR and in each of the Bureaus to implement an effective EDI (EEO) program throughout the Department.

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

Department of the Interior

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

Plan to Attain Essential Elements

PART H.59

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)]

Managers and supervisors are unaware of the requirements of the Affirmative Action Plan for persons with disabilities. The Affirmative Action Plan is not posted on external websites for all Bureaus.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
01/30/2019	09/30/2021			Train managers and supervisors on the requirements of the Affirmative Action Plan for persons with disabilities. Ensure all Bureaus post the Affirmative Action Plan on external websites.

Responsible Officials

Title	Name	Standards Address the Plan?
Director, Affirmative Employment Program Division	Tyvonnia Ward (or designee)	Yes
Ayanna Sears (or designee)	Director, Workforce Relation Division	No
Chief Learning Officer and Director Office of Strategic Employee and Organizational Development	Dr. Vicki A. Brown	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2020	OHC and ODICR to develop and implement continuous training for HR and EDI (EEO) practitioners to carry out their responsibilities effectively for the Affirmative Action Plan.	No	09/30/2022	
09/30/2020	Establish and implement a continual campaign to engage managers and supervisors in actively supporting the Affirmative Action Plan for persons with disabilities..	No	09/30/2021	
09/30/0020	Establish joint discussions with the Departmental ODICR and OSEOD to collaborate on incorporating Disability Employment as a training block of instruction in the new supervisor course.	Yes	06/30/2021	
09/30/2021	Verify that disability-related questions from members of the public are answered promptly and correctly.	No		

Accomplishments

Fiscal Year	Accomplishment
2019	During the reporting year, the Directors of the Departmental ODICR and OHC issued joint messaging, on behalf of the Secretary of the Interior, instituting the affirmative action plan for advancing individuals with disabilities throughout the Department. The memorandum also provided resources, including the Workforce Recruitment Program. Some Bureaus enacted ongoing training to communicate the various hiring authorities available to employ people with disabilities. The OHC provided a webinar to HR practitioners and hiring managers on the specifics of using the Workforce Recruitment Program (WRP) to obtain qualified talent.
2020	Bureau HR Specialists provided multiple training sessions to managers and supervisors regarding the use of the special hiring authorities for hiring and placement of PWD and PWTD. Bureau HR Specialists provided deskside training to leaders as requests for reasonable accommodation arose throughout the year. OHC conducted podcasts to educate hiring managers on WRP and encouraged them to utilize the WRP to obtain qualified talent and reduce the time to hire by using non-competitive appointments.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.60

Brief Description of Program
Deficiency:

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.

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

Department of the Interior

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

Plan to Attain Essential Elements

PART H.61

Brief Description of Program
Deficiency:

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

Managers and supervisors are unaware of the requirements of the Affirmative Action Plan for persons with disabilities. The Affirmative Action Plan is not posted on external websites for all Bureaus.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.62

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.

Establish internal processes to ensure consistency in utilizing all available data (i.e., union data, results from reasonable accommodations, complaints filed, etc) to identify triggers to potential barriers in the workplace.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.63

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)]

Establish internal processes to ensure consistency in utilizing all available data (i.e., union data, results from reasonable accommodations, complaints filed, etc) to identify triggers to potential barriers in the workplace.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.64

Brief Description of Program Deficiency: 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)]

DOI does not currently have a standard process to consider whether any group(s) of employees or applicants might be adversely impacted by Departmental employment decisions, such as re-organizations and re-alignments.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
02/06/2018	09/30/2025	09/30/2023		Develop a Department-wide process and procedure to consider the impact on employees prior to implementing decisions, such as re-organizations and re-alignments.

Responsible Officials

Title	Name	Standards Address the Plan?
Director, Affirmative Employment Program Division	Tyvonnia Ward (or designee)	No
Director, Office of Civil Rights and Chief Diversity Officer	Erica D. White-Dunston (or designee)	No
Deputy Assistant Secretary - Human Capital and Chief Human Capital Officer	Raymond Limon (or designee)	No
Director, Workforce Relation Division	Ayanna Sears (or designee)	No
Chief Learning Officer and Director Office of Strategic Employee and Organizational Development	Dr. Vicki A. Brown	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2020	Establish joint discussions with the Departmental ODICR and OSEOD to collaborate on incorporating Disability Employment as a training block of instruction in the new supervisor course.	No	06/30/2021	
09/30/2020	OHC and ODICR to develop and implement continuous training for HR and EDI (EEO) practitioners to carry out their responsibilities effectively for the Affirmative Action Plan.	No	09/30/2022	
09/30/2020	Establish and implement a continual campaign to engage managers and supervisors in actively supporting the Affirmative Action Plan for persons with disabilities.	No	09/30/2021	
09/30/2021	Verify that disability-related questions from members of the public are answered promptly and correctly.	No		

Accomplishments

Fiscal Year	Accomplishment
2019	During the reporting year, the Directors of the Departmental ODICR and OHC issued joint messaging, on behalf of the Secretary of the Interior, instituting the affirmative action plan for advancing individuals with disabilities throughout the Department. The memorandum also provided resources, including the Workforce Recruitment Program. Some Bureaus enacted ongoing training to communicate the various hiring authorities available to employ people with disabilities. The OHC provided a webinar to HR practitioners and hiring managers on the specifics of using the Workforce Recruitment Program (WRP) to obtain qualified talent.
2020	Bureau HR Specialists provided multiple training sessions to managers and supervisors regarding the use of the special hiring authorities for hiring and placement of PWD and PWTD. Bureau HR Specialists provided deskside training to leaders as requests for reasonable accommodation arose throughout the year.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.65

Brief Description of Program
Deficiency:

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

Establish internal processes to ensure consistency in utilizing all available data (i.e., union data, results from reasonable accommodations, complaints filed, etc) to identify triggers to potential barriers in the workplace.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.66

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]

DOI lacks the internal processes to ensure the consistent use of available data (i.e., union data, results from reasonable accommodations, complaints filed, processes, procedures, etc.) to identify triggers to potential barriers in the workplace and develop corrective action plans.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
09/30/2018	12/30/2021			Establish internal process among EDI community to review and utilize relevant employment data.

Responsible Officials

Title	Name	Standards Address the Plan?
Bureau MD 715 Program Managers	Various Personnel	No
Bureau Human Capital Management	Various Personnel	No
Director, Affirmative Employment Program Division	Tyvonnia Ward (or designee)	Yes
Director, Strategic Talent Management Programs Division	Landon Mock (or designee)	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	Conduct assessment to identify the current internal processes for data collection and any challenges to accessing data.	No		
12/30/2021	Establish business rules to assess employment data on a recurring basis to identify triggers.	No		
12/20/2021	Expand data collection and sources for trigger identification (applicant flow, exit surveys, climate surveys, focus groups, etc.).	No		
12/20/2021	Revise exit survey data collection to ensure exit interviews or surveys include questions on how to improve the recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities.	No		
12/20/2021	Develop action plans to address identified barriers and periodically review for effectiveness.	No		
12/20/2021	Receive training and research methods that can be utilized for identifying triggers.	No		
12/20/2021	Determine what reports, processes, procedures etc. should be looked at for inclusion in the trigger/barrier analysis identification process.	No		
09/30/2018	EDI (EEO) and OHC offices work collaboratively to establish a structure for receiving and sharing employment data on a recurring basis.	No		

Accomplishments

Fiscal Year	Accomplishment
2019	In September 2019, The Office of Civil Rights coordinated with the U.S. Geological Service to conduct Department-wide one-week barrier analysis training. The Office of Civil Rights requested the addition of an MD-715 Team Lead for the AEP Division, and it was approved. The MD-715 Team Lead will be responsible for leading and coordinating a DOI barrier analysis team to identify and remove employment barriers. Additional resources are needed for business process improvements for data modeling and dashboards for barrier analysis.
2020	In FY 2020, the Departmental ODICR capitalized on monthly MD-715 Program Manager and Diversity Partner meetings by providing training and tools to enhance practitioner knowledge and effectiveness in implementing EDI (EEO) program initiatives. FY 2020 Topics included: <ul style="list-style-type: none"> • 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; • 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; and • Experts from multiple Bureaus provided information on the available hiring authorities to bolster hiring opportunities from all groups.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.67

Brief Description of Program
Deficiency:

D.4.d. Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR §1614.203(d)(7)(ii)]

DOI does not currently have a standard process to consider whether any group(s) of employees or applicants might be adversely impacted by Departmental employment decisions, such as re-organizations and re-alignments.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.68

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)]

Establish internal processes to ensure consistency in utilizing all available data (i.e., union data, results from reasonable accommodations, complaints filed, etc) to identify triggers to potential barriers in the workplace.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.69

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)]

Establish internal processes to ensure consistency in utilizing all available data (i.e., union data, results from reasonable accommodations, complaints filed, etc) to identify triggers to potential barriers in the workplace.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.70

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.

Managers and supervisors are unaware of the requirements of the Affirmative Action Plan for persons with disabilities. The Affirmative Action Plan is not posted on external websites for all Bureaus.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
09/30/2018	09/30/2021	09/30/2022		Post the Department Affirmation Action Plan to the public website.

Responsible Officials

Title	Name	Standards Address the Plan?
Director, Office of Civil Rights and Chief Diversity Officer	Erica D. White-Dunston	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
03/30/2020	Develop Affirmative Action Plan (AAP).	Yes		08/01/2019
06/30/2020	Review and approval of AAP.	Yes		08/01/2019
12/30/2020	Post AAP on public website.	Yes		08/01/2019

Accomplishments

Fiscal Year	Accomplishment
2019	The AAP for FY 2018 was posted on the public website.
2020	Bureau HR Specialists provided multiple training sessions to managers and supervisors regarding the use of the special hiring authorities for hiring and placement of PWD and PWT. Bureau HR Specialists provided deskside training to leaders as requests for reasonable accommodation arose throughout the year. OHC conducted podcasts to educate hiring managers on WRP and encouraged them to utilize the WRP to obtain qualified talent and reduce the time to hire by using non-competitive appointments.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.71

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)]

Establish internal processes to ensure consistency in utilizing all available data (i.e., union data, results from reasonable accommodations, complaints filed, etc) to identify triggers to potential barriers in the workplace.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.72

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)]

Establish internal processes to ensure consistency in utilizing all available data (i.e., union data, results from reasonable accommodations, complaints filed, etc) to identify triggers to potential barriers in the workplace.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.73

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]

Establish internal processes to ensure consistency in utilizing all available data (i.e., union data, results from reasonable accommodations, complaints filed, etc) to identify triggers to potential barriers in the workplace.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
09/30/2018	12/30/2021			Establish internal process among EDI community to review and utilize relevant employment data.

Responsible Officials

Title	Name	Standards Address the Plan?
Bureau Human Capital Management	Various Personnel	No
Bureau MD 715 Program Managers	Various Personnel	No
Director, Affirmative Employment Program Division	Tyvonnia Ward (or designee)	No
Director, Strategic Talent Management Programs Division	Landon Mock (or designee)	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	Conduct assessment to identify the current internal processes for data collection and any challenges to accessing data.	No		
12/30/2021	Establish business rules to assess employment data on a recurring basis to identify triggers.	No		
12/20/2021	Expand data collection and sources for trigger identification (applicant flow, exit surveys, climate surveys, focus groups, etc.).	No		
12/20/2021	Revise exit survey data collection to ensure exit interviews or surveys include questions on how to improve the recruitment, hiring, inclusion, retention, and advancement of individuals with disabilities.	No		
12/20/2021	Develop action plans to address identified barriers and periodically review for effectiveness.	No		
12/20/2021	Receive training and research methods that can be utilized for identifying triggers.	No		
12/20/2021	Determine what reports, processes, procedures etc. should be looked at for inclusion in the trigger/barrier analysis identification process.	No		
09/30/2018	EDI (EEO) and OHC offices work collaboratively to establish a structure for receiving and sharing employment data on a recurring basis.	No	12/30/2021	

Accomplishments

Fiscal Year	Accomplishment
2019	In September 2019, The Office of Civil Rights coordinated with the U.S. Geological Service to conduct Department-wide one-week barrier analysis training. The Office of Civil Rights requested the addition of an MD-715 Team Lead for the AEP Division, and it was approved. The MD-715 Team Lead will be responsible for leading and coordinating a DOI barrier analysis team to identify and remove employment barriers. Additional resources are needed for business process improvements for data modeling and dashboards for barrier analysis.
2020	In FY 2020, the Departmental ODICR capitalized on monthly MD-715 Program Manager and Diversity Partner meetings by providing training and tools to enhance practitioner knowledge and effectiveness in implementing EDI (EEO) program initiatives. FY 2020 Topics included: <ul style="list-style-type: none"> • 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; • 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; and • Experts from multiple Bureaus provided information on the available hiring authorities to bolster hiring opportunities from all groups.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.74

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)]

Encourage all employees to use ADR and annually evaluate the effectiveness of the program.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
12/31/2020	12/31/2021			Encourage all employees to use ADR and annually evaluate the effectiveness of the program.

Responsible Officials

Title	Name	Standards Address the Plan?
Director, Collaborative Action and Dispute Resolution	William Hall (or designee)	Yes
Director, Affirmative Employment Program Division	Tyvonnia Ward (or designee)	Yes
Director, Adjudication, Compliance & Equity (ACE) Division	Thomas Ziehnert (or designee)	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
03/05/2021	Meet with all stakeholders to identify any current processes and procedures for encouraging employees to use ADR and collect feedback to innovate and expand those processes.	No		
04/30/2021	Develop and implement a Department-wide campaign to encourage the use of ADR.	No		
12/31/2021	Develop a process to annually evaluate the effectiveness of the ADR program.	No		

Accomplishments

Fiscal Year	Accomplishment
2020	This is a new Part H. No action taken.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.75

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)]

Encourage all employees to use ADR and annually evaluate the effectiveness of the program.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
12/31/2020	12/31/2021			Encourage all employees to use ADR and annually evaluate the effectiveness of the program.

Responsible Officials

Title	Name	Standards Address the Plan?
Director, Adjudication, Compliance & Equity (ACE) Division	Thomas Ziehnert (or designee)	Yes
Director, Collaborative Action and Dispute Resolution	William Hall (or designee)	Yes
Director, Affirmative Employment Program Division	Tyvonnia Ward (or designee)	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
03/05/2021	Meet with all stakeholders to identify any current processes and procedures for encouraging employees to use ADR and collect feedback to innovate and expand those processes.	No		
04/30/2021	Develop and implement a Department-wide campaign to encourage the use of ADR.	No		
12/31/2021	Develop a process to annually evaluate the effectiveness of the ADR program.	No		

Accomplishments

Fiscal Year	Accomplishment
2020	This is a new Part H. No action taken.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.76

Brief Description of Program Deficiency: 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.

DOI does not identify and disseminate significant trends and best practices in its EDI (EEO) program to senior executive leaders.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
12/31/2020	12/31/2022			Identify and disseminate significant trends and best practices in the DOI EDI (EEO) program.

Responsible Officials

Title	Name	Standards Address the Plan?
Director, Adjudication, Compliance & Equity (ACE) Division	Thomas Ziehnert (or designee)	Yes
Director, Affirmative Employment Program Division	Tyvonnia Ward (or designee)	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
06/30/2021	Monitor trends in the DOI EDI (EEO) program to verify DOI is meeting its obligations under EEOC statutes.	No		
12/31/2021	Review other agencies' best practices and adopt them, where appropriate, to improve the effectiveness of the DOI EDI (EEO) program.	No		
12/31/2022	Compare DOI 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 senior executive leaders on significant trends and best practices in the DOI EDI (EEO) program.	No		

Accomplishments

Fiscal Year	Accomplishment
2020	<p>The Adjudication, Compliance & Equity (ACE) Division conducted multiple training sessions for senior leadership throughout the Department regarding proactive strategies to prevent complaints. The training included:</p> <ul style="list-style-type: none"> • 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. • Discussions with all managers and supervisors within the U.S. Park Police on recurring complaint activity and strategies to mitigate risks. • Educating mediators in the Conflict Resolution Plus (CORE Plus) Program on the requirements set forth in MD-110 for EEO and ADR processes. <p>The Affirmative Employment Program Division published and disseminated Department-wide, one article relating to employment of women in senior executive positions and impediments that dissuade full participation by all women.</p>

Department of the Interior

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

Plan to Attain Essential Elements

PART H.77

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)]

Identify and disseminate significant trends and best practices in the DOI EDI (EEO) program.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.78

Brief Description of Program Deficiency:

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

The Department does not have a tracking mechanism to account for and ensure timely issuance of requests for reasonable accommodation.

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, Human Resources Information Systems Division	Christopher Lawson (or designee)	No
Managers and Supervisors	Various Personnel	No
Director, Workforce Relations Division	Ayanna Sears (or designee)	No
Employee Relations Program Manager	Megan Castaneda	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.	No		
09/30/2021	Secure vendor to design a comprehensive tracking system that accounts for the requirements of the Rehabilitation Act.	No		
12/30/2022	Establish a recurring reporting process to monitor timeframes for reasonable accommodations.	No		

Accomplishments

Fiscal Year	Accomplishment
2019	OHC requested funding to create a Department-wide reasonable accommodation tracking system.
2020	In the absence of a Department-wide tracking system, the Departmental reasonable accommodation coordinator issued data calls to the Bureaus to provide updates on the number of timely issued RA solutions. This process revealed that there is not a systematic approach to account for reasonable accommodations. Multiple Bureaus did not track, some tracked certain aspects of the process that could not account for timeliness, and etc. Discussions were ongoing about the need for a standardized tracking system. At the close of the FY, OHC received funding to develop a Department-wide reasonable accommodation tracking system. No further action was taken.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.79

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.

Identify and disseminate significant trends and best practices in the DOI EDI (EEO) program.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.80

Brief Description of Program
Deficiency:

E.3.c. Does the Agency encourage all employees to use ADR, where ADR is appropriate? [See MD-110, Ch. 3(IV)(C)]

DOI does not encourage all employees to use Alternative Dispute Resolution (ADR) and does not annually evaluate the effectiveness of its ADR program.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.81

Brief Description of Program
Deficiency:

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)?

Issue acceptance letters/dismissal decisions, investigations, final agency decisions and final actions, within a reasonable timeframe

Department of the Interior

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

Plan to Attain Essential Elements

PART H.82

Brief Description of Program
Deficiency:

E.1.f. Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?

Issue acceptance letters/dismissal decisions, investigations, final agency decisions and final actions, within a reasonable timeframe

Department of the Interior

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

Plan to Attain Essential Elements

PART H.83

Brief Description of Program
Deficiency:

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)?

Issue acceptance letters/dismissal decisions, investigations, final agency decisions and final actions, within a reasonable timeframe

Department of the Interior

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

Plan to Attain Essential Elements

PART H.84

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.
Issue acceptance letters/dismissal decisions, investigations, final agency decisions and final actions, within a reasonable timeframe.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
12/31/2020	12/31/2021			Issue acceptance letters/dismissal decisions, investigations, final agency decisions and final actions, within a reasonable timeframe.

Responsible Officials

Title	Name	Standards Address the Plan?
Director, Adjudication, Compliance & Equity (ACE) Division	Thomas Ziehnert (or designee)	No

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	Meet with the Bureaus to evaluate the internal processes for acceptance letters/dismissal decisions, investigations, final agency decisions, and final actions to identify solutions to ensure these processes are timely.	No		
09/30/2021	Draft a plan to identify goals, objectives, resources, and staffing to ensure adequate quality control and timeliness.	No		
09/30/2021	Review the plan with stakeholders to finalize goals and objectives for improving timeliness of processes.	No		
12/31/2021	Implement the plan to ensure the timeliness of processes.	No		

Accomplishments

Fiscal Year	Accomplishment
2020	This is a new Part H. No action taken.

Department of the Interior

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

Plan to Attain Essential Elements

PART H.85

Brief Description of Program Deficiency:

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

DOI 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?
Director, Affirmative Employment Program Division	Tyvonnia Ward (or designee)	Yes
Director, Human Resources Information Systems Division	Christopher Lawson (or designee)	Yes
Director, Strategic Talent Management Programs Division	Landon Mock (or designee)	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
06/01/2021	Assess recruitment plans and schedules in the Bureaus and Offices to identify triggers.	No		
08/02/2021	Establish a process to partner with EDI (EEO) practitioners to develop recruitment plans.	No		
08/02/2021	Create a recruitment goal in the plans to target underrepresented groups.	No		
10/04/2022	Identify Department-wide recruiters and train recruiters on diversity principles.	No		
12/30/2022	Re-design the Departmental and OHC websites to showcase DOIs commitment to a diverse, inclusive, and accessible workplace.	No		
12/30/2025	The Departmental ODICR meet with stakeholders to collaborate on the development of enterprise systems for recruitment activities and resurveying the workforce.	No	09/30/2021	

Accomplishments

Fiscal Year	Accomplishment
2019	Upon request, OHC provided the Departmental ODICR timely access to data (e.g., exit interview data, climate assessment surveys, and grievance data).
2020	Upon request, OHC has updated the survey data and has provided FEVS, data, grievance data as requested by ODICR).

Department of the Interior

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Plan to Attain Essential Elements

PART H.86

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 Department does not have a standardized process in place to provide the Departmental OCRODICR exit interview data, climate assessment survey data, EEO ADR, and other data from OHC and CADR to ascertain barriers in employment for any protected group.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
09/30/2018	09/30/2025	09/30/2021		Develop internal processes to obtain the receipt of exit interview data, climate assessment surveys, detail opportunities, grievance data, EEO ADR data and etc. from the OHC and CADR.

Responsible Officials

Title	Name	Standards Address the Plan?
Director, Collaborative Action and Dispute Resolution	William Hall (or designee)	No
Director, Workforce Relations Division	Ayanna Sears (or designee)	No
Director, Human Resources Information Systems Division	Christopher Lawson (or designee)	Yes
Director, Affirmative Employment Program Division	Tyvonnia Ward (or designee)	Yes
Director, Adjudication, Equity, and Compliance Division	Thomas Ziehnert (or designee)	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2025	Work with OHC and CADR on developing and implementing a process or mechanism to receive data on a reoccurring basis	No	09/30/2021	
09/30/2021	Review the data and determine barriers.	No	03/30/2022	

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Plan to Attain Essential Elements

Accomplishments

Fiscal Year	Accomplishment
2019	<p>The Departmental ODICR Director met with the Directors of CADR and ELLU to discuss the need for the Departmental ODICR to receive requisite data on employment matters addressed within CADR’s area of responsibility. At the conclusion of the FY, discussions were ongoing to establish a recurring process to receive data.</p> <p>The OHC developed a new online exit interview survey to disseminate to departing employees. The Departmental ODICR’s Affirmative Employment Program Division Director reviewed and provided substantive feedback on ensuring questions considered the viewpoints of protected groups and their employment experiences.</p> <p>At the conclusion of the FY, talks were ongoing regarding establishing a process for recurring receipt of exit survey information.</p>
2020	<p>In February 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.</p> <p>In June 2020, OHC launched the new DOI Exit Survey System to centralize all exit survey data for the Department. In September 2020, OHC trained the entire MD 715 community on how to access the Exit Survey System to extract relevant data for barrier analysis. At the close of the FY, discussions were ongoing to grant access to all MD 715 Program Managers throughout DOI.</p> <p>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 to grant access to Applicant Flow Data and train DOI HR and EDI (EEO) practitioners on how to use the system to extract the data. A more detailed training for MD 715 practitioners is scheduled for second quarter FY 2021.</p> <p>The migration of all bureaus/offices to USASTaffing is to establish a single workflow system and to standardize processes that enable more efficient hiring (e.g., sharing job certificates) and consistent metrics (e.g., time-to-hire definition). Current Status is All Bureau staffing specialists, (600+ HR professionals,) will be using USASTaffing as the DOI’s single hiring system NLT June 15, 2020. During the COVID-19, rapidly responded and migrated to a virtual training environment. To Date over 300 users have been trained and all transitioning bureaus have begun using USA Staffing with their announcements as of April 30, 2020. My DOI Career, our world class career pathing system has increased from 25 occupations to 91 occupations encompassing over 86% of the workforce.</p> <p>In addition, despite significant challenges due to a bifurcated system within DOI, OHC developed the Department’s efforts to obtain full certification from the OPM for the SES, SL and ST performance system to prevent barriers in the senior executive ranks. OHC instituted a quality assurance program where all final SES, SL and ST transactions are reported to the HQ for review. This allows DOI to provide Executives pay at the EX-2 and compete for talent across the Government. Imitated the effort to provide HR staffing solutions to our customers (US Geological Survey, the Office of the Solicitor, and the Assistant Secretary for Indian Affairs) by working with each office to ensure no loss of service. Additionally, due to the high number (over 30 errors with the multiple handoffs of packages, processing and hiring actions), taking steps to recommend the centralization of Executive Resources aids the Department in more transparency, less hand offs and mistakes and enhances customer service. The pandemic also required a new/innovative solution to in person Executive Resources Board meetings. transitioned to, 1) bi-weekly ERB meetings to ensure timely review of bureau requests, and 2) to virtual meetings on Microsoft teams. 3) Electronic notebooks, reducing the paper notebooks and time to print, copy and develop these notebooks. This resulted in a highly professional “notebook but electronic” version of the ERB binders. The ERB members quickly not only adapted but responded favorably to this new version. Approaching eight months, we have saved over \$20,000 in paper and recycling costs, countless hours of personnel hours and increased productivity and responsiveness with the ERB notebooks.</p>

Department of the Interior

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Plan to Eliminate Identified Barriers

PART I1

Source of the Trigger:	Workforce Data (if so identify the table)	
Specific Workforce Data Table:	Workforce Data Table - A1	
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	<p>Black or African American Employment The number of Black or African American men and women in the Department's permanent workforce has steadily decreased for five consecutive years and remains below the availability of Black or African American men (5.5%) and women (6.5%) in the Civilian Labor Force (CLF). In FY 2020 the total for this group was 5.5% (2.7% men) and (2.8% women). The data revealed that since FY 2015, the number of new hires of Blacks or African Americans remained at approximately 2%, which is below the federal benchmark of 8.9%. Specifically, Black or African American men have been the least racial group to get hired, to receive promotions, and to receive awards and recognition as compared to any other racial category in DOI. 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 employees at DOI.</p> <p>Asian American Pacific Islander Employment For five consecutive years Asian American Pacific Islander men and women did not meet the CLF benchmark of 3.9%. In FY 2020, the total for this group was 2.9% (1.5% men) and (1.4% women). The data also revealed DOI new hires of Asian American and Pacific Islanders were 3.4%, which is below the federal benchmark of 4.9%. 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 Asian American Pacific Islander employees at DOI.</p> <p>Hispanic or Latino Employment A review of the data revealed Hispanic or Latino men and women occupied in the DOI permanent workforce did not meet the CLF benchmark of 10%. In FY 2020 the total for this group was 6.7% (3.8% men) and (2.9% women). The data also revealed a potential barrier for career advancement for Hispanic or Latino employees after the GS-12 level, as the number of Hispanic or L</p>	
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i>	
	Black or African American Males Black or African American Females Asian Males Asian Females	
Barrier Analysis Process Completed?:	N	
Barrier(s) Identified?:	N	
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	Barrier Name	Description of Policy, Procedure, or Practice
	Institutional/Structural Barriers	A review of the data revealed people of color occupied in the DOI permanent workforce did not meet the CLF benchmark for the Mission Critical Occupations.

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Plan to Eliminate Identified Barriers

Objective(s) and Dates for EEO Plan

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
09/30/2019	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 minorities employees to the senior grades of GS-13 through SES.

Responsible Official(s)

Title	Name	Standards Address The Plan?
Director, Strategic Human Capital Planning and Evaluation (SHCPE) Division	Kermit Howard	No
Embrace Division Director	Tyvonnia Ward (or designee)	No
ERGs, Diversity Advocates and SEPMS	Various Personnel	No
Director, Strategic Talent Management Programs Division	Landon Mock	No
Director, Strategic Employee and Organizational Development	Vicki Brown	Yes
Bureau Human Capital Management	Various Personnel	No
Bureau MD-715 Program Managers	Various Personnel	No
Director, Strategic Employee and Organizational Development	Dr. Vicki Brown (or designee)	No

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
03/30/2021	Conduct State of the Agency Briefing with Senior Executives. Publish and disseminate approved FY 2020 MD 715 Report to Senior Executives Across the Department.	No		
06/30/2021	Solicit representatives from each office and Bureau to serve on the Inter-Departmental Barrier Analysis working group.	No		
12/30/2022	Begin phased barrier analysis.	No		
12/30/2022	Introduce DOI 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		
12/30/2019	Promote opportunities for employees to connect to Employee Resource Groups (ERGs) and Diversity Advocates.	No	12/31/2021	
12/30/2022	Introduce DOI managers, supervisors and employees to the White House Initiative on Asian American and Pacific Islanders (AAPI) and ERGs to develop recruitment sources and pipelines of potential Asian applicants.	No		

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Plan to Eliminate Identified Barriers

Report of Accomplishments

Fiscal Year	Accomplishments
2020	<p>U.S. Fish and Wildlife Service (FWS)</p> <ul style="list-style-type: none"> • FWS sponsored the Directorate Resource Assistant Fellows Program (DFP) in compliance with the Direct Hiring Authority articulated in DOI Personnel Bulletin No. 12-15. The program's primary focus is to reach women and people of color for internships that lead to fulltime permanent positions in the FWS mission critical occupations. • In FY 2020, FWS specifically targeted its recruitment activities at Asian American and Native American Pacific Islanders (AANAPI) Serving Institutions. FWS Recruiters shared funding, internship and employment opportunities with faculty and staff at AANAPIs across the country and participated in virtual campus events. <p>FWS partnered with the Director for Leadership Development Programs, UNCF-Gates Millennium Scholars Program (GMS). This partnership has provided a network to conduct targeted recruitment to reach Asian American interns and alumni to fill internships and permanent positions.</p> <p>The Service-wide Targeted Recruitment Team (STRT) works with the recruiters to implement the targeted recruitment goals and objectives outlined in the FWS Diversity and Inclusion Implementation Plan. FWS conducts targeted recruitment to reach Asian American applicants by providing vacancy announcements for temporary, term and permanent positions, as well as intern positions. The recruitment team actively reached out to establish contacts with Asian American affinity groups at colleges/universities to keep the community informed of vacancies and other student opportunities.</p> <p>National Park Service (NPS)</p> <p>The NPS continued to expand their internship and apprenticeship programs to ensure students developed the knowledge, skills and abilities needed for a career in NPS or any other public lands agency. Current programs include the Hawaii Island Youth Ranger Internship Program that trains up to 75 high school students in natural and cultural resources interpretation, environmental education, administration, protection (law enforcement) and park maintenance. Upon completion of training, students may be hired at a GS-1, WG-1 or equivalent salary to work during the summer.</p> <p>REPORT OF ACCOMPLISHMENTS</p> <p>US Fish and Wildlife Service (FWS)</p> <p>FWS continued the Directorate Resource Assistant Fellows Program (DFP) in FY 2020, prioritizing recruitment at Minority-Serving Institutions (including Hispanic-Serving Institutions), and other institutions of higher education to reach Hispanic or Latino student populations. The DFP announcement was also posted at Hispanic-Serving Schools through Handshake, the college/university online portal for outreach.</p> <p>FWS partnered with the Director for Leadership Development Programs, UNCF-Gates Millennium Scholars Program (GMS). This partnership has provided a network to conduct targeted recruitment to reach Hispanic or Latino interns and alumni for internships and permanent positions.</p> <p>The Service-wide Targeted Recruitment Team (STRT) works with the ODIWM recruiters to implement the targeted recruitment goals and objectives outlined in the Diversity and Inclusion Implementation Plan (DIIP). FWS conducts targeted recruitment to reach Hispanic or Latino applicants by providing vacancy announcements for temporary, term and permanent positions, as well as intern positions. The recruitment team actively reaches out to establish contacts with Hispanic or Latino affinity groups at colleges/universities to keep the community informed of vacancies and other student opportunities.</p> <p>Bureau of Land Management (BLM)</p> <p>BLM utilized various resources and programs such as the Executive Orders Program, the Direct Hire Authority for Resource Assistant Internship, and Pathways Program to recruit and hire Hispanic and Latino students. BLM's robust outreach, recruitment, and retention activities also included partnerships with numerous public and private agencies such as the Hispanic Association of Colleges and Universities (HACU),</p>

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Plan to Eliminate Identified Barriers

Report of Accomplishments

Fiscal Year	Accomplishments
	Minorities in Agriculture Natural Resources and Related Sciences (MANRRS), and active engagement with communities and educational institutions at all levels. BLM also collaborated with other federal and non-federal agencies, and educational institutions to increase the diversity of the applicant pool and build sustainable talent pipelines.

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Plan to Eliminate Identified Barriers

Report of Accomplishments

Fiscal Year	Accomplishments
2020	<p>The Departmental OCR's Director allocated a full-time equivalent (FTE) to lead the Department's efforts to identify employment barriers and establish a systematic approach to removing barriers for each affected group. This hiring action is a monumental decision, in that, in the Departmental OCRs history, there has never been an individual dedicated to fulfilling the requirements set forth by the EEOC Management Directive (MD) 715. The selectee onboarded in the summer of 2020, and within weeks the individual engaged in recurring sessions with designated MD 715 Program Managers from across DOI to standardize their knowledge of EEOC requirements and to familiarize the group with the intricacies of the EEOC FedSep online tool as a resource for barrier identification and elimination.</p> <p>National Park Service (NPS) The NPS signed a Strategic Alliance Memorandum with Central State University and Wilberforce University along with the Cincinnati African American Chamber of Commerce, Central Ohio African American Chamber of Commerce, City of Columbus and the Ohio Department of Transportation. The signing of this agreement will lay the foundation for Ohio's HBCU's to create opportunities for their students to be a part of the State's entrepreneurial ecosystem through curriculum development, internships, and job fairs. NPS had 14 Youth Conservation Corps interns to include six (6) minority students. These students launched a new urban Junior Ranger Angler Program and assisted with summer Metro-Detroit YMCA and National Park programs. In addition to regular trail maintenance, they assisted with the Ticket-to-Float Urban Kayak Explorer Program. The NPS Historically Black Colleges & Universities Internship Program (HBCUI) provided temporary employment opportunities to HBCU undergraduate and graduate students to NPS parks and units in the fields of health, recreation, and natural and cultural resource conservation. The Greening Youth Foundation served as the partner organization.</p> <p>NPS collaborated with the Hispanic Association of Colleges and Universities (HACU), Minorities in Agriculture Natural Resources and Related Sciences (MANRRS), and the National Association for Equal Opportunity (NAFEO) in Higher Education to participate in training workshops, career fairs and outreach events.</p> <p>U.S. Fish and Wildlife Service (FWS)</p> <ul style="list-style-type: none"> • FWS established a Barrier Analysis Team (BAT) for the fourth year in a row to conduct an in-depth examination of barriers pertaining to recruitment, hiring, and retention of women, people of color, and persons with disabilities. • • FWS sponsored the Directorate Resource Assistant Fellows Program (DFP) in compliance with the Direct Hiring Authority articulated in DOI Personnel Bulletin No. 12-15. The program's primary focus was to reach women and people of color for internships that led to fulltime permanent positions in the FWS mission critical occupations. In FY 2020 FWS specifically targeted its recruitment activities at Historically Black Colleges and Universities (HBCUs). • • In partnership with the White House Initiative on Historically Black Colleges and Universities (WHI-HBCU), the FWS shared funding, internship and employment opportunities with faculty and staff at HBCUs across the country. The FWS participated in 11 events at HBCUs and attended the 2020 HBCU Week Conference as one of the virtual exhibitors. For HBCU Week 2020, the Law Enforcement division's National Outreach Work (NOW) participated in the conference's virtual career fair. <p>FWS conducted 'Zeta Days at the Refuge', a national initiative that encourages members of the Zeta Phi Beta Sorority to visit local national wildlife refuges across the country to enjoy the outdoors and learn about wildlife conservation. FWS also supported and promoted local refuge visits by members of Phi Beta Sigma Fraternity and the organization's youth affiliate organization, Sigma Beta Clubs, encouraging outdoor recreational and educational activities.</p> <p>FWS partnered with the Director for Leadership Development Programs, UNCF-Gates Millennium Scholars Program (GMS). This partnership has provided a network to conduct targeted recruitment to reach Black or African American interns and alumni for internships and permanent positions.</p> <p>The Service-wide Targeted Recruitment Team (STRT) works with the ODIWM recruiters to implement the targeted recruitment goals and objectives outlined in the Diversity and Inclusion Implementation Plan (DIIP). FWS conducts targeted recruitment to reach Black or African American applicants by providing vacancy announcements for temporary, term and permanent positions, as well as intern positions. The recruitment</p>

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Plan to Eliminate Identified Barriers

Report of Accomplishments

Fiscal Year	Accomplishments
	<p>team actively reached out to establish contacts with Black or African American affinity groups at colleges/ universities to keep the community informed of vacancies and other student opportunities.</p> <p>Bureau of Land Management (BLM) The Bureau of Land Management Arizona (BLM-AZ) State Director's Office formed the BLM-AZ Recruitment, Engagement, Diversity and Inclusion (REDI) Arizona Allstars Team to promote retention, engagement, diversity and inclusion in a more streamlined and effective manner. REDI replaces multiple other groups with overlapping objectives, and dovetails with Employee Engagement Ambassadors. REDI is composed of diverse members from all AZ units and levels of the organizations.</p> <p>During the reporting year, the Affirmative Employment team conducted a week-long series of virtual round-table discussions with every Employee Resource Group (ERG) across DOI. The team invited employees to engage with them one-on-one to ascertain sticking points, understand each group's employment experience, hear concerns, and to establish an approach going forward that will incrementally improve the employment lifecycle where needed.</p> <p>Conducting these types of listening sessions was the first in DOI history. Employees within a particular race and ethnic category, from across DOI, convened in a central location to discuss their employment concerns first-hand with the Departmental OCR. A Senior Executive within the Asian American Pacific Islander community was inspired by the discussion and the plan that developed. The individual committed funding to the Department OCR to hire a GS-13 Program Analyst for one year to help implement its planned objectives.</p> <p>U.S. Fish and Wildlife Service (FWS)</p> <ul style="list-style-type: none"> • FWS sponsored the Directorate Resource Assistant Fellows Program (DFP) in compliance with the Direct Hiring Authority articulated in DOI Personnel Bulletin No. 12-15. The program's primary focus is to reach women and people of color for internships that lead to fulltime permanent positions in the FWS mission critical occupations. • In FY 2020, FWS specifically targeted its recruitment activities at Asian American and Native American Pacific Islanders (AANAPI) Serving Institutions. FWS Recruiters shared funding, internship and employment opportunities with faculty and staff at AANAPIs across the country and participated in virtual campus events. <p>FWS partnered with the Director for Leadership Development Programs, UNCF-Gates Millennium Scholars Program (GMS). This partnership has provided a network to conduct targeted recruitment to reach Asian American interns and alumni to fill internships and permanent positions.</p> <p>The Service-wide Targeted Recruitment Team (STRT) works with the recruiters to implement the targeted recruitment goals and objectives outlined in the FWS Diversity and Inclusion Implementation Plan. FWS conducts targeted recruitment to reach Asian American applicants by providing vacancy announcements for temporary, term and permanent positions, as well as intern positions. The recruitment team actively reached out to establish contacts with Asian American affinity groups at colleges/universities to keep the community informed of vacancies and other student opportunities.</p>

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Plan to Eliminate Identified Barriers

PART I.2

Source of the Trigger:	Workforce Data (if so identify the table)				
Specific Workforce Data Table:	Workforce Data Table - A4				
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Potential Blocked Pipelines and Glass Ceilings For five consecutive years, people of color and women did not meet the federal benchmark for senior level permanent positions at DOI. In particular, the data revealed that women overall, Asians, Blacks or African Americans, Hispanic/Latinos, Native Hawaiian or Pacific Islanders, American Indian or Alaska Natives, PWDs, and PWTDs occupied the least number of senior level permanent positions in DOI for multiple years. The data for these same demographic groups revealed they are not being hired in leadership roles at DOI in comparison to the federal benchmark.				
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> Black or African American Males Black or African American Females Asian Males Asian Females Native Hawaiian or Other Pacific Islander Males Native Hawaiian or Other Pacific Islander Females American Indian or Alaska Native Males American Indian or Alaska Native Females				
Barrier Analysis Process Completed?:	N				
Barrier(s) Identified?:	N				
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<table border="1"> <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
08/01/2018	09/30/2023	No			Assess opportunities to enter the SES through DOI's career development program and external hiring.
09/30/2020	09/30/2023	No			Create transparent roadmaps for career advancement within Mission Critical Occupations (MCO) and broadly communicate the requirements using Employee Organizations.

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Plan to Eliminate Identified Barriers

Responsible Official(s)		
Title	Name	Standards Address The Plan?
Director, Affirmative Employment Program Division	Tyvonnia Ward (or designee)	No
Director, Office of Human Capital and the Deputy Chief Human Capital Officer (DCHCO)	Jennifer Ackerman	No
EEO Bureau and Bureau Human Capital Offices	Various Personnel	No
Director, Strategic Employee and Organizational Development	Vicki Brown	No
ERGs, Diversity Advocates and SEPMS	Various Personnel	No

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2023	Obtain the career development data from the OHC to assess whether a policy, practice, or procedure is a barrier to advancement to the SES.	No		
09/30/2023	Analyze how existing developmental programs for career development to SES are available to a broad and diverse applicant pool.	No		
09/30/2023	Partner with OHC, and agency leadership to review classroom training, assignment of duties, and other relevant factors used to advance employees from grades 1 through 10, and grades 11 through SES for MCO.	No		
09/30/2023	Utilize Employee Organizations to design targeted events to increase employee awareness and prepare groups to capitalize on various career advancement opportunities.	No		

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Plan to Eliminate Identified Barriers

Report of Accomplishments

Fiscal Year	Accomplishments
2019	<p>Departmental Office of Civil Rights (OCR)</p> <p>The Departmental OCR Director collaborated with leaders within OHC to delineate obligations for DOI Employee Organizations to establish more control over the teams' program performance to enhance EDI (EEO) efforts across DOI. At the conclusion of the FY, OCR has program functional responsibility for EOs, taking full responsibility for the types of activities conducted by the groups to ensure they align with Diversity and Inclusion strategic objectives. OHC has structural responsibility for EOs to ensure EOs meet the statutory requirement for existence as an EO in DOI.</p> <p>The Departmental OCR Affirmative Employment staff met with each of the Employee Resource Groups to ascertain employment concerns and to jointly developed planned activities for FY 2021 that addresses common and prevalent issues faced by the groups.</p> <p>The Departmental OCR invited OHC subject matter experts to provide MD 715 Program Managers and Diversity Partners with detailed training on a number of relevant topic impacting employment:</p> <ol style="list-style-type: none"> 1. The first was training on how to utilize the DOI Career Connections website. The training was robust and taught from the perspective that equipped the team with skills to teach others how to navigate the employment tool effectively; 2. Second, training that showcased the various hiring authorities used in DOI to onboard different groups non-competitively, or into highly sought intern programs throughout DOI. The staff learned how and when to properly use the various hiring authorities from an applicant perspective, as well as a hiring manager; 3. Training on how to extract applicant flow data from the USA Staffing employment tool; and 4. Training on how navigate the new and improved exit survey online tool. <p>In addition, the Departmental OCR invited the Interior Business Center team to provide MD 715 Program Managers with detailed training on how to navigate the Oracle Business Intelligence Enterprise Edition (OBIEE) system. OBIEE houses all employment related actions conducted throughout DOI.</p> <p>During the training session OCR learned that not all MD 715 practitioners had access to OBIEE to effectively perform their duties. Immediately following the training, the Departmental OCR worked closely with IBC and the Bureaus to ensure all MD 715 practitioners without access gained access as expected. By the close of the FY, 98% of the MD 715 Program Management staff had access to and was trained on how to navigate OBIEE. In prior years, access to OBIEE was limited to a select few within DOI. The various staff members, with a need to know, were prohibited from conducting trend analysis throughout the year to identify triggers in employment. The current access alleviates a significant program deficiency.</p> <p>Other Activities Occurring Within OHC to Advance DOI Employment Initiatives</p> <p>OSEOD collaborated with OPM, other federal agencies, and key DOI stakeholders, to "Create a Culture of Coaching" within the Department by implementing the Federal Coach Training Program and an Interior Coach Training Program.</p> <p>OHC developed and finalized a Supervisory Framework & Policy that is competency driven based on the OPM supervisor competencies and will support supervisors at all four levels of lead self, lead teams, lead projects, and lead organizations.</p> <p>OHC developed and fielded a Department-wide training needs assessment in August 2020. The competency-based assessment asked for feedback on both general competencies, leadership competencies, and technical competencies. This is the first time DOI has assessed technical competencies across the</p>

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Plan to Eliminate Identified Barriers

Report of Accomplishments

Fiscal Year	Accomplishments
	Department. Several thousand employees responded, and the results will inform the DOI University and Bureau course offerings in the near future.

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 |

For four consecutive years the Department has not met the federal hiring goal of 12% for PWD in grades GS-11 to SES. In FY 2020, the total for this group was 8.4% (2,612), compared to 7.8% (2,407) in FY 2019, and 7.6% (2,365) in FY 2018. While this group remains lower than the federal hiring goal, there has been an increase of 0.8% over the last three years.

*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 | Yes |

For four consecutive years the Department has not met the affirmative action hiring goal for employing people with targeted disabilities at grades GS-11 through SES. In FY 2020, the total for this group was 1.9% (583) compared to 1.7% (519) in FY 2019, and in FY 2018 1.6% (494). There were incremental increases from FY 2018 to FY 2020, however, the Department has not met the goal.

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. In FY 2020, the Office of Human Capital (OHC) met regularly with Bureau HR Directors to account for the proactive steps taken to achieve the hiring goal. OHC dedicated a full-time equivalent (FTE) to oversee the Department's efforts for meeting the hiring goals. Each of the Bureaus designated an HR practitioner to work along-side OHC's program lead for disability employment. These individuals work closely with managers and supervisors to convey the Department's targeted goals during the completion of the hiring action. 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, OCR, and multiple Bureau EDI programs are 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 Department-wide Equity, Diversity, and Inclusion EDI (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 throughout the Department.

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Architectural Barriers Act Compliance	10	0	4	Sloan Farrell Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.
Section 508 Compliance	3	6	8	Siddhartha Sharma Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.
Processing applications from PWD and PWTD	50	24	0	Cynthia Piper Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.
Answering questions from the public about hiring authorities that take disability into account	53	24	0	Angela Lennartson Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.
Processing reasonable accommodation requests from applicants and employees	9	7	0	Mark Guberman and Devon Cummings Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.
Special Emphasis Program for PWD and PWTD	4	7	1	There are no Disability Program Managers at the Departmental OCR or any Bureau within the DOI.

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 Departmental OCR or any Bureau within DOI. 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 designated Disability Program Managers, employees assigned to special emphasis programs participated in the following training opportunities conducted in various Bureaus and Offices: • The Department and Bureaus 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 Bureaus and Offices to inform, educate, and engage in all matters concerning PWD recruitment, retention, training, and inclusion. • Multiple Bureau and Office representatives participated in the Federal Exchange on Employment and Disability (FEED) meetings where participants learned about policies/guidelines, best practices for implementing effective disability programs, as well as the tools and tips for enhancing disability employment, and creating sustainable partnerships.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer No

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

Section III: 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: • My DOI Careers used Twitter to send vacancy announcements to disability advocacy groups such as the National Rights Network, the National Alliance on Mental Illness, the American Association of People with Disabilities, etc., to alert these organizations of available positions throughout the Department. • In FY 2020, Bureaus partnered with the State Vocational Rehabilitation Agencies, Disability Services Offices at colleges and universities, Employer Assistance Referral Network, Workforce Recruitment Program, and Veterans Administration (VA) Special Program offices to obtain candidates for vacancies throughout the Department. o These partnerships resulted in the following recruitment activities in FY 2020: Workshops and one-on-one training sessions provided to applicants to help them understand the federal hiring process and how to write a resume using USAJobs. Through an email List. SERV, over 300 Affinity Organizations, Academia, America Job Centers, State Vocational Rehabilitation Agencies, Centers for Independent Living, and Employment Network Service Providers received multiple vacancy announcements for mission critical occupations. Affinity organizations (i.e. National Technical Institute for the Deaf, DoD Wounded Warrior Program, etc.) provided briefings to hiring managers about the intricacies on their respective programs, the type of candidates participating in the programs, and how to utilize their services to obtain quality candidates for vacant positions.

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

DOI 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, 3.6% of new hires were placed using the Schedule A hiring authority and 7.5% of the new hires used the 30% or more disabled veterans hiring authority. Additionally, there were five (5) PWD new hires selected at the GS-15 grade level, 15 PWD new hires selected at the GS-14 grade level, and 33 PWD new hires selected at the GS-13 grade level. PWTD had a similar story in that there were four (4) selected at the GS-14 grade level, and nine (9) at the GS-13 grade level

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 Department does not have a system in place to ensure all new supervisors, and newly promoted supervisors are made aware of hiring authorities for people with disabilities. To remedy this deficiency, the Departmental 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 and through Hiring 101. ii. Multiple Bureau HR Specialists provided desk side training to hiring managers at the onset of initiating a vacancy announcement. In addition, HR Specialists availed themselves when requested by specific offices (e.g. EEO, Diversity Change Agent, FEV working group, etc.) to provide guidance and direction to participants of a designated event.

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. Bureaus recruited at virtual career fairs during the year to identify qualified PWDs and PWTDs for employment. DOI’s participation at these events refreshed existing partnerships and expanded its capability of reaching new groups not previously identified. 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, DOI did not have access to applicant flow data to determine if PWD and PWTD applied for mission critical positions. In July 2020, the OHC and EDI (EEO) communities received access to OPM’s USA-Staffing applicant flow system. In August 2020, the communities were trained in how to extract applicant flow data from the system. The data was not analyzed in this reporting period, however, all Bureaus are expected 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 every grade level throughout the Department, with the exception of 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 and EDI (EEO) communities received access to OPM's USA-Staffing applicant flow system in July with subsequent training in August 2020. The teams were unable to determine if triggers existed outside of access to the relevant data.

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

a. Promotions for MCO (PWD) Answer Yes

b. Promotions for MCO (PWTD) Answer Yes

Trigger – The main trigger FY 2020 is DOI's inability to access applicant flow data, and the late permissions granted to the OHC and EDI (EEO) communities for extracting said data from USA-Staffing. The employment data revealed that of the 16 MCOs, PWTD were selected in only five (5) out of 16 MCOs for promotional opportunities.

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. DOI lacks relevant tracking systems to account for the applicants and attendees of sponsored events. Trigger – DOI does not have a Department-wide mentoring program in place to ensure any of its employees engage in specialized development opportunities offered through an organized mentoring program. Both triggers are the subject of a Part H corrective action plan to ensure tracking and development is institutionalized throughout the DOI. In the absence of a plan, the following activities occurred in FY 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, it is unknown the exact number. • Multiple Bureaus and Offices established career ladder positions requiring on-the-job and classroom training and mentoring to ensure success and opportunity for advancement. • Multiple Bureaus and Offices provided developmental opportunities and mentorship/coaching for employees, including PWD and PWTD, to improve their skills and to increase their opportunities for advancement. National Park Service (NPS) o 33% of selectees into the Fellowship Programs were PWD o 66% of selectees into the Mentoring Program were PWD o 20% of selectees into the Aspiring Leader Program were PWD and 2% PWTD o 10% of selectees into other “Career Development” programs were PWD United States Geological Survey (USGS) o 10% of selectees into the USGS Mentoring Program were PWD o 5% of selectees into other “Career Development” programs were PWD and 1.3% were PWTD • The OHC and some of the Bureaus 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 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 OPPORTUNITIES

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

Response: a. Some of the Bureaus offered various leadership development opportunities for employees to further their career advancement goals. In FY 2020, the following leadership development opportunities were provided: • Bureau of Land Management (BLM) sponsored the National Leadership Academy. Applicant data was not captured. • BSEE sponsored the Emerging Leader Program (ELP) for all employees GS-11 to GS-13. Applicant data was not captured. • BOEM sponsored the Navigating Leadership Program, a mid-level development program designed for grades GS-14 and GS-15, and the Aspiring to Leadership Program, an entry-level leadership development program. Applicant data was not captured. • The NPS sponsored the Future Leaders Program that provides developmental opportunities for disabled veterans. Applicant data was not captured. • Reclamations sponsored two development programs in FY 2020: 1) Exploring Supervision at Reclamation (ESR), and 2) Reclamation Leadership Development Program (RLDP). ESR introduces non-supervisory employees with information on supervisory responsibilities. The training provides an overview of supervisory and human resource competencies that new supervisors need to master as they transition from an individual contributor role to a supervisor role in the Federal Government. Applicant data was not captured. b. DOIU offers Leadership and Development Programs to improve diversity management, and professional skill sets of DOI employees. The Program Opportunities included: Aspiring to Leadership – An Entry Level Leadership Program This 5-month program is designed for the employees at the GS 7-11 levels who want leadership roles. The program focuses on increasing awareness of personal leadership style, reinforcing strengths, and building practical leadership skills that will prepare participants for future leadership roles. Through assessments, lectures, and large and small group discussions, participants develop knowledge and expertise in the following competency areas: • Conflict Management • Interpersonal Skills • Oral Communication • Problem Solving and Decisiveness. Applicant data for FY 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. Pathways to Leadership – Bureau of Indian Affairs Pathways to Leadership is a 4- month program designed explicitly for the Bureau of Indian Affairs developing leaders. The program prepares participants to lead the programs and responsibilities affecting Indian Affairs. Targeted to employees at the GS-13 and GS-14 levels, the program focuses on increasing competency proficiency in Conflict Management, Resilience, External Awareness, Political Savvy, Partnering, and Accountability. Participants explore the impact of personal values on ethical decision making; learn the importance of emotional intelligence and its effect on employee engagement and performance; build skills in leveraging diversity, political savvy, creating partnerships; and influencing/negotiating. They also produce a leadership network through mentoring and presentations by BIA senior leaders. Applicant data for FY 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 SESC DP focuses on developing the competencies in each of the Executive Core Qualifications (ECQs) to prepare candidates to lead at the executive level. The SESC 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 (#)
Training Programs	0	0	0	0	0	0
Other Career Development Programs	0	0	0	0	0	0
Internship Programs	0	0	0	0	0	0
Fellowship Programs	0	0	0	0	0	0
Mentoring Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	0	0
Detail Programs	0	0	0	0	0	0

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

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

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

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

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

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

C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or 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 No
- b. Awards, Bonuses, & Incentives (PWTD) Answer No

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

Trigger - DOI did not conduct recognition programs in FY 2020. There is not an EDI (EEO) award listed in the agency convocation award program and is the subject of a corrective action plan listed in the existing MD 715 report.

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

Trigger - DOI did not conduct recognition programs in FY 2020. There is not an EDI (EEO) award listed in the agency convocation award program and is the subject of a corrective action plan listed in the existing MD 715 report.

D. PROMOTIONS

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

a. SES

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer Yes

b. Grade GS-15

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer Yes

c. Grade GS-14

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer Yes

d. Grade GS-13

i. Qualified Internal Applicants (PWD)

Answer Yes

ii. Internal Selections (PWD)

Answer Yes

Trigger - DOI did not have access to applicant flow data until July 2020, the data for this FY was not analyzed to determine if impediments exists. As stated above, the OHC and EDI (EEO) communities were granted access to OPM's USA-Staffing applicant flow system and are now able to retrieve applicant flow data. In August 2020, all Bureaus OHC and EDI (EEO) practitioners were trained to extract data from the system with the expectation of a conduct an analysis of the data in FY 2021. The table below shows how internal selections are not meeting the federal goal of 12%. Promotions Qualified Internal Applicants Internal Selections Regulatory GS-13 Data not available 47 (8.8%) 12% GS-14 Data not available 14 (5.2%) 12% GS-15 Data not available 6 (6.7%) 12% SES Data not available 1 (3.7%) 12%

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

Trigger: DOI was unable to analyze the data for the number of PWTD applying for internal selections. The number of selections of PWTDs fell below the federal standard of 2% for all senior graded positions. More work is required to meet the standards. The table below shows the internal selections made during FY 2020 for PWTD as compared to the federal goal of 2%. Promotions Qualified Internal Applicants Internal Selections Regulatory GS-13 Data not available 7 (1.2%) 2% GS-14 Data not available 2 (0.8%) 2% GS-15 Data not available 0 (0.0%) 2% SES Data not available 0 (0.0%) 2%

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

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

Trigger: Applicant flow data is unavailable until late FY 2020. The second trigger revealed that the higher the grade level, the least number of PWDs were selected to fill senior level positions (E.g. 5-PWDs for GS-15, 15-PWDs for GS-14, 33-PWDs for GS-13, etc.).

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

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

Trigger: Applicant flow data is unavailable until late FY 2020. The second trigger revealed that the higher the grade level, the least number of PWTDs were selected to fill senior level positions (E.g. 0-PWTDs for GS-15, 4-PWTDs for GS-14, 9-PWTDs for GS-13, etc.).

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

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

Trigger: Applicant flow data is unavailable until late FY 2020. The second trigger revealed that the higher the grade level, the least number of PWDs were selected to fill senior level positions.

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

- a. Executives
 - i. Qualified Internal Applicants (PWTD) Answer Yes
 - ii. Internal Selections (PWTD) Answer Yes

b. Managers

i. Qualified Internal Applicants (PWTD) Answer Yes

ii. Internal Selections (PWTD) Answer Yes

c. Supervisors

i. Qualified Internal Applicants (PWTD) Answer Yes

ii. Internal Selections (PWTD) Answer Yes

Trigger: 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 will conduct an analysis of qualified PWTD internal applicants for promotions to supervisory positions in FY 2021. The second trigger revealed that the higher the grade the least number of PWTD were selected for higher graded positions. The data revealed that PWTDs were selected at the GS-13 grade level, however, the number of selectees declined at the GS-14 grade level and were no selections of PWTDs at the GS-15 and SES grade levels.

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

a. New Hires for Executives (PWD) Answer Yes

b. New Hires for Managers (PWD) Answer Yes

c. New Hires for Supervisors (PWD) Answer Yes

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

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving 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

Trigger: DOI 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 PWD were among the new hires, however, the majority were hired at the GS-13 level.

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

Trigger: During the reporting year, the OHC did not collect relevant data to determine why 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 Yes

b. Involuntary Separations (PWD) Answer Yes

Trigger: PWDs voluntarily separated from DOI at the same level in which the DOI onboarded this group to the workforce. This imbalance suggests a potential retention issue.

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

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

Trigger: PWTD voluntarily separated from DOI at the same level in which the DOI onboarded this group to the workforce. This imbalance suggests a potential retention issue.

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

Trigger: During the reporting year, the OHC did not have a consistent method for collecting Department-wide exit survey data. Therefore, the Departmental OCR 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/eoo/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/eoo/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 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. The Departmental OCR, Public Civil Rights Division (PCR) initiated a collaborative effort in FY 2018 that continued into FY 2020. Whereby key senior executives at the Bureaus, the Departmental OCR, and OHC work collaboratively to improve access to public lands for people with disabilities. In FY 2020, the PCR Director worked closely with Bureaus to expand access for persons with disabilities to utilize Electric Bikes on public lands managed by DOI. During the FY, PCR worked closely with the Bureau of Indian Education (BIE) and Bureau of Indian Affairs (BIA) to better comply with the Department's obligations to implement Section 504 of the Rehabilitation Act of 1973 in BIE operated schools and colleges.

C. REASONABLE ACCOMMODATION PROGRAM

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

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

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

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

• Reoccurring Training throughout FY 2020 - Some Bureaus provided reasonable accommodation training to managers and supervisors. The training provided managers and supervisors insight into how to recognize a request for reasonable accommodation when plain language was used, to engage in the interactive process, to meet timelines, and to ensure proper documentation throughout the process. Reasonable accommodation training is also offered via the DOI Talent Management system. • Community of Practice – The HR Reasonable Accommodation Coordinators and EDI (EEO) communities met monthly to ascertain best practices, discuss sticking points for issuing accommodation solutions, and discussed ways in which to improve the employee experience for people with disabilities and targeted disabilities. The collaborative process improved the flow for getting results to accommodation solutions. • Inter-Bureau Expert Team (I-BET) - OHC established an I-BET for the Employment/Special Placement of Persons with Disabilities (PWD) in accordance with the Affirmative Action Plan for PWD and PWTD. The group met monthly to account for the Departments process towards achieving the hiring goals. The Bureaus and Offices engaged in best practices for recruitment, retention, and training. I

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

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

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

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

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

Answer Yes

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

DOI received one finding of discrimination alleging disability harassment. A summary of the corrective measures taken in the finding of discrimination were as follows: • Pay Complainant back pay. • Conduct four hours of EEO training. • Post a Notice to all employees located in the common work area. • Pay an award of \$50,000 in compensatory damages to the Complainant. In addition, during FY 2020, there 14 settlements where mental disability harassment was alleged, and 13 settlements where physical disability harassment was alleged. The corrective actions for settlements were as follows:

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 Yes

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

Answer Yes

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

There was one finding of discrimination where physical disability, failure to accommodate was alleged. A summary of the corrective measures taken are as follows: • Pay complainant in the amount of \$95,000.00, within sixty days. • Compensate complainant for all back pay and any other losses • Post a Notice to all employees located in the common work area. • Conduct four hours of EEO training.

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 PWTB?

Answer No

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

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

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/01/2018	Office of Human Capital (OHC) and the Office of Diversity, Inclusion and Civil Rights (ODICR), to finalize and publish a Department-wide reasonable accommodation policy and procedure that aligns with the EEOC final rule.	Yes	09/30/2021	
12/01/2018	ODICR to partner with OSEOD to establish a systematic approach for ensuring managers and supervisors are aware of their obligations for reasonable accommodation.	No	09/30/2022	
12/01/2018	OHC to obtain funding to develop and implement a Department-wide tracking system for reasonable accommodations.	Yes		08/30/2020
06/01/2020	Obtain and analyze Applicant Flow Data for PWD and PWTD	No		07/30/2020
05/01/2021	OHC in partnership with Departmental ODICR to establish a plan to gradually increase the number of PWD and PWTD.	No		
09/30/2021	Develop and implement Department-wide campaign regarding disability employment.	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments
2019	<p>During FY 2019:</p> <p>OHC requested funding to create a Department-wide reasonable accommodation tracking system.</p> <p>Department issued hiring goals to comply with the final rule for Section 504 of the Rehabilitation Act.</p> <p>The goals were broadly disseminated throughout the Department.</p> <p>OHC allocated an FTE, GS-14 equivalent to oversee the Affirmative Action employment goals for people with disabilities.</p> <p>At the close of the FY, the position was advertised and a selection pending.</p> <p>Two Employee Resource Groups were established for the further advancement of People with Disabilities and Targeted Disabilities within the DOI workforce. The Employees for the Advancement of People with Disabilities (EAPWD) and People with Special Abilities of Power (PSAP).</p> <p>At the close of the FY, 12.5 percent of new hires were PWDs, and 3.1 percent were PWTDs.</p> <p>DOI posted its reasonable accommodation and personal assistance services procedures to the public website.</p>

Report of Accomplishments

Fiscal Year	Accomplishments
2020	<p>The Departmental ODICR developed its DRAFT Diversity and Inclusion strategic plan that heavily addresses disability employment.</p> <p>The Departmental ODICR Director created and disseminated to key stakeholders, the DRAFT EDI (EEO) and Diversity Policy Statement.</p> <p>The Departmental ODICR hired a Lead MD-715 Program Manager to work closely with the Bureau EDI (EEO) and OHC communities to ensure compliance with the EEOC Affirmative Action Plan.</p> <p>OHC received funding for the Department-wide reasonable accommodation tracking system. A shell tracking system was created and exhibited to OHC and EDI (EEO) practitioners for feedback.</p> <p>The Departmental ODICR met with the Disability ERGs to ascertain sticking points for employment of people with disability throughout the DOI. The information contained is source of information used in the Department-wide campaign in the future.</p> <p>OHC selected a GS-14 action officer to oversee the Affirmative Action hiring of people with disabilities. Each Bureau designated officials to work closely with the OHC representative to account for disability hiring. The team establish a charter to government processes for disability hiring. Established goals for FY 2021 and beyond for meeting Affirmative Action goals.</p>

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

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/31/2021	Review and analyze exit surveys to identify barriers to retention.	No		
12/31/2021	Conduct study on reasonable accommodation requests. Identify trends in processing requests, delays, denials, etc. to ascertain correlations to separations.	No		
12/31/2021	Establish process to monitor separations on recurring basis by disability.	No		
09/30/2021	Utilize ERGs to improve employment experience for PWD and PWTB.	No		

Report of Accomplishments

Fiscal Year	Accomplishments
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.
2019	DOI OHC convened an exit and retention survey working group to review the current DOI Exit Survey and Bureau Exit Survey and provided recommended changes to the senior leadership team. ODICR representatives will ensure consideration of disability-related questions are included in the final submission of established core questions.

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

The Departmental ODICR and entire EDI (EEO) community throughout the DOI lack 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

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

The implementation of hiring goals and the establishing of a designated POC for affirmative action hiring resulted in 1,212 (8.1 percent) PWD new hires, and 299 (2.0 percent) PWTB new hires. There were five (5) PWD new hires selected to fill GS-15 positions, 15 PWD new hires selected to fill GS-14 positions, 33 PWD new hires selected to fill GS-13 positions during the reporting year. Additionally, four (4) PWTB new hires selected to fill GS-14 positions, and nine (9) PWTB new hires selected to fill GS-13 positions. Year after year, DOI has steadily increased the number of PWD employed throughout the agency, increasing from 8.0 percent in FY 2013 to 12.7 percent in FY 2020. Likewise, DOI incrementally increased its hiring of PWTB, from 1.5 percent in FY 2013 to 2.0 percent in FY 2020. There is a steady increase in communication regarding employing people with disabilities through podcasts, tweets, training, and Department-wide publications (e.g. HR Monthly, Training Tuesday, and Connections Magazine, etc.). The Departmental ODICR developed an internal website to serve as a platform for managers and employees for all aspects of EDI (EEO), whereby, there is a strong emphasis on disability employment. The website is scheduled to launch during the third quarter of FY 2021.

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

The Departmental ODICR's strategic focus is on developing and implementing a Department-wide campaign to educate the workforce on the intricacies of disability employment. The Departmental ODICR will establish a Department-wide barrier analysis team to incrementally address impediments in employment for PWD, PWTB, and other affected groups.