

Affirmative Action Plan (MD-715 – Part J)

Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), Equal Employment Opportunity Commission (EEOC) regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their plans 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.

The U.S. Fish and Wildlife Service (FWS) currently has an annual goal of hiring 27 PWD and/or PWTD (three per region). In Fiscal Year (FY) 2022, FWS continued to exceed this goal by hiring 115 PWD, including 30 PWTD, from outside the organization.

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 X |
| b. Cluster GS-11 to SES (PWD) | Yes X | No 0 |

The percentage of PWD in FY 2022 for the GS-1 to GS-10 cluster is 14.7%. The percentage has decreased by 0.2% from FY 2021.

The percentage of PWD in FY 2022 for the GS-11 to Senior Executive Service (SES) cluster is 9.5%. The percentage has increased by 0.6% since FY 2021.

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 X |
| b. Cluster GS-11 to SES (PWTD) | Yes 0 | No X |

The percentage of PWTD in FY 2022 for the GS-1 to GS-10 cluster is 3.9%. The percentage has increased by 0.2% from FY 2021.

The percentage of PWTD in FY 2022 for the GS-11 to SES cluster is 2.1%. The percentage has increased by 0.3% from FY 2021.

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

FWS Directorate members and their respective leadership teams received monthly progress reports on the changes in workforce participation rates. The Office of Diversity and Inclusive Workforce Management (ODIWM) is working to ensure that agency leadership remains aware of goals and objectives for the advancement of PWD and PWTD outlined under the MD-715 and the FWS Diversity and Inclusion Implementation Plan (DIIP).

Section II: Model Disability Program

Pursuant to 29 C.F.R. §1614.203(d)(1), agencies must ensure sufficient staff, training, and resources to recruit and hire PWD and PWTD, 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 X No 0

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 | | 36 | | Human Resources Specialists, Division of Human Resources Phone: (703) 358-1743 |
| Answering questions from the public about hiring authorities that take disability into account | | 36 | 1 | Bill Fuller, Accountability Officer/Human Resources Specialist Bill_Fuller@fws.gov |
| Processing reasonable accommodation requests from applicants and employees | | 13 | | Rick Greenblat, Employee-Management Relations Chief, Joint Administrative Operations (JAO), rick_greenblat@fws.gov |
| Section 508 Compliance | 1 | | 11 | Keon Sheffield, National Section 508 Coordinator, Email: Keon_sheffield@fws.gov |
| Architectural Barriers Act Compliance | 7 | | | Bobbea Burnette Cadena, Public Civil Rights Manager, Office of Diversity and Inclusive Workforce Management (ODIWM), Bobbea_Cadena@fws.gov |
| Special Emphasis Program for PWD and PWTD | | 5 | | Bobbea Burnette Cadena, Disability Program Manager, Office of Diversity and Inclusion Workforce Management (ODIWM),Email: Bobbea_Cadena@fws.gov |

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

Yes X No 0

- In FY 2022, FWS delivered live required training to the entire workforce that focused on reasonable accommodations. In addition to meeting annual DEIA and EEO training requirements, employees gained foundational knowledge about the DIIP, DEIA and EEO best practices, and other information to support inclusion in the workplace.
- In FY 2022, FWS hosted a virtual panel discussion for all employees during National Disability Employment Awareness Month titled ‘Flipping the Script on Disability.’ The live event emphasized the importance of ensuring that PWD - seen and unseen - have full access to employment, FWS facilities, and services. The event highlighted employee experiences, allyship, and the establishment of the FWS People with Disabilities Employee Resource Group (ERG).
- In FY 2022, employees had access to training on retention and mentoring for federal employees with disabilities through the FWS People with Disabilities ERG, ODIWM and Division of Human Resources (HR). The trainings explored successful practices for retaining diverse talent and mentoring as a disability inclusion strategy. Human Resources provided training on reasonable accommodations. The training reviewed a framework for adopting a mentoring culture, tips for successful implementation of a mentoring program and resources for partnering with disability mentoring initiatives. In FWS annual DEIA training, there was an emphasis on the importance of retention for people with disabilities and invisible disabilities.
- There was a strong focus on reasonable accommodation and safety within the workplace during the mandatory DEIA training and trainings/discussions within the People with Disabilities Employee Resource Group, which meets on a monthly basis with presentations geared towards people with disabilities. Additionally, the ERG has grown from 8 members to 93 during FY 2022.
- In FY 2022, FWS hosted a workshop for Employee Management Relations (EMR) Specialists to discuss the Reasonable Accommodation Policy and procedures. EMR Specialists were provided an opportunity to gain valuable insight on types of accommodations that have been provided, what is and is not reasonable, and discuss current requests for reasonable accommodations.
- FWS provided training on the Reasonable Accommodation Policy, including PAS, to the Region 2 managers and supervisors. The training provided a step-by-step process on roles and responsibilities throughout the reasonable accommodation process. Managers and supervisors were provided an opportunity to explore their knowledge through the use of scenarios.

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*.

Yes X No 0

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.

The FWS National Recruitment Team continuously works to develop:

- Contacts at the Department of Aging and Rehabilitative Services, Non-Paid Work Experience Program, to provide experience and potential job opportunities to PWTD.
- Recruiting partnerships with community, academic, and governmental groups that reach PWTD to maximize recruiting from all sources when filling positions at grade GS-11 and above, including managerial and supervisory positions at grades GS-13 to GS-15 and SES.
- Contacts at more than 455 organizations representing military/Veteran, women, minority and disability affinity interests at institutions of higher education, American Job Centers, state vocational rehabilitation agencies, Centers for Independent Living, and employment network service providers.
- Contacts through the Workforce Recruitment Program annual online recruitment list to identify and contact students and graduates with targeted disabilities about potential opportunities for positions before they are advertised.

The FWS National Recruitment Team utilized the *HireVeteran.com* website to post position vacancies targeting Veterans eligible for noncompetitive hiring authority (e.g., 30% Veteran, Veterans Readjustment Appointment or VRA).

- Upon inquiry from hiring officials, the Recruitment Team reaches out to sources identified above for potential candidates eligible for noncompetitive special hiring (e.g., 30% Veterans, VRA, Schedule A) to be considered for an identified vacancy.

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.

The Directorate's Deputies group (Deputies) took steps to increase use of special hiring authorities (SHA), including Schedule A, for all permanent, entry-level professional 400 Series jobs (GS 5/7/9). FWS developed a hiring manager toolkit including a hiring authorities' at-a-glance guide, as well as other educational material on the hiring process and hiring pathways.

The Division of Human Resources (HR) and ODIWM use the Schedule A and eligible 30%-or-more disabled Veterans hiring authorities to identify and hire qualified PWD and PWTD professionals for positions in the permanent workforce.

FWS recruited PWD and PWTD under the 30%-or-more disabled Veterans hiring authority at Veteran career fairs sponsored by the U.S. Departments of Defense and Veterans Administration at several venues across the country. Vacancy announcements included statements indicating that FWS encourages and will accept applications from Veterans with compensable disabilities or 30%-or-more disabled Veterans.

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

HR specialists determine if applicants are eligible for appointment under SHAs in 5 CFR §213.31.02(u). They ensure that the application packages from PWD or PWTD applicants include the following:

For Schedule A eligible candidates:

- Current resume with places and dates of employment, including month/year to month/year, and number of hours worked per week (e.g., 40 hours, 32 hours, etc.)
- Schedule A letter from a licensed medical professional (e.g., a physician or other medical professional duly certified by U.S. State, District of Columbia, or a U.S. territory, to practice medicine); a licensed vocational rehabilitation specialist (state or private); or any federal agency, state agency, or an agency of the District of Columbia or a U.S. territory that issues or provides disability benefits as described in 5 CFR §213.3102 (3) (ii)

For eligible disabled Veteran candidates:

- Current resume with places and dates of employment, including month/year to month/year, and number of hours worked per week (e.g., 40 hours, 32 hours, etc.)
- Copy of DD-214, Record of Military Service (member copy 4) to determine eligibility for Veterans’ preference and honorable discharge
- Copy of SF-15 stating candidate has a 30%-or-more disability rating and can perform the duties of the position for which they are applying
- Department of Veterans Affairs rating letter that identifies the disability percentage for the applicant

HR forwards applications to hiring officials and meets with them to explain the hiring flexibilities and how and when an applicant can be non-competitively appointed. PWD and PWTD can apply for vacancies advertised on USAJobs.gov even after they have closed. In these cases, HR specialists provide applicants’ information to the hiring officials and meet with them to provide guidance on the hiring authorities.

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 X No 0 N/A

FWS developed a hiring manager toolkit including a hiring authorities’ at-a-glance guide, as well as other educational material on the hiring process and hiring pathways. The Deputies took steps to increase use of SHAs, including Schedule A, for all permanent, entry-level professional 400 series jobs (GS 5/7/9). The rate at which employees first onboarded through a Schedule A appointment are in career ladder positions is similar to that of employees in the overall permanent workforce. Both HR and workforce recruiters provided guidance to managers and hiring officials on the use of SHAs to directly appoint PWD and PWTD.

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.

FWS recruited at career fairs at institutions of higher education, as well as professional and military sponsored events to reach out to qualified PWD and PWTD for employment. FWS maintains a database of contacts representing U.S. military installations, Veterans Employment Service offices, state job offices, and Veterans' assistance centers. Contacts include various disabled Veterans' organizations, centralized Veterans' applicant referral services on military bases, and the Disabled American Veterans National Service offices.

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 X | No 0 |
| b. New Hires for Permanent Workforce (PWTD) | Yes 0 | No X |

The percentage of PWD in FY2022 among the new hires in the permanent workforce was 11.2%.

The percentage of PWTD in FY2022 among the new hires in the permanent workforce was 2.9%.

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 X |
| b. New Hires for MCO (PWTD) | Yes 0 | No X |

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 X |
| b. Qualified Applicants for MCO (PWTD) | Yes 0 | No X |

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 X |
| b. Promotions for MCO (PWTD) | Yes 0 | No X |

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.

The following activities are part of efforts to ensure sufficient opportunities for advancement:

- Managers and supervisors are required to adhere to the policy on the development and establishment of individual development plans (IDP) for each employee, supervisor, and manager.
- The National Conservation Training Center (NCTC) and the Division of Human Resources send periodic reminders and resources to all employees regarding their IDPs.
- IDPs at FWS include formal and informal training and mentoring programs, career development opportunities, details to promotions, and similar programs that address advancement.
- FWS develops one-year training plans for eligible Veterans with a 30%-or-more disability rating who were hired under the VRA.

B. Career Development Opportunities

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

FWS promotes two formal career development programs nationwide to develop its next cadre of leaders: (1) Stepping Up to Leadership Program (SUTL) for GS-11/12, and (2) Advanced Leadership Development Program (ALDP) for GS/GM 13/14. The employees participating in these programs compete through a merit selection process.

In addition, FWS provides opportunities for employees to participate in various mentoring and training programs. The Department of the Interior (DOI) also solicited applications for a DOI-level SES candidate development program.

The following activities are part of efforts to ensure career development opportunities:

- An intranet page is a comprehensive resource promoting temporary job details within FWS to enhance career paths.
- Employees are encouraged to participate in available training, coaching, and mentoring opportunities in their regions and programs.
- Managers and supervisors are required to adhere to the policy on the development and establishment of IDPs for each employee, supervisor, and manager.
- The National Conservation Training Center (NCTC) offers a comprehensive course catalog that offers both technical and leadership training aimed at increasing employee competency in accomplishing the mission under the agency's Leadership Competency Model. This approach enhances employee readiness for positions of greater responsibility, complementing the scientific and natural resources management knowledge and skills that remain critical to employee performance and success in conservation leadership.

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 |
| | (#) | (#) | (%) | (%) | (%) | (%) |
| Advanced Leadership Development Program (ALDP) | 45 | 24 | 2 | 2 | 1 | 1 |
| Stepping Up to Leadership Program (SUTL) | 154 | 48 | 12 | 3 | 3 | 0 |

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

- | | | |
|---------------------|-------|------|
| a. Applicants (PWD) | Yes X | No 0 |
| b. Selections (PWD) | Yes X | No 0 |

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 box.

- | | | |
|---------------------------|-------|------|
| a. ALDP Applicants (PWTD) | Yes 0 | No X |
| b. ALDP Selections (PWTD) | Yes 0 | No X |
| c. SUTL Applicants (PWTD) | Yes 0 | No X |
| d. SUTL Selections (PWTD) | Yes X | No 0 |

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 X |
| b. Awards, Bonuses, & Incentives (PWTD) | Yes 0 | No X |

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 0 | No X |
| b. Pay Increases (PWTD) | Yes 0 | No X |

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

D. Promotions

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

- a. SES
 - i. Qualified Internal Applicants (PWD) Yes 0 No X
 - ii. Internal Selections (PWD) Yes 0 No X
- b. Grade GS-15
 - i. Qualified Internal Applicants (PWD) Yes 0 No X
 - ii. Internal Selections (PWD) Yes 0 No X
- c. Grade GS-14
 - i. Qualified Internal Applicants (PWD) Yes 0 No X
 - ii. Internal Selections (PWD) Yes 0 No X
- d. Grade GS-13
 - i. Qualified Internal Applicants (PWD) Yes 0 No X
 - ii. Internal Selections (PWD) Yes 0 No X

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

3. 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

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

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

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

5. 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 X
- b. New Hires for Managers (PWD) Yes 0 No X
- c. New Hires for Supervisors (PWD) Yes 0 No X

6. 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 X |
| b. New Hires for Managers (PWTD) | Yes 0 | No X |
| c. New Hires for Supervisors (PWTD) | Yes 0 | No X |

Section V: Plan to Improve Retention of Persons with Disabilities

To be a model employer for PWD, agencies must have policies and programs in place to retain these employees. 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 (PAS).

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 X No 0 N/A 0

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

| | | |
|----------------------------------|-------|------|
| a. Voluntary Separations (PWD) | Yes X | No 0 |
| b. Involuntary Separations (PWD) | Yes X | No 0 |

Voluntary resignations were higher than expected: 16.25% of employees who resigned from the permanent workforce during FY 2022 had reportable disabilities, while only 11.1% of the permanent workforce had reportable disabilities.

Involuntary separations were higher than expected: 33% of employees who involuntarily separated from the permanent workforce during FY 2022 had reportable disabilities, while only 11.1% of the permanent workforce had reportable disabilities.

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 0 | No X |
| b. Involuntary Separations (PWTD) | Yes 0 | No X |

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*.

There were 614 exit survey responses in FY 2022, of which 92 were from PWD. According to FWS employee exit responses:

- 37% of PWD indicated that a lack of promotion/career advancement opportunity was a primary reason for separating.
- 70% of PWD felt they were provided adequate technology, tools, and equipment to effectively perform their job.
- 47% of PWD felt executives/senior leaders were effective in motivating and leading the 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.

Link to DOI's Section 508 policies and guidelines: <https://www.doi.gov/ocio/section508>

If an individual with a disability believes that a bureau or office has failed to procure Electronic and Information Technology (EIT) conforming to Section 508, that individual has the right to file a complaint with the DOI Office of Diversity, Inclusion and Civil Rights (ODICR). ODICR shall apply the complaint procedures outlined in 43 CFR Part 17, Subpart E, which are established to implement Section 504 for resolving allegations of discrimination in a federally conducted program or activity.

Complaints must be submitted in writing to ODICR at the following address:

U.S. Department of the Interior
Attn: Director, Office of Diversity, Inclusion and Civil Rights
1849 C Street, N.W.
Washington, D.C. 20240

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

Link to DOI's Public Civil Rights (PCR) website: <https://www.doi.gov/pmb/eeo/Public-Civil-Rights>

How to file a PCR 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 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/or public entity; the nature of the complaint, the*

basis of the complaint (race, color, national origin, gender, age, sex and/or disability), and the date the alleged discrimination occurred.

- *If the alleged discrimination occurred outside DOI jurisdiction, we would forward your complaint to the state or federal agency that has jurisdiction. You can read more about the PCR complaint process in [Civil Rights Directive 2011-01](#).*

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 2022, the PCR Team:

- Conducted and completed a total of 14 (six on-site and eight remote) Federally Assisted Program (FAP) civil rights compliance reviews. The team worked with state recipients of federal funding to complete 100% of the scheduled reviews and issue Reports of Findings before the close of the fiscal year.
- Developed and proposed a process to conduct self-evaluations of all FWS facilities (954) on a five-year recurring schedule. The plan includes training more than 245 FWS employees on *How to Conduct a Federally Conducted Program (FCP) Self-Evaluation*.
- Developed 83 fillable, Section 508 accessible checklists based on the Architectural Barriers Act Accessibility Standards (ABAAS) that will be used to conduct FCP self-evaluations and create transition plans for each facility. The FWS checklists resulted in a projected savings of over \$190,000 per year and will not require outside resources to maintain data.
- Completed a pilot FCP self-evaluation at the Wichita Mountains National Wildlife Refuge in Oklahoma. The pilot provided an opportunity to ground truth the checklists, collect photos and video clips to develop training, and provide additional hands-on experience for PCR accessibility consultants.
- Developed a new training method, 'By Us For Us' (BUFU), that allows the accessibility consultants to present training and learn from each other. Eight BUFU sessions were completed on ABAAS.
- Developed a process to highlight FWS facilities that are increasing access. An article was written on the Aransas National Wildlife Refuge and featured on intranet news feeds and shared in FWS all-employee email digest (FWS Wild Weekly).
- Re-developed the [ODIWM-PCR SharePoint site](#) to include information on PCR programs, training, success stories, complaints processes, and other resources.
- FWS spent more than \$9 million in projects to increase access on public lands. The projects included removing and replacing facilities, installing vault toilets, replacing wash stations, restrooms, parking facilities and a fishing pier.

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 period 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.)**

FWS abides by the DOI Reasonable Accommodations/Personal Assistance Services Policy that establishes a 15-business day limit to provide a decision memo to a requester (when no medical documents are required) and a 20-business day limit for providing an approved accommodation (unless notification of delayed implementation is issued to extend that period by 10 days). In FY 2022, the average period for approving a request was below the 15-business day limit and the average period for implementing an accommodation was 15-20 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.

- FWS is committed to providing reasonable accommodations to our employees and to applicants for employment in order to assure that PWD enjoy equal employment opportunity, unless to do so would cause undue hardship.
- The EMR team provides advisory services for employees and managers in the implementation of the reasonable accommodations policy. Each FWS region and program has been assigned a servicing EMR specialist to ensure prompt response to inquiries.
- FWS follows the DOI policies that direct bureaus and offices: (1) Personnel Bulletin 14-01, Reasonable Accommodation for Individuals with Disabilities; (2) Personnel Bulletin 08-09, Procedures for Conducting a DOI-wide Search and Position Reassignment for Cases Involving Reasonable Accommodations; and (3) Personnel Bulletin 17-18, PAS Procedures.
- FWS Director and Directorate members are responsible for implementing DOI policy and procedures for reasonable accommodations and PAS within their respective regions/programs and for ensuring that sufficient resources are available for providing reasonable accommodations to PWD and PAS for PWTD.
- The DOI’s reasonable accommodations/PAS policy establishes a 15-business day limit to provide a decision memo to a requester (when no medical documents are required) and a 20-business day limit from date of decision for providing an approved accommodation (unless notification of delayed implementation is issued to extend that period by 10 days).
- In FY 2022, ODIWM hosted a workshop for EMR specialists to discuss the reasonable accommodations policy and procedures in effect at that time. EMR specialists were provided an opportunity to gain valuable insight on types of reasonable accommodations that have been provided, what is and is not reasonable, and discuss pending requests for reasonable accommodations.
- FWS provided training on the policy, including PAS, to managers and supervisors in the FWS Southwest Region. The training provided a step-by-step process on roles and responsibilities throughout the reasonable accommodation process. Managers and supervisors were provided an opportunity to explore their knowledge using training scenarios.

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 PAS to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.

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

Requests for PAS follow the same process as requests for reasonable accommodations and include timely processing of approved services, conducting training for managers and supervisors, and monitoring requests to identify trends. FWS is regulated by the DOI Reasonable Accommodations/Personal Assistance Services Policy, which has been sent to the EEOC. The policy is posted on the DOI website and a link to it is provided on the FWS website. The fact sheet for PAS procedures has been posted on the FWS website as well as on its intranet site.

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 0 No X 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 0 No X 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.

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 0 No X 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 0 No X 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.

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 X No 0

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

Yes X No 0 N/A

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.

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|---|---|
| <p>Triggers Workforce Data</p> | <p>Inclusion rate in the GS-11 to SES cluster: The percentage of PWD in FY 2022 for the GS-11 to Senior Executive Service (SES) cluster is 9.5%.</p> <p>Low participation of PWD in the Professional Biology series: PWD make up 7.3% of permanent professional biologists versus the EEOC goal of 12%.</p> <p>Voluntary and involuntary separations: Voluntary resignations were higher than expected: 16.25% of employees who resigned from the permanent workforce during FY 2022 had reportable disabilities, while only 11.1% of the permanent workforce had reportable disabilities. Involuntary separations were higher than expected: 33% of employees who involuntarily separated from the permanent workforce during FY2022 had reportable disabilities, while only 11.1% of the permanent workforce had reportable disabilities.</p> <p>Career development applicants and selections based on FY 2022 data for SUTL and ALDP: 0% of SUTL selectees were PWD compared to the applicant benchmark of 1.3%. 4.4% of ALDP applicants were PWD compared to the eligible pool of 6.5% 6.3% of SUTL selectees were PWD compared to the applicant pool of 9.7%</p> |
| <p>Barrier(s)</p> | <ul style="list-style-type: none"> • Inclusion of non-inclusive and restrictive language on job vacancies is prohibitive for PWD and fails to account for possible accommodations. • Lack of supervisor awareness about reasonable accommodations resources and options prevents employees from fully accessing accommodations. |
| <p>Objective(s)</p> | <ul style="list-style-type: none"> • Adopt inclusive language for physical requirements, and remove driver’s license requirements when applicable, in job vacancy announcements • Develop additional training resources for managers and supervisors to increase awareness of reasonable accommodations rights and responsibilities, including information on funding sources • Develop focused reasonable accommodation training and engagement sessions for managers, supervisors, and employees that is in addition to the mandatory EEO/Diversity Training for FY 2023. • Develop templates for reasonable accommodation related documents that will help to provide consistency and expedite communications. • Add the request for reasonable accommodation higher up in FWS job announcements to make it easier for applicants to find. |
| <p>Responsible Official(s)</p> | <p>Performance Standards Address the Plan? (Yes or No)</p> |
| <p>FWS Director FWS Deputy Director DEIA Committee Chairperson EEO Director Diversity Program Manager Employee Relations Manager Assistant Director, Management and Administration</p> | <p>Yes</p> |
| <p>Barrier Analysis Process Completed? (Yes or No)</p> | <p>Barrier(s) Identified? (Yes or No)</p> |
| <p>Yes</p> | <p>Yes</p> |
| <p>Statement of Identified Barrier: Description of Policy, Procedure, or Practice</p> | |
| <ul style="list-style-type: none"> • Inclusion of non-inclusive and restrictive language on job vacancies is prohibitive for PWD and fails to account for possible accommodations. • Lack of supervisor awareness for reasonable accommodations resources and options prevents employees from fully accessing accommodations. | |

| Sources of Data | Sources Reviewed? (Yes or No) | Identify Information Collected |
|---|-------------------------------|--|
| Workforce Data Tables | Yes | FY 2022 MD-715 B Tables. See triggers outlined above. |
| Complaint Data (Trends) | Yes | Informal and Formal Complaints data and trends from <i>iComplaints</i> platform, internal tracking systems, and Annual Federal Equal Employment Opportunity Statistical Report of Discrimination Complaints - 462 Report (EEOC Form 462). Disability was the most common basis of discrimination reported during FY 2022. There were 12 disability based complaints in FY2022. |
| Grievance Data (Trends) | Yes | Harassment allegations and actions for FY 2022 |
| Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes) | Yes | No findings of discrimination |
| Climate Assessment Survey (e.g., FEVS) | Yes | Analyzed the FY 2022 Federal Employee Viewpoint Survey (FEVS) and FY 2022 FWS Diversity & Inclusion Workplace Assessment Survey |
| Exit Interview Data | Yes | According to FWS employee exit responses: <ul style="list-style-type: none"> 37% of PWD indicated that a lack of promotion/career advancement opportunities was the primary reason for separating 70% of PWD felt they were provided adequate technology, tools, and equipment to effectively perform their job 47% of PWD felt executives/senior leaders were effective in motivating and leading the workforce |
| Focus Groups | Yes | The FWS PWD ERG meets on a monthly basis as a forum for employees who identify as PWD. Participants discussed numerous factors that contribute to their success and wellbeing within the agency including: <ul style="list-style-type: none"> Arbitrary physical requirements preventing PWD from applying for jobs Pervasive stigma creating an unwelcome environment Lack of awareness and resources available for reasonable accommodations Safety within the workplace Ensuring full access to employment and community involvement |
| Interviews | Yes | In FY 2022, the FWS Barrier Analysis Team interviewed five supervisors and ten employees to discuss barriers faced by PWD and recommendations for removing them. |
| Reports (e.g., Congress, EEOC, MSPB, GAO, OPM) | Yes | OPM Focus Group Report 2020 Met Group – Values Listening Sessions Report 2022 USAID: Efforts to Advance Diversity, Equity, Inclusion, and Accessibility – GAO, July 26, 2022 |
| Other (Please Describe) | Yes | In FY 2022, the Barrier Analysis Team identified these key barriers for PWD: |

| | | | <ul style="list-style-type: none"> • Lack of supervisory knowledge on reasonable accommodations • Lack of professional development • Ability to remote work • A specific barrier was the driver's license requirement for positions <p>Analyzed Directorate Resource Assistant Fellows Program (DFP): 9.7% (6) of FY 2022 DFP hires were individuals with a disability (one was a targeted disability).</p> | |
|--------------------------|--|---|---|------------------------------|
| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Staffing & Funding (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
| 12/31/2021 | 1. Recommend NCTC clarify selection process (e.g., requirements, evaluation criteria, timelines, deciding officials) for SUTL and ALDP to employees during the launch of the two programs in FY 2021. | Yes | 12/31/2022 | 09/30/2022 |
| 12/31/2022 | 2. ODIWM will brief the DEIA Committee and Directorate on the results of the 2021 FWS Diversity and Inclusion Workplace Assessment. | Yes | | 04/27/2022 |
| 12/31/2022 | 3. ODIWM will conduct equity training for entire FWS workforce on disabilities in the workplace and reasonable accommodations. | Yes | | 09/30/2022 |
| 12/31/2022 | 4. ODIWM will establish a central process to track and fulfill regional and program requests for facilitation of conversations related to diversity, equity, inclusion, and accessibility. | Yes | | 12/01/2022 |
| 12/31/2022 | 5. ODIWM will recommend the JAO develop a project plan to conduct full review of driver's license requirements to determine business need and develop a process for determining the necessity for each announcement. | Yes | | 12/31/2022 |
| 12/31/2022 | 6. ODIWM will evaluate previous FY quarter's hiring success and brief the DEIA Committee on needed adjustments. | Yes | | 09/21/2022 |
| 12/31/2022 | 7. ODIWM will create an action plan to increase communication on Schedule A hiring authority to managers and employees. | Yes | | 09/30/2022 |
| 12/31/2022 | 8. ODIWM will recommend Regional Directors employ employee | Yes | | 10/29/2021 |

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| | engagement and leadership (EELD) coordinators and include them on their regional leadership teams. | | | |
| 09/30/2023 | 9. JAO will add the request for reasonable accommodation higher up in FWS job announcements to make it easier for applicants to find. | Yes | | |
| 09/30/2023 | 10. EMR will develop templates for reasonable accommodation related documents that will help to provide consistency and expedite communications. | Yes | | |
| 03/15/2023 | 11. FWS will develop focused reasonable accommodation training and engagement sessions for managers, supervisors, and employees that is in addition to the mandatory EEO/Diversity Training for FY 2023. | Yes | | |
| Fiscal Year 2022 | Accomplishments | | | |
| | <ol style="list-style-type: none"> 1. NCTC clarified the selection process for SUTL and ALDP through all employee announcements and on the FWS SharePoint site (e.g., requirements, evaluation criteria, timelines, deciding officials) during the launch of the two programs in FY 2022. 2. ODIWM briefed the DEIA Committee and Directorate with the results of the 2021 Diversity and Inclusion Workplace Assessment. More than 3,400 FWS employees representing 36% of the workforce participated. ODIWM shared results through a briefing with OPM for the Directorate, numerous sessions of an all-employee webcast delivered by ODIWM, and individual briefings for each Regional Director and Assistant Director. 3. FWS is in the second year of offering a universal, live DEIA and EEO training course to ensure that all employees have foundational training on DEIA, the DIIP, and best practices for DEIA. The FY 2022 training included a focus on the hiring and retention of PWD and reasonable accommodations. 4. ODIWM established a central process on the FWS SharePoint site to track and fulfill regional and program requests for facilitation of conversations related to diversity, equity, inclusion, and accessibility. 5. FWS updated 225 FW 1 Manual Chapter to drastically reduce the number of positions that require a driver's license. To meet the threshold at least 50% of the time must be spent driving. The corresponding handbook includes a Driver's License Determination Worksheet that will be used by the supervisor and classification specialist to determine if a position requires a valid driver's license. 6. ODIWM conducted workforce analyses throughout the year and provided monthly reports on hiring success for leadership. In September 2022, ODIWM briefed the Directorate on the status of workforce demographics and provided recommendations for making reasonable progress to meet the Civilian Labor Force benchmarks for low participation groups. 7. ODIWM coordinated with the Deputies to encourage national use of direct hiring authorities and provided tools to set this practice as an expectation for hiring managers. ODIWM shared information on how to use the direct hiring authorities | | | |

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| | <p>through articles in the FWS Wild Weekly and outreach events such as the National Disability Employment Awareness Month observance for all employees.</p> <p>8. The FWS team of EELD coordinators expanded to include a position in each of the eight FWS regions. The positions are included on regional leadership teams and coordinate training, professional development, and wellbeing services to connect employees with the resources and tools that they need to succeed.</p> |
| | <p>Additional accomplishments in FY 2022 related to PWD and PWTD:</p> <ul style="list-style-type: none"> • The Disability Program Manager (DPM) provided EMR with training on reasonable accommodations. This initiated enhanced collaboration among the DPM and EMR on RA issues. EMR also used that training as a springboard to make training available to both supervisors and employees. • EMR updated the FWS SharePoint page on reasonable accommodations to provide both supervisors and employees with information, checklists and other resources, and continues to partner with the DPM in the development of additional resources. • There are 35 resources for reasonable accommodations that were made available to employees on the SharePoint site, including self-help links, videos, and trainings to learn how to make various types of documents 508-compliant, and a video for supervisors on why Section 508 is important. • FWS added reasonable accommodations to its suite of menu options for supervisors and employees on its central system for administrative requests (<i>MySupport</i>). In addition to this direct way of requesting reasonable accommodations, employees have the option of contacting EMR directly via email/phone/chat. |

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

N/A

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

- In FY 2022, FWS delivered live required training to the entire workforce that focused on reasonable accommodations. In addition to meeting annual DEIA and EEO training requirements, employees gained foundational knowledge about the DIIP, DEIA and EEO best practices, and other information to support inclusion in the workplace.
- FWS made significant improvements in engaging all employees in achieving DEIA goals. The framework of the DIIP continued to guide the organization through an orderly process of barrier analysis and removal with a focus on coordinated action and accountability. Nationally, we are encouraging the use of direct hiring authorities and providing tools to set this practice as an expectation for hiring managers.
- FWS conducted a second Diversity and Inclusion Workplace Assessment in partnership with OPM. More than 3,400 employees representing 36% of the workforce made their voices heard about their job satisfaction and satisfaction with the organization. The survey results were shared with all employees through interactive webinars and on the FWS intranet. The assessment results, paired with those from FEVS and Gallup surveys administered regionally in FWS, provide essential employee feedback to inform the annual DIIP work plan actions to advance DEIA.

- ODIWM continued to regularly brief leadership on workforce participation and recruitment numbers. In addition, ODIWM completed its barrier analysis for PWD and PWTD, which informed the barriers and activities outlined above. ODIWM has established a process to track progress on action items on a weekly basis with responsible regions and programs.

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.

In FY 2023, FWS will take the following actions to address the barriers outlined above for PWD and PWTD: 1) Each Directorate member will be briefed on the results from the FY 2022 Barrier Analysis Team, emphasizing feedback received from PWD and PWTD, 2) ODIWM will continue to work with the Deputies Team to encourage the use of the special hiring authorities, 3) ODIWM will deliver training to all employees on reasonable accommodations, 4) EMR is developing templates for reasonable accommodations related documents that will help to provide consistency and expedite communications and is partnering with the DPM in their development, and 5) FWS is evaluating options to track/monitor reasonable accommodations requests (e.g., *MySupport* or the DOI *I-Mart* system).

Under the DIIP, FWS annually commits to a consistent set of expectations across the organization for messaging, coordinated action, adaptive management, and accountability. Leadership will continue to listen to employee feedback through surveys, exit interviews, and focus groups to refine its annual action plan.