



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 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)	Yes 0	No <input checked="" type="checkbox"/>
b. Cluster GS-11 to SES (PWD)	Yes <input checked="" type="checkbox"/>	No 0

The percentage of PWD in the GS-1 to GS-10 was 12% (2,667) in FY 2018 compared to 11.5% (2,708) in FY 2017. The participation rates met the 12% regulatory goal.

The percentage of PWD in the GS-11 to SES cluster was 7.6% (1,585) in FY 2018 compared to 7.4% (1,579) in FY 2017 that falls below the goal of 12%. The participation rates remained unchanged for both FY 2017 and FY 2018.

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.

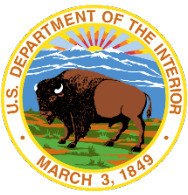
a. Cluster GS-1 to GS-10 (PWTD)	Yes 0	No <input checked="" type="checkbox"/>
b. Cluster GS-11 to SES (PWTD)	Yes <input checked="" type="checkbox"/>	No 0

The percentage of PWTD in the GS-1 to GS-10 was 2.91% (646) in FY 2018 compared to 2.91% (646). The participation rates met the 2% regulatory requirement.

The percentage of PWTD in the GS-11 to SES cluster was 1.59% (330) in FY 2018, and 1.54% (333) in FY 2017, which falls below the goal of 2%.

3. The trend remained the same for both GS-1 to GS-10 and GS-11 to SES. Describe how the agency has communicated the numerical goals to the hiring managers and/or recruiters.

DOI has a plan in place since 2011. The new goals were established and communicated through Human Capital leadership and as part of Hiring Excellence messaging in 2017. DOI set a 12 percent hiring goal for Individuals with Disabilities



at all grade levels and 2 percent hiring goal for Individuals with Targeted Disabilities at all grade levels. DOI continues to communicate the goal using various approaches, such as:

- Identifying the goals during webinars and training events focused on non-competitive authorities, including Schedule A and Special Hiring Authorities for Veterans.
- As part of the promotion efforts for WRP.
- Discussing the goals on HR senior leadership calls and encouraging bureau-level communication with hiring managers.
- HR specialists are having pre-recruitment discussions with hiring officials where they discuss hiring goals and the use of special hiring authorities including those for Disabled Veterans and Persons with Disabilities.

## 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.

### 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.

Yes  No

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	14	27	3	Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.
Answering questions from the public about hiring authorities that take disability into account	13	53	3	Akia West-Butler HR Specialist <a href="mailto:akia_west-butler@ios.doi.gov">akia_west-butler@ios.doi.gov</a>



U.S. Equal Employment Opportunity Commission

Department of the Interior 2018

Disabilities Affirmative Action Plan (AAP)

				Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.
Processing reasonable accommodation requests from applicants and employees	25	8	33	Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.
Section 508 Compliance	6	13	11	Siddhartha Sharma DOI Section 508 Program Manager <a href="mailto:Siddhartha_Sharma@ios.doi.gov">Siddhartha_Sharma@ios.doi.gov</a>  Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.
Architectural Barriers Act Compliance	7	9	4	Sloan Farrell Director Public Civil Rights <a href="mailto:Sloan_Farrell@ios.doi.gov">Sloan_Farrell@ios.doi.gov</a>  Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.
Special Emphasis Program for PWD and PWTD	6	14	8	Akia West-Butler HR Specialist <a href="mailto:akia_west-butler@ios.doi.gov">akia_west-butler@ios.doi.gov</a>  Each Bureau maintains responsibility for servicing their respective workforce; the total FTEs are included in the count.

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.

Yes  No

The Agency has provided disability program and reasonable accommodation practitioners with sufficient training to carry out their roles and responsibilities in FY 2018. Trainings are included, but is not limited to:



U.S. Equal Employment Opportunity Commission

Department of the Interior 2018

Disabilities Affirmative Action Plan (AAP)

- The U.S. Access Board provided training on the new Section 508 standards.
- The Agency Section 508 Program Manager hosted a series of webinars each month on various topics related to making the electronic and information technology accessible to the website.
- Employment Opportunities for Individuals with Disabilities webinar.
- Multiple DOI representatives participated in the Federal Exchange on Employment and Disability (FEED) meetings where participants learned about policies/guidelines, best practices for implementing effective disability programs, as well as the tools and tips for enhancing disability employment, and creating sustainable partnerships.

**B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM**

1. 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.

Yes  No

**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.

DOI utilizes the Schedule A, and the 30 percent or More Disabled Veteran appointing authorities to fill vacant positions throughout the workforce. The DOI Disability Program Manager actively communicates with the vocational rehabilitation centers for veterans, students, and PWD to disseminate vacant positions within the organization and to provide valuable input as to the expectations surrounding the knowledge, skills, ability and educational requirements for the jobs advertised. The designed Selective Placement Program Coordinators and Veterans Employment Program Managers within the Bureaus track and coordinate applications of applicants who qualify under non-competitive authorities. Additionally, the DOI Social Media team identified and disseminated vacancy announcements to Twitter, and LinkedIn.

During the reporting year, the Bureau of Land Management (BLM) hosted a Veterans Career Fair Summit on August 18, 2018 in Washington, DC. Representatives from the U.S. Department of Veterans Affairs, Operation Warfighter, the Wounded Warriors Project and other agencies offering support and assistance to disabled veterans. The



*U.S. Equal Employment Opportunity Commission*

Department of the Interior 2018

Disabilities Affirmative Action Plan (AAP)

workshop presenters provided information on the range of VA services and benefits that may support the quality of life and health of veterans and their families.

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

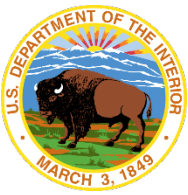
DOI is dedicated to providing full and continuing employment opportunities, internship opportunities, advancement potential, and reasonable accommodations to PWD/PWTD and disabled veterans, especially 30% or more disabled veterans.

DOI will seek to hire PWTD and disabled veterans using authorized special appointment authorities and targeted recruitment efforts, promote the use of Schedule A hiring authority and will encourage all hiring managers to review Schedule A applicants for all positions before the online publication of the vacancy.

DOI will accept applications to utilize Schedule A, 5 CFR 213.3102(u), for hiring people with severe physical disabilities, psychiatric disabilities, and intellectual disabilities. This excepted authority is used to appoint persons with severe physical disabilities, mental disabilities, and intellectual disabilities. Such individuals may qualify for conversion to permanent status after two years of satisfactory service.

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.

Upon receipt of an application for a Schedule A appointment, the representatives of the Human Resource Offices (HRO) verifies that the applicant provided proof of disability by submitting documentation from either: (a) A licensed medical professional; (b) A certified rehabilitation professional; or (c) Any Federal, state, District of Columbia, or US Territory agency that issues or provides disability benefits. The proof of disability in the form of a letter, certifying that the applicant has a disability. The letter must clearly state that the applicant is qualified for an appointment under the Schedule A Appointing Authority. The HR practitioners conduct a qualification analysis based on the resume and any supporting documentation relating to the applicant's knowledge, skills, and ability to perform the duties of the position under the Office of Personnel Management qualification requirements, contacts the hiring official, and explains/provides guidance for hiring a Schedule A appointee under the Special Hiring Authority.



U.S. Equal Employment Opportunity Commission

Department of the Interior 2018

Disabilities Affirmative Action Plan (AAP)

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.

Yes  No  N/A

In FY 2018, the Agency provided ongoing disability training to its hiring managers using various educational methods. These methods include coaching/mentoring, small program office discussions, on-the-job and online webinar.

Vacancies are sent to all Disability Program Coordinators prior to or at the time vacancies are advertised.

**B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS**

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

Over the years, the DOI maintains interactive contacts with the numerous vocational rehabilitation centers for both the military and civilian disabled population. The teams assist the Agency in its recruitment, advertisement, and training of applicants and employees of the DOI. In 2018, DOI collaborated with local military installations to provide workshops, mentorship opportunities, advice and guidance in the areas of federal employment, federal resumes writing and developing quality interview skills. At the end of FY 2018, the social media team tagged via Twitter and LinkedIn, a variety of resource groups designed to employ people with disabilities and provided a steady stream of open vacancies within the Department.

**C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)**

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

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

New hires for PWD is 12.1%, and PWTD is 2.8% for 2018. The number of new hiring has not changed in the previous reporting cycle. The five years trend has shown steady increases in the recruiting and hiring trend for Individuals with Disabilities and Disabled Veterans.





U.S. Equal Employment Opportunity Commission

Department of the Interior 2018

Disabilities Affirmative Action Plan (AAP)

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.

a. New Hires for MCO (PWD)	Yes 0	No 0	N/A ✓
b. New Hires for MCO (PWTD)	Yes 0	No 0	N/A ✓

Triggers cannot be analyzed due to lack of sufficient data. OPM’s USA-Staffing applicant flow system does not provide the necessary information for DOI to tell an accurate story relating to its hiring actions. At the end of FY 2018, discussions were ongoing with OPM’s Product Development Branch officials to determine the root cause and remedy the recurring situation for the DOI.

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.

a. Qualified Applicants for MCO (PWD)	Yes 0	No 0	N/A ✓
b. Qualified Applicants for MCO (PWTD)	Yes 0	No 0	N/A ✓

During FY 2018, DOI was unable to determine if discrepancies between the number of applicants who applied and were selected for vacancies due to the Agency’s data collection system. At the end of FY 2018, discussions were ongoing with OPM’s Product Development Branch officials to determine the root cause and remedy the recurring situation for the DOI.

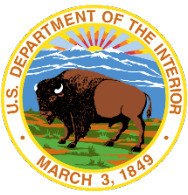
4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

a. Promotions for MCO (PWD)	Yes 0	No 0
b. Promotions for MCO (PWTD)	Yes 0	No 0

Applicant pool data is not available. OPM’s USA-Staffing applicant flow data system currently does not provide the necessary information. DOI will coordinate with the USA Staffing OPM team to get the data.

## 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**

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

The Agency has attempted to ensure there are developmental opportunities and mentorship or coaching available for PWD and PWTD to improve their skills and increase their opportunities for advancement. All managers and supervisors are encouraged to promote the career development of all employees, including PWD and PWTD.

## **B. CAREER DEVELOPMENT OPPORTUNITIES**

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

DOI launched a number of Leadership and Development Programs to increase diversity, management, and occupational skill sets. The DOI University (DOIU) offers the following programs:

### **Aspiring to Leadership – An Entry Level Leadership Program**

This 5-month program is designed for the employee at the GS 7-11 levels who aspires to leadership roles. The program focuses on increasing awareness of personal leadership style, reinforcing strengths, and building a set of practical leadership skills that will prepare participants for future leadership roles. Through assessments, lecture, and large and small group discussion, participants develop knowledge and skills in the following competency areas:

- Conflict Management
- Interpersonal Skills
- Oral Communication
- Problem Solving and Decisiveness

### **Exploring Leadership – A Mid-Level Leadership Program**

It's a developmental program designed for a mid-level employee at GS-11-12 and high performing GS-9s who have demonstrated leadership potential. The program focuses on the competencies critical to successfully leading in the challenging and complex Federal environment. The program is comprised of three core sessions, tailored to develop proficiency in Teambuilding, Accountability, Problem Solving, Decisiveness, and Influencing/Negotiating. Exploring Leadership uses a blended learning approach and includes assessment, instructor-led learning, large and small group discussion, case studies, mentoring and webinars to give participants a challenging and enriching leadership development experience.

### **Pathways to Leadership – Bureau of Indian Affairs**





*U.S. Equal Employment Opportunity Commission*

Department of the Interior 2018

Disabilities Affirmative Action Plan (AAP)

Pathways to Leadership is a 4- month program specifically designed for Bureau of Indian Affairs developing leaders. The program prepares participants to lead the programs and responsibilities affecting Indian Affairs. Targeted to employees at the GS-13 and GS-14 levels, the program focuses on increasing competency proficiency in Conflict Management, Resilience, External Awareness, Political Savvy, Partnering, and Accountability. Participants explore the impact of personal values on ethical decision making; learn the value of emotional intelligence and its impact on employee engagement and performance; build skills in leveraging diversity, political savvy, creating partnerships; and influencing/negotiating. They also create a leadership network through mentoring and presentations by BIA senior leaders.

**Senior Executive Service Candidate Development Program**

The Department of the Interior's Senior Executive Service Candidate Development Program (SESCDP) is an OPM certified program that is tailored to grow and develop a cadre of highly qualified leaders for senior executive positions. The SESCO DP focuses on developing the competencies in each of the Executive Core Qualifications (ECQs) to prepare candidates to lead at the executive level. The SESCO DP is a 12-month competitively selected program and includes the following:

- an Executive Development Plan that is based on individual competency development needs;
- at least 80 hours of executive level training that addresses the ECQs and includes individuals from outside the candidate's agency;
- core learning sessions that focus on the competencies for successful SES-level performance at DOI;
- a 120-day detail that is outside the candidate's home bureau/office and differs from the candidate's current and past assignments; and
- a mentor who is a member of the Senior Executive Service.

The SESCO DP includes formal classroom training, formal leadership assessments, executive level developmental assignments, networking opportunities with other senior executives, exposure to government-wide leadership challenges, and mentoring. Individuals who successfully complete all program requirements and prepare the ECQ statement or template are eligible for their SESCO DP package to be forwarded to OPM's Qualification Review Board (QRB) for evaluation. Those who receive QRB approval are awarded a non-competitive certificate for appointment to a senior executive position without further competition. The certificate does not expire.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate. [Collection begins with the FY 2018 MD-715 report, which is due on February 28, 2019.]





U.S. Equal Employment Opportunity Commission

Department of the Interior 2018

Disabilities Affirmative Action Plan (AAP)

Triggers cannot be analyzed at this time due to the lack of sufficient data. The current DOI Learning Management System (LMS) for all employees, including PWD/PWTD, does not populate into the Table B-12 Career Development Distributed by Disability. The Agency will enhance its capability to collect training/career development training beginning in FY 2019 through the new DOI Talent and anticipates further development to ensure data captured includes PWD/PWTD.

**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)                      Yes 0                      No
- b. Awards, Bonuses, & Incentives (PWTD)                      Yes 0                      No

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

- a. Pay Increases (PWD)    Yes                       No 0
- b. Pay Increases (PWTD)    Yes                       No 0

7.1% of QSIs were given to PWD (inclusion rate = 8.7%)

1.6% of QSIs were given to PWTD (inclusion rate = 1.9%)

The DOI is below the benchmark for PWD and PWTD regarding QSIs in 2018. PWD/PWTD received a smaller increase in the percentage of awards as compared to the total workforce in FY 2018. No changes since FY 2016.

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)                      Yes 0                      No 0                      N/A
- b. Other Types of Recognition (PWTD)                      Yes 0                      No 0                      N/A

DOI does not have any other types of recognition programs.



## D. PROMOTIONS

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.

a. SES		
i. Qualified Internal Applicants (PWD)	Yes 0	No 0
ii. Internal Selections (PWD)	Yes <input checked="" type="checkbox"/>	No 0
b. Grade GS-15		
i. Qualified Internal Applicants (PWD)	Yes 0	No 0
ii. Internal Selections (PWD)	Yes 0	No <input checked="" type="checkbox"/>
c. Grade GS-14		
i. Qualified Internal Applicants (PWD)	Yes 0	No 0
ii. Internal Selections (PWD)	Yes <input checked="" type="checkbox"/>	No 0
d. Grade GS-13		
i. Qualified Internal Applicants (PWD)	Yes 0	No 0
ii. Internal Selections (PWD)	Yes <input checked="" type="checkbox"/>	No

Data on Qualified Internal Applicants (PWD) unavailable.

Promotions	Qualified Internal Applicants	Internal Selections	Regulatory
GS-13	Data not available	20 (6.6%)	12%
GS-14	Data not available	10 (6.6%)	12%
GS-15	Data not available	2 (3.8%)	12%
SES	Data not available	0 (0.0%)	12%

Applicant flow data remains an issue within the DOI. Therefore, the Department is unable to determine the percentage of qualified internal applicants by disability distribution. During 2018, the rate of PWDs among the individuals selected for promotion at grades GS-13 (6.6%), GS-14 (6.6%) and GS-15 (3.8%). During 2017, the percentage of PWD among individuals selected for promotion at grades GS-15: 2 (2.8%), GS-14: 9 (4.2%), and GS-13: 20 (5.6%). Both fell below the 12% benchmark. Therefore, the DOI does have a potential trigger involving the internal promotions for PWD.



U.S. Equal Employment Opportunity Commission

Department of the Interior 2018

Disabilities Affirmative Action Plan (AAP)

The promotions for PWD has been slowly trending upwards for the last four years for GS-13. The participation rates for people with disabilities in the Executive Senior leadership (GS-15 and above) were lower than their workforce rates in DOI. No prior changes for the GS-15 and above.

At the end of FY 2018, discussions were ongoing with the OPM USA Staffing personnel to eliminate barriers to obtaining applicant flow data.

2. Does the 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.

a. SES

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes √	No 0

b. Grade GS-15

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No √

c. Grade GS-14

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes √	No 0

d. Grade GS-13

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes √	No 0







U.S. Equal Employment Opportunity Commission

Department of the Interior 2018

Disabilities Affirmative Action Plan (AAP)

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.

a. New Hires to SES (PWTD)	Yes 0	No 0
b. New Hires to GS-15 (PWTD)	Yes 0	No 0
c. New Hires to GS-14 (PWTD)	Yes 0	No 0
d. New Hires to GS-13 (PWTD)	Yes 0	No 0

Application and Qualification pool data is not available. DOI is unable to analyze new hires for PWTD.

In the current reporting period, DOI selected 1% (3) of PWTD at the GS-13 grade level, none at the GS-14 grade level, 1.9% (1) at the GS-15 grade level, and none at the SES level. No significant number of new hires change from FY 2017 to FY 2018.

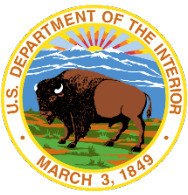
Ongoing discussions with OPM USA Staffing personnel to determine the root cause and to develop an adequate solution to the identified problem.

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.

a. Executives		
i. Qualified Internal Applicants (PWD)	Yes 0	No 0
ii. Internal Selections (PWD)	Yes 0	No 0
b. Managers		
i. Qualified Internal Applicants (PWD)	Yes 0	No 0
ii. Internal Selections (PWD)	Yes 0	No 0
c. Supervisors		
i. Qualified Internal Applicants (PWD)	Yes 0	No 0
ii. Internal Selections (PWD)	Yes 0	No 0

In FY 2018, the Agency could not identify any triggers using the existing EEO-MD-715 Workforce Tables B7 or B9. This table does not include a snapshot to meet EEOC’s new requirements to conduct this analysis.

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



U.S. Equal Employment Opportunity Commission

Department of the Interior 2018

Disabilities Affirmative Action Plan (AAP)

applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

a. Executives

i. Qualified Internal Applicants (PWTD) Yes 0 No 0

ii. Internal Selections (PWTD) Yes 0 No 0

b. Managers

i. Qualified Internal Applicants (PWTD) Yes 0 No 0

ii. Internal Selections (PWTD) Yes 0 No 0

c. Supervisors

i. Qualified Internal Applicants (PWTD) Yes 0 No 0

ii. Internal Selections (PWTD) Yes 0 No 0

In FY 2018, the Agency could not identify any triggers using the existing EEO-MD-715 Workforce Tables B7 or B9. This table does not include a snapshot to meet EEOC’s new requirements to conduct this analysis.

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.

a. New Hires for Executives (PWD) Yes 0 No 0

b. New Hires for Managers (PWD) Yes 0 No 0

c. New Hires for Supervisors (PWD) Yes 0 No 0

In FY 2018, the Agency could not identify any triggers using the existing EEO-MD-715 Table B9. This table does not include a snapshot to meet EEOC’s new requirements to conduct this analysis. The Agency is planning to meet with the DOI/IBC to explore the redevelopment of its existing EEO Tables to accommodate the necessary workforce data snapshots under EEOC MD-715 guidance on workforce tables. The Agency anticipates obtaining these snapshots in FY 2020 to continue its analysis.

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.

a. New Hires for Executives (PWTD) Yes 0 No 0

b. New Hires for Managers (PWTD) Yes 0 No 0

c. New Hires for Supervisors (PWTD) Yes 0 No 0



In FY 2018, the Agency could not identify any triggers using the existing EEO-MD-715 Table B-9. This table does not include a snapshot to meet EEOC’s new requirements to conduct this analysis. The Agency is planning to meet with the DOI/IBC to explore the redevelopment of its existing EEO Tables to accommodate the necessary workforce data snapshots under EEOC MD-715 guidance on workforce tables. The Agency anticipates obtaining these snapshots in FY 2020 to continue its analysis

## 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.

Yes  No  N/A

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.

Voluntary Separations (PWD) Yes  No

Involuntary Separations (PWD) Yes  No

Inclusion rate: 9.2%

Triggers exist for PWD (11.7%) who voluntarily separated from the agency, as compared to the rate of Person without Disabilities 81%. Triggers exist for PWD (30.5%) who involuntarily separated from the agency, as compared to the rate of Person without Disabilities 57%.



U.S. Equal Employment Opportunity Commission

Department of the Interior 2018

Disabilities Affirmative Action Plan (AAP)

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

- |                                   |   |                             |
|-----------------------------------|---|-----------------------------|
| a. Voluntary Separations (PWTD)   | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| b. Involuntary Separations (PWTD) | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Inclusion rate: 2.1%

Triggers exist for PWTD (2.7%) who voluntarily separated from the agency as compared to the rate of person without disabilities 81%. Triggers exist for PWTD (6.7%) who involuntarily separated from the agency as compared to the rate of person without disabilities.

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.

The DOI’s current exit survey tool does not collect data on disability status. No unified approach is consistently applied throughout the Department that captures data from existing employees to determine if barriers exist that impede the full inclusion of PWD and/or PWTD employed in the DOI workforce.

## **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.

DOI Accessibility Website Address: <https://www.doi.gov/accessibility>.

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



*U.S. Equal Employment Opportunity Commission*

Department of the Interior 2018

Disabilities Affirmative Action Plan (AAP)

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.

DOI Accessibility Website Addresses <https://www.doi.gov/accessibility> and <https://www.doi.gov/accesscenter/>.

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

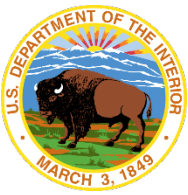
In FY 2018, collaborative discussions with key Senior Executive officials at the Bureaus, the Office of Civil Rights, and Human Capital Management officials on how to improve access to public lands for PWD and PWTD who utilize e-Bikes for mobility. The focus is to solidify and improve internal policies for access as well as to remove perceived physical barriers to full access. It is ongoing discussions after FY.

To advance program maturity, Bureau/Office Section 508 Coordinators will continue to collaborate with the Acquisition team to consistently implement and adhere to established DOI Section 508 acquisition policies, processes and procedures. Training is provided to acquisition personnel regarding their roles and responsibilities in implementing Section 508 requirements. DOI is continuing to develop a new accessibility module in the Service Asset Management Inventory (SAMI) system. This module is make accessibility information available to facility managers.

During FY2017, the DOI Section 508 Program established a system using Remedy to track status of Section 508 related consultations received from bureaus and offices, and complaints received from individuals with disabilities. In FY 2018, the DOI Section 508 Program responded to at least 221 requests from bureaus and offices for consultations and provided policy guidance regarding Section 508 of the Rehabilitation Act and related Section 508 laws and regulations. No formal Section 508 complaints were filed against DOI.

All DOI personnel are required to complete the mandatory 2018 Information Management and Technology training course, which includes a module communicating Section 508 requirements. Additionally, the DOI Section 508 Program provided the following training in 2018 to IT program and project managers, software developers, web content developers, document creators and other DOI personnel:

Collaborated with staff to train bureau/office personnel in creating Section 508 compliant electronic documents (1-hour course). At least 695 students completed the webinar to date in FY 2018. In addition, there were approximately 2,212 views of the webinar recording to date in FY 2018.



*U.S. Equal Employment Opportunity Commission*

Department of the Interior 2018

Disabilities Affirmative Action Plan (AAP)

Collaborated with BLM Section 508 and web personnel to develop training for creating Section 508 compliant Microsoft Excel files. The training was recorded at the end of FY 2018, and will be posted on DOI Talent during FY 2019.

Provided Section 508 training to bureau/office personnel in the FAC/COR acquisition courses hosted by the DOI University Learning Centers in Washington DC, Albuquerque, NM and Denver, CO. At least 442 students were trained to date in FY 2018.

The DOI OCIO hosted a Section 508 Awareness event on May 17, 2018. The event included presentations and vendors that displayed various technologies for persons with disabilities. Approximately 819 individuals viewed the first session and 804 individuals viewed the second session of the event in person and virtually.

On March 29, 2018, the DOI Section 508 Program collaborated with the DOI Office of Digital Strategy and National Park Service (Harpers Ferry Center) to host the Ensuring Accessibility: Everything you need to know about Audio Description training at the Main Interior Building. The audio description training focused on the community of users, core principles and video production considerations. In addition, the class covered audio description scripting and evaluating the work of others. Approximately 337 individuals attended the webinar training and 323 individuals viewed the webinar recording to date in FY 2018.

On October 25, 2017, provided a training presentation about Section 508 requirements to OSM staff during disability month. Approximately 117 OSM personnel attended the presentation.

### **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 processing initial requests for reasonable accommodations during the reporting period was approximately 20 days. The average number of business days to grant an accommodation is 5 days. The average number of days reported by DOI Bureaus are as follows:

- BLM – 25 days





- BOR – 17 days
- FWS – 15 days
- OSMRE – 20 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.

Training for managers and supervisors is done on a quarterly basis. Scheduled classes are focused to provide each manager and supervisor insight into the accommodation process. Classes include how to recognize a request for accommodation, how to engage in the interactive process, how to meet timelines, and ensure proper documentation throughout the process. The RA policy is an effective overview of the entire process. Local training provides more in-depth of the process.

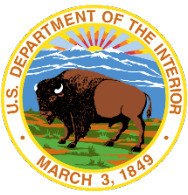
#### **D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE**

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.

The DOI implemented procedures for Personal Assistance Services (PAS) with Personnel Bulletin (PB) No. 17-18, dated January 3, 2018. These procedures have been disseminated to the Bureaus for implementation..

The Community of Practice (COP) for Reasonable Accommodation was initiated. This is a joint community of practice that includes representatives from both HR and EEO from all of the bureaus as well as the DOI Medical Officer from the Office of Safety and Health. The Community of Practice meets regularly to share best practices and to ensure consistency in communicating the requirements for a successful Reasonable Accommodation program. The COP has identified challenges and strengths common to both the HR and EEO communities. Three sub-teams were formed and were tasked with finding solutions to some of the biggest challenges including lack of training, lack of a tracking system, and little understanding of the reassignment as a last resort process. The sub-teams are actively addressing each of these issues.



## 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?

Yes  No  N/A

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?

Yes  No  N/A

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.



U.S. Equal Employment Opportunity Commission

Department of the Interior 2018

Disabilities Affirmative Action Plan (AAP)

DOI received one finding of discrimination based on harassment. The DOI had ten settlements in lieu of a finding of discrimination based on mental disability harassment, and fourteen settlements based on physical disability harassment.

EEO compliance training was ordered as corrective action in each finding.

**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?

Yes  No  N/A

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?

Yes  No  N/A

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.

During the reporting year, DOI had 10.8% of formal EEO complaints filed against the Department alleging failure to provide reasonable accommodation compared to the government-wide average of 12.50%. There were zero findings of discrimination. After FY 2018, the Office of Civil Rights and the Office of Human Capital practitioners began collaboration on developing a DOI-wide reasonable accommodation campaign to ensure all managers, supervisors, and employees know their roles and responsibilities in the processes.



U.S. Equal Employment Opportunity Commission  
 Department of the Interior 2018  
 Disabilities Affirmative Action Plan (AAP)

## 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

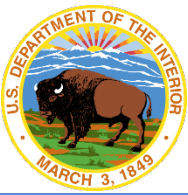
<b>TYPE OF TRIGGER</b>	<b>BRIEF DESCRIPTION OF TRIGGER</b>
	The percentage of PWD in the GS-11 to SES cluster was 7.6% in FY 2018, which falls below the goal of 12.0%. The percentage of PWTD in the GS-11 to SES cluster was 1.6% in FY 2018, which falls below the goal of 2.0%.
<b>TYPE OF BARRIER(s)</b>	<b>BRIEF BARRIER(s)</b>
	DOI has no policy in place to require hiring managers and supervisors to achieve targeted goals.

### 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 workforce participation rates of PWD and PWTD at all grade levels.	12/30/2018		09/30/2025

### RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Director Office of Civil Rights	Erica White-Dunston	Yes
Director, Strategic Talent Programs Division	Martin Pursley	Yes

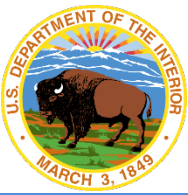


U.S. Equal Employment Opportunity Commission

Department of the Interior 2018

Disabilities Affirmative Action Plan (AAP)

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	<p>B1 – Total Permanent Workforce: PWD 9.2% below 12% Goal; PWTD 2.1% meet 2% Goal</p> <p>B14 – Separations by Disability: PWD Separating at rates (12.5%) higher than expected PWTD Separating at rates (2.9%) higher than expected</p>
Complaint Data (Trends)	Yes	<p>462 – (Part IV) Bases and Issues Alleged in Complaints Filed: In FY 2018, 10.8% of all formal EEO complaints filed against DOI alleged a failure to accommodate disability. The number of EEO complaints filed against DOI alleged a failure to accommodate disability has steadily increased over the past five reporting periods..</p> <p>No FEAR Act Report (as of 4th Qtr. FY 2018) – Complaints based on disability increased in the last five years from 31 to 42 of all complaints in FY 2018</p>
Grievance Data (Trends)	No	
Focus Group	No	
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)	Yes	462 Report FY 2018 – DOI showed steady increases in the total number of settlements based on disability harassment and reasonable accommodation when compared to FY 2017.
Climate Assessment Survey (e.g., FEVS)	Yes	<p>Veteran and Disabilities status are providing steady negative responses to almost all questions in the Federal Employee Viewpoint Survey (FEVS).</p> <p>The three questions (Q40, Q69, and Q71) used in the Best Places to Work report based on the FY 2018 FEVS, indicates an employee's intent to remain with an agency, reveals PWDs responded less favorably when compared to Individuals without disabilities.</p>
Other (Please Describe)	No	



U.S. Equal Employment Opportunity Commission

Department of the Interior 2018

Disabilities Affirmative Action Plan (AAP)

**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)
10/30/18	Joint meeting with the Office of Civil Rights and Office of Human Capital at the Headquarter to discuss program requirement and to establish an agency-wide goal	Yes		
12/30/2019	Disseminate a DOI-wide numerical goals for disabilities			
12/1/2020	Office of Human Capital, working in partnership with the Office of Civil Rights, will finalize and publish a new Department-wide policy on reasonable accommodation.			
12/1/2025	Office of Human Capital to provide subject matter expertise to the Office of Strategic Employee and Organization Development in their development of training for new supervisors and newly promoted supervisors on effectively responding to and acting on requests for reasonable accommodations to qualified disabled individuals.			
12/1/2025	Office of Human Capital requested funding to create a Department-wide reasonable accommodation tracking system			
10/1/2025	Implement and post Affirmative Action plan for Individuals with Disabilities to the DOI website internally and externally.			

**REPORT OF ACCOMPLISHMENTS**

2018	<p>Newly established. No action taken.</p> <p>The Office of Human Capital requested funding to create a Department-wide reasonable accommodation tracking system. Once funding has been secured, the Office of Human</p>
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*U.S. Equal Employment Opportunity Commission*

**Department of the Interior 2018**

**Disabilities Affirmative Action Plan (AAP)**

Capital, in partnership with the Office of Civil Rights and Bureau representatives, will work with an established vendor to develop the system to meet both human resources and equal employment opportunity needs.

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

Newly objective established. No planned activities were taken at the end of FY 2018.

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

To be determined

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.

Until a barrier(s) has been identified, DOI will also continue to focus on the planned activities outlined above.



## 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

### BRIEF DESCRIPTION OF TRIGGER

TYPE OF TRIGGER

Higher than expected separation rates for IWD and IWTD.

### BRIEF BARRIER(S)

TYPE OF BARRIER(S)

None

## 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 IWD and IWTD.	09/30/2025		

## RESPONSIBLE OFFICIAL(S)

TITLE	NAME	PERFORMANCE STANDARDS ADDRESS THIS PLAN (YES OR NO)
Director, Strategic Talent Programs Division	Martin Pursley	

Barrier Analysis Process Completed? (Yes or No)

No

Barrier(s) Identified? (Yes or No)

No



U.S. Equal Employment Opportunity Commission

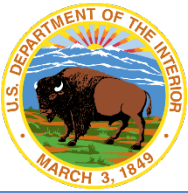
Department of the Interior 2018

Disabilities Affirmative Action Plan (AAP)

Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	B14 – Separations by Disability: PWD Separating at rates (12.5%) higher than expected PWTD Separating at rates (2.9%) higher than expected  Upward trend.
Complaint Data (Trends)	Yes	462 – (Part IV) Bases and Issues Alleged in Complaints Filed: In FY 2018, 10.8% of all formal EEO complaints filed against DOI alleged a failure to accommodate disability. The number of EEO complaints filed against DOI alleged a failure to accommodate disability has steadily increased over the past five reporting periods..  No FEAR Act Report (as of 4th Qtr. FY 2018) – Complaints based on disability increased in the last five years from 31 to 42 of all complaints in FY 2018
Grievance Data (Trends)	No	
Focus Group	No	
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)	Yes	462 Report FY 2018 – DOI showed steady increases in the total number of settlements based on disability harassment and reasonable accommodation when compared to FY 2017.
Climate Assessment Survey (e.g., FEVS)	Yes	Veteran and Disabilities status are providing steady negative responses to almost all questions in the Federal Employee Viewpoint Survey (FEVS).  The three questions (Q40, Q69, and Q71) used in the Best Places to Work report based on the FY 2018 FEVS, indicates an employee's intent to remain with an agency, reveals PWDs responded less favorably when compared to Individuals without disabilities.

**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)
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U.S. Equal Employment Opportunity Commission

Department of the Interior 2018

Disabilities Affirmative Action Plan (AAP)

9/30/2025	Review and analyze exit surveys to identify barriers to retention.			
9/30/2025	Conduct study on reasonable accommodation requests and procedures for delayed and denied accommodations to identify any potential correlation to high separations			

**REPORT OF ACCOMPLISHMENTS**

2018 Newly established. No action taken.

4. Please explain the factor (s) that prevented the agency from timely completing any of the planned activities.  
 Newly objective established. No planned activities were taken at the end of FY 2018.
5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).  
 To be determined
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.  
 Until a barrier(s) has been identified, DOI will also continue to focus on the planned activities