

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

DOI Office of the Secretary - FY 2025

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: No

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

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

a. Cluster GS-1 to GS-10 (PWTD)

Answer: No

b. Cluster GS-11 to SES (PWTD)

Answer: No

Grade Level Cluster (GS or Alternate Pay Planb)	Total	Reportable Disability Total	Reportable Disability Percentage (Numerical Goal 12 Percent)	Targeted Disability Total	Targeted Disability Percentage (Numerical Goal 2 Percent)
Grades GS-11 to SES	6727	1252	18.61	301	4.47
Grades GS-1 to GS-10	1160	329	28.36	101	8.71

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

OS has continued to communicate diverse hiring initiative up to and including the disability goals through strategic messaging and other observances. Additionally, numerical hiring goals are established for individuals with disabilities, and targeted disabilities are announced by the OHC to all Bureaus via the Human Capital Leadership Council (HCLC). The HCLC is comprised of senior human capital officials in OHC, the Bureaus, and other HR lines of business. The hiring goals are further communicated to the Interior Business Center (IBC) and BSEE staff to be implemented throughout the workplace.

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: Yes

The Division's Director temporarily assigned DPM duties. The division has developed a gap analysis of the department's successes and challenges complying with CFR 29 1614.203(d) Rehabilitation Act. The overarching objective is to outline responsibilities, measurables, and timelines for all level of stakeholders involved in the affirmative action plan. The Division will continue to collaborate with the Office of Human Capital.

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	Total Full Time	Total Part Time	Total Collateral Duty	Responsible Official (Name, Title, Office Email)
Special Emphasis Program for PWD and PWTD	0	0	0	Vacant
Answering questions from the public about hiring authorities that take disability into account	9	0	0	HR Specialists (Recruitment & Placement) for respective OS serviced organizations
Section 508 Compliance	1	0	0	Siddhartha Sharma DOI Section 508 Program Manager
Processing reasonable accommodation requests from applicants and employees	11	0	0	HR Specialists (Recruitment & Placement) for respective OS serviced organizations
Architectural Barriers Act Compliance	1	0	0	Sloan Farrell Director Public Civil Rights Director Public Civil Rights
Processing applications from PWD and PWTD	9	0	0	

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: Yes

IBC and BSEE HR Operations train all HR Specialists (Recruitment & Placement) in processing applications from persons with disabilities and fielding related questions.

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

There are no Disability Program Managers in the OS. The Special Placement Coordinator in OHC assigned to ensure Department hiring goals are achieved, conducted monthly trainings on disability recruitment and retention to standardize practitioner knowledge. Employees are encouraged to participate in the Federal Exchange on Employment & Disability (FEED), a federal interagency working group focused on information sharing, best practices, and collaborative partnerships designed to make the Federal government a model employer of people with disabilities.

Section III: Program Deficiencies In The Disability Program

Section IV: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

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

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

OS used Schedule A and 30 Percent or more Disabled Veterans appointing authorities to identify and hire qualified PWD and PWTD applicants for positions in the permanent work-force.

All vacancy announcements included a statement encouraging Schedule A and 30 Percent or more Disabled Veteran applicants to apply. As a result, in FY 2022, 28 of new hires were placed using the Schedule A hiring authority, and 5.5 percent of the new hires used the 30 Percent or more Disabled Veterans hiring authority.

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

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:

- A licensed medical professional;
- A certified rehabilitation professional; or
- Any Federal, state, District of Columbia, or US Territory agency that issues or provides disability benefits.

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: Yes

IBC provides hiring managers with an online Supervisor's Toolkit and links to the OPM website on hiring authorities available for use, including those applicable to PWD and PWTD.

BSEE/IBC HR Specialists actively engage with the hiring managers to understand their position needs and advise on methods to meet them, including advising on potential applicant pools and hiring authorities.

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.

The OS plans to continue utilizing the following resources: WRP, OPM's Shared List of People with Disabilities for recruitment, the Ticket-to-Work Program, State Vocational Rehabilitation Agencies (SVRAs), DOL's Veterans' Employment and Training Service (VETS) program, VA's Vocational Rehabilitation and Employment (VR&E) Service, and DOD's Operation Warfighter, SkillBridge and Hiring Heroes Programs

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", describe the trigger(s) below.

a. New Hires for Permanent Workforce (PWD)

Answer: No

b. New Hires for Permanent Workforce (PWTD)

Answer: No

New Hires	Total (Number)	Reportable Disability Permanent Workforce (Percentage)	Reportable Disability Temporary Workforce (Percentage)	Targeted Disability Permanent Workforce (Percentage)	Targeted Disability Temporary Workforce (Percentage)
% of Total Applicants	0	0.00	0.00	0.00	0.00
% of Qualified Applicants	0	0.00	0.00	0.00	0.00
% of New Hires	216	8.33	2.31	1.85	0.00

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: No

b. New Hires for MCO (PWTD)

Answer: No

New Hires to Mission-Critical Occupations	Total (Number)	Reportable Disability New Hires (Percentage)	Targetable Disability New Hires (Percentage)
Numerical Goal	--	12%	2%
0301 MISCELLANEOUS ADMINISTRATION AND PROGRAM	38	13.16	2.63
0343 MANAGEMENT AND PROGRAM ANALYSIS	13	15.38	7.69
0501 FINANCIAL ADMINISTRATION AND PROGRAM	5	20.00	20.00
0510 ACCOUNTING	2	0.00	0.00
0511 AUDITING	6	0.00	0.00
0905 GENERAL ATTORNEY	30	16.67	3.33
1102 CONTRACTING	16	12.50	0.00
1171 APPRAISING	3	33.33	0.00
1811 CRIMINAL INVESTIGATING	3	0.00	0.00
2210 INFORMATION TECHNOLOGY MANAGEMENT	12	16.67	0.00

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box. 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: No

b. Qualified Applicants for MCO (PWTD)

Answer: No

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: No

b. Promotions for MCO (PWTD)

Answer: No

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

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

A. ADVANCEMENT PROGRAM PLAN

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

OS utilizes the Interior merit promotion plan that covers all employees of the organization and ensures opportunities for advancement for all, including PWD and PWTD.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

BSEE/IBC administers a mentoring program called Pathways to Excellence. Pathways to Excellence matches interested employees in mentoring relationships that enhance self-awareness, personal growth, and professional engagement. Any employee can volunteer to mentor or become a mentee with supervisory approval.

Employee development:

- **Crucial Conversations** - Crucial Conversations training teaches communication skills when high stakes, opinions vary, and emotions run strong. This class helps improve dialogue and engagement, create behavior change, and build performance and culture. This class is one or two days in duration and requires supervisory approval.
- **Emerging Leaders** - Increases participants' capacity to lead people, solve problems and get results and increases their organizational awareness and psychological fitness for leadership. In this 12-month program, participants learn through seminars, mentoring, and business research. They lead projects that impact the enterprise. They cultivate relationships with senior leaders to gain insights into executive leadership. Through their study and practice of leadership, customer service, and business planning and resource management, graduates of the program become more effective technical and managerial leaders, helping IBC to achieve its mission. Selections for participation in the program are made through a competitive process, requiring supervisory approval and input.
- **Job Shadowing** - Job shadowing is a simple, powerful workplace learning strategy. During a shadowing experience, one employee (the observer) visits another employee (the host) to observe a day on the job. The observer learns about the host's work, mission, and career field, and the host gets to share their career field with a colleague who wants to know. The program allows employees to understand better our organizations' missions, cultures, work, and colleagues who drive our success. This program requires supervisory approval.
- **New Employee Orientation Program (NEOP)** – New employees receive an overview of DOI, IBC's alignment to PMB, including all directorates and the Office of the Director, and employee programs and resources. New employees are required to attend live orientation within six months of their start date but are encouraged to participate in the orientation closest to their start date. Other components of NEOP include employee and supervisor checklists and a buddy program.
- **Psychological Safety Workshops** – This workshop allows participants to assess their psychological safety within a work unit and discuss the stages of psychological safety and how to improve it
- **Strengths Finder Workshops** - This workshop provides participants with an online assessment tool by Gallup Organization, helping participants discover what they naturally do best, learn how to develop their greatest talents, and use their results to live their best life. The workshop allows teams to identify and leverage the strengths of individual team members to build better productivity and engagement in the group

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 Applicants (Percentage)	Total Participants Selectees (Percentage)	PWD Applicants (Percentage)	PWD Selectees (Percentage)	PWTD Applicants (Percentage)	PWTD Selectees (Percentage)
Training Programs		0	0	0	0	0
Coaching Programs	0	0	0	0	0	0
Fellowship Programs	0	0	0	0	0	0
Detail Programs	0	0	0	0	0	0
Internship Programs	0	0	0	0	0	0
Mentoring Programs			0	0	0	0
Other Career Development 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: No

b. Selections (PWD)

Answer: No

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: No

b. Selections (PWTD)

Answer: No

C. AWARDS

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

a. Awards, Bonuses, & Incentives (PWD)

Answer: Yes

b. Awards, Bonuses, & Incentives (PWTD)

Answer: Yes

PWD had a participation rate of 6.47 Percent and PWTD had a participation rate of 0.84 Percent among employees receiving cash awards of \$5,000 or more.

Time-Off Awards	Total (Number)	Reportable Disability (Percentage)	Without Reportable Disability (Percentage)	Targeted Disability (Percentage)	Without Targeted Disability (Percentage)
Time-Off Awards 1 - 10 hours: Awards Given	1934.00	15.51	84.49	3.05	96.95
Time-Off Awards 1 - 10 Hours: Total Hours	13657.00	15.83	84.17	3.14	96.86
Time-Off Awards 1 - 10 Hours: Average Hours	7.06	7.21	7.03	7.27	7.05
Time-Off Awards 11 - 20 hours: Awards Given	642.00	14.17	85.83	3.74	96.26
Time-Off Awards 11 - 20 Hours: Total Hours	10886.00	14.35	85.65	3.88	96.12
Time-Off Awards 11 - 20 Hours: Average Hours	16.96	17.16	16.92	17.58	16.93
Time-Off Awards 21 - 30 hours: Awards Given	545.00	12.66	87.34	2.39	97.61
Time-Off Awards 21 - 30 Hours: Total Hours	13612.00	12.77	87.23	2.36	97.64
Time-Off Awards 21 - 30 Hours: Average Hours	24.98	25.19	24.95	24.69	24.98
Time-Off Awards 31 - 40 hours: Awards Given	544.00	18.20	81.80	5.88	94.12
Time-Off Awards 31 - 40 Hours: Total Hours	21023.00	18.14	81.86	5.86	94.14
Time-Off Awards 31 - 40 Hours: Average Hours	38.65	38.53	38.67	38.47	38.66
Time-Off Awards 41 or more Hours: Awards Given	11.00	0.00	100.00	0.00	100.00
Time-Off Awards 41 or more Hours: Total Hours	528.00	0.00	100.00	0.00	100.00
Time-Off Awards 41 or more Hours: Average Hours	48.00	0.00	48.00	0.00	48.00

Cash Awards	Total (Number)	Reportable Disability (Percentage)	Without Reportable Disability (Percentage)	Targeted Disability (Percentage)	Without Targeted Disability (Percentage)
Cash Awards \$500 and Under: Awards Given	1018.00	17.78	82.22	3.73	96.27
Cash Awards \$500 and Under: Total Amount	409854.00	17.42	82.58	3.66	96.34
Cash Awards \$500 and Under: Average Amount	402.61	394.36	404.39	394.29	402.93
Cash Awards: \$501 - \$999: Awards Given	684.00	17.40	82.60	2.78	97.22
Cash Awards: \$501 - \$999: Total Amount	520949.00	17.61	82.39	2.94	97.06
Cash Awards: \$501 - \$999: Average Amount	761.62	770.86	759.68	805.89	760.36
Cash Awards: \$1000 - \$1999: Awards Given	1595.00	18.62	81.38	4.08	95.92
Cash Awards: \$1000 - \$1999: Total Amount	2099662.00	17.81	82.19	3.89	96.12
Cash Awards: \$1000 - \$1999: Average Amount	1316.40	1259.01	1329.54	1254.94	1319.01
Cash Awards: \$2000 - \$2999: Awards Given	1021.00	13.81	86.19	3.43	96.57
Cash Awards: \$2000 - \$2999: Total Amount	2428561.00	13.64	86.36	3.47	96.53
Cash Awards: \$2000 - \$2999: Average Amount	2378.61	2349.77	2383.23	2410.40	2377.48
Cash Awards: \$3000 - \$3999: Awards Given	616.00	17.86	82.14	5.03	94.97
Cash Awards: \$3000 - \$3999: Total Amount	2083411.00	17.83	82.17	5.03	94.97
Cash Awards: \$3000 - \$3999: Average Amount	3382.16	3377.85	3383.10	3380.23	3382.26
Cash Awards: \$4000 - \$4999: Awards Given	370.00	10.81	89.19	1.89	98.11
Cash Awards: \$4000 - \$4999: Total Amount	1645803.00	10.59	89.41	1.81	98.19
Cash Awards: \$4000 - \$4999: Average Amount	4448.12	4356.60	4459.21	4245.86	4452.02
Cash Awards: \$5000 or more: Awards Given	704.00	10.09	89.91	1.99	98.01
Cash Awards: \$5000 or more: Total Amount	7093187.00	7.63	92.37	1.24	98.77
Cash Awards: \$5000 or more: Average Amount	10075.55	7626.49	10350.25	6257.00	10153.03

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

a. Awards, Bonuses, & Incentives (PWTB)

Answer: No

b. Pay Increases (PWTB)

Answer: No

Other Awards	Total (Number)	Reportable Disability (Percentage)	Without Reportable Disability (Percentage)	Targeted Disability (Percentage)	Without Targeted Disability (Percentage)
Total Performance Based Pay Increases Awarded	135.00	5.93	94.07	0.74	99.26

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

OS did not collect data for other recognition programs.

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 (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

- a. SES
i. Qualified Internal Applicants (PWD) Yes X (3.75 Percent) No 0
ii. Internal Selections (PWD) Yes X (0 Percent) No 0
- b. Grade GS-15
i. Qualified Internal Applicants (PWD) Yes X (6.18 Percent) No 0
ii. Internal Selections (PWD) Yes X (7.14 Percent) No 0
- c. Grade GS-14 Yes X (7.42 Percent) No 0
i. Qualified Internal Applicants (PWD) Yes X (4.95 Percent) No 0
ii. Internal Selections (PWD)
- d. Grade GS-13
i. Qualified Internal Applicants (PWD) Yes X (7.79 Percent) No 0
ii. Internal Selections (PWD) Yes X (4.30 Percent) No 0

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 |

a. SES

- | |
|---|
| i. Qualified Internal Applicants (PWTD) Yes 0 No X (3.45 Percent) |
| ii. Internal Selections (PWTD) Yes 0 No X (1.61 Percent) |

b. Grade GS-15

- | |
|---|
| i. Qualified Internal Applicants (PWTD) Yes O No X (2.28 Percent) |
| ii. Internal Selections (PWTD) Yes X (0.00 Percent) No O |

c. Grade GS-14

- | |
|---|
| i. Qualified Internal Applicants (PWTD) Yes O No X (3.36 Percent) |
| ii. Internal Selections (PWTD) Yes O No X (2.00 Percent) |

d. Grade GS-13

- | |
|---|
| i. Qualified Internal Applicants (PWTD) Yes O No X (3.37 Percent) |
| ii. Internal Selections (PWTD) Yes X (1.08 Percent) No O |

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 |

SES

- Qualified Internal Applicants (PWTD) no data provided
- Internal Selections (PWTD) no data provided
- Grade GS-15 Qualified Internal Applicants (PWTD) no data provided Internal Selections (PWTD) no data provided

GS-14

- Qualified Internal Applicants (PWTD) no data provided
- Internal Selections (PWTD) 2.0 percent

Grade GS-13

- Qualified Internal Applicants (PWTD) no data provided
- Internal Selections (PWTD) 2.9 percent

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: No |
| b. New Hires to GS-15 (PWTD) | Answer: No |
| c. New Hires to GS-14 (PWTD) | Answer: No |
| d. New Hires to GS-13 (PWTD) | Answer: No |
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: No |
| ii. Internal Selections (PWD) | Answer: No |
| b. Managers | |
| i. Qualified Internal Applicants (PWD) | Answer: No |
| ii. Internal Selections (PWD) | Answer: No |
| c. Supervisors | |
| i. Qualified Internal Applicants (PWD) | Answer: No |
| ii. Internal Selections (PWD) | Answer: No |
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: No |
| ii. Internal Selections (PWTD) | Answer: No |
| b. Managers | |
| i. Qualified Internal Applicants (PWTD) | Answer: No |
| ii. Internal Selections (PWTD) | Answer: No |
| c. Supervisors | |
| i. Qualified Internal Applicants (PWTD) | Answer: No |
| ii. Internal Selections (PWTD) | Answer: No |
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: No |
| b. New Hires for Managers (PWD) | Answer: No |
| c. New Hires for Supervisors (PWD) | Answer: No |

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: No |
| b. New Hires for Managers (PWTD) | Answer: No |
| c. New Hires for Supervisors (PWTD) | Answer: No |

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer: Yes

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

a. Voluntary Separations (PWD)

Answer: No

b. Involuntary Separations (PWD)

Answer: No

Separations	Total (Number)	Reportable Disabilities (Percentage)	Without Reportable Disabilities (Percentage)
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	18	0.31	0.19
Permanent Workforce: Resignation	781	10.58	9.12
Permanent Workforce: Retirement	304	3.75	3.64
Permanent Workforce: Other Separations	341	2.34	4.54
Permanent Workforce: Total Separations	1444	16.98	17.50

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(s) in the text box.

a. Voluntary Separations (PWTD)

Answer: No

b. Involuntary Separations (PWTD)

Answer: No

Separations	Total (Number)	Targeted Disabilities (Percentage)	Without Targeted Disabilities (Percentage)
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	18	0.00	0.23
Permanent Workforce: Resignation	781	8.03	9.48
Permanent Workforce: Retirement	304	3.16	3.69
Permanent Workforce: Other Separations	341	1.95	4.22
Permanent Workforce: Total Separations	1444	13.14	17.62

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.

Most separations comprised employees who voluntarily left the OS to work for another federal agency or retired.

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://doi.gov/ocio/section508> and Interior's Accessibility Statement <https://doi.gov/accessibility>.

How to file a complaint:

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

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.

The agency has posted the notice of rights under 29 C.F.R. § 1614.203(d)(4) on the public website at <https://doi.gov/accessibility>.

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.

- Document Accessibility Training was offered Department-wide teaching employ-ees how to create accessible Microsoft Word documents and how to convert them to fully accessible PDFs. There were 12 sessions held and 1,031 attendees.

- The Interior Section 508 Program trained OS personnel in creating Section 508 compliant Excel spreadsheets (1-hour course) in FY 2022. Excel Spreadsheets: 12 sessions held, 262 attendees.

- The Interior Section 508 Program collaborated with the OCIO IT enterprise Solu-tions team and other stakeholders to establish the FY2022Interior Digital Week event to include Section 508 awareness on July 25–29, 2022. This event aims to increase the knowledge and willingness of Interior personnel to comply with Sec-tion 508 requirements.

- On May 19, 2022, the Interior Section 508 Program collaborated with the ODCIR personnel to present at the Interior Virtual Environmental Justice Symposium hosted by the Department Office of Environmental Policy and Compliance. The presentation was about including disability in the environmental justice conversa-tion. Provided general information regarding Section 508 during the presentation.

- On August 2, 2022, the Interior Section 508 Program offered a Section 508 Awareness Presentation to BSEE as part of their Ally Engagement & Enrichment Week 2022. It included general information regarding Section 508 and had a screen reader demonstration. In addition, it included a demonstration of a video that contained accurate captions and audio descriptions.

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 requests for reasonable accommodation is approximately eleven calendar days. Each process step is captured and tracked as its own discreet step. This means if medical is requested/required, that is followed from the initial request to request for medical. Then if medical documentation is provided, that step is tracked separately from the date the medical is received until the decision. The average of each step was eleven calendar days.

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.

OS adheres to the Interior policy on administering reasonable accommodation requests, including timely processing of incoming requests, collaborating, and advising supervisors on program requirements and specific requests received, coordinating with the agency physician as needed, ensuring approved requests are monitored, and assessing any trends that surface and discussing with senior management. In addition, training and other educational resources are available to employees and supervisors throughout the year.

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.

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

OS adheres to the Interior policy on PAS and ensures supervisors are aware of the policy and requirements. During the requested period, OS did not receive any PAS re-quests. The Employee Relations staff are knowledgeable on the PAS process and available to assist supervisors and employees in working through PAS requests received.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer: No

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

Answer: No

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

none

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer: No

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

Answer: 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.

None

Section VIII: Identification and Removal of Barriers

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

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

Answer: No

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

Answer: No

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

Source of the Trigger 1 (Workforce Data Table, Complaints data, FEVS, or other sources)

Source	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?	PWD and PWTD voluntarily separated at the same level in which the OS onboarded this group to the workforce. This imbalance suggests a potential retention issue.
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.

Description of Policy, Procedure, or Practice

Objective(s) and Dates for EEO Plan

Date Initiated	09/30/2020
Target Date	09/30/2023
Sufficient Funding / Staffing?	No
Date Modified	
Date Completed	
Objective Description	Improve employment experience for PWD and PWTD.

Responsible Official(s)

Title	Director, Workforce Relations Division, BSEE
Name	Mark Guberman (or designee)
Standards Address The Plan?	Yes
Title	Disability Selective Placement Program Coordinator
Name	Andrea Martinez
Standards Address The Plan?	No
Title	Director, Human Resource Office, Interior Business Center
Name	Devin Cummings (or designee)

Standards Address The Plan?	Yes
Title	OS MD-715 Program Manager
Name	Kimberly Ly
Standards Address The Plan?	Yes
Title	Managers and Supervisors
Name	Various Offices
Standards Address The Plan?	No

Planned Activities Toward Completion of Objective

Target Date	12/31/2021
Planned Activities	Review and analyze exit surveys to identify barriers to retention.
Sufficient Staffing & Funding?	Yes
Modified Date	
Completion Date	07/12/2021
Target Date	12/31/2021
Planned Activities	Conduct study on reasonable accommodation requests. Identify trends in processing requests, delays, denials, etc. to ascertain correlations to separations.
Sufficient Staffing & Funding?	Yes
Modified Date	12/31/2023
Completion Date	
Target Date	09/30/2021
Planned Activities	Utilize ERGs to improve employment experience for PWD and PWTD.
Sufficient Staffing & Funding?	Yes
Modified Date	
Completion Date	09/30/2022
Target Date	10/01/2021
Planned Activities	Issue Annual Hiring Goals for PWDs and PWTDs and socialize throughout OS
Sufficient Staffing & Funding?	Yes
Modified Date	
Completion Date	09/30/2022
Target Date	12/31/2021
Planned Activities	Develop and post notice of rights for employees and applicants under Section 508 of the Rehabilitation Act and the Architectural Barriers Act on the internal and external websites.
Sufficient Staffing & Funding?	Yes
Modified Date	
Completion Date	04/30/2022

Report of Accomplishments

Fiscal Year	2019
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Accomplishment	During FY 2019: OHC requested funding to create a Department-wide reasonable accommodation tracking system. Department issued hiring goals to comply with the final rule for Section 504 of the Rehabilitation Act. The goals were broadly disseminated throughout the Department. OHC allocated an FTE, GS-14 equivalent to oversee the Affirmative Action employment goals for people with disabilities. At the close of the FY, the position was advertised and a selection pending. 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). DOI posted its reasonable accommodation and personal assistance services procedures to the public website.
Fiscal Year	2021
Accomplishment	Exit Interview Results related to the recruitment, hiring, inclusion, retention, and advancement of PWDs and PWTs were insignificant based on the number of employees participating in the survey prior to their departure from the OS workforce. Discussions were ongoing with the OHC to increase employee participation in the exit survey.
Fiscal Year	2020
Accomplishment	OHC received funding for the Department-wide reasonable accommodation tracking system. A shell tracking system was created and exhibited to OHC and DEI (EEO) practitioners for feedback. No OS activities during this period due to the absence of an OS DEI (EEO) Director.
Fiscal Year	2022
Accomplishment	Developed and posted notice of rights under Section 508 and the Architectural Barriers Act on external websites. During FY 2022, OS updated its public web page https://doi.gov/accessibility for accessibility and consistency to include a description of rights and how to file a complaint under Section 508. Modified Date: Conducting the reasonable accommodation study. In FY 2021, ODICR began leading a cross-functional DEIA team at the Department level, comprising collateral duty staff from within the Immediate Office of the Secretary and the Offices of Policy Analysis, Planning and Performance Management, Environmental Policy and Compliance, and Human Capital. Additionally, the DEIA team coordinates several working groups that consist of collateral-duty colleagues from multiple offices and bureaus across the Department who also support the implementation of numerous executive orders (EO) related to equity. This includes an Accessibility working group, which meets monthly to examine and identify solutions to existing challenges to workplace accessibility, including disability employment practices, reasonable accommodation, and accessible facilities. At the close of the fiscal year, the Accessibility working group is developing a workforce accessibility assessment to be completed by the various program office stakeholders to reveal a deeper investigation into policies, procedures, and practices that can potentially be barriers to equal employment opportunities.
Source of the Trigger 2 (Workforce Data Table, Complaints data, FEVS, or other sources)	
Source	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?

The higher the grade level, the least number of PWD and PWTD were selected to fill senior level positions.

Source

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?

The higher the grade level, the least number of PWD and PWTD were selected to fill senior level positions.

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 1

To be determined

Description of Policy, Procedure, or Practice

To be determined

Objective(s) and Dates for EEO Plan**Date Initiated**

02/06/2020

Target Date

12/30/2023

Sufficient Funding / Staffing?

Yes

Date Modified**Date Completed****Objective Description**

Increase PWD and PWTD employees at senior grade levels in the OS workforce

Date Initiated

09/30/2020

Target Date

09/30/2021

Sufficient Funding / Staffing?

Yes

Date Modified**Date Completed**

09/30/2022

Objective Description

Educate managers and supervisors on the intricacies of disability employment

Responsible Official(s)**Title**

Director, Workforce Relations Division, BSEE

Name

Mark Guberman (or designee)

Standards Address The Plan?

Yes

Title

Director, Human Resource Office, Interior Business Center

Name

Devin Cummings (or designee)

Standards Address The Plan?

Yes

Planned Activities Toward Completion of Objective**Target Date**

12/31/2021

Planned Activities

Obtain and analyze Applicant Flow Data for PWD and PWTD

Sufficient Staffing & Funding?

No

Modified Date

09/30/2022

Completion Date	09/30/2022
Target Date	09/30/2021
Planned Activities	Office of Human Capital (OHC), to finalize and publish a department-wide reasonable accommodation policy and procedure that aligns with the EEOC final rule.
Sufficient Staffing & Funding?	No
Modified Date	09/30/2022
Completion Date	09/30/2022
Target Date	09/30/2022
Planned Activities	Develop and implement OS-wide campaign regarding disability employment.
Sufficient Staffing & Funding?	Yes
Modified Date	09/30/2023
Completion Date	
Report of Accomplishments	
Fiscal Year	2021
Accomplishment	No Action Taken During the Reporting Period.
Fiscal Year	2019
Accomplishment	OHC requested funding to create a Department-wide reasonable accommodation tracking system. Departmental issued hiring goals to comply with the final rule for Section 504 of the Rehabilitation Act. The goals were broadly disseminated throughout the Department. OHC allocated an FTE, GS-14 equivalent to oversee the Affirmative Action employment goals for people with disabilities. At the close of the FY, the position was advertised and a selection pending. 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). DOI posted its reasonable accommodation and personal assistance services procedures to the public website.
Fiscal Year	2020
Accomplishment	OHC selected a GS-14 action officer to oversee the Affirmative Action hiring of people with disabilities throughout the Department of the Interior. The selectee worked closely with the Bureau Special Placement Coordinators to educate managers and supervisors on the statutory requirement for hiring, advancing and developing people with disabilities. The number of people with disabilities and targeted with disabilities increased in GS-13 through SES throughout Department, including the OS DOs.
Fiscal Year	2021

Accomplishment

OHC in partnership with ODICR and leaders within the EEO community throughout the Department of the Interior went line-by-line over the current policy to ensure it contained pertinent elements as expected. OHC made relevant changes to the reasonable accommodation policy and submitted it to the EEOC on April 27, 2022, for their review and approval. EEOC approved the Interior reasonable accommodation policy, and the procedure was socialized within the Department for final approval with a targeted implementation date of October 2022.

OHC implemented an enterprise-wide tracking system to monitor the timeliness of accommodation solutions. The new reasonable accommodation tracking system is scheduled to go live in October 2022. At the close of the FY, OHC is in the process of developing its communication strategy to educate the entire workforce on the new reasonable accommodation policy and the use of the Department's tracking system.

In June 2022, at ODICR's request, OHC began revising its online resources to include various outreach products on its external and internal websites that improve the effectiveness of reasonable accommodation and personal assistance service programs. In recognition of 2022, NDEAM, ODICR, in partnership with OHC and Bureaus, will launch a department-wide campaign to reiterate the need for a diverse employee population to ensure Interior's continued success and to encourage employee self-identification.

HROs completed the following:

- Training managers and supervisors to ensure they are aware of how the OS uses the Schedule A hiring authority to hire persons with severe disabilities and the role of managers/supervisors in the recruitment and hiring process; and
- HR staffing specialists discuss all available hiring flexibilities with hiring managers at the onset of the recruitment request.

At the close of the fiscal year, the ODICR and OHC were developing and implementing a Department-wide disability employment campaign.

Source of the Trigger 3 (Workforce Data Table, Complaints data, FEVS, or other sources)

Source	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?	The higher the grade level, the least number of PWD and PWTD were selected to fill senior level positions.
Source	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?	The higher the grade level, the least number of PWD and PWTD were selected to fill senior level positions.
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 1	To be determined
Description of Policy, Procedure, or Practice	To be determined

Objective(s) and Dates for EEO Plan

Date Initiated	02/06/2020
Target Date	12/30/2023

Sufficient Funding / Staffing?	Yes
Date Modified	
Date Completed	
Objective Description	Increase PWD and PWTD employees at senior grade levels in the OS workforce
Date Initiated	09/30/2020
Target Date	09/30/2021
Sufficient Funding / Staffing?	Yes
Date Modified	
Date Completed	09/30/2022
Objective Description	Educate managers and supervisors on the intricacies of disability employment
Responsible Official(s)	
Title	Director, Workforce Relations Division, BSEE
Name	Mark Guberman (or designee)
Standards Address The Plan?	Yes
Title	Director, Human Resource Office, Interior Business Center
Name	Devin Cummings (or designee)
Standards Address The Plan?	Yes
Planned Activities Toward Completion of Objective	
Target Date	12/31/2021
Planned Activities	Obtain and analyze Applicant Flow Data for PWD and PWTD
Sufficient Staffing & Funding?	No
Modified Date	09/30/2022
Completion Date	09/30/2022
Target Date	09/30/2021
Planned Activities	Office of Human Capital (OHC), to finalize and publish a department-wide reasonable accommodation policy and procedure that aligns with the EEOC final rule.
Sufficient Staffing & Funding?	No
Modified Date	09/30/2022
Completion Date	09/30/2022
Target Date	09/30/2022
Planned Activities	Develop and implement OS-wide campaign regarding disability employment.
Sufficient Staffing & Funding?	Yes
Modified Date	09/30/2023
Completion Date	
Report of Accomplishments	
Fiscal Year	2021
Accomplishment	No Action Taken During the Reporting Period.
Fiscal Year	2019

Accomplishment	OHC requested funding to create a Department-wide reasonable accommodation tracking system. Departmental issued hiring goals to comply with the final rule for Section 504 of the Rehabilitation Act. The goals were broadly disseminated throughout the Department. OHC allocated an FTE, GS-14 equivalent to oversee the Affirmative Action employment goals for people with disabilities. At the close of the FY, the position was advertised and a selection pending. 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). DOI posted its reasonable accommodation and personal assistance services procedures to the public website.
Fiscal Year	2020
Accomplishment	OHC selected a GS-14 action officer to oversee the Affirmative Action hiring of people with disabilities throughout the Department of the Interior. The selectee worked closely with the Bureau Special Placement Coordinators to educate managers and supervisors on the statutory requirement for hiring, advancing and developing people with disabilities. The number of people with disabilities and targeted with disabilities increased in GS-13 through SES throughout Department, including the OS DOs.
Fiscal Year	2021
Accomplishment	OHC in partnership with ODICR and leaders within the EEO community throughout the Department of the Interior went line-by-line over the current policy to ensure it contained pertinent elements as expected. OHC made relevant changes to the reasonable accommodation policy and submitted it to the EEOC on April 27, 2022, for their review and approval. EEOC approved the Interior reasonable accommodation policy, and the procedure was socialized within the Department for final approval with a targeted implementation date of October 2022. OHC implemented an enterprise-wide tracking system to monitor the timeliness of accommodation solutions. The new reasonable accommodation tracking system is scheduled to go live in October 2022. At the close of the FY, OHC is in the process of developing its communication strategy to educate the entire workforce on the new reasonable accommodation policy and the use of the Department's tracking system. In June 2022, at ODICR's request, OHC began revising its online resources to include various outreach products on its external and internal websites that improve the effectiveness of reasonable accommodation and personal assistance service programs. In recognition of 2022, NDEAM, ODICR, in partnership with OHC and Bureaus, will launch a department-wide campaign to reiterate the need for a diverse employee population to ensure Interior's continued success and to encourage employee self-identification. HROs completed the following: • Training managers and supervisors to ensure they are aware of how the OS uses the Schedule A hiring authority to hire persons with severe disabilities and the role of managers/supervisors in the recruitment and hiring process; and • HR staffing specialists discuss all available hiring flexibilities with hiring managers at the onset of the recruitment request. At the close of the fiscal year, the ODICR and OHC were developing and implementing a Department-wide disability employment campaign.

4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities. Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.

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

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

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

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

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