



U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT
Department of the Interior – Office of Secretary 2021 MD-715

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

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

Section I: Efforts to Reach Regulatory Goals

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

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

Response:

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

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

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

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

Response:

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



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

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

Response:

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

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

Section II: Model Disability Program

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



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A. Plan to Provide Sufficient and Competent Staffing for the Disability Program

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

Response:

No ✓

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

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

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	2	0	0	Cynthia Piper Director Human Resources, BSEE/BOEM cynthia.piper@bsee.gov



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

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



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Response:

No ✓

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

B. Plan to Ensure Sufficient Funding for The Disability Program

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

Response:

No ✓

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



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Section III: Plan to Recruit and Hire Individuals with Disabilities

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

A. Plan to Identify Job Applicants with Disabilities

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

Response:

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

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

Response:

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

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

3. When individuals apply for a position under a hiring authority that takes disability into



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account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority and (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

Response:

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

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

Response:

No ✓

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



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

B. Plan to Establish Contacts with Disability Employment Organizations

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

Response:

During FY 2021, the DOI maintained a database that contained partnerships with over 300 U.S. military installations, Veterans Employment Service, Academia, State Job Offices, and Veterans’ Assistance Centers nationwide. Participants of the Listserv received e-mail notifications throughout the year of available job opportunities and free training events open to people with disabilities. Additionally, information from the Dept. of Labor, ODEP is shared with the supervisor to inform them of various events and activities related to the hiring activities and initiatives for PWD. Moreover, the Dept. of Veteran Affairs, the NAVSEA Wounded Warrior and Veteran Office, and Operation Warfighter (OWF) Program Office.

C. Progression Towards Goals (Recruitment and Hiring)

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

Response:

- a. New Hires for Permanent Workforce (PWD) No
- b. New Hires for Permanent Workforce (PWTD) No

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



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2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

Response:

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

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

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO)? If “yes,” please describe the triggers below.

Response:

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

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

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If “yes,” please describe the triggers below.



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Response:

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

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

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

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

A. Advancement Program Plan

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

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

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



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

B. Career Development Opportunities

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

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

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs	Unknown ¹	Unknown	Unknown	Unknown	Unknown	Unknown
Fellowship Programs	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown

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



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

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

Response:

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

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

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



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box.

Response:

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

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

Awards

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

Response:

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

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

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



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

Response:

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

C. Promotions

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

Response:

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



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

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

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

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

Response:

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



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- | | | | |
|-----|--------------------------------------|--------------|----|
| i. | Qualified Internal Applicants (PWTD) | Yes ✓ | No |
| ii. | Internal Selections (PWTD) | Yes ✓ | No |

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

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

Response:

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

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

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) below.

Response:



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

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

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

Response:

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



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

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

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

Response:

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

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

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

Response:



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

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

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

Response:

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

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

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

Response:

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

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



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

Section V: Plan to Improve Retention of Persons with Disabilities

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

A. Voluntary and Involuntary Separations

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

Response:

Yes √

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

Response:

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

Trigger on voluntary separations:

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



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

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

Trigger on involuntary separations:

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

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

Response:

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

Trigger on voluntary separations:

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

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

Trigger involuntary separations:

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



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

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

B. Accessibility of Technology and Facilities

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

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

Response:

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

How to file a complaint:

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

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



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

Response:

How to File a Public Civil Rights Complaint: Within 180 days of the date of the alleged discrimination, a signed, written complaint should be filed with the Director, Office of Civil Rights, Department of the Interior, 1849 C Street, NW Mailstop 4359, Washington, DC, 20240.

The complaint should include your name, address, zip code, and telephone number; the name and address of the alleged discriminatory official(s) and public entity; the nature of the complaint, the basis of the complaint (race, color, national origin, gender, age, sex, and disability), and the date the alleged discrimination occurred. If the alleged discrimination occurred outside DOI jurisdiction, DOI will forward the complaint to the State or Federal agency with jurisdiction.

You can read more about the PCR complaint process in Civil Rights Directive 2011-01 <https://www.doi.gov/pmb/eo/Public-Civil-Rights>.

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

Response:

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



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

C. Reasonable Accommodation Program

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

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

Response:

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

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

Response:

- Reoccurring Training throughout FY 2021 -. Reasonable accommodation training is offered via the DOI Talent Management system.
- Inter-Bureau Expert Team (i-BET) - OHC established an i-BET for the Employment/Special Placement of Persons with Disabilities (PWD) per the Affirmative Action Plan for PWD and PWTD. The group met monthly to account for the



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

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

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

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

Response:

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



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Section VI: EEO Complaint and Findings Data

A. EEO Complaint Data Involving Harassment

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

Response:

No

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

Response:

No

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

Response: None



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B. EEO Complaint Data Involving Reasonable Accommodation

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

Response:

No ✓

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

Response:

No ✓

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

Response: None



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Section VII: Identification and Removal of Barriers

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

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

No ✓

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

No ✓

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

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

OBJECTIVE(S) AND DATES FOR EEO PLAN

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



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



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

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

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



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

REPORT OF ACCOMPLISHMENTS

FY 2019	<p>During FY 2019:</p> <p>OHC requested funding to create a Department-wide reasonable accommodation tracking system.</p> <p>Departmental issued hiring goals to comply with the final rule for Section 504 of the Rehabilitation Act.</p> <p>The goals were broadly disseminated throughout the Department.</p> <p>OHC allocated an FTE, GS-14 equivalent to oversee the Affirmative Action employment goals for people with disabilities. At the close of the FY, the position was advertised and a selection pending.</p> <p>Two Employee Resource Groups were established for the further advancement of People with Disabilities and Targeted Disabilities within the DOI workforce. The Employees for the Advancement of People with Disabilities (EAPWD) and People with Special Abilities of Power (PSAP).</p> <p>DOI posted its reasonable accommodation and personal assistance services procedures to the public website.</p>
FY 2020	<p>OHC selected a GS-14 action officer to oversee the Affirmative Action hiring of people with disabilities throughout the Department of the Interior. The selectee worked closely with the Bureau Special Placement Coordinators to educate managers and supervisors on the statutory requirement for hiring, advancing and developing people with disabilities. The number of people with disabilities and targeted with disabilities increased in GS-13 through SES throughout Department, including the OS DOs.</p>



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	<p>OHC received funding for the Department-wide reasonable accommodation tracking system. A shell tracking system was created and exhibited to OHC and OED practitioners for feedback.</p> <p>No OS activities during this period due to the absence of an OS EEO Director.</p>
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FY 2021	No Action Taken During the Reporting Period.
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4. Please explain the factor (s) that prevented the agency from timely completing any of the planned activities.

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

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

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

The ODICR developed an internal website to serve as a platform for managers and employees for all aspects of OS EEO, whereby, there is a strong emphasis on disability employment. The website launched during the third quarter of FY 2021.

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

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



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Section VII: Identification and Removal of Barriers

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

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

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

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

TYPE OF TRIGGER	BRIEF DESCRIPTION OF TRIGGER
	PWD and PWTD voluntarily separated at the same level in which the DOI onboarded this group to the workforce. This imbalance suggests a potential retention issue.
TYPE OF BARRIER(S)	BRIEF BARRIER(S)
	None identified. A barrier analysis was not conducted due to limited resources allocated to the OS EEO.

OBJECTIVE(S) AND DATES FOR EEO PLAN

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

RESPONSIBLE OFFICIAL(S)

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



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



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Anti-Harassment Processes)		
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PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

TARGET DATE (MM/DD/YYYY)	PLANNED ACTIVITIES	SUFFICIENT FUNDING & STAFFING (YES OR NO)	MODIFIED DATE (MM/DD/YYYY)	DATE COMPLETED (MM/DD/YYYY)
12/31/2021	Review and analyze exit surveys to identify barriers to retention.	No		7/12/2021
12/31/2021	Conduct study on reasonable accommodation requests. Identify trends in processing requests, delays, denials, etc. to ascertain correlations to separations.	No		
12/31/2021	Establish process to monitor separations on recurring basis by disability.	No		
09/30/2021	Utilize ERGs to improve employment experience for PWD and PWTD.	No		

REPORT OF ACCOMPLISHMENTS

FY 2019	OHC convened an exit and retention survey working group to review the current DOI Exit Survey and Bureau Exit Survey and provided recommended changes to the senior leadership team. OCR representatives will ensure consideration of disability-related questions are included in the final submission of established core questions.
FY 2020	In June 2020, DOI centralized the exit survey data in a department-wide system and trained the Bureaus and Offices on how to download the data to identify barriers to retention.
FY 2021	Exit Interview Results related to the recruitment, hiring, inclusion, retention, and advancement of PWDs and PWTDs were insignificant based on the number of



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

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

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

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

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

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

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