



# The State of the Agency



**FY 2022**

U.S. Fish and Wildlife Service  
EEO Program and MD-715 Status Report

**MD-715**  
**Parts A Through D**

**Part A - Department or Agency Identifying Information**

| Agency                                | Second Level Component               | Address             | City       | State | Zip Code | Agency Code | FIPS Code |
|---------------------------------------|--------------------------------------|---------------------|------------|-------|----------|-------------|-----------|
| U.S. Department of the Interior (DOI) | U.S. Fish and Wildlife Service (FWS) | 1849 C Street, N.W. | Washington | DC    | 20240    | IN15        | 1448      |

**Part B - Total Employment**

| Total Employment    | Permanent Workforce | Temporary Workforce | Total Workforce |
|---------------------|---------------------|---------------------|-----------------|
| Number of Employees | 8080                | 708                 | 8788            |

**Part C.1 - Head of Agency and Head of Agency Designee**

| Agency Leadership       | Name            | Title           |
|-------------------------|-----------------|-----------------|
| Head of Agency          | Martha Williams | Director        |
| Head of Agency Designee | Stephen Guertin | Deputy Director |

**Part C.2 - Agency Official(s) Responsible for Oversight of EEO Program(s)**

| EEO Program Staff   | Name            | Title                                  | Occupational Series | Pay Plan and Grade | Phone Number | Email Address  |
|---|-----------------|--|---------------------|--------------------|--------------|--|
| Principal EEO Director/Official                                       | Inez Uhl        | EEO Director                           | 0260                | GS-15              | 571-389-5878 | <a href="mailto:Inez_Uhl@fws.gov">Inez_Uhl@fws.gov</a>               |
| Affirmative Employment Program Manager                                | Hector Zarate   | Affirmative Employment Program Manager | 0260                | GS-14              | 703-358-2003 | <a href="mailto:Hector_Zarate@fws.gov">Hector_Zarate@fws.gov</a>     |
| Complaint Processing Program Manager (Informal and Formal Complaints) | Michelle Witter | EEO Complaints Manager                 | 0260                | GS-14              | 303-236-4460 | <a href="mailto:Michelle_Witter@fws.gov">Michelle_Witter@fws.gov</a> |
| Public Civil Rights Program   | Bobbea Cadena   | Public Civil Rights Manager            | 0260                | GS-14              | 703-346-5175 | <a href="mailto:Bobbea_Cadena@fws.gov">Bobbea_Cadena@fws.gov</a>     |
|   |                 |  |                     |                    |              |  |

**EEOC FORM**  
**U.S. Equal Employment Opportunity Commission**

**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

| <b>EEO Program Staff</b>  | <b>Name</b>            | <b>Title</b>                           | <b>Occu-<br/>pational<br/>Series</b> | <b>Pay Plan<br/>and<br/>Grade</b> | <b>Phone Number</b> | <b>Email Address</b>   |
|---|------------------------|--|--------------------------------------|-----------------------------------|---------------------|--|
| Diversity & Inclusion Program   | Hector Zarate          | National Diversity Program Manager     | 0260                                 | GS-14                             | 703-358-2003        | <a href="mailto:Hector_Zarate@fws.gov">Hector_Zarate@fws.gov</a>           |
| Hispanic Program Manager (SEPM)                                       | Rhonda Spinks          | Program Analyst                        | 0343                                 | GS-12                             | 571-395-0749        | <a href="mailto:Rhonda_Spinks@fws.gov">Rhonda_Spinks@fws.gov</a>           |
| Women's Program Manager (SEPM)  | Rachel McCracken       | Workforce Diversity Specialist         | 0343                                 | GS-13                             | 303-236-4589        | <a href="mailto:Rachel_F_McCracken@fws.gov">Rachel_F_McCracken@fws.gov</a> |
| Disability Program Manager (SEPM)                                     | Bobbea Burnette Cadena | Public Civil Rights Program Manager    | 0260                                 | GS-14                             | 703-346-5175        | <a href="mailto:Bobbea_Cadena@fws.gov">Bobbea_Cadena@fws.gov</a>           |
| Special Placement Program Coordinator (Individuals with Disabilities) | Bill Fuller            | Accountability Officer                 | 0201                                 | GS-14                             | 571-319-7294        | <a href="mailto:Bill_Fuller@fws.gov">Bill_Fuller@fws.gov</a>               |
| Anti-Harassment Program Manager                                       | Kimberly Hintz         | Policy Analyst                         | 0201                                 | GS-14                             | 256-656-6112        | <a href="mailto:Kimberly_Hintz@fws.gov">Kimberly_Hintz@fws.gov</a>         |
| ADR Program Manager   | Michelle Witter        | EEO Complaints Manager                 | 0260                                 | GS-14                             | 303-236-4460        | <a href="mailto:Michelle_Witter@fws.gov">Michelle_Witter@fws.gov</a>       |
| Compliance Manager  | Michelle Witter        | EEO Complaints Manager                 | 0260                                 | GS-14                             | 303-236-4460        | <a href="mailto:Michelle_Witter@fws.gov">Michelle_Witter@fws.gov</a>       |
| Principal MD-715 Preparer   | Julia Bumbaca          | Affirmative Employment Program Manager | 0260                                 | GS-14                             | 703-358-2349        | <a href="mailto:Julia_Bumbaca@fws.gov">Julia_Bumbaca@fws.gov</a>           |

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**U.S. Equal Employment Opportunity Commission**

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**Part D.1 – List of Subordinate Components Covered in this Report**

Please identify the subordinate components within the agency (e.g., bureaus, regions, etc.).

If the agency does not have any subordinate components, please check the box.

| Subordinate Component              | City         | State | Country (Optional) | Agency Code | FIPS Codes |
|------------------------------------|--------------|-------|--------------------|-------------|------------|
| Region 1                           | Portland     | OR    |                    | IN1501      | 1448       |
| Region 2                           | Albuquerque  | NM    |                    | IN1502      | 1448       |
| Region 3                           | Bloomington  | MN    |                    | IN1503      | 1448       |
| Region 4                           | Atlanta      | GA    |                    | IN1504      | 1448       |
| Region 5                           | Hadley       | MA    |                    | IN1505      | 1448       |
| Region 6                           | Lakewood     | CO    |                    | IN1506      | 1448       |
| Region 7                           | Anchorage    | AK    |                    | IN1507      | 1448       |
| Region 8                           | Sacramento   | CA    |                    | IN1508      | 1448       |
| Headquarters                       | Falls Church | VA    |                    | IN1509      | 1448       |
| Management & Administration / IRTM | Falls Church | VA    |                    | IN1510      | 1448       |

**Part D.2 – Mandatory and Optional Documents for this Report**

In the table below, the agency must submit these documents with its MD-715 report.

| Did the agency submit the following mandatory documents? | Please respond Yes or No | Comments |
|--|--------------------------|----------|
| Organizational Chart                                     | Yes                      |          |
| EEO Policy Statement                                     | Yes                      |          |
| Strategic Plan   | Yes                      |          |
| Anti-Harassment Policy and Procedures                    | Yes                      |          |
| Reasonable Accommodation Procedures                      | Yes                      |          |
| Personal Assistance Services Procedures                  | Yes                      |          |
| Alternative Dispute Resolution Procedures                | Yes                      |          |

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In the table below, the agency may decide whether to submit these documents with its MD-715 report.

| <b>Did the agency submit the following optional documents?</b>  | <b>Please respond Yes or No</b> | <b>Comments</b> |
|---|---------------------------------|-----------------|
| Federal Equal Opportunity Recruitment Program (FEORP) Report  | Yes                             |                 |
| Disabled Veterans Affirmative Action Program (DVAAP) Report   | Yes                             |                 |
| Operational Plan for Increasing Employment of Individuals with Disabilities under Executive Order 13548 | Yes                             |                 |
| Diversity and Inclusion Plan under Executive Order 13583  | Yes                             |                 |
| Diversity Policy Statement  | Yes                             |                 |
| Human Capital Strategic Plan  | Yes                             |                 |
| EEO Strategic Plan  | Yes                             |                 |
| Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey                    | Yes                             |                 |

|                          |  |
|--------------------------|--|
| <b>PART E</b>            | <i>U.S. Equal Employment Opportunity Commission</i><br><b>FEDERAL AGENCY ANNUAL<br/> EEO PROGRAM STATUS REPORT</b> |
| <b>Executive Summary</b> |  |

### Part E.1 - Executive Summary: Mission

The mission of the U.S. Fish and Wildlife Service (FWS) is *working with others to conserve, protect, and enhance fish, wildlife, plants, and their habitats for the continuing benefit of the American people.*

FWS is a bureau within the Department of the Interior (DOI) with a mission governed by many of the nation’s most important environmental [laws, agreements, and treaties](#). Its vision is to be a leader and trusted partner in fish and wildlife conservation, known for scientific and public service excellence.

In Fiscal Year (FY) 2022, there were 8,080 people in the permanent workforce working at a national executive office and headquarters in Washington, D.C., and Falls Church, Virginia; [eight regional offices](#); and field offices across the country. The director, deputy directors, regional directors, and assistant directors for national programs comprise the agency Directorate (Directorate).

Read more about the FWS mission and vision, statutory authorities, organization, and programs [on the FWS website](#).

### Part E.2 - Executive Summary: Elements A to F

#### Introduction

*“Our success in meeting the mission of the U.S. Fish and Wildlife Service rests on a foundation of shared values and underlying beliefs that we can be our true selves at work, that dignity and respect are paramount, and that our individual and collective accomplishments are valued. The breadth and diversity of our backgrounds, identities, and experiences are our greatest organizational strength. We are more likely to succeed and thrive in a workplace without barriers, where we are inspired to achieve the Service’s mission with excellence, innovation, and relevancy far into the future.”*

— Service Director Martha Williams, September 2022

The FWS’s commitment in FY 2022 to transforming its workplace culture and prioritizing diversity, equity, inclusion, and accessibility (DEIA) received foundational support with Director Martha Williams signing [Director’s Order 226, Advancing Diversity, Equity, Inclusion, and Accessibility \(DEIA\) for Transformational Change in the U.S. Fish and Wildlife Service](#) (Director’s Order 226/Order). The Order sets a vision, expectations, and accountability for advancing DEIA in multifaceted ways. It charts a course for lasting culture change through ongoing implementation of the FWS Diversity and Inclusion Implementation Plan (DIIP).



The DIIP is a five-year strategy that empowers employees at all levels to create inclusive and welcoming workplaces and enact promising practices that remove inequities for employees, partners, and stakeholders. FWS made strides to drive change under three overarching objectives — employee engagement, barrier analysis and removal, and recruitment and hiring.

FWS develops and implements work plans under the DIIP each fiscal year that build on past progress and prioritize actions informed by employee input and recommendations from barrier analysis teams, working groups, and surveys. The work plans align with Presidential and Secretarial priorities and other official direction for advancing DEIA across the federal government.

In this annual report to the U.S. Equal Employment Opportunity Commission (EEOC), FWS affirms that its Equal Employment Opportunity (EEO) program in FY 2022 met the requirements outlined in Management Directive 715 (MD-715). The following sections demonstrate an organizational commitment to be a model employer and public service agency and a strategy to prevent traditionally ingrained policies and practices that exclude people from the FWS workforce or its services, partnership opportunities, and resources.

In FY 2022, FWS continued to advance DEIA through actions such as:

- Engaging employees in a multi-phase project to define and establish a shared purpose and core values for the organization
- Offering universal live DEIA and EEO training and interactive virtual DEIA programs to ensure that all employees have foundational knowledge on the DIIP and promising practices
- Expanding staffing for employee engagement and leadership development coordination to every FWS region
- Conducting an organization-wide Diversity and Inclusion Workplace Assessment in partnership with the Office of Personnel Management and an employee-led Barrier Analysis Team to garner essential feedback to inform recommendations and decisions
- Fostering inclusive and welcoming workplaces by supporting the establishment and growth of employee-led communities of practice and resource groups
- Providing a Careers and Internships webpage and an online onboarding guide for new hires as resources for prospective and new employees
- Targeting recruitment outreach to academic institutions and other organizations serving minorities, Veterans, and people with disabilities (PWD)

The workforce representation analysis (described in more detail below) indicates that FWS has achieved mixed results during FY 2022. The participation rates for Black or African Americans (both men and women) declined (-0.2%), while the representation rates of other low-participation race or national origin (RNO)-gender groups either increased or were unchanged. Participation improved for minority women (+0.2%) and White women (+0.5%), the number of women and minorities in professional biological series (+1.9%), and women in leadership (+1.1%).

Looking ahead, FWS will continue to build on progress and prioritize actions that are informed by feedback from employee teams, working groups, and surveys as well as official direction for advancing DEIA across the federal government. Ongoing efforts will have an impact across multiple demographic, gender, and disability groups and are intended to create a culture of dignity and

respect, where everyone's talents and contributions are recognized, valued, and used in a manner that contributes to the mission.

### Element A: Demonstrated Commitment from Agency Leadership

Organizational commitment to EEO and DEIA is evident at the highest levels of the agency. The Director's Office oversees the EEO Director/Chief Diversity Officer, who leads the Office of Diversity and Inclusive Workforce Management (ODIWM). The EEO Director/Chief Diversity Officer sits on the Directorate and is an ex-officio member of the DEIA Committee. The Joint Administrative Operations (JAO) program provides executive level direction for human resources and other administrative policy functions supporting EEO. FWS' National Conservation Training Center (NCTC) plans and delivers employee training to meet DEIA objectives throughout the organization.

The following organizational entities further fulfill executive-level roles for EEO and DEIA:

- **DEIA Committee:** The DEIA Committee is chartered to provide leadership, influence, and oversight in the implementation of Executive and Secretarial Orders related to DEIA, national level DEIA initiatives, and the DIIP. The Deputy Director of Operations serves as Committee Chair, and its executive decision-making team is comprised of several Directorate and Deputies Group members. Ex-officio members serve in a consulting capacity and represent FWS programs, employee resource groups, and communities of practice within the sphere of DEIA.
- **FWS Directorate:** Under [Director's Order 226](#), leaders at the highest level of the organization are expected to act with integrity, exemplify treating others with dignity and respect, and fully embrace the commitment to organizational transformation to advance DEIA and ensure a culture of belonging. They lead DEIA efforts in their respective administrative regions and programs and ensure that employees are empowered to participate in and lead DEIA initiatives and DIIP actions.
- **Office of Diversity and Inclusive Workforce Management (ODIWM):** The EEO Director leads ODIWM and is the Chief Diversity Officer for FWS. The program is responsible for a broad management portfolio that includes recruitment and outreach, diversity and inclusion, accessibility, equal employment opportunity, affirmative employment, and public civil rights. ODIWM is an integral part of achieving the mission and works closely with the Director's office, Directorate, DEIA Committee, and other leadership teams across the organization. The Chief Diversity Officer/ EEO Director provides briefings, serves as an advisor to leadership, is involved in both personnel and management actions, and oversees the delivery of diversity and EEO programs and services.
- **Racial Equity + Justice, Equity, Diversity, Inclusion, and Accessibility (RE+JEDIA) Team:** This cross-programmatic leadership team chaired by Directorate members developed recommendations for the agency's response to addressing RE+JEDIA challenges. Team recommendations continue to inform actions to advance DEIA and to ensure fair, just, and impartial treatment of external partners and communities served by FWS.
- **External Partnerships for DEIA:** FWS is represented, actively participates on the leadership board, and staffs the [Diversity Joint Venture for Careers in Conservation](#), a consortium of



more than 60 federal and state agencies, universities, non-governmental organizations, foundations, and professional societies working in partnership to increase the number of women and minorities in the environmental and conservation workforce. Additionally, FWS through its External Affairs' Division of Partners and Intergovernmental Affairs has established official memorandums of understanding (MOU) and partnerships with Historically Black Colleges and Universities (HBCU) and other minority-serving institutions and organizations to advance DEIA through recruitment and career opportunities.

## Element B: Integration of EEO into the Agency's Strategic Mission

As FWS endeavors to advance DEIA to be a model employer and public service agency, it has aligned EEO efforts to its mission through [Director's Order 226](#), organizational priorities, and strategic actions under the DIIP. These guiding documents align with Presidential, EEOC, Secretarial, and other official direction, including the [Government-wide Strategic Plan to Advance DEIA in the Federal Workforce](#).

The Director's Order affirms that advancing DEIA for lasting and transformational change is mission critical, stating organizational intent to:

- Make a sustained commitment to affect transformational and lasting change as an employer and organization by identifying and eliminating traditionally ingrained policies and practices that exclude people from the workforce, services, partnership opportunities, and resources,
- Identify, acknowledge, and dismantle existing systems that contribute to inequities and replace them with policies and practices that benefit the entire organization, create equal opportunity, ensure environmental justice, and enable FWS to fully achieve its mission with partners and constituents, and
- Establish and sustain a welcoming workplace culture that inspires, values, and empowers every employee to learn, grow, and succeed.

**FWS Diversity and Inclusion Implementation Plan:** The Director's Order sets overarching and strategic direction to achieve DEIA goals through implementation of the DIIP. FWS has been implementing this iteration of the DIIP since FY 2020 and is making strides to transform its work culture through employee engagement, barrier analysis and removal, and recruitment and hiring:

- *Employee engagement* — FWS will continue to engage employees with a consistent and meaningful message that prioritizes inclusion and will adopt promising practices and take actions that lead to a welcoming workplace for all.
- *Barrier Analysis and Removal* — FWS will continuously analyze barriers to DEIA, engage in barrier identification and elimination, and monitor the metrics that show how FWS is making progress to advance DEIA across the organization.
- *Recruitment and Hiring* — FWS will continue to connect with the values of a diverse public and enhance support for conservation by recruiting and hiring in a way that focuses on excellence and is supported by diverse applicant pools. It will focus on targeted recruitment to reach groups of prospective applicants who are underrepresented in FWS or who historically have been excluded from conservation jobs.

The EEO Director oversees the delivery of EEO programs and is responsible for a broad portfolio that includes recruitment and outreach, diversity and inclusion, accessibility, equal employment opportunity, affirmative employment, and public civil rights. This centralized leadership facilitates collaboration with leadership and managers of regions and programs nationwide who have direct involvement in carrying out the EEO program. This integration is evident in the following key areas:

- **Barrier Analysis Team (BAT):** A BAT was formed in FY 2022 for the sixth consecutive year, and the team led by ODIWM included representatives from all regions and headquarters. It evaluated workforce data to develop recommendations on removing barriers for various low participation groups in FWS including people of color, women, LGBTQIA+, and people with disabilities that will inform actions in the current and future DIIP work plans.
- **FY 2022 Annual DEIA and EEO Training for FWS Employees:** For the second consecutive year, ODIWM delivered live required training to the entire workforce. In addition to meeting annual DEIA and EEO training requirements, employees gained foundational knowledge about the DIIP, DEIA and EEO promising practices, and other information to support inclusion in the workplace. The course focused on several topics including workforce data, barrier analysis, reasonable accommodations, and other services for people with disabilities, as well as EEO rights, regulations, and interactive scenarios.
- **Diversity and Inclusion Workplace Assessment:** FWS conducted a second Diversity and Inclusion Workplace Assessment in partnership with the Office of Personnel Management (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 assessment results, paired with those from the Federal Employee Viewpoint Survey (FEVS) and Gallup surveys administered regionally, provided essential employee feedback and identified barriers that informed actions under the DIIP. The survey findings were shared with all employees via a series of live webinars.
- **Coordinated recruitment and outreach:** FWS has a centralized team of recruitment specialists serving under a National Recruitment Program Manager in ODIWM. The recruiters serve specific geographic regions, which enables each of them to build relationships with leaders and hiring managers and to develop more localized outreach strategies for job announcements. The National Targeted Recruitment Team, formed three years ago, is made up of employees representing each region and program. The team increased participation by managers and employees in recruitment outreach activities and in cultivating partnerships with minority-serving academic institutions.
- **Public Civil Rights (PCR):** The PCR Division ensured that facilities, programs, and activities managed by FWS, and recipients of federal financial assistance, provided access in a non-discriminatory manner. PCR accessibility consultants conducted compliance reviews and offered guidance on accessibility standards.
- **Special observance program sponsorship:** Under the DIIP, Directorate members and their respective regions/programs hosted and delivered live national events and other educational programs in collaboration with ODIWM's Diversity and AEP Division to engage employees in official special observances. These partnerships reinforced leadership accountability in building cultural awareness and achieving DEIA objectives in the workplace.

- **Internal Communications for Employee Engagement:** ODIWM employs a full-time communications specialist to support leadership messaging and employee communications for DEIA nationally. The communications specialist and agency internal communications lead co-chair a DEIA Communications Team that includes core representation from headquarters programs with a leadership role in DEIA and FWS regions. DEIA-related communication efforts at the national level are coordinated by the team to ensure consistent and clear messaging, effective communication strategies for the DIIP and other DEIA actions, and content management and editorial oversight for the Welcoming Workplace intranet page and other platforms.

### Element C: Management and Program Accountability

There is an expectation that every employee will play a role in ensuring a climate of inclusion in every work unit and in work with others outside the organization. [Director's Order 226](#) (Section 5) establishes accountability and articulates responsibilities for leadership, supervisors, managers, and employees as follows:

- **All employees:** All employees must ensure that the workplace environment is conducive to inclusiveness and welcoming for everyone and are expected to participate in DEIA efforts and barrier removal at their respective levels. In the continuous pursuit of excellence, all employees share responsibility in creating a culture of dignity and respect in FWS, where everyone's talents and contributions are recognized, valued, and used in a manner that contributes to mission accomplishment.
- **Managers and supervisors:** Managers and supervisors must lead by example and proactively implement efforts to make lasting change for DEIA in their work units. To achieve a goal of recruiting, developing, and retaining a diverse and inclusive workforce of the highest caliber, supervisors and managers will be held accountable for prioritizing DEIA, modeling promising practices, implementing DIIP actions, and engaging in barrier removal. Managers and supervisors must ensure that employees in their work units are empowered and have the time they need to participate in and lead DEIA activities.
- **FWS Directorate:** Leaders at the highest level of the organization must act with integrity, exemplify treating others with dignity and respect, and fully embrace the commitment to organizational transformation to advance DEIA and ensure a culture of belonging. Directorate members are expected to lead DEIA efforts in their respective regions and programs, and they must ensure that employees are empowered to participate in and lead DEIA initiatives and DIIP actions.

**Performance measures:** All supervisors are accountable for DEIA actions through elements included in employee performance appraisal plans (EPAP). At the leadership level, SES positions include an EPAP critical element for EEO and diversity advocacy, and Directorate members are expected to communicate EEO-related responsibilities to their subordinates to set clear expectations. In addition, all employees have a mandatory annual EEO and diversity training requirement that is tracked in the agency's learning management system.

**DIIP accountability tracking:** In addition to the overarching accountability set under the Director’s Order and performance plans, the DIIP and annual work plans establish responsibilities and timelines for actions. ODIWM and the DEIA Committee coordinator hold weekly meetings among responsible parties to review progress in accomplishing DIIP actions and deadlines, share information, and address any challenges. The status of DIIP work plan actions is tracked and the information is made available to leadership. Additionally, progress is shared on an ongoing basis with employees through briefings, quarterly DIIP updates, news and stories posted on the FWS intranet site, and a weekly email digest.

## Element D: Proactive Prevention

### The DIIP and Proactive Prevention

The DIIP is an adaptive strategy to proactively identify and address EEO barriers. Annual work plans under the DIIP include targeted actions that are timely, directed at correcting deficiencies, informed by employee feedback and barrier analysis, and that continue to build on progress. In addition to complying with EEO laws, regulations, and policies, efforts are focused on three objectives – employee engagement, barrier analysis and removal, and recruitment and hiring. The significant benchmarks set and achieved for FY 2022 aligned with these objectives and are described below.

#### DIIP Objective 1: Employee Engagement

- **Values Project:** FWS completed Phase One and entered Phase Two of a multi-year in-depth process to set organizational core values with support from the Metropolitan Group. During FY 2022, Met Group conducted 20 executive interviews, five general listening sessions, and 25 listening sessions for specific groups of employees (e.g., employee resource groups, job series) to begin the process of defining and establishing a shared purpose and organizational core values. The results of the Values Project will inform work across organizational priorities in meeting the FWS mission. Phase 2 of the project extends into FY 2023.
- **Grassroots Employee Groups:** Employee resource groups (ERG) and communities of practice are welcoming forums and drivers of inclusion and positive change in FWS. Two new ERGs formed in FY 2022 – the Black, Indigenous, and People of Color ERG and the FWS People with Disabilities ERG – increasing the total number of official ERGs to three with the FWS Pride ERG. The Institutional Change Community of Practice, with nearly 200 involved employees, accomplishes projects and initiatives to adopt a community-focused conservation approach for DEIA and environmental justice.
- **DEIA and EEO Training:** For a second consecutive year, ODIWM offered a universal, live DEIA and EEO training course to all employees to ensure that they have foundational training on DEIA, the DIIP, and promising practices. In addition to the required two-hour course, additional training and participation in DEIA related activities were encouraged.
- **IDEA – Inclusion, Diversity, Equity, and Accessibility – Conversations:** In FY 2021, ODIWM launched a series of live broadcasts to spark ideas and dialogue among employees and share promising practices for DEIA. Two of the three IDEA Conversations hosted to date occurred in FY 2022.
- **Employee Engagement and Leadership Development Coordinators:** The team of employee engagement and leadership development coordinators (EELD) expanded in FY 2022 to include

a position in each region. The team coordinates and provides training, professional development, and wellbeing services to help ensure employees have the resources and tools that they need to succeed.

- **Mentoring:** A national team was chartered in FY 2022 to develop recommendations for a mentoring program framework and a bank of resources to support a culture of mentorship in FWS. The team's recommendations now inform DIIP work plan actions to ensure that all employees have access and opportunity to participate in mentoring relationships, either as a mentor or mentee.
- **Special emphasis observance partnerships:** Directorate members and their respective regions/programs hosted and delivered live national educational programs in cooperation with ODIWM's Diversity Team to engage employees in nine official special observances in FY 2022.

#### DIIP Objective 2: Barrier Analysis and Removal

- **Barrier Analysis Team (BAT):** A BAT was formed in FY 2022 for the sixth consecutive year. The team led by ODIWM included representatives from all regions and headquarters. It evaluated workforce data to develop recommendations on removing barriers for various low participation groups including people of color, women, LGBTQIA+, and PWD. Additionally, the BAT identified barriers in the areas of retention, access to resources, and reasonable accommodations for PWD, and a gap in organization-wide practices for improving retention and employee wellness for people of color and women in the workplace. The BAT's recommendations are informing actions in the current and future DIIP work plans.
- **Diversity and Inclusion Workplace Assessment:** FWS conducted a 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 assessment results, paired with those from the Federal Employee Viewpoint Survey (FEVS) and Gallup surveys administered regionally, provided essential employee feedback, and identified barriers that inform actions under the DIIP. The survey findings were shared with all employees via a series of live webinars.
- **Improved Policy:** FWS acted to evaluate, address, and remove policy barriers identified in past years. For example, the 225 FW 1 Manual Chapter was updated to drastically reduce the number of positions requiring a driver's license to accommodate PWD, and new policy is being developed for gender neutral restroom signage.

#### DIIP Objective 3: Recruitment and Hiring

- FWS has official MOUs with four minority-serving institutions and two members of the National Pan-Hellenic Council, familiarly known as "The Divine Nine," to foster pathways to careers in the agency.
- FWS is represented and actively participates on the leadership board of the [Diversity Joint Venture for Careers in Conservation \(DJV\)](#), a consortium of more than 60 federal and state agencies, universities, non-governmental organizations, foundations, and professional societies working in partnership to increase the number of women and minorities in the

environmental and conservation workforce. Additionally, FWS provides staff support for the DJV Board.

- Recruitment specialists last year participated in 168 outreach events at 127 schools, 60 of which are minority serving institutions, and 41 events with organizations serving minorities, Veterans, and PWD.
- In FY 2022, FWS conducted research on the latest data from the U.S. Department of Educational National Center for Education Statistics to identify 140 schools including 80 minority-serving institutions for targeted recruitment based on analysis of the number of degrees conferred to minority students in majors aligned with professional biology job series.
- Under the White House Initiative on HBCU, FWS shares funding and internship and employment opportunities with faculty and staff at HBCU across the country.
- FWS recently launched a new careers and internships section on its external website at [fws.gov/careers](https://fws.gov/careers), and recruitment efforts are enhanced through a listserv with 16,000+ subscribers and investment in announcing positions on online job boards such as HBCU Connect; Professional Diversity Network; Minorities in Agriculture, Natural Resources, and Related Sciences (MANRRS); and United Latino Job Bank.
- Certain regions in an ongoing partnership with the Student Conservation Association (SCA) hosted undergraduate interns through the Career Discovery Internship Program (CDIP).
- To efficiently address questions on job opportunities and internships and to ensure consistent responsiveness to potential candidates, the recruitment team established and monitors a general inbox ([connect@fws.gov](mailto:connect@fws.gov)) that features an automated reply that provides each recruiter's email for additional questions and inquiries.
- In August 2022, FWS launched a [New Hire Onboarding Guide](#) on [fws.gov](https://fws.gov) to ensure new hires have everything they need to make a successful transition into their new role from tentative selection to starting their new job. This work is part of the National Onboarding Initiative sponsored by the Deputies Employee Onboarding and Integration Team.
- Nationally, the use of direct hiring authorities is encouraged to increase diversity in the workforce and actions under the DIIP will provide tools and set this practice as an expectation for hiring managers.
- FWS currently uses direct hire authority for the Directorate Resource Assistant Fellows Program (DFP) participants after they complete their degree and are now using new Recent Grads and Post-Secondary hiring authorities to announce positions at recruitment outreach events and to source candidates through careers-focused social media accounts. In FY 2022, FWS recruited for the DFP through the Hispanic Access Foundation (HAF), Greening Youth Foundation (GYF), Alaska Native Science & Engineering Program, American Indian Higher Education Consortium (AIHEC), and the Thurgood Marshall College Fund (TMCF) for targeted outreach to improve minority participation. In FY 2022, DFP opportunities were afforded to 93 students (80% female and 39% minorities) increasing representation from FY 2021.

#### **Proactive Prevention and Policies**

- The EEO Non-Discrimination Policy, Anti-Harassment Policy and Personal Assistance Services Procedures, and the annual Director's Memorandum on Mandatory Equal Employment Opportunity and Diversity Training for managers, supervisors, and employees were issued and distributed to all employees.



- The FWS Anti-Harassment Policy: (1) informs employees of what type of behavior is prohibited and the appropriate steps to take if they believe harassment has occurred; (2) provides for multiple avenues of redress, in addition to the EEO complaint process; (3) provides for a prompt management inquiry and appropriate corrective and disciplinary action; and, (4) prohibits acts of retaliation against employees and witnesses.
- FWS followed the DOI Civil Rights Directive 2014-02, Personnel Bulletin 14-01, DOI Policy and Procedures on Reasonable Accommodation for Individuals with Disabilities, issued on February 20, 2014, which sets policy for DOI bureaus and offices when responding to reasonable accommodation requests.
- FWS continued to provide personal assistance services in accordance with the January 2017 regulations, which amended Section 501 of the Rehabilitation Act.

### Element E: Efficiency

FWS achieves efficiency in its EEO program in several ways, such as:

- There is sufficient staffing, funding, and authority to achieve the identification and elimination of barriers.
- ODIWM is kept separate from the Office of the Solicitor or other agency offices having conflicting or competing interests.
- The EEO Director manages a fair and impartial complaint resolution and adjudication process and refers complaints to the DOI Office of Diversity, Inclusion, and Civil Rights (ODICR) when a conflict of interest occurs.
- FWS has an alternative dispute resolution (ADR) program that facilitates the early, effective, neutral, and informal resolution of disputes. Managers and supervisors are required to participate in ADR when mediation is elected by a complainant. In FY 2022, the ADR rate was 52% compared to 49% in FY 2021.
- FWS tracked complaint information through DOI's online tracking system (*Entellitrak*) and tracked complaints electronically using a computerized log to provide live updates on complaint status.
- FWS employs full-time permanent EEO counselors as well as contract counselors when necessary. Work performed by the counselors is monitored for technical accuracy and to ensure that deadlines are met. If the work by a contract counselor is not completed in the specified timeframes, FWS negotiates costs to reflect a reduction in compensation due to the delay.
- Access to FWS and federally funded properties is ensured through the PCR Division within ODIWM. The PCR Division works with headquarters and field offices and responds to complaints involving the lack of availability of access to properties.
- Employee relations specialists provide advisory services and assistance for employees and managers in the implementation of the reasonable accommodations policy. Regions and programs have been assigned a servicing specialist to ensure prompt response to inquiries.
- ODWIM developed internal webpages that describe services and resources the program provides for employees and managers. This is a centralized location to share information, training opportunities, upcoming events, and other information.

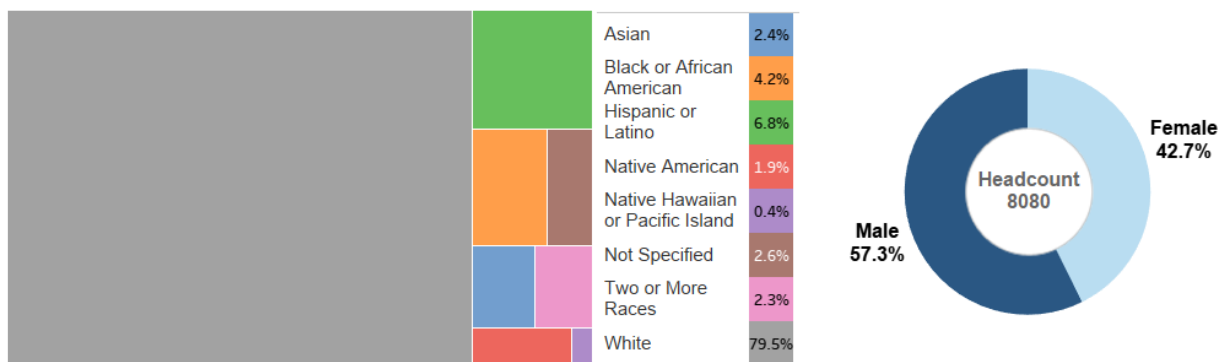
## Element F: Responsiveness and Legal Compliance

FWS has a system in place to ensure that officials comply promptly with any orders or directives issued by EEOC, the DOI, and all other adjudicatory bodies with jurisdiction over EEO laws.

## Part E.3 - Executive Summary: Workforce Analyses

### Summary

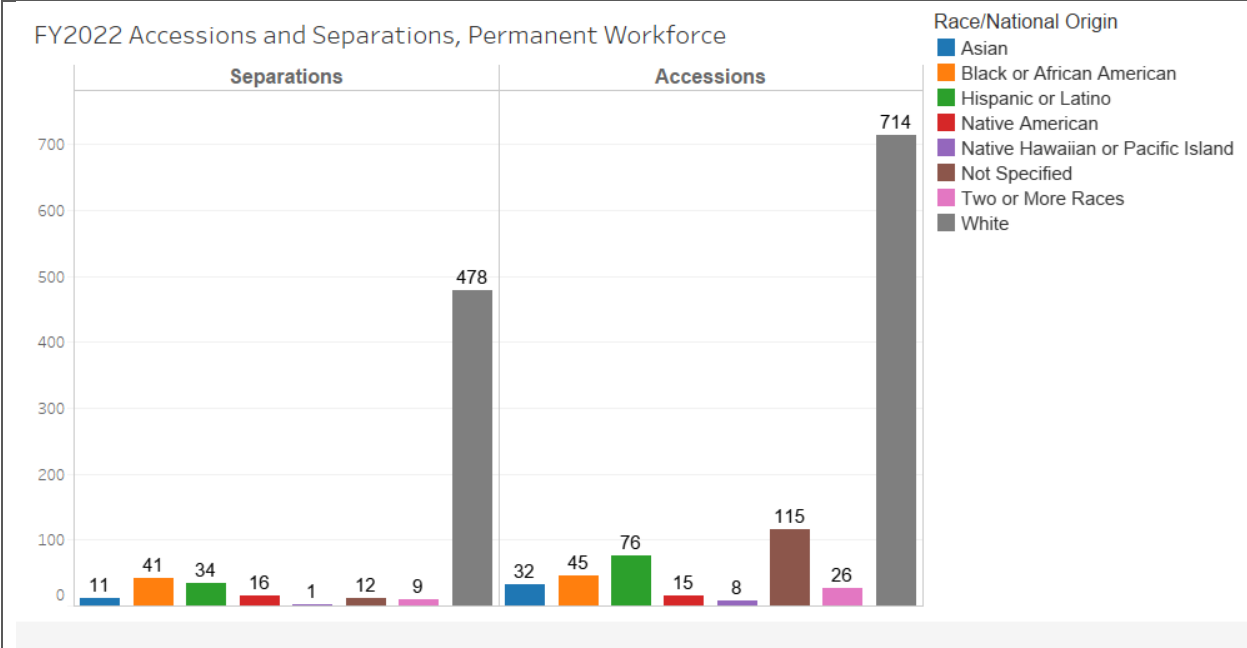
FY2022 Total Permanent Workforce



Diversity outcomes for FWS were mixed for FY 2022. While the participation rates for Black or African Americans (both men and women) declined, those for other low-participation RNO-gender groups either increased or were unchanged. The participation rates for minority and White women increased, while the participation rates for minority and White men declined.

The only substantial participation rate changes were the increase in the participation rate for White women (+0.5) and the decline in the participation rate for White men (-1.8). However, a significant concern over the interpretation of these outcomes is that the percentage of employees who declined to self-identify their RNO increased to 2.6% of the permanent workforce, up +1.2% for the FY.

At the beginning of the FY, the participation rates for Black or African American men and women, Hispanic or Latino men and women, Asian men and women, women identifying with two or more races, and White women were low when compared to their participation rates in similar occupations in the Civilian Labor Force (CLF) 2018. Outcomes of efforts to ameliorate these low participation rates yielded modest increases in the participation rate for each of these groups, except Black or African American men and women and Hispanic or Latino men.



During FY 2022 the permanent workforce grew by a record 4.3%. At the same time, the minority participation rate grew by a scant one tenth of one percent (0.1%). Failure to increase minority participation more significantly can primarily be attributed to a hiring shortfall, although substantial separations of Native Americans and retirements of Black or African Americans contributed.

Of the 1,031 hires, 202 (19.9%) were members of minority groups, significantly below the 26.6% minority participation rate in the occupations hired in CLF 2018. Although overall minority separations were consistent with minority participation at the beginning of the FY, significantly more African Americans and Native Americans left the workforce than anticipated by an equiprobability model.

Statistical analysis of accessions and separations for the minority groups that lost ground provides insights into the dynamics. The participation decline for Black or African American men and women can be attributed both to a shortfall in hiring and to the large number of retirements. For Black or African Americans, 45 were hired and 46 left, including 19 retirees. The 45 hired constituted 4.4% of hires, significantly below their 7.7% availability rate in the occupations hired in CLF 2018. Additionally, the 19 Black or African American retirements constituted 6.0% of retirements, above the 4.4% participation of Black or African Americans in the permanent workforce at the beginning of the FY.

The participation decline for Native Americans can be attributed to a substantial number of Native Americans who left the workforce. For Native Americans, 15 were hired and 22 left, including only five retirees. Native American hires have historically exceeded availability in the CLF. The 15 Native Americans hired constituted 0.9% of hires, significantly above their 0.3% availability rate in the occupations hired in CLF 2018. At the same time, the 22 Native Americans who left constituted 3.2% of separations, significantly above their 2.0% participation in the permanent workforce at the beginning of the FY.

To increase the availability of qualified members of low-participation groups, FWS reduced the initial grades for many of its administrative and professional vacancies, effectively making them

developmental positions. During FY 2022, 43.2% of permanent outside hires in professional and administrative occupations were filled at grades 05, 07, or 09. This percentage is up from the 38.5% achieved in FY 2021, but down from the 46.0% achieved in FY 2020, the 51.1% achieved in FY 2019 and the 68.6% achieved in FY 2018.

### Professional Biologist Occupations

Professional biologists constitute 47.3% of the permanent workforce and 58.6% of its senior positions (GS-13 and above). Thus, the diversity of the professional biology workforce today is directly linked to the diversity of FWS leadership and the organization in the future.

During FY 2022 the size of the professional biology permanent workforce increased by 120 (+3.2%) and its diversity increased substantially as well, with the number of women and minorities increasing by 127 (+ 7.3%). The number of White women increased by 100 (+ 7.9%), the number of minority women increased by 18 (+9.0%) the number of minority men increased by one (+0.4%), and the number of women with unspecified RNO increased by eight (+57.1%).

In terms of overall participation rate, women and minorities were up +1.9%: women were up +2.0% (White women were up +1.5%, minority women were up +0.3%, and women with unspecified RNO were up +0.2%). Minorities were up +0.1% overall; minority women were up +0.3% and minority men were down -0.2%.

Drilling down to single RNO/Gender groups, the participation of Black or African American men and women, Asian men and women, Hispanic or Latino women, women identifying with two or more races, and White women in the professional biology workforce was significantly low at the beginning of the FY in comparison to similar occupations in CLF 2018. Outcomes of efforts to ameliorate these low participation rates during FY 2022 were mixed and are summarized in Table 1.

**Table 1: Box Score for FY 2022 Professional Biology Demographics**

|   | Participation<br>9/30/2021 | Hires | Separations | Change |
|---|----------------------------|-------|-------------|--------|
| Black or African American women               | Low                        | <     |             | -0.1%  |
| Black or African American men                 | Low                        |       |             |        |
| Hispanic or Latino women                      | Low                        | >     | <           | +0.4%  |
| Hispanic or Latino men                        |                            |       |             | -0.1%  |
| Asian women                                   | Low                        | <     |             |        |
| Asian men                                     | Low                        | <     |             |        |
| Native Hawaiian or other Pacific Island women |                            | >     |             | +0.1%  |

|   |     |   |  |       |
|---|-----|---|--|-------|
| Native Hawaiian or other Pacific Island men |     |   |  |       |
| American Indian or Alaska Native women      |     |   |  | -0.1% |
| American Indian or Alaska Native men        |     |   |  | -0.1% |
| Two or more races women                     | Low |   |  | +0.1% |
| Two or more races men                       |     | < |  | -0.1% |
| White women                                 | Low | > |  | +1.5% |
| White men                                   |     | < |  | -2.4% |

For the low participation groups, the participation of White women increased +1.5%, the participation of Hispanic or Latino women increased +0.4%, and the participation of women identifying with two or more races increased +0.1%. The participation of Black or African American women declined -0.1%, and the participation of Asian men and women was unchanged.

During FY 2022, FWS hired 354 professional biologists from outside the agency and competitively selected another 22 from other occupations to fill professional biology positions. Black or African American women, Asian men and women, men identifying with two or more races, and White men were hired in numbers that were significantly below their availability in CLF 2018 in the positions filled,<sup>1</sup> while Hispanic or Latino women, Native Hawaiian and other Pacific Island women and White women were hired in numbers that were significantly above theirs.<sup>2</sup>

In professional biology occupations, all individual RNO/gender groups except Hispanic or Latino women left FWS in numbers that were consistent with their participation in the professional biology workforce at the beginning of the FY. Significantly fewer Hispanic or Latino women left than anticipated by an equiprobability model.<sup>3</sup>

Thus, the increase in the participation of White women can be attributed to success in hiring, while the declines in the participation of Black or African American women and of men identifying with two or more races, and the failure to increase the participation of Asian men and women, can be attributed to hiring shortfalls. The substantial increase in the participation of Hispanic or Latino women is attributable to the combination of substantial success in hiring and to the small number of separations.

<sup>1</sup>indicated by "<" in the Hires column in Table 1>

<sup>2</sup> indicated by ">" in the Hires column in Table 1>

<sup>3</sup> Indicated by "<" in the Separations column in Table 1

## Law Enforcement officers

By the end of FY 2022, FWS had 436 full-time law enforcement officers, 205 in the Office of Law Enforcement and 231 in the Division of Refuge Law Enforcement. The overall participation of women and minorities in the law enforcement officer workforce are low when compared to their availability in similar occupations in CLF 2018.

At the beginning of FY 2022, the Office of Law Enforcement employed 216 criminal investigators and conservation law enforcement officers, 62 of whom were women or minorities (or 28.7%), which was significantly below the 46.1% participation rate of women and minorities in similar occupations in CLF 2018. During FY 2022, the Office of Law Enforcement hired seven criminal investigators from outside the agency and competitively selected four others from other occupations. Seven of these new appointments were women or minorities, but five women and minorities were among the 22 criminal investigators who left. The net effect was that the participation of women and minorities in the criminal investigator occupation increased by +1.5%.

At the beginning of FY 2022, the Division of Refuge Law Enforcement employed 231 law enforcement officers, 57 of whom were women and minorities (or 24.7%), which was significantly below the 46.1% participation rate of women and minorities in similar occupations in CLF 2018. During FY 2022, the division hired 18 law enforcement officers from the outside and internally selected two individuals from other occupations. Four of these new law enforcement officers were women or minorities, but eight women or minorities left. The net effect was that the participation of women and minorities declined -2.1%. Notably, nine of the 18 (50%) outside hires were Veterans, seven of which had disabilities rated 30% or more.

## Senior Workforce

FWS uses the total permanent administrative/professional workforce as the standard against which to compare the demographic distribution of its senior workforce. The participation of women and minorities remained low in comparison to this standard. Despite these statistics, in FY 2022 the participation of women increased +1.1% and the participation of minorities increased +0.5%.

The representation rates for Hispanic, Native Hawaiian, and White women saw gains, while representation of Native American women declined. For men, the representation of Black/African American men and Asian men increased, while other RNO groups remained unchanged.

Historically, roughly two-thirds of entrants to the senior workforce gain entry through internal promotion; the other third is typically hired from outside. The proportion of additions through internal promotions has steadily declined over the past three years, and this trend continued in FY 2022. In FY 2022, 51.6% of entrants to the senior workforce gained entry through internal promotion, down from 54.1% in FY 2021, 56.1% in FY 2020, and 68.1% in FY 2019.

Significantly more White women and Native Hawaiians/Pacific Islanders were promoted than expected by an equiprobability model. All other RNO/gender groups were promoted to GS-13 in numbers that were consistent with their participation in the GS-12 workforce at the beginning of the FY.



The CLF is tabulated by occupation, not by occupation and grade, so it is not an appropriate standard against which to gauge the availability of RNO/gender additions to the senior workforce. As the senior workforce is drawn from all administrative and professional series (including biology and law enforcement), the distribution of the entire administrative and professional workforce is used as a comparator. By that standard, additions of African American men & women in senior positions were significantly higher than expected. The participation rates of other groups are within or above the range expected based on their respective participation rates in the administrative and professional series.

There were 186 separations from the senior workforce in FY 2022. All RNO/gender groups left in numbers consistent with their participation in the senior workforce at the beginning of the FY except for Hispanic or Latino female and Asian groups, both of which separated at a rate lower than expected. Unfortunately, despite being added at a higher rate than expected in the senior workforce, African American employees separated at a higher rate than expected during FY 2022.

**Professional/Administrative Series (Except Professional Biology and Law Enforcement)**

Professional occupations in this group include a variety of non-biology STEM occupations such as geology, chemistry, hydrology, cartography, engineering, archeology, geography, statistics, as well as occupations such as accounting, economics, and contracting. Administrative occupations include occupations such as park ranger, recreation planning, human resources, program management, public affairs, administrative officer, and budget analysis. While these occupations are essential to the FWS mission, the number of employees within each is too small to analyze separately, and many have similar enough demographic distributions to make grouping them meaningful.

These occupations constitute 29.0% of the permanent workforce and 32.5% of its senior positions (GS-13 and above) and their demographic profiles are directly tied to diversifying the workforce at all levels. At the beginning of the FY, the participation rates of men who self-identify as Hispanic or Latino, as Asian, or as White, as well as women who self-identify as Asian were significantly low when compared to a similar group of occupations in CLF 2018.

Table 2 summarizes the dynamics of the demographic changes in this segment of the permanent workforce during FY 2022.

|   | Participation<br>09/30/2021 | Hires | Separations | Change |
|---|-----------------------------|-------|-------------|--------|
| Black or African American women               |                             |       |             | -0.4%  |
| Black or African American men                 |                             |       | >           | -0.3%  |
| Hispanic or Latino women                      |                             |       |             |        |
| Hispanic or Latino men                        | Low                         |       |             | +0.3%  |
| Asian women                                   | Low                         |       |             | +0.3%  |
| Asian men                                     | Low                         | <     |             |        |
| Native Hawaiian or other Pacific Island women |                             | >     |             | +0.1%  |
| Native Hawaiian or other Pacific Island men   |                             |       |             |        |

|  |     |   |   |       |
|--|-----|---|---|-------|
| American Indian or Alaska Native women |     |   | > | -0.2% |
| American Indian or Alaska Native men   |     |   |   | -0.1% |
| Two or more races women                |     |   |   | +0.1% |
| Two or more races men                  |     |   |   | +0.1% |
| White women                            |     |   |   | -0.8% |
| White men                              | Low | < |   | -0.4% |
| Minority women                         |     |   |   |       |
| Minority men                           | Low |   |   | -0.1% |
| Minority                               | Low |   |   | -0.1% |
| RNO not specified                      | -   | - | - | +1.3% |

As Table 2 indicates, during FY 2022 the demographics of the permanent workforce in these occupations changed in complex ways. On the one hand participation rates were up for Hispanic or Latino men (+0.3%), Asian women (+0.3%), Native Hawaiian or Other Pacific Island women (+0.1%), and men and women who self-identify with two or more races (each up +0.1%). On the other hand, the participation rates were down for Black or African Americans (-0.7%), American Indian/Alaska Natives (-0.3%), White women (-0.8%), and White men (-0.4%). Overall, the participation of minority men declined -0.1% and the participation of minority women was unchanged. An impediment to relating these changes directly to actual changes in workforce RNO diversity is the fact that the participation of those declining to identify their RNO in this group of occupations was up +1.3%.

In FY 2022, FWS hired 320 employees in these occupations from outside sources and competitively selected 47 from other occupations within the organization. All RNO/gender groups except Native Hawaiian or other Pacific Island women, Asian men, and White men were hired in numbers consistent with their participation in similar occupations in CLF 2018. Native Hawaiian or other Pacific Island women were hired at a significantly higher rate than expected relative to their availability in CLF 2018, while Asian men and White men were hired at a significantly lower rate than theirs.

During FY 2022, 195 permanent employees in these occupations left FWS and another 26 moved to occupations outside this group. All RNO/gender groups except Black or African American men and Native American women left in numbers that were consistent with their participation in this segment of the workforce at the beginning of the FY. Significantly more African American men and Native American women left than would be anticipated by an equiprobability model.

These data suggest that the increase in the participation of Native Hawaiian or other Pacific Island women can be attributed to extraordinary success in hiring, while the decline in the participation of Native American women can be attributed to significant separations. For the low participation groups, the decline in the participation of White men and the failure to increase the participation of Asian men can be attributed to hiring shortfalls. For other single RNO/gender groups with substantial changes (e.g., Black or African American men and women, Asian women), both hire and separation rates were within the expected range, but the combination was not.

In the past few years, the proportion of administrative and professional vacancies that can be considered developmental has consistently decreased year-to-year. During FY 2022, entry-level developmental positions constituted only 30.3% of permanent outside hires in these other

administrative or professional occupations that were filled at grades 05, 07, or 09. This percentage is down from the 39.5% in FY 2021, 46.0% in FY 2020, and 51.1% in FY 2019.

### Technical Biology and Federal Wage System Occupations

There were 885 employees in this segment of the permanent workforce including 179 forestry and range technicians and engineering equipment operators in fire management programs; 174 biology/forestry/range technicians who are not part of the fire programs; 498 maintenance workers/engineers and equipment operators who support national wildlife refuges; national fish hatcheries and other facilities; and 34 animal caretakers who maintain the animals in the fish facilities.

At the beginning of the FY the demographics of these occupations in the agency were mostly male (90.3%) and White (82.6%). In contrast, the availability of men and Whites in this group of occupations in CLF 2018 was male (78.0%) and White (71.7%). Drilling down to single RNO/gender combinations the participation rates of Black or African American men and women, Hispanic or Latino men and women, Asian men and women, women who identify with two or more races, and White women were all quite low relative to their participation in similar occupations in CLF 2018.

During FY 2022 substantial progress was made in closing these gaps. The permanent workforce in these occupations increased +5.7%: The participation of women was up +1.0% (White women -0.2%, minority women +0.8%, and women who declined to identify their RNO +0.4%). There was increased participation for minority women nearly across the board. The number of Black or African American women was up +1.0%, Hispanic or Latino women by +1.0%, Asian women by +3.0%, Native American women by +2.0%, and of women identifying with two or more races by +1.0%. As with other segments of the permanent workforce, an impediment to relating these RNO changes directly to actual changes in workforce diversity is the fact that the number of individuals declining to identify their RNO in this group of occupations was up +2.8%, now constituting 5.6% of the permanent workforce in this group of occupations.

In FY 2022, FWS hired 200 employees in these occupations from external sources and competitively selected one employee from an occupation outside this group. All RNO/gender groups except Black or African American men and women, Hispanic or Latino men, and White men and women were hired in numbers consistent with their availability in CLF 2018 in the occupations filled. Black or African American men and women, Hispanic or Latino men, and White women were hired at a significantly lower rate than expected relative to their availability in the positions filled in CLF 2018, while White men were hired at a significantly higher rate than theirs.

During FY 2022, 125 permanent employees in these occupations left FWS and another 26 moved to occupations outside this group. All RNO/gender groups left in numbers that were consistent with their participation in this segment of the workforce at the beginning of the FY.

Substantial progress was made within fire program occupations in this group, which includes mostly forestry technicians and engineering equipment operators. During FY 2022 the Fire Management Program hired 75 employees in this group, including 11 women (15%) and 13 members of minority groups (17%), thereby increasing the participation of women in this segment of the Fire Program by eight (+1.1%) and of minorities by 10 (+0.6%).

Progress was also made in the small non-fire management biology technician workforce, which had only one Black or African American and only one Asian at the beginning of the FY. During FY 2022, 32 employees were hired from the outside including five in Ecological Services, 25 in the Fisheries program, and two within the National Wildlife Refuge System (NWRS) including two Asian women (one each in Fisheries and NWRS), but no Black or African Americans were hired. Overall, the size of the non-fire management biology technician workforce declined by two, the number of women increased by three and the number of minorities increased by one.

In the maintenance worker/engineer and equipment operator occupations, at the beginning of the FY the participation rates of Black or African American men and women and of Hispanic men were low relative to their availability in similar occupations in CLF 2018. In a workforce of 498 permanent employees in these occupations there were no Black or African American women, six Black or African American men (1.2%), and 26 Hispanic or Latino men (5.2%). During FY 2022, 78 employees were hired from the outside, 20 in Fisheries and 58 in the NWRS. Each of the 20 outside hires in Fisheries identified their RNO was White (one White woman, 18 White men, and one man who did not identify his RNO), while six of the 58 outside hires in NWRS were minorities (one Black or African American woman, one Hispanic or Latino woman, three Hispanic or Latino men, and one Asian man).

At the beginning of the FY, the small animal caretaker workforce had no Black or African Americans, Hispanic or Latinos, Asians, or Native Hawaiian or other Pacific Islanders. During FY 2022, 15 employees were hired from outside the agency, including eight women (one Hispanic or Latino woman, five White women, and two women who did not identify their RNO). The Hispanic or Latino woman was the only minority group member hired.

Progress in the permanent wage-grade workforce, which includes 559 of the employees in this group, was mixed. During FY 2022, the participation of women increased +0.1%, but the participation of minorities declined -1.2%. However, the statistics on the participation of minorities in this group are based on some uncertainty: 70 employees were hired in wage-grade occupations, and 14 of them (20%) declined to identify their RNO, thereby reducing the participation percentages of all non-zero RNO groups.

In FY 2022, 73 employees in technical biology and wage grade occupations left FWS. All groups left the agency in numbers consistent with their participation in this segment of the workforce at the beginning of the FY.

### Leadership Development

In FY 2022, FWS sponsored two agency-wide leadership development programs. Stepping Up to Leadership (SUTL) was open to employees in grades GS-11 and GS-12 as well as wage grade (WG) supervisors and employees in WG-9/10/11 positions. The Advanced Leadership Development Program (ALDP) was available to GS-13/14 employees.

Regarding SUTL, significantly more White and minority women, and Black/African American men, from the pool of eligible employees applied than would be expected based on an equiprobability statistical model. All other individual RNO/gender groups applied in numbers that were consistent with their participation in the pool of eligible employees.

Minorities were also selected for SUTL in numbers that were higher than expected from the list of applicants, in particular Hispanic/Latino employees. All other individual RNO/gender groups were selected in numbers consistent with an equiprobability statistical model from the list of applicants.

Significantly more White women, minority women, and African American employees applied for ALDP than was predicted by an equiprobability statistical model. All other individual RNO/gender groups applied in numbers that were consistent with their participation in the pool of eligible employees.

It is noteworthy that five selectees in the very competitive ALDP program were members of minority groups. Significantly more African American employees were selected than predicted by an equiprobability statistical model. All other individual RNO/gender groups were selected at a rate consistent with their participation in the pool of applicants.

No individuals with targeted disabilities were selected for SUTL, although this is within the expected range based on their availability in the applicant pool. In respect to the ALDP program, both employees with disabilities and employees with targeted disabilities were selected at a higher rate than expected.

### Employees with Disabilities

The EEOC established two standards for agencies to use in evaluating the adequacy of their workforce with respect to the employment of persons with disabilities. A no-less-than 2% standard applies to employees with targeted disabilities, and a no-less-than 12% standard applies to employees with reportable disabilities, where "reportable" refers to all disabilities listed on OPM's Self-identification of Disabilities form (SF-256). Each standard applies separately to the segment of the permanent workforce in grades GS-10 and below and the segment of the permanent workforce in grades GS-11 and above. The table below captures the extent to which the permanent workforce met these standards at the end of FY 2022 and the progress made since the end of FY 2021.

| <b>Employment of Persons with Disabilities (Permanent Workforce)</b> |                  |                 |             |                   |              |                            |          |
|--|------------------|-----------------|-------------|-------------------|--------------|----------------------------|----------|
|  |                  | <b>Targeted</b> |             | <b>Reportable</b> |              | <b>Permanent Workforce</b> |          |
|  |                  | <b>#</b>        | <b>%</b>    | <b>#</b>          | <b>%</b>     | <b>#</b>                   | <b>%</b> |
| <b>All grades</b>  | 9/30/2021        | 201             | 2.6%        | 886               | 11.4%        | 7742                       | 100.0%   |
|  | <b>9/30/2022</b> | <b>213</b>      | <b>2.6%</b> | <b>898</b>        | <b>11.1%</b> | 8080                       | 100.0%   |
|  | Change           | +12             | +0.0%       | +12               | -0.3%        | +338                       |          |
| <b>GS-10 &amp; below</b>   | 9/30/2021        | 94              | 3.9%        | 381               | 15.8%        | 2419                       | 100.0%   |
|  | <b>9/30/2022</b> | <b>98</b>       | <b>3.9%</b> | <b>372</b>        | <b>14.7%</b> | 2528                       | 100.0%   |
|  | Change           | +4              | +0.0%       | -9                | -1.1%        | +109                       |          |
| <b>GS-11 &amp; above</b>   | 9/30/2021        | 107             | 2.0%        | 505               | 9.5%         | 5338                       | 100.0%   |
|  | <b>9/30/2022</b> | <b>115</b>      | <b>2.1%</b> | <b>526</b>        | <b>9.5%</b>  | 5546                       | 100.0%   |
|  | Change           | +8              | +0.1%       | +21               | +0.0%        | +208                       |          |
| <b>Standard</b>  |                  |                 | 2.0%        |                   | 12.0%        |                            |          |

As the table indicates, FWS met both standards for the segment of the permanent workforce in grades GS-10 and below, in addition to employees with targeted disabilities in grades GS-11 and

above. However, the participation of employees with disabilities fell by 0.3% during FY 2022. In addition, FWS fell short of the standard of employees with reportable disabilities in grades GS-11 and above.

The EEOC also requires agencies "to take specific steps that are reasonably designed to gradually increase the number of individuals with disabilities employed at the agency until it meets the goals established above." To this end, the Director continued to challenge the eight Regional Directors and as a group the Assistant Directors for headquarters' programs to each hire at least three individuals with targeted disabilities annually, for a minimum total of 27 hires per year. During FY 2022 FWS met this challenge by hiring 115 individuals with disabilities, including 30 individuals with targeted disabilities, well above this organizational goal.

Despite this success, a statistical analysis of separations in the permanent workforce indicated that employees with reportable disabilities involuntarily separated from FWS at a significantly higher rate than was anticipated by an equiprobability model. Voluntary separations of employees with reportable disabilities were also higher than expected in comparison to the overall permanent workforce.

### Trends in EEO Complaints

FY 2022 showed a slight decrease from FY 2021 in the percentage of individuals who proceeded from the pre-complaint process to the formal complaint process. In FY 2021, 71% of pre-complainants filed formal complaints. In FY 2022, 67% of pre-complainants filed formal complaints. This percentage is above the five-year average.

| <b>Trends in FWS Complaints FY 2014 - FY 2022</b> |                |                |                |                |                |                |                |                |                |
|---|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
|   | <b>FY 2014</b> | <b>FY 2015</b> | <b>FY 2016</b> | <b>FY 2017</b> | <b>FY 2018</b> | <b>FY 2019</b> | <b>FY 2020</b> | <b>FY 2021</b> | <b>FY 2022</b> |
| Pre-Complaints                                    | 39             | 33             | 52             | 47             | 44             | 43             | 35             | 35             | 49             |
| Formal Complaints                                 | 31             | 23             | 37             | 29             | 16             | 23             | 22             | 25             | 33             |
| % Pre-Complaints Go Formal                        | 79%            | 70%            | 71%            | 61%            | 36%            | 47%            | 63%            | 71%            | 67%            |

Reprisal was the most common basis of discrimination reported in FY 2022, alleged in 17 complaints. The second most frequently alleged bases were sex and disability at 12 complaints each.

| <b>Trends in Basis for Discrimination Complaints</b><br>(Referenced from Part IV of the EEOC 462 Report) |                |                |                |                |                |                |                |                |                |
|--|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
| <b>Basis</b>   | <b>FY 2014</b> | <b>FY 2015</b> | <b>FY 2016</b> | <b>FY 2017</b> | <b>FY 2018</b> | <b>FY 2019</b> | <b>FY 2020</b> | <b>FY 2021</b> | <b>FY 2022</b> |
| Race   | 14             | 10             | 9              | 8              | 3              | 2              | 9              | 2              | 7              |
| Sex  | 9              | 11             | 15             | 13             | 5              | 6              | 12             | 14             | 12             |



|                 |    |    |    |    |    |    |    |    |    |
|-----------------|----|----|----|----|----|----|----|----|----|
| Age             | 8  | 7  | 8  | 9  | 3  | 10 | 10 | 3  | 7  |
| Color           | 4  | 2  | 1  | 0  | 0  | 0  | 0  | 2  | 5  |
| National Origin | 4  | 1  | 4  | 0  | 1  | 0  | 0  | 3  | 2  |
| Religion        | 0  | 3  | 2  | 1  | 0  | 0  | 0  | 1  | 3  |
| Disability      | 13 | 8  | 15 | 18 | 5  | 11 | 19 | 12 | 12 |
| Reprisal        | 18 | 16 | 20 | 12 | 10 | 16 | 6  | 18 | 17 |
| Genetics        | 0  | 0  | 0  | 0  | 0  | 0  | 0  | 0  | 1  |

Harassment (non-sexual) remains a significant reason for complaints (see chart below), as it is government wide. The number of harassment complaints at 17 was a slight increase from FY 2021, however, there were more formal complaints filed overall.

| <b>Harassment (Non-Sexual) Complaint Trends</b><br>(Referenced 4 <sup>th</sup> Quarter FY 2021 No FEAR Report) |         |         |         |         |         |         |         |         |
|--|---------|---------|---------|---------|---------|---------|---------|---------|
| FY 2014  | FY 2015 | FY 2016 | FY 2017 | FY 2018 | FY 2019 | FY 2020 | FY 2021 | FY 2022 |
| 21   | 15      | 21      | 22      | 12      | 15      | 12      | 14      | 17      |

Employees who enter the EEO process are given the choice of traditional EEO counseling or ADR when appropriate. In FY 2022, the ADR rate was 52% compared to 49% in FY 2021.

## Part E.4 - Executive Summary: Accomplishments

In FY 2022, FWS continued implementing its five-year (FY 2020-2024) DIIP, which is a five-year strategy that empowers employees at all levels to create inclusive and welcoming workplaces and enact promising practices that remove inequities for employees, partners, and stakeholders. Progress was made to drive change under three overarching objectives — employee engagement, barrier analysis and removal, and recruitment and hiring – with the following benchmarks:

- Improved Workforce Statistics:** Workforce participation analyses described in more detail above indicate that FWS has achieved mixed DEIA results in FY 2022. The participation rates for Black or African Americans (both men and women) declined (-0.2%), while the representation rates of other low-participation RNO-gender groups either increased or were unchanged. Participation improved for minority women (+0.2%) and White women (+0.5%), increases in the numbers of women and minorities in professional biological series (+1.9%), and women in leadership (+1.1%).
- Diversity and Inclusion Workplace Assessment:** 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 assessment results, paired with those from the Federal Employee Viewpoint Survey (FEVS) and Gallup surveys administered regionally within FWS, provided essential employee feedback and identified barriers that informed actions under the DIIP. The survey findings were shared with all employees via a series of live webinars.

- **Barrier Analysis Team (BAT):** A BAT was formed in FY 2022 for the sixth consecutive year, and the team led by ODIWM diversity specialists included representatives from all regions and headquarters. It evaluated workforce data to develop recommendations on removing barriers for various low participation groups including people of color, women, LGBTQIA+, and PWD. Additionally, the BAT identified barriers in the areas of retention, access to resources, and reasonable accommodations for PWD, and a gap in organization-wide practices for improving retention and employee wellness for people of color and women in the workplace. The BAT’s recommendations are informing actions in the current and future DIIP work plans.
- **Values Project:** FWS completed Phase One and entered Phase Two of a multi-year in-depth listening process with support from the Metropolitan Group. During FY 2022, Met Group conducted 20 executive interviews, 5 general listening sessions, and 25 listening sessions for specific groups of employees (e.g., employee resource groups, job series) to begin the process of defining and establishing a shared purpose and organizational core values. A shared purpose and enduring core values will inform work across organizational. Phase 2 of the project extends through FY 2023.
- **Grassroots Employee Groups:** Employee resource groups and communities of practice are welcoming forums and drivers of inclusion and positive change in FWS. Two new ERGs were formed in FY 2022 – the Black, Indigenous, and People of Color ERG and the People with Disabilities ERG – increasing the total number of official FWS ERGs to three, along with the Pride ERG. The Institutional Change Community of Practice, with nearly 200 involved employees, accomplishes projects and initiatives to adopt a community-focused conservation approach that increases DEIA and environmental justice.
- **DEIA and EEO Training:** For a second consecutive year, ODIWM offered a universal, live DEIA and EEO training course to all employees to ensure that they have foundational training on DEIA, the DIIP, and promising practices. In addition to the required two-hour course, additional training and participation in activities was encouraged. As part of the course, employees had the opportunity to provide feedback on the approach and material and 98% of respondents indicated their level of knowledge after the session was “Knowledgeable” or “Very Knowledgeable.”
- **IDEA – Inclusion, Diversity, Equity, and Accessibility – Conversations:** In FY 2021, ODIWM launched a series of live broadcasts to spark ideas and dialogue among employees and share promising practices for DEIA. Two of the three IDEA Conversations hosted to date occurred in FY 2022.
- **Employee Engagement and Leadership Development Coordinators:** The team of employee engagement and leadership development coordinators expanded in FY 2022 to include a position in each region. The team coordinates and provides training, professional development, and wellbeing services to help ensure employees have the resources and tools that they need to succeed.
- **Selection Process for Leadership Programs:** FWS clarified the selection process for its Stepping up to Leadership and Advanced Leadership Development programs 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. This action addressed barriers to participation identified in previous years’ barrier analyses.

- **Mentoring:** A team of employees was chartered this year to develop recommendations for a national mentoring program framework and a bank of resources to support a culture of mentorship in FWS. The team's recommendations now inform DIIP work plan actions to ensure that all employees have access and opportunity to participate in mentoring relationships, either as a mentor or mentee.
- **Special Emphasis Observance Partnerships:** Directorate members and their respective regions/programs hosted and delivered live national educational programs in cooperation with ODIWM's Diversity and AEP Division to engage employees in nine recognized official special observances in FY 2022.
- **Improved EEO Policy:** FWS acted to evaluate, address, and remove policy barriers identified in past years. For example, the 225 FW 1 Manual Chapter was updated to significantly reduce the number of positions requiring a driver's license to accommodate PWD, and new policy is in place for gender neutral restroom signage.
- **Public Civil Rights (PCR):** The PCR Division ensured that FWS facilities, programs, and activities and recipients of federal financial assistance provide access in a non-discriminatory manner. Accessibility consultants completed 14 (six on-site and eight desk) Federally Assisted Program (FAP) civil rights compliance reviews for non-FWS entities. Additionally, they developed and proposed a process to conduct 954 Federally Conducted Program (FCP) Self-Evaluations on a five-year recurring schedule. In preparation for conducting the self-evaluations, the PCR Division utilized the Architectural Barriers Accessibility Standards and created 83 fillable and 508 accessible checklists which will realize a budget savings of over \$190,000 per year and conducted a pilot FCP Self-Evaluation process at the Wichita Mountains Wildlife Refuge. Most notably, FWS has spent more than \$9 million in projects to increase access on public lands, including removing and replacing facilities, installing vault toilets, replacing wash stations, restrooms, parking facilities and a fishing pier.
- **Recruitment Partnerships and Outreach:**
  - FWS has official MOUs with four minority-serving institutions and two historically Black Greek organizations to foster pathways to careers in the agency. In FY 2022, MOUs were signed with New Mexico State University and the University of Texas – San Antonio and an expansion of the partnership is planned to include two HBCU: Fort Valley State University and Tuskegee University.
  - FWS is represented and actively participates on the leadership board of the [Diversity Joint Venture for Careers in Conservation](#), a consortium of more than 60 federal and state agencies, universities, non-governmental organizations, foundations, and professional societies working in partnership to increase the number of women and minorities in the environmental and conservation workforce. Additionally, FWS provides staff support for the DJV Board. In FY 2022, the DJV partnered with the DOI-Office of Human Capital (DOI-OHC) to develop an Artificial Intelligence (AI) pilot supporting students of diverse backgrounds seeking conservation-related careers both in and external to DOI. This effort aligns closely with the Executive Order on DEIA in the Federal Workforce and leverages FWS's and DOI's efforts to create a diverse and inclusive workforce with the efforts of the broader conservation community. This partnership alone has saved FWS approximately \$250,000 in development expenses that would otherwise have been necessary to achieve the DJV's conservation career map goals.

- FWS maintained proactive partnerships with organizations such as Corazon Latino, Environment for the Americas, Green Latinos, Greening Youth Foundation, Hispanic Access Foundation, Hispanics Enjoying Camping, Hiking and the Outdoors, Hispanic Prosperity Initiative, Latino Outdoors, League of United Latin American Citizens, Phi Beta Sigma Fraternity, SODAS LIFE, Urban American Outdoors, White House Initiative on HBCU, and the Zeta Phi Beta Sorority.
- Recruitment specialists last year participated in 168 outreach events at 127 schools, 60 of which are minority serving institutions, and 41 events with organizations serving minorities, Veterans, and PWD.
- In FY 2022, FWS conducted research on the latest data from the U.S. Department of Education National Center for Education Statistics to identify 140 schools including 80 minority-serving institutions for targeted recruitment based on analysis of the number of degrees conferred to minority students in majors aligned with professional biology job series.
- Under the White House Initiative on HBCU, FWS shares funding and internship and employment opportunities with faculty and staff at HBCU across the country. FWS participated in 18 recruitment outreach events at HBCU and participates on the initiative's Interagency Work Group.
- FWS recently launched a new careers and internships section on its external website at [fws.gov/careers](https://fws.gov/careers). Recruitment efforts are also enhanced through a listserv with 16,000+ subscribers and the investment of announcing positions online through job boards such as HBCU Connect; Professional Diversity Network; Minorities in Agriculture, Natural Resources, and Related Sciences (MANRRS); and the United Latino Job Bank.
- Certain regions in an ongoing partnership with the Student Conservation Association (SCA) hosted undergraduate interns through the Career Discovery Internship Program (CDIP).
- To efficiently address questions on FWS job opportunities and internships and to ensure consistent responsiveness to potential candidates, the recruitment team established and monitors a general inbox ([connect@fws.gov](mailto:connect@fws.gov)), which features an automated reply that provides each recruiter's email for additional questions and inquiries.
- **Direct Hiring Authorities:**
  - FWS uses direct hire authority for the Directorate Resource Assistant Fellows Program (DFP) participants after they complete their degree and are now using new Recent Grads and Post-Secondary hiring authorities to announce positions at recruitment outreach events and to source candidates through careers-focused social media accounts. In FY 2022, FWS recruited for the DFP through the Hispanic Access Foundation (HAF), Greening Youth Foundation (GYF), Alaska Native Science & Engineering Program, American Indian Higher Education Consortium (AIHEC), and the Thurgood Marshall College Fund (TMCf) for targeted outreach to improve minority participation. In FY 2022, FWS provided DFP opportunities for 93 students, 80% of whom were female and 39% were minorities, increasing representation from FY 2021.
  - The DEIA Committee briefed the Directorate on special hiring authority study findings, recommendations, timelines, and deliverables. Guidance is forthcoming under the DIIP on their availability and benefits (e.g., Direct Hiring Authorities, Pathways conversions, Public

Land Corps, Veterans, Schedule A) that have proven to be better sources of diverse candidates than posting positions through the delegated examining unit (open to the public).

- FWS has implemented promising practices to limit bias in the hiring process, including guidance on the use of hiring panels, use of career ladders, and bias interrupter exercises for panels.
- **Promoting Employee Retention:**
  - In August, FWS launched a [New Hire Onboarding Guide](#) on fws.gov to ensure new hires have everything they need to make a successful transition into their new role from tentative selection to starting their new job. This work is part of the National Onboarding Initiative sponsored by the Deputies Employee Onboarding & Integration Team.
  - ODIWM established a central process on the FWS intranet site to track and fulfill regional and program requests for facilitation of conversations related to DEIA.

## Part E.5 - Executive Summary: Planned Activities

As FWS endeavors to advance DEIA to be a model employer and public service agency, the intentional steps it takes transform its work culture are as important as vision-setting for the future. Director Williams signed [Director's Order 226](#) in September setting overarching direction for how the organization will achieve DEIA goals through implementation of the DIIP.

The FY 2023 DIIP Work Plan builds on collective successes to date and prioritizes actions that are informed by feedback from employee teams, working groups, and surveys as well as official direction for advancing DEIA across the federal government. FWS will continue to carry out activities under its DIIP, in alignment with the newly released governmentwide DEIA plan. The following planned activities will have an impact across multiple demographic, gender, and disability groups.

Among other actions, this year FWS will:

- Continue the process of creating a shared organizational purpose and values through the Values Project.
- Act on recommendations to ensure a culture of mentorship and open communication in FWS.
- Engage employees through focused DEIA and EEO training opportunities that build knowledge and awareness and address barriers to success.
- Continue a series of live broadcasts, launched last year, on IDEA – Inclusion, Diversity, Equity, and Accessibility – Conversations to spark ideas and dialogue among employees and share promising practices for DEIA.
- Develop more promising practices to expand the use of special hiring authorities to diversify the workforce for the future.
- Foster inclusive and welcoming workplaces by supporting the establishment and growth of employee-led communities of practice and resource groups, including new ERGs for women and Veterans and an Employee Well-Being Community of Practice. Additionally, research policy for options available to provide funding for employee resource groups.

- Increase supervisor and employee engagement by conducting outreach to encourage requests for consultation with ODIWM for diversity and inclusion support such as facilitating conversations related to diversity, equity, inclusion, and accessibility.
- ODIWM will work with JAO to include direct language about the availability of reasonable accommodations into vacancy announcements.
- FWS will introduce a FWS Stay Interview Guide (for managers & supervisors) that will serve as a tool to promote employee retention. The guide includes a standard question flow and promising practices for managers and supervisors.

Efforts in FWS to advance DEIA are intended to create a culture of dignity and respect, where everyone's talents and contributions are recognized, valued, and used in a manner that contributes to the mission.

Please refer to Part I and Part J for a breakdown of the barrier analysis and removal actions for FY 2022.

|   |   |
|---|---|
| <b>EEOC FORM 715-01<br/>PART F</b>  | <b>U.S. Equal Employment Opportunity Commission<br/>FEDERAL AGENCY ANNUAL<br/>EEO PROGRAM STATUS REPORT</b> |
| <b>Certification of Establishment of Continuing Equal Employment Opportunity Programs</b> |   |

I, Inez Uhl, GS-0260-15, am the Principal EEO Director for the U.S. Fish and Wildlife Service (FWS).

FWS has conducted an annual self-assessment of Section 717 and Section 501 programs against the essential elements as prescribed by EEO MD-715. If an essential element was not fully compliant with the standards of EEO MD-715, a further evaluation was conducted and, as appropriate, EEO Plans for Attaining the Essential Elements of a Model EEO Program, are included with this Federal Agency Annual EEO Program Status Report.

FWS has also analyzed its workforce profiles and conducted barrier analyses aimed at detecting whether any management or personnel policy, procedure or practice is operating to disadvantage any group based on race, national origin, gender or disability. EEO Plans to eliminate identified barriers, as appropriate, are included with this Federal Agency Annual EEO Program Status Report.


I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.

**INEZ UHL** Digitally signed by INEZ UHL  
Date: 2023.03.08 15:50:31  
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\_\_\_\_\_  
Inez Uhl, EEO Director  
U.S. Fish and Wildlife Service

\_\_\_\_\_  
Date

Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEOC MD-715.

 Digitally signed by MARTHA WILLIAMS  
Date: 2023.03.13 11:03:16  
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Martha Williams  
Director  
U.S. Fish and Wildlife Service

\_\_\_\_\_  
Date

## **MD-715 - PART G**

### **Agency Self-Assessment Checklist**

The Part G Self-Assessment Checklist is a series of questions designed to provide federal agencies with an effective means for conducting the annual self-assessment required in Part F of MD-715. This self-assessment permits EEO Directors to recognize, and to highlight for their senior staff, deficiencies in their EEO program that the agency must address to comply with MD-715's requirements. Nothing in Part G prevents agencies from establishing additional practices that exceed the requirements set forth in this checklist.

All agencies will be required to submit Part G to EEOC. Although agencies need not submit documentation to support their Part G responses, they must maintain such documentation on file and make it available to EEOC upon request.





The Part G checklist is organized to track the MD-715 essential elements. As a result, a single substantive matter may appear in several different sections, but in different contexts. For example, questions about establishing an anti-harassment policy fall within Element C (Management and Program Accountability), while questions about providing training under the anti-harassment policy are found in Element A (Demonstrated Commitment from Agency Leadership).

For each MD-715 essential element, the Part G checklist provides a series of "compliance indicators." Each compliance indicator, in turn, contains a series of "yes/no" questions, called "measures." To the right of the measures, there are two columns, one for the agency to answer the measure with "Yes", "No", or "NA;" and the second column for the agency to provide "comments", if necessary. Agencies should briefly explain any "N/A" answer in the comments. For example, many of the sub-component agencies are not responsible for issuing final agency decisions (FADs) in the EEO complaint process, so it may answer questions about FAD timeliness with "NA" and explain in the comments column that the parent agency drafts all FADs.

A "No" response to any measure in Part G is a program deficiency. For each such "No" response, an agency will be required in Part H to identify a plan for correcting the identified deficiency. If one or more sub-components answer "No" to a particular question, the agency-wide/parent agency's report should also include that "No" response.





## MD-715 - PART G Agency Self-Assessment Checklist

| <b>Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP</b>  |   |                             |  |
|---|---|-----------------------------|--|
| <b>This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.</b> |   |                             |  |
| <br>Compliance Indicator                                      |   | Measure Met?<br>(Yes/No/NA) | Comments   |
| <br>Measures  |   |                             |  |
| <b>A.1.a</b>  | <b>A.1 – The agency issues an effective, up-to-date EEO policy statement.</b>   | Yes                         |  |
|   | Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency’s commitment to EEO for all employees and applicants? If “yes”, please provide the annual issuance date in the Comments column. [see MD-715, II(A)]      | Yes                         | April 8, 2022<br><a href="https://www.fws.gov/sites/default/files/documents/EEO-Non%20Discrimination%20Policy%20Memo%20FY%202022.pdf">https://www.fws.gov/sites/default/files/documents/EEO-Non%20Discrimination%20Policy%20Memo%20FY%202022.pdf</a>   |
| <b>A.1.b</b>  | <b>A.1 – The agency issues an effective, up-to-date EEO policy statement.</b>   | Yes                         |  |
|   | Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)] | Yes                         |  |
| <br>Compliance Indicator                                    |   | Measure Met?<br>(Yes/No/NA) | Comments   |
| <br>Measures  |   |                             |  |
| <b>A.2.a</b>  | <b>A.2 – The agency has communicated EEO policies and procedures to all employees.</b>  | Yes                         |  |
|   | Does the agency disseminate the following policies and procedures to all employees  | Yes                         |  |
| <b>A.2.a.1</b>  | <b>A.2 – The agency has communicated EEO policies and procedures to all employees.</b>  | Yes                         |  |
|   | Anti-harassment policy? [see MD 715, II(A)]   | Yes                         | On the intranet (SharePoint) site and through mandatory annual EEO/Diversity training<br><a href="https://www.doi.gov/sites/doi.gov/files/elips/documents/pb-18-01-prevention-and-elimination-of-harassing-conduct-signed-2018-03-23-508.pdf">https://www.doi.gov/sites/doi.gov/files/elips/documents/pb-18-01-prevention-and-elimination-of-harassing-conduct-signed-2018-03-23-508.pdf</a> |



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| <b>A.2.a.2</b>   | Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]  | Yes                             | DOI PB 21-03<br><a href="https://www.doi.gov/sites/doi.gov/files/elips/documents/pb-21-03-processing-requests-for-reasonable-accommodation-for-individuals-with-disabilities-10-24-2022-508.pdf">https://www.doi.gov/sites/doi.gov/files/elips/documents/pb-21-03-processing-requests-for-reasonable-accommodation-for-individuals-with-disabilities-10-24-2022-508.pdf</a> |
| <b>A.2.b</b>   | Does the agency prominently post the following information throughout the workplace and on its public website   |                                 |   |
| <b>A.2.b.1</b>   | The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]                         | Yes                             |   |
| <b>A.2.b.2</b>   | Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]                              | Yes                             |   |
| <b>A.2.b.3</b>   | Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.   | Yes                             | <a href="https://www.doi.gov/accesscenter/accommodations">https://www.doi.gov/accesscenter/accommodations</a>   |
| <b>A.2.c</b>   | Does the agency inform its employees about the following topics:  |                                 |   |
| <b>A.2.c.1</b>   | EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often.   | Yes                             | Annually through the EEO Policy Statement, required training, and on an ongoing basis through the internal SharePoint site.   |
| <b>A.2.c.2</b>   | ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.   | Yes                             | On an ongoing basis through the SharePoint site and as needed for employees who engage with EEO Counselors.   |
| <b>A.2.c.3</b>   | Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.  | Yes                             | Annually through various methods including required training and on an ongoing basis through the internal SharePoint site.  |
| <b>A.2.c.4</b>   | Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often. | Yes                             | Annually  |
| <b>A.2.c.5</b>   | Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] If “yes”, please provide how often.                                | Yes                             | Annually  |
| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>A.3 – The agency assesses and ensures EEO principles are part of its culture.</b>  | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b><br><br><b>New Compliance Indicator</b>  |





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| <b>A.3.a</b>   | Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section.                                  | Yes                                 | The FWS submits nominations for the Secretary’s Diversity Award: These awards, which are signed by the Secretary, recognize and honor employees or groups of employees who have provided exemplary service and/or have made significant contributions to efforts to increase diversity at all levels. |
| <b>A.3.b</b>   | Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]   | Yes                                 |   |
| <b>Essential Element B: INTEGRATION OF EEO INTO THE AGENCY’S STRATEGIC MISSION</b><br><b>This element requires that the agency’s EEO programs are structured to maintain a workplace that is free from discrimination and supports the agency’s strategic mission.</b> |  |                                     |   |
| <br><b>Compliance Indicator</b><br><br><b>Measures</b>   | <b>B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.</b>   | <b>Measure Met?<br/>(Yes/No/NA)</b> | <b>Comments</b>   |
| <b>B.1.a</b>   | Is the agency head the immediate supervisor of the person (“EEO Director”) who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]  | No                                  |   |
| <b>B.1.a.1</b>   | If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If “yes,” please provide the title of the agency head designee in the comments.                                       | Yes                                 | In FY 2022, the EEO Director reported to the Deputy Director of Program Management and Policy.  |
| <b>B.1.a.2</b>   | Does the agency’s organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]   | Yes                                 |   |
| <b>B.1.b</b>   | Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency’s EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]                  | Yes                                 |   |
| <b>B.1.c</b>   | During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the “State of the agency” briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 | Yes                                 | On March 28, 2022, the EEO Director provided a briefing to the Director and the Deputy Directors on the State of the Agency covering all components of MD-715.  |



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|  |   |                                 |   |
|--|---|---------------------------------|---|
|  | Instructions, Sec. I)] If “yes”, please provide the date of the briefing in the comments column.  |                                 |   |
| <b>B.1.d</b>   | Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]  | Yes                             |   |
| <br><b>Compliance Indicator</b><br><br><b>Measures</b>     | <b>B.2 – The EEO Director controls all aspects of the EEO program.</b>  | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments<br/>New Compliance Indicator</b>  |
| <b>B.2.a</b>   | Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)] | Yes                             |   |
| <b>B.2.b</b>   | Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR §1614.102(c)(4)]  | Yes                             |   |
| <b>B.2.c</b>   | Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]                                      | Yes                             |   |
| <b>B.2.d</b>   | Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]  | Yes                             | Although final agency decisions are issued by the DOI, ODICR and the EEO Director monitors their completion to ensure timeliness. |
| <b>B.2.e</b>   | Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]   | Yes                             |   |
| <b>B.2.f</b>   | Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]   | Yes                             |   |
| <b>B.2.g</b>   | If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2) and (c)(3)]   | Yes                             |   |
| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b>   |



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| <b>B.3.a</b>  | Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]  | Yes                             |  |
| <b>B.3.b</b>  | Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.  | Yes                             | The DOI FY2022-2026 Strategic Plan states, "The Department commits itself to upholding and advancing DEIA.... We will remove obstacles that adversely affect our ability to hire and retain members of underrepresented communities. We will assess the workplace culture, identifying and addressing behaviors that can lead to inequity, intolerance, discrimination, and harassment." |
| <hr/>   |  |                                 |  |
| <br><b>Compliance Indicator</b> | <b>B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.</b>  | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b>  |
| <br><b>Measures</b>             |  |                                 |  |
| <b>B.4.a</b>  | Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:   |                                 |  |
| <b>B.4.a.1</b>  | to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]  | Yes                             |  |
| <b>B.4.a.2</b>  | to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]  | Yes                             |  |
| <b>B.4.a.3</b>  | to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]  | Yes                             |  |
| <b>B.4.a.4</b>  | to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column. | Yes                             |  |

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| <b>B.4.a.5</b>   | to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]  | Yes                             |   |
| <b>B.4.a.6</b>   | to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]  | Yes                             |   |
| <b>B.4.a.7</b>   | to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section. | Yes                             |   |
| <b>B.4.a.8</b>   | to effectively administer its special emphasis programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]         | Yes                             |   |
| <b>B.4.a.9</b>   | to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]   | Yes                             |   |
| <b>B.4.a.10</b>  | to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]   | Yes                             |   |
| <b>B.4.a.11</b>  | to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]  | Yes                             |   |
| <b>B.4.b</b>   | Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]  | Yes                             |   |
| <b>B.4.c</b>   | Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]   | Yes                             |   |
| <b>B.4.d</b>   | Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?   | Yes                             |   |
| <b>B.4.e</b>   | Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?   | Yes                             |   |
| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.</b>  | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b><br><br><b>New Indicator</b> |

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| <b>B.5.a</b>   | Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:  |     |  |
| <b>B.5.a.1</b> | EEO Complaint Process? [see MD-715(II)(B)]  | Yes |  |
| <b>B.5.a.2</b> | Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]   | Yes |  |
| <b>B.5.a.3</b> | Anti-Harassment Policy? [see MD-715(II)(B)]   | Yes |  |
| <b>B.5.a.4</b> | Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)] | Yes |  |
| <b>B.5.a.5</b> | ADR, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]  | Yes |  |

| <br><b>Compliance Indicator</b> | <b>B.6 – The agency involves managers in the implementation of its EEO program.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b>      |
|---|---|---------------------------------|----------------------|
| <br><b>Measures</b>             |   |                                 | <b>New Indicator</b> |
| <b>B.6.a</b>  | Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]  | Yes                             |                      |
| <b>B.6.b</b>  | Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]   | Yes                             |                      |
| <b>B.6.c</b>  | When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I] | Yes                             |                      |
| <b>B.6.d</b>  | Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR § 1614.102(a)(5)]            | Yes                             |                      |

**Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY**  
**This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency's EEO Program and Plan.**

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| <br><b>Compliance Indicator</b><br><br><b>Measures</b>  |   | <b>Measure Met?<br/>(Yes/No/NA)</b> | <b>Comments</b>   |
|---|---|-------------------------------------|---|
|   | <b>C.1 – The agency conducts regular internal audits of its component and field offices.</b>  |                                     |   |
| <b>C.1.a</b>  | Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If “yes”, please provide the schedule for conducting audits in the comments section.   | Yes                                 | The EEO Director and EEO Program Managers communicate and consult with members of the Directorate frequently to bring any program deficiencies to their attention. Component and field offices are required to provide information on progress towards completing their EEO, diversity and inclusion, and barrier removal requirements. |
| <b>C.1.b</b>  | Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If “yes”, please provide the schedule for conducting audits in the comments section.  | Yes                                 | In FY 2022, the FWS Affirmative Employment Program Division reviewed data and tracked progress on barrier analysis and removal.   |
| <b>C.1.c</b>  | Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]   | Yes                                 |   |
|   |   |                                     |   |
| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>C.2 – The agency has established procedures to prevent all forms of EEO discrimination.</b>  | <b>Measure Met?<br/>(Yes/No/NA)</b> | <b>Comments</b><br><br><b>New Indicator</b>   |
| <b>C.2.a</b>  | Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC’s enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)] | Yes                                 |   |
| <b>C.2.a.1</b>  | Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]   | Yes                                 |   |
| <b>C.2.a.2</b>  | Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]  | Yes                                 |   |





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| <b>C.2.a.3</b> | Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]   | Yes |   |
| <b>C.2.a.4</b> | Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [see Enforcement Guidance, V.C.]  | Yes |   |
| <b>C.2.a.5</b> | Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <i>Complainant v. Dep't of Veterans Affairs</i> , EEOC Appeal No. 0120123232 (May 21, 2015); <i>Complainant v. Dep't of Defense (Defense Commissary Agency)</i> , EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column. | Yes |   |
| <b>C.2.a.6</b> | Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR 1614.203(d)(2)]  | Yes |   |
| <b>C.2.b</b>   | Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR 1614.203(d)(3)]  | Yes | DOI PB 21-03<br><a href="https://www.doi.gov/sites/doi.gov/files/elips/documents/pb-21-03-processing-requests-for-reasonable-accommodation-for-individuals-with-disabilities-10-24-2022-508.pdf">https://www.doi.gov/sites/doi.gov/files/elips/documents/pb-21-03-processing-requests-for-reasonable-accommodation-for-individuals-with-disabilities-10-24-2022-508.pdf</a> |
| <b>C.2.b.1</b> | Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)]   | Yes |   |
| <b>C.2.b.2</b> | Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]  | Yes |   |
| <b>C.2.b.3</b> | Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR 1614.203(d)(1)(ii)(B)]  | Yes |   |
| <b>C.2.b.4</b> | Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR 1614.203(d)(3)(i)(M)]   | Yes | DOI PB 21-03<br><a href="https://www.doi.gov/sites/doi.gov/files/elips/documents/pb-21-03-processing-requests-for-reasonable-accommodation-for-individuals-with-disabilities-10-24-2022-508.pdf">https://www.doi.gov/sites/doi.gov/files/elips/documents/pb-21-03-processing-requests-for-reasonable-accommodation-for-individuals-with-disabilities-10-24-2022-508.pdf</a> |



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| <b>C.2.b.5</b>   | Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests in the comments column.        | Yes                             |   |
| <b>C.2.c</b>   | Has the agency established procedures for processing requests for personal assistance services that comply with EEOC’s regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)] | Yes                             | DOI PB 17-18<br><a href="https://www.doi.gov/sites/doi.gov/files/uploads/personnel_bulletin_17-18_personal_assistance_services.pdf">https://www.doi.gov/sites/doi.gov/files/uploads/personnel_bulletin_17-18_personal_assistance_services.pdf</a> |
| <b>C.2.c.1</b>   | Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If “yes”, please provide the internet address in the comments column.                            | Yes                             | <a href="https://www.doi.gov/accesscenter/accommodations/pas">https://www.doi.gov/accesscenter/accommodations/pas</a>   |
| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b><br><br><b>New Indicator</b>   |
| <b>C.3.a</b>   | Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?                  | Yes                             |   |
| <b>C.3.b</b>   | Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:   |                                 |   |
| <b>C.3.b.1</b>   | Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]   | Yes                             |   |
| <b>C.3.b.2</b>   | Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]   | Yes                             |   |
| <b>C.3.b.3</b>   | Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]   | Yes                             |   |
| <b>C.3.b.4</b>   | Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]  | Yes                             |   |
| <b>C.3.b.5</b>   | Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]  | Yes                             |   |





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| <b>C.3.b.6</b>   | Provide disability accommodations when such accommodations do not cause an undue hardship? [ see 29 CFR §1614.102(a)(8)]  | Yes                             |   |
| <b>C.3.b.7</b>   | Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]  | Yes                             |   |
| <b>C.3.b.8</b>   | Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]  | Yes                             |   |
| <b>C.3.b.9</b>   | Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]   | Yes                             |   |
| <b>C.3.c</b>   | Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]  | N/A                             | There were no findings of discrimination in FY2022; therefore, the EEO Director did not make recommendations for remedial or disciplinary action. |
| <b>C.3.d</b>   | When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]  | N/A                             | There were no recommendations for disciplinary action by the EEO Director for FY 2022 per C.3.c above.  |
| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b>   |
| <b>C.4.a</b>   | Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]   | Yes                             |   |
| <b>C.4.b</b>   | Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I] | Yes                             |   |
| <b>C.4.c</b>   | Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]  | Yes                             |   |



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| <b>C.4.d</b>   | Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]  | Yes                             |  |
| <b>C.4.e</b>   | Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:  |                                 |  |
| <b>C.4.e.1</b>   | Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]  | Yes                             |  |
| <b>C.4.e.2</b>   | Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]  | Yes                             |  |
| <b>C.4.e.3</b>   | Develop and/or provide training for managers and employees? [see MD-715, II(C)]  | Yes                             |  |
| <b>C.4.e.4</b>   | Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]  | Yes                             |  |
| <b>C.4.e.5</b>   | Assist in preparing the MD-715 report? [see MD-715, II(C)]   | Yes                             |  |
| <br><b>Compliance Indicator</b><br><br><b>Measures</b>     | <b>C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.</b>  | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b>                                      |
| <b>C.5.a</b>   | Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)]   | Yes                             |  |
| <b>C.5.b</b>   | When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If “yes”, <b><u>please state the number of disciplined/sanctioned individuals during this reporting period in the comments.</u></b> | N/A                             | There were no findings of discrimination in FY 2022. |
| <b>C.5.c</b>   | If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [see MD-715, II(C)]  | N/A                             | There were no findings of discrimination in FY2022.  |
| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>C.6 – The EEO office advises managers/supervisors on EEO matters.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b>                                      |





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| <b>C.6.a</b>   | Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If “yes”, please identify the frequency of the EEO updates in the comments column.                            | Yes                             | The EEO Office provides workforce demographic updates on a monthly basis. Additionally, management/supervisory officials are provided a copy of the EEOC MD-715 Report, which includes the 462 Report on Complaints, barrier analysis plans, and special emphasis accomplishments. |
| <b>C.6.b</b>   | Are EEO officials readily available to answer managers’ and supervisors’ questions or concerns? [see MD-715 Instructions, Sec. I]  | Yes                             |  |
| <b>Essential Element D: PROACTIVE PREVENTION</b>   |  |                                 |  |
| <b>This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.</b> |  |                                 |  |
| <br><b>Compliance Indicator</b>  | <b>D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b>  |
| <br><b>Measures</b>  |  |                                 |  |
| <b>D.1.a</b>   | Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]  | Yes                             |  |
| <b>D.1.b</b>   | Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] | Yes                             |  |
| <b>D.1.c</b>   | Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]  | Yes                             |  |
|  |  |                                 |  |





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| <br><b>Compliance Indicator</b><br><br><b>Measures</b>    | <b>D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b><br><br><b>New Indicator</b>  |
|---|---|---------------------------------|--|
| <b>D.2.a</b>  | Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, II(B)]   | Yes                             |  |
| <b>D.2.b</b>  | Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]  | Yes                             |  |
| <b>D.2.c</b>  | Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]  | Yes                             | The EEO Office conducts adverse impact analyses for programs that are considering workforce changes. |
| <b>D.2.d</b>  | Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] If “yes”, please identify the data sources in the comments column. | Yes                             | See Part I for full list.  |
| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>D.3 – The agency establishes appropriate action plans to remove identified barriers.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b><br><br><b>New Indicator</b>  |
| <b>D.3.a.</b>   | Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]  | Yes                             |  |
| <b>D.3.b</b>  | If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]  | Yes                             |  |
| <b>D.3.c</b>  | Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]   | Yes                             |  |



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| <br><b>Compliance Indicator</b><br><br><b>Measures</b>   | <b>D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b><br><br><b>New Indicator</b>  |
|--|--|---------------------------------|--|
| <b>D.4.a</b>   | Does the agency post its affirmative action plan on its public website? [see 29 CFR 1614.203(d)(4)] Please provide the internet address in the comments.   | Yes                             | <a href="https://www.fws.gov/program/diversity-and-inclusive-workforce-management/what-we-do">https://www.fws.gov/program/diversity-and-inclusive-workforce-management/what-we-do</a><br><br><a href="https://www.fws.gov/media/md-715-reports-2017-2021">https://www.fws.gov/media/md-715-reports-2017-2021</a> |
| <b>D.4.b</b>   | Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]  | Yes                             |  |
| <b>D.4.c</b>   | Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]  | Yes                             |  |
| <b>D.4.d</b>   | Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR 1614.203(d)(7)(ii)] | Yes                             |  |
| <b>Essential Element E: EFFICIENCY</b><br><b>This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency’s EEO programs and an efficient and fair dispute resolution process.</b> |  |                                 |  |
| <br><b>Compliance Indicator</b><br><br><b>Measures</b>                                       | <b>E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.</b>  | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b>  |
| <b>E.1.a</b>   | Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?   | Yes                             |  |
| <b>E.1.b</b>   | Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?  | Yes                             |  |
| <b>E.1.c</b>   | Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(l)?   | Yes                             |  |

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|--|---|---------------------------------|---|
| <b>E.1.d</b>   | Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments. | Yes                             | Average: Five Days  |
| <b>E.1.e</b>   | Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?                    | Yes                             |   |
| <b>E.1.f</b>   | Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?   | Yes                             |   |
| <b>E.1.g</b>   | If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?           | N/A                             | The FWS completes all investigations in a timely manner.  |
| <b>E.1.h</b>   | When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?   | Yes                             |   |
| <b>E.1.i</b>   | Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?  | Yes                             |   |
| <b>E.1.j</b>   | If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comments column.            | Yes                             | FWS holds the firms accountable by withholding payment until legally sufficient work products are received. |
| <b>E.1.k</b>   | If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]  | Yes                             |   |
| <b>E.1.l</b>   | Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]  | Yes                             |   |
| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>E.2 – The agency has a neutral EEO process.</b>  | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b><br><br><b>Revised Indicator</b>   |







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|--|---|---------------------------------|---|
| <b>E.2.a</b>   | Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)]  | Yes                             | The EEO Complaint program at FWS is in a clearly different structure with separate roles than the defensive function.   |
| <b>E.2.b</b>   | When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If “yes”, please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column. | Yes                             | ODIWM's EEO Complaints and Compliance Division conducts sufficiency reviews. The EEO specialists conducting legal sufficiency reviews are supervised by an attorney. In addition, DOI, ODICR conducts its own legal sufficiency reviews where a FAD has been requested. |
| <b>E.2.c</b>   | If the EEO office relies on the agency’s defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]   | N/A                             | The EEO office does not rely on the defensive function to conduct legal sufficiency reviews.  |
| <b>E.2.d</b>   | Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]  | Yes                             |   |
| <b>E.2.e</b>   | If applicable, are processing time frames incorporated for the legal counsel’s sufficiency review for timely processing of complaints? [see EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)]  | N/A                             | The EEO office does not rely on the defensive function to conduct legal sufficiency reviews.  |
| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b>   |
| <b>E.3.a</b>   | Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]  | Yes                             |   |
| <b>E.3.b</b>   | Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]   | Yes                             |   |
| <b>E.3.c</b>   | Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]  | Yes                             |   |
| <b>E.3.d</b>   | Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]  | Yes                             |   |
| <b>E.3.e</b>   | Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]  | Yes                             |   |



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|--|--|-------------------------------------|---|
| <b>E.3.f</b>   | Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]   | Yes                                 |   |
| <br><b>Compliance Indicator</b><br><br><b>Measures</b>     | <b>E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.</b>   | <b>Measure Met?<br/>(Yes/No/NA)</b> | <b>Comments</b>   |
| <b>E.4.a</b>   | Does the agency have systems in place to accurately collect, monitor, and analyze the following data:  |                                     |   |
| <b>E.4.a.1</b>   | Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]  | Yes                                 |   |
| <b>E.4.a.2</b>   | The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]   | Yes                                 |   |
| <b>E.4.a.3</b>   | Recruitment activities? [see MD-715, II(E)]  | Yes                                 |   |
| <b>E.4.a.4</b>   | External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]  | Yes                                 |   |
| <b>E.4.a.5</b>   | <b>The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]</b>  | Yes                                 |   |
| <b>E.4.a.6</b>   | The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]                             | Yes                                 |   |
| <b>E.4.b</b>   | Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]  | Yes                                 |   |
| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.</b>  | <b>Measure Met?<br/>(Yes/No/NA)</b> | <b>Comments</b>   |
| <b>E.5.a</b>   | Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments. | Yes                                 | FWS monitors trends in the EEO Program and conducts barrier analyses in compliance with the statutes that EEOC administers. |





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|--|--|---------------------------------|---|
| <b>E.5.b</b>   | Does the agency review other agencies' best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If "yes", provide an example in the comments.        | Yes                             | FWS participated in the DEIA Promising Practices survey from OMB which served as an idea bank for promising practices and initiatives. FWS carried out its own research into promising practices that are being implemented across multiple industries. FWS participates in best practices meetings and discussions with other DOI bureaus on at least a monthly basis to identify improvement opportunities. |
| <b>E.5.c</b>   | Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]  | Yes                             |   |
| <b>Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE</b>  |  |                                 |   |
| <b>This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.</b>   |  |                                 |   |
| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.</b>  | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b>   |
| <b>F.1.a</b>   | Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]                     | Yes                             |   |
| <b>F.1.b</b>   | Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]   | Yes                             |   |
| <b>F.1.c</b>   | Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]  | Yes                             |   |
| <b>F.1.d</b>   | Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]   | Yes                             |   |
| <b>F.1.e</b>   | When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)] | N/A                             | FWS did not have any delays nor poor work products in FY 2022. All Orders were adhered to in a timely manner.   |

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| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.</b>  | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b><br><br><b>Indicator moved from E-III Revised</b> |
|--|--|---------------------------------|--|
| <b>F.2.a</b>   | Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]  | Yes                             |  |
| <b>F.2.a.1</b>   | When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]                           | Yes                             |  |
| <b>F.2.a.2</b>   | When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501] | N/A                             | There were no findings of discrimination in FY2022.              |
| <b>F.2.a.3</b>   | When a complainant files an appeal, does the agency timely forward the investigative file to EEOC’s Office of Federal Operations? [see 29 CFR §1614.403(e)]                              | Yes                             |  |
| <b>F.2.a.4</b>   | Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?   | Yes                             |  |
| <br><b>Compliance Indicator</b><br><br><b>Measures</b> | <b>F.3 - The agency reports to EEOC its program efforts and accomplishments.</b>   | <b>Measure Met? (Yes/No/NA)</b> | <b>Comments</b>  |
| <b>F.3.a</b>   | Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]  | Yes                             |  |
| <b>F.3.b</b>   | Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]  | Yes                             |  |

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**MD-715 – Part H**  
**Agency EEO Plan to Attain the Essential Elements of a Model EEO Program**

Please describe the status of each plan that the agency has implemented to correct deficiencies in the EEO program.

If the agency did not address any deficiencies during the reporting period, please check the box.

**Statement of Model Program Essential Element Deficiency**

| Type of Program Deficiency   | Brief Description of Program Deficiency              |
|--|--|
| [Part G Question B.1.a.]<br><br>Agency head is not the immediate supervisor of the person (“EEO Director”) who has day-to-day control over the EEO office. | The EEO Director does not report to the agency head. |

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

| Date Initiated<br>(mm/dd/yyyy) | Objective  | Target Date<br>(mm/dd/yyyy) | Modified Date<br>(mm/dd/yyyy) | Date Completed<br>(mm/dd/yyyy) |
|--------------------------------|--|-----------------------------|-------------------------------|--------------------------------|
| 03/13/2023                     | Compliance with the Elijah E. Cummings Federal Employee Anti-Discrimination Act of 2020. | 03/26/2023                  |                               |                                |

**Responsible Official(s)**

| Title        | Name            | Performance Standards Address the Plan?<br>(Yes or No) |
|--------------|-----------------|--|
| FWS Director | Martha Williams | Yes  |

**Planned Activities Toward Completion of Objective**

| Target Date<br>(mm/dd/yyyy) | Planned Activities                          | Sufficient Funding & Staffing?<br>(Yes or No) | Modified Date<br>(mm/dd/yyyy) | Completion Date<br>(mm/dd/yyyy) |
|-----------------------------|---|---|-------------------------------|---------------------------------|
| 03/26/2023                  | Realign the EEO Director and update the FWS | Yes   |                               |                                 |

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| <b>Target Date</b><br>(mm/dd/yyyy) | <b>Planned Activities</b> | <b>Sufficient Funding &amp; Staffing?</b><br>(Yes or No) | <b>Modified Date</b><br>(mm/dd/yyyy) | <b>Completion Date</b><br>(mm/dd/yyyy) |
|------------------------------------|---------------------------|--|--------------------------------------|--|
|                                    | organization chart.       |  |                                      |  |

**Report of Accomplishments**

| <b>Fiscal Year</b> | <b>Accomplishments</b> |
|--------------------|------------------------|
|                    | N/A                    |

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MD-715 – Part I

**Agency EEO Plan to Eliminate Identified Barrier**  
**LGBTQ Participation**

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

If the agency did not conduct barrier analysis during the reporting period, please check the box.

**Statement of Condition That Was a Trigger for a Potential Barrier:**

| Source of the Trigger                                       | Narrative Description of Trigger  |
|---|---|
| FY 2022 Diversity and Inclusion Workplace Assessment Survey | <p>Compared to other FWS employees, diversity and inclusion training was a top concern for LGBTQ employees. The next biggest concern in comparison to other employees was with FWS as a welcoming workplace. Specifically:</p> <p>“FWS offers sufficient training in diversity and inclusion (D&amp;I)” (-)20% positive response rate, compared to those who did not identify as LGBTQ.</p> <p>“FWS is a welcoming and inclusive place to work for employees of all races and ethnicities” (-)18% positive response rate, compared to those who did not identify as LGBTQ.</p> <p>“FWS is a welcoming and inclusive place to work for employees of all genders.” (-)17% positive response rate, compared to those who did not identify as LGBTQ.</p> <p>“FWS is a welcoming and inclusive place to work for all employees.” (-)16% positive response rate, compared to those who did not identify as LGBTQ.</p> |

**EEO Group(s) Affected by Trigger**

| EEO Group                         |
|-----------------------------------|
| All Men X                         |
| All Women X                       |
| Hispanic or Latino Males          |
| Hispanic or Latino Females        |
| White Males                       |
| White Females                     |
| Black or African American Males   |
| Black or African American Females |
| Asian Males                       |

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| <b>EEO Group</b>                                  |
|---|
| Asian Females                                     |
| Native Hawaiian or Other Pacific Islander Males   |
| Native Hawaiian or Other Pacific Islander Females |
| American Indian or Alaska Native Males            |
| American Indian or Alaska Native Females          |
| Two or More Races Males                           |
| Two or More Races Females                         |

**Barrier Analysis Process**

| <b>Sources of Data</b>  | <b>Source Reviewed?<br/>(Yes or No)</b> | <b>Identify Information Collected</b>   |
|---|---|---|
| Workforce Data Tables   | Yes                                     | Currently, there is no workforce participation data for employees who identify as LGBTQ.  |
| Complaint Data (Trends)   | Yes                                     | There was no complaint activity related to sexual orientation discrimination, filed under the basis of sex.   |
| Grievance Data (Trends)   | Yes                                     | Grievance data does not differentiate or give details into LGBTQ+ status. However, harassment allegations and actions include 126 total grievances from 2017-2022, and 41 instances of misconduct, which highlights need to continue efforts directed towards workplace inclusion.  |
| Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes) | Yes                                     | No FY 2022 EEO findings of discrimination.  |
| Climate Assessment Survey (e.g., FEVS)  | Yes                                     | Reported in initial triggers above. LGBTQ employees are consistently rating the workforce more negatively than non-LGBTQ employees.<br><br>FY 2022 Federal Employee Viewpoint Survey (FEVS) for all respondents: <ul style="list-style-type: none"> <li>○ I have similar access to advancement opportunities (e.g., promotion, career development, training) as others in my work unit. (68.6% positive response)</li> <li>○ In my work unit, excellent work is similarly recognized for all employees (e.g., awards, acknowledgements). (71.3% positive response)</li> <li>○ My organization's management practices promote</li> </ul> |



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| <b>Sources of Data</b>                         | <b>Source Reviewed?<br/>(Yes or No)</b> | <b>Identify Information Collected</b>  |
|--|---|--|
|  |   | diversity (e.g., outreach, recruitment, promotion opportunities). (72.4% positive response)  |
| Exit Interview Data                            | Yes                                     | For all respondents, lack of promotion and/or career advancement opportunity, pay, dissatisfaction with work environment, and dissatisfaction with supervisor were in the top six reasons identified for leaving.  |
| Focus Groups                                   | Yes                                     | <p>The FY 2022 Barrier Analysis Team (BAT) consisted of a sub-team that focused on LGBTQ through discussions and worked through the barrier analysis progress. Triggers included: fear of reprisal, lack of mentoring and career advancement, insufficient diversity and inclusion training, lack of welcoming and inclusive work environment, rigid qualifications for the hiring process, and a lack of targeted recruitment for LGBTQ.</p> <p>The Sexual Orientation and Gender Identity (SOGI) data collection tool is not activated in the FWS personnel system and this limits the ability to conduct more extensive workforce and barrier analysis.</p> |
| Interviews                                     | Yes                                     | The FY 2022 BAT conducted interviews with employees from FWS employee resource groups and communities of practice, Joint Administrative Operations and HR, National Conservation Training Center (NCTC), Office of Diversity and Inclusive Workforce Management (ODIWM) Complaints Program, and the FWS National Recruitment Team.   |
| Reports (e.g., Congress, EEOC, MSPB, GAO, OPM) | Yes                                     | <p>OPM Focus Group Report 2020</p> <p>Met Group – Values Listening Sessions Report 2022 (contracted by FWS)</p>  |
| Other (Please Describe)                        | Yes                                     | LGBTQ+ ERG Membership Survey   |

**Status of Barrier Analysis Process**

| <b>Barrier Analysis Process Completed?<br/>(Yes or No)</b> | <b>Barrier(s) Identified?<br/>(Yes or No)</b> |
|--|---|
| Yes  | Yes   |

**Statement of Identified Barrier(s)**

|  |
|--|
| <b>Description of Policy, Procedure, or Practice</b> |
|--|

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| <b>Description of Policy, Procedure, or Practice</b>   |
|--|
| Various Human Capital and Information Technology systems do not have a chosen name field.  |
| The Sexual Orientation and Gender Identify (SOGI) data collection tool is not currently activated to enable more extensive workforce and barrier analysis.   |
| FWS has no policy on gender-neutral and inclusive restroom signage.  |
| FWS does not have a procedure to engage all supervisors on a regular basis on national expectations related to DEIA and related topics (for example: topics such as accountability, reprisal, and intercultural competencies). |

Objective(s) and Dates for EEO Plan

| <b>Objective</b>  | <b>Date Initiated<br/>(mm/dd/yyyy)</b> | <b>Target Date<br/>(mm/dd/yyyy)</b> | <b>Sufficient<br/>Funding &amp;<br/>Staffing?<br/>(Yes or No)</b> | <b>Modified Date<br/>(mm/dd/yyyy)</b> | <b>Date Completed<br/>(mm/dd/yyyy)</b> |
|---|--|-------------------------------------|---|---------------------------------------|--|
| ODIWM and JAO will recommend to DOI integrating a chosen name field into various human resources systems.   | 12/31/2021                             | 12/31/2022                          | Yes   |                                       | 12/31/2022                             |
| ODIWM will recommend to the JAO that HR staff expand available resources and awareness for how benefits apply to members of the LGBTQ community.  | 12/31/2021                             | 12/31/2022                          | Yes   |                                       | 12/31/2022                             |
| ODIWM will recommend that the JAO develop facilities guide for incorporating restrooms and facilities requests for members of the LGBTQ community.  | 12/31/2021                             | 12/31/2022                          | Yes   |                                       | 12/31/2022                             |
| ODIWM and JAO will work with DOI and the Interior Business Center (IBC) to develop a plan and track action items towards integrating a chosen name field into human resources and information technology systems. | 12/31/2022                             | 09/30/2023                          | Yes   |                                       |  |

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| <b>Objective</b>   | <b>Date Initiated<br/>(mm/dd/yyyy)</b> | <b>Target Date<br/>(mm/dd/yyyy)</b> | <b>Sufficient<br/>Funding &amp;<br/>Staffing?<br/>(Yes or No)</b> | <b>Modified Date<br/>(mm/dd/yyyy)</b> | <b>Date Completed<br/>(mm/dd/yyyy)</b> |
|--|--|-------------------------------------|---|---------------------------------------|--|
| FWS will launch a dedicated SharePoint site that addresses LGBTQ issues and ensures employees are aware of updated policies and resources available to them.                         | 12/31/2022                             | 06/30/2023                          | Yes   |                                       |  |
| FWS will develop step-down policy and implementation guidance for DOI's policy on restroom signage.  | 12/31/2022                             | 09/30/2023                          | Yes   |                                       |  |
| FWS will develop a standardized process to engage supervisors on national expectations related to DEIA and related topics (for example, via standardized supervisor connect forums). | 12/31/2022                             | 04/01/2023                          | Yes   |                                       |  |
| Explore the feasibility of activating the SOGI data collection tool that is currently available.   | 03/17/2023                             | 09/30/2023                          | Yes   |                                       |  |
| Partner with OPM to advance the release of the SOGI data tool that is being developed for government-wide use.   | 03/17/2023                             | 09/30/2023                          | Yes   |                                       |  |

**Responsible Official(s)**

| <b>Title</b>         | <b>Name</b>     | <b>Performance Standards<br/>Address the Plan?<br/>(Yes or No)</b> |
|----------------------|-----------------|--|
| Director, FWS        | Martha Williams | Yes  |
| Deputy Director, FWS | Stephen Guertin | Yes  |
| Deputy Director, FWS | Wendi Weber     | Yes  |

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| <b>Title</b>                                      | <b>Name</b>    | <b>Performance Standards Address the Plan? (Yes or No)</b> |
|---|----------------|--|
| DEIA Committee Chair                              | Wendi Weber    | Yes  |
| Assistant Director, Management and Administration | Janine Velasco | Yes  |
| EEO Director                                      | Inez Uhl       | Yes  |

**Planned Activities Toward Completion of Objective**

| <b>Target Date</b> | <b>Planned Activities</b>  | <b>Modified Date</b> | <b>Completion Date</b> |
|--------------------|--|----------------------|------------------------|
| 4/30/2022          | 1. ODIWM will brief the DEIA Committee and Directorate with the results of the FY 2021 Diversity and Inclusion Workplace Assessment, specifically reporting on experiences related to LGBTQ employees. |                      | 4/27/2022              |
| 12/31/2022         | 2. ODIWM will conduct equity training for entire FWS workforce incorporating workforce triggers, barrier analysis, and barrier removal.  |                      | 9/30/2022              |
| 12/31/2022         | 3. ODIWM will establish a central process to track and fulfill regional and program requests for facilitation of conversations related to DEIA.  |                      | 12/01/2022             |
| 12/31/2022         | 4. ODIWM and JAO will recommend to DOI adding a chosen name field to integrate into various human resources systems.   |                      | 11/10/2022             |
| 12/31/2022         | 5. ODIWM will recommend to the JAO that HR staff expand available resources and awareness for how benefits apply to members of the LGBTQ community.  |                      | 09/30/2022             |
| 12/31/2022         | 6. ODIWM will recommend the development of facilities guide for incorporating restrooms and facilities requests for members of the LGBTQ community.  |                      | 09/30/2022             |

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| <b>Target Date</b> | <b>Planned Activities</b>  | <b>Modified Date</b> | <b>Completion Date</b> |
|--------------------|--|----------------------|------------------------|
| 09/30/2023         | 7. Continue to work with DOI and the Interior Business Center (IBC) on systems outside of FWS control and share information on the status of integrating a chosen name field into various human resources systems. |                      |                        |
| 06/30/2023         | 8. Launch the dedicated SharePoint site that addresses LGBTQ issues and ensures employees are aware of updated policies and resources available to them.   |                      |                        |
| 09/30/2023         | 9. Develop step-down policy and implementation guidance for DOI's policy on restroom signage.  |                      |                        |
| 04/01/2023         | 10. Develop a standardized process to engage supervisors on national expectations related to DEIA and related topics (for example, via standardized supervisor connect forums).                                    |                      |                        |

**Report of Accomplishments**

| <b>Fiscal Year</b> | <b>Accomplishments</b>  |
|--------------------|---|
| 2022               | <ol style="list-style-type: none"> <li>1. ODIWM briefed the DEIA Committee and Directorate with the results of the FY 2021 Diversity and Inclusion Workplace Assessment. More than 3,400 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.</li> <li>2. 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 people with disabilities (PWD) and reasonable accommodations.</li> <li>3. ODIWM established a central process on the FWS SharePoint site to track and fulfill regional and program requests for facilitation of conversations related to DEIA.</li> </ol> |

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|  |  |
|--|--|
|  | <ol style="list-style-type: none"><li>4. ODIWM met with the JAO to discuss how employees can display their chosen name on various online systems such as Microsoft applications, DOI Talent, and Concur. A Chosen Name Project Proposal was drafted. Most of the IT systems (FBMS, FPPS, DOI Talent) are not controlled by FWS and the JAO therefore reached out to ODICR Leadership and was informed that OPM will be releasing guidance on how to use flexibilities in naming conventions as appropriate. The JAO and Information Resources Technology Management (IRTM) case management systems were updated to have drop downs for name change requests.</li><li>5. JAO worked with the FWS Pride ERG to develop a dedicated SharePoint site that addresses LGBTQ issues related to healthcare, benefits, and FWS and DOI policies that can impact members of this community.</li><li>6. DOI issued a policy on restroom signage and FWS is working on the step-down policy and implementation that includes the approved signage.</li></ol> |
|--|--|

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**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

MD-715 – Part I

**Agency EEO Plan to Eliminate Identified Barrier**  
**Black or African American Participation**

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

If the agency did not conduct barrier analysis during the reporting period, please check the box.

**Statement of Condition That Was a Trigger for a Potential Barrier:**

| <b>Source of the Trigger</b> | <b>Specific Workforce Data Table</b> | <b>Narrative Description of Trigger</b>  |
|------------------------------|--------------------------------------|--|
| Workforce Data Tables        | Table A-1                            | Black or African American employees make up 4.2% of permanent workforce versus Organizational Civilian Labor Force (CLF) of 6.7%.                      |
| Workforce Data Tables        | Table A-1                            | 4.4% (45/1031) of hires were Black or African American.  |
| Workforce Data Tables        | Table A-1                            | 6.8% (46/681) of separations were Black or African Americans.  |
| Workforce Data Tables        | Table A-6                            | Black or African American employees make up 1.3% of biology workforce versus Occupational CLF of 3.1%.   |
| Workforce Data Tables        | Table A-6                            | The overall participation of Black or African American law enforcement officers in the permanent workforce is 3.2%, which is below their CLF of 10.8%. |
| Workforce Data Tables        | Tables A-7                           | Black or African American employees make up 4.1% of the Senior/Executive Permanent Workforce (GS/GM 13-15 & SES).                                      |

**EEO Group(s) Affected by Trigger**

| <b>EEO Group</b>                  |
|-----------------------------------|
| All Men                           |
| All Women                         |
| Hispanic or Latino Males          |
| Hispanic or Latino Females        |
| White Males                       |
| White Females                     |
| Black or African American Males X |

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| <b>EEO Group</b>                                  |
|---|
| Black or African American Females X               |
| Asian Males                                       |
| Asian Females                                     |
| Native Hawaiian or Other Pacific Islander Males   |
| Native Hawaiian or Other Pacific Islander Females |
| American Indian or Alaska Native Males            |
| American Indian or Alaska Native Females          |
| Two or More Races Males                           |
| Two or More Races Females                         |

**Barrier Analysis Process**

| <b>Sources of Data</b> | <b>Source Reviewed?<br/>(Yes or No)</b> | <b>Identify Information Collected</b>   |
|------------------------|---|---|
| Workforce Data Tables  | Yes                                     | <p>The FY 2022 Barrier Analysis Team (BAT) identified triggers in the FY 2022 MD-715 A Tables. The participation of Black or African American women declined -0.1%. See triggers outlined above.</p> <p>Despite being added at a higher rate than expected in the senior workforce, it was also found that African American employees separated at a higher rate than expected during FY 2022.</p> <p>During FY 2022, FWS hired 354 professional biologists from outside the agency and competitively selected another 22 from other occupations to fill professional biology positions. Black or African American women were hired in numbers that were significantly below their availability in CLF 2018 in the positions filled.</p> <p>The participation decline for Black or African American men and women can be attributed both to a shortfall in hiring and to the large number of retirements. For Black or African Americans, 45 were hired and 46 left including 19 retirees. The 45 hired constituted 4.4% of hires, significantly below their 7.7% availability rate in the occupations hired in CLF 2018.</p> |



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| Sources of Data   | Source Reviewed?<br>(Yes or No) | Identify Information Collected  |
|---|---------------------------------|---|
| Complaint Data (Trends)   | Yes                             | In FY 2022, four EEO complaints were filed alleging discrimination based on Race-Black/African American.  |
| Grievance Data (Trends)   | Yes                             | Grievance data does not differentiate or give details into race or national origin status. However, harassment allegations and actions include 126 total grievances from 2017-2022, and 41 instances of misconduct, which highlights need to continue efforts directed towards workplace inclusion.   |
| Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes) | Yes                             | EEO decisions (no findings of discrimination in FY 2022)  |
| Climate Assessment Survey (e.g., FEVS)  | Yes                             | <p>For the FY 2022 Diversity and Inclusion Workplace Assessment Survey employees who identified as a race other than white responded significantly less favorably than respondents who identified as White. The top six significantly less favorable items were:</p> <ul style="list-style-type: none"> <li>○ “I can disclose a suspected violation of any law, rule or regulation without fear of reprisal.” (-16% difference)</li> <li>○ FWS senior leaders demonstrate support for equal opportunity, anti-discrimination, diversity and inclusion policies. (-16% difference)</li> <li>○ FWS leaders are committed to a workforce representative of all segments of society. (-15% difference)</li> <li>○ Employees are treated fairly in my organization. (-15% difference)</li> <li>○ I can talk openly with managers and supervisors about concerns relating to issues of diversity and inclusion. (-15% difference)</li> <li>○ Prohibited personnel practices are not tolerated. (-14% difference)</li> </ul> <p>FY 2022 Federal Employee Viewpoint Survey (FEVS) for all respondents:</p> <ul style="list-style-type: none"> <li>○ I have similar access to advancement opportunities (e.g., promotion, career development, training) as others in my work unit. (68.6% positive response)</li> <li>○ In my work unit, excellent work is similarly recognized for all employees (e.g., awards, acknowledgements). (71.3% positive response)</li> <li>○ My organization's management practices promote diversity (e.g., outreach, recruitment, promotion opportunities). (72.4% positive response)</li> </ul> |

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| <b>Sources of Data</b>                         | <b>Source Reviewed?<br/>(Yes or No)</b> | <b>Identify Information Collected</b>   |
|--|---|---|
| Exit Interview Data                            | Yes                                     | For all respondents, lack of promotion and/or career advancement opportunity, pay, dissatisfaction with work environment, and dissatisfaction with supervisor were in the top six reasons identified for leaving.   |
| Focus Groups                                   | Yes                                     | The FY 2022 BAT consisted of a sub-team that focused on Black or African Americans through discussions and worked through the barrier analysis progress. Issues identified included: fear of reprisal, rampant microaggressions, lack of career advancement and detail opportunities, lack of welcoming and inclusive work environment, lack of fairness in the form of biases, experience racism that is seen but not interrupted by colleagues, and the need to increase outreach to historically Black colleges and universities (HBCU). |
| Interviews                                     | Yes                                     | The FY 2022 BAT conducted interviews with employees from employee resource groups and communities of practice, Joint Administrative Operations and HR, National Conservation Training Center, ODIWM Complaints Program, and the FWS National Recruitment Team.  |
| Reports (e.g., Congress, EEOC, MSPB, GAO, OPM) | Yes                                     | OPM Focus Group Report 2020<br><br>Met Group – Values Listening Sessions Report 2022 (contracted report)  |
| Other  | Yes                                     | Analyzed DFP participation rates: 32% of DFP fellows were people of color. Selections of Black or African Americans in the DFP program has consistently not reflected the representative applicant pool in the past five years. The selection rate ranged from 0% – 3% during that period, compared to the applicant pool ranging from 3% - 7% during that span.  |

**Status of Barrier Analysis Process**

| <b>Barrier Analysis Process Completed?<br/>(Yes or No)</b> | <b>Barrier(s) Identified?<br/>(Yes or No)</b> |
|--|---|
| Yes  | Yes   |

**Statement of Identified Barrier(s)**

|  |
|--|
| <b>Description of Policy, Procedure, or Practice</b> |
|--|

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| Description of Policy, Procedure, or Practice   |
|---|
| Systemic bias in the hiring process prevents Black or African American applicants from accessing FWS.   |
| Requirements for Qualification for the 0485 and 0486 Occupational Series are restrictive and hinder minorities from qualifying.   |
| FWS does not have a procedure to engage all supervisors on a regular basis on national expectations related to DEIA and related topics (for example: topics such as accountability, reprisal, and intercultural competencies).  |
| FWS does not have a national process or procedure for strengthening the capacity of HBCUs to participate in its programs, grants and procurement opportunities, and internships. This impedes FWS from creating an ecosystem where HBCU students are competitive when seeking jobs with FWS. HBCUs are underrepresented in the total amount of awards that are given to Institutions of Higher Education. FWS does not have sufficient information to understand why this is happening. |

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

| Objective  | Date Initiated | Target Date | Sufficient Funding & Staffing? | Modified Date | Date Completed |
|--|----------------|-------------|--------------------------------|---------------|----------------|
| Encourage managers and supervisors to use Stay Interviews.   | 12/31/2020     | 12/31/2021  | Yes                            | 3/31/2023     |                |
| Form a group to reevaluate the need for specific course requirements in the 0485 and 0486 series and consider retiring these job series and classifying all future positions as 0401 or another job series with less restrictive educational qualifications. | 12/31/2020     | 12/31/2021  | Yes                            | 12/31/2022    | 12/31/2022     |
| Develop performance standards, goals, and measurable objectives for DFP partner organizations.   | 12/31/2020     | 12/31/2021  | Yes                            |               | 04/01/2021     |
| Improve the process for job announcement development by creating a strategy that puts less emphasis on the 5-scale rating in the self-assessment for vacancy announcements.  | 12/31/2022     | 09/30/2023  | Yes                            |               |                |
| Develop recommendations for FWS Leadership to reduce any barriers found after review of  | 12/31/2022     | 06/30/2023  | Yes                            |               |                |

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| <b>Objective</b>  | <b>Date Initiated</b> | <b>Target Date</b> | <b>Sufficient Funding &amp; Staffing?</b> | <b>Modified Date</b> | <b>Date Completed</b> |
|---|-----------------------|--------------------|---|----------------------|-----------------------|
| basic education requirements for GS-0485.   |                       |                    |   |                      |                       |
| ODIWM recommend a standardized process to engage supervisors on national expectations related to DEIA and related topics (for example, via standardized supervisor connect forums). | 12/31/2022            | 04/01/2023         | Yes                                       |                      |                       |
| Set up a pilot project that will work with HBCUs and investigate the specific barriers they face in being competitive for Institute of Higher Education financial awards.           | 06/16/2023            | 06/16/2024         | Yes                                       |                      |                       |

**Responsible Official(s)**

| <b>Title</b>                                      | <b>Name</b>     | <b>Performance Standards Address the Plan?<br/>(Yes or No)</b> |
|---|-----------------|--|
| Director, FWS                                     | Martha Williams | Yes  |
| Deputy Director, FWS                              | Stephen Guertin | Yes  |
| Deputy Director, FWS                              | Wendi Weber     | Yes  |
| DEIA Committee, Chair                             | Wendi Weber     | Yes  |
| Assistant Director, Management and Administration | Janine Velasco  | Yes  |
| EEO Director                                      | Inez Uhl        | Yes  |

**Planned Activities Toward Completion of Objective**

| <b>Target Date<br/>(mm/dd/yyyy)</b> | <b>Planned Activities</b>  | <b>Modified Date<br/>(mm/dd/yyyy)</b> | <b>Completion Date<br/>(mm/dd/yyyy)</b> |
|-------------------------------------|--|---------------------------------------|---|
| 12/31/2022                          | 1. ODIWM will brief the DEIA Committee and Directorate with the results of the FY 2021 Diversity and Inclusion Workplace Assessment. |                                       | 04/27/2022                              |

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| <b>Target Date<br/>(mm/dd/yyyy)</b> | <b>Planned Activities</b>   | <b>Modified Date<br/>(mm/dd/yyyy)</b> | <b>Completion Date<br/>(mm/dd/yyyy)</b> |
|-------------------------------------|---|---------------------------------------|---|
| 12/31/2022                          | 2. ODIWM will conduct equity training for entire FWS workforce incorporating triggers, barrier analysis, and barrier removal.   |                                       | 09/30/2022                              |
| 12/31/2022                          | 3. 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.                                |                                       | 12/01/2022                              |
| 12/31/2022                          | 4. DEIA Committee will develop and advertise scope of work for contractor to perform large-scale analysis into bias in the hiring process.  |                                       | 12/31/2022                              |
| 12/31/2022                          | 5. ODIWM will evaluate previous quarter's hiring success, modify approach as needed, and brief the DEIA Committee on needed adjustments.  |                                       | 09/21/2022                              |
| 09/30/2023                          | 6. HR will implement Executive Order 13932 to improve the process for job announcement development by creating a strategy that puts less emphasis on the 5-scale rating in the self-assessment for vacancy announcements. |                                       |   |
| 06/30/2023                          | 7. HR will review the basic education requirements for the GS-0485 series and will make recommendations for changes, as needed.   |                                       |   |
| 04/01/2023                          | 8. ODIWM will recommend to the Directorate a standardized process to engage supervisors on national expectations related to DEIA and related topics (for example, via standardized supervisor connect forums).            |                                       |   |
| 06/16/2023                          | 9. FWS will conduct a pilot project to work with HBCUs and investigate the specific barriers they face in being competitive for Institute of Higher Education financial awards.   |                                       |   |

**Report of Accomplishments**

| <b>Fiscal Year</b> | <b>Accomplishments</b>   |
|--------------------|--|
| 2022               | 1. ODIWM briefed the DEIA Committee and Directorate with the results of the 2021 Diversity and Inclusion Workplace Assessment. |

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|  |  |
|--|--|
|  | <p>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.</p> <ol style="list-style-type: none"><li>2. 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.</li><li>3. 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.</li><li>4. FWS contracted with Metropolitan Group in October 2021 to begin the work of 'The Values Project.' Phase 1 is completed, and FWS entered Phase 2 of an in-depth listening process to engage a critical mass of employees in defining and establishing our shared purpose and organizational core values. Shared purpose and enduring core values will inform the Service's work across priorities in meeting our conservation mission.</li><li>5. 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.</li></ol> <p>Additional accomplishments in FY 2022</p> <ul style="list-style-type: none"><li>• The FWS Deputies' Group conducted an extensive analysis of hiring practices, barriers and biases, and finalized an implementation plan for increased use of special hiring authorities for entry level positions. Additionally, the Deputies' Group led the coordination of regional targeted recruitment plans and designated regional coordinators to improve consistency in recruitment and hiring strategies across the Service.</li><li>• HR formed a working group to review the basic education requirements for the GS-0485 series and will make recommendations for changes, as needed. The workgroup began regular meetings and will develop recommendations for Service Leadership in Spring 2023.</li></ul> |
|--|--|

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**MD-715 – Part I**  
**Agency EEO Plan to Eliminate Identified Barrier**  
**Asian Participation**

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

If the agency did not conduct barrier analysis during the reporting period, please check the box.

**Statement of Condition That Was a Trigger for a Potential Barrier:**

| <b>Source of the Trigger</b> | <b>Specific Workforce Data Table</b> | <b>Narrative Description of Trigger</b>  |
|------------------------------|--------------------------------------|--|
| Workforce Data Tables        | Table A-1                            | Low participation of Asian employees in the permanent workforce.<br>Asian employees make up 2.4% of permanent workforce versus the Organizational CLF of 6.9%. |
| Workforce Data Tables        | Table A-1                            | 3.1% (32/1031) of hires in the permanent workforce were Asian.   |
| Workforce Data Tables        | Table A-6                            | Asian employees make up 1.8% of the professional biology workforce versus the Occupational CLF of 9.0%.  |
| Workforce Data Tables        | Table A-6                            | 1.7% (6/354) of hires in the professional biology workforce were Asian.  |
| Workforce Data Tables        | Table A-6                            | 1.7% (4/236) of separations in the professional biology workforce were Asian.  |
| Workforce Data Tables        | Table A-7                            | Asian employees make up 1.9% of the Senior/Executive Permanent Workforce (GS/GM 13-15 & SES).  |

**EEO Group(s) Affected by Trigger**

| <b>EEO Group</b>           |
|----------------------------|
| All Men                    |
| All Women                  |
| Hispanic or Latino Males   |
| Hispanic or Latino Females |
| White Males                |
| White Females              |

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| <b>EEO Group</b>                                  |
|---|
| Black or African American Males                   |
| Black or African American Females                 |
| Asian Males X                                     |
| Asian Females X                                   |
| Native Hawaiian or Other Pacific Islander Males   |
| Native Hawaiian or Other Pacific Islander Females |
| American Indian or Alaska Native Males            |
| American Indian or Alaska Native Females          |
| Two or More Races Males                           |
| Two or More Races Females                         |

**Barrier Analysis Process**

| <b>Sources of Data</b>  | <b>Source Reviewed?<br/>(Yes or No)</b> | <b>Identify Information Collected</b>  |
|---|---|--|
| Workforce Data Tables   | Yes                                     | The FY 2022 BAT identified triggers in the MD-715 A tables. See triggers outlined above.<br><br>During FY 2022, FWS hired 354 professional biologists from outside the agency and competitively selected another 22 from other occupations to fill professional biology positions. Asian men and women representation was significantly below their availability in CLF 2018 for the positions filled. |
| Complaint Data (Trends)   | Yes                                     | There was no complaint activity related to Asian discrimination, filed under the basis of Race.  |
| Grievance Data (Trends)   | Yes                                     | Grievance data does not differentiate or give details into race or national origin. However, harassment allegations and actions include 126 total grievances from 2017-2022, and 41 instances of misconduct, which highlights need to continue efforts directed towards workplace inclusion.   |
| Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes) | Yes                                     | EEO decisions - no findings of discrimination in FY 2022.  |
| Climate Assessment Survey (e.g., FEVS)  | Yes                                     | For the FY 2022 Diversity and Inclusion Workplace Assessment Survey employees who identified as a race   |



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| Sources of Data     | Source Reviewed?<br>(Yes or No) | Identify Information Collected   |
|---------------------|---------------------------------|--|
|                     |                                 | <p>other than White responded significantly less favorably than respondents who identified as White on 24 climate items. Less favorable items were:</p> <ul style="list-style-type: none"> <li>○ “I can disclose a suspected violation of any law, rule or regulation without fear of reprisal.” (-16% difference)</li> <li>○ FWS senior leaders demonstrate support for equal opportunity, anti-discrimination, diversity and inclusion policies. (-16% difference)</li> <li>○ FWS leaders are committed to a workforce representative of all segments of society. (-15% difference)</li> <li>○ Employees are treated fairly in my organization. (-15% difference)</li> <li>○ I can talk openly with managers and supervisors about concerns relating to issues of diversity and inclusion (-15% difference)</li> <li>○ Prohibited personnel practices are not tolerated. (-14% difference).</li> </ul> <p>FY 2022 Federal Employee Viewpoint Survey (FEVS) for all respondents:</p> <ul style="list-style-type: none"> <li>○ I have similar access to advancement opportunities (e.g., promotion, career development, training) as others in my work unit. (68.6% positive response)</li> <li>○ In my work unit, excellent work is similarly recognized for all employees (e.g., awards, acknowledgements). (71.3% positive response)</li> <li>○ My organization's management practices promote diversity (e.g., outreach, recruitment, promotion opportunities). (72.4% positive response)</li> </ul> |
| Exit Interview Data | Yes                             | Employee exit survey responses for all respondents identified the lack of promotion and/or career advancement opportunity, pay, dissatisfaction with work environment, and dissatisfaction with supervisor as the top reasons identified for leaving.  |
| Focus Groups        | Yes                             | The FY 2022 Barrier Analysis Team (BAT) consisted of a sub-team that focused on Asians through discussions and worked through the barrier analysis progress. Barriers identified included: fear of reprisal, lack of fairness in resolving complaints, lack of career advancement and detail opportunities, lack of welcoming and inclusive work environment, lack of fairness in the form of biases, bias in the hiring process, and rigidity in the questionnaires for job announcements. The BAT conducted focus groups with  |

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**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

| <b>Sources of Data</b>                         | <b>Source Reviewed?<br/>(Yes or No)</b> | <b>Identify Information Collected</b>  |
|--|---|--|
|  |   | EEO counselors to understand and discover any persistent trends. The focus group discussed employee frustrations with management communication and the subtle nature of discrimination.  |
| Interviews                                     | Yes                                     | The FY 2022 BAT conducted interviews with employees from FWS employee resource groups and communities of practice, Joint Administrative Operations and HR, National Conservation Training Center, ODIWM Complaints Program, and the FWS National Recruitment Team. |
| Reports (e.g., Congress, EEOC, MSPB, GAO, OPM) | Yes                                     | OPM Focus Group Report 2020<br>Met Group – Values Listening Sessions Report 2022 (contracted report)   |
| Other (Please Describe)                        | Yes                                     | Analyzed Directorate Resource Assistant Fellows Program (DFP): 1.6% (1) of FY 2022 DFP hires were Asian.   |

**Status of Barrier Analysis Process**

| <b>Barrier Analysis Process Completed?<br/>(Yes or No)</b> | <b>Barrier(s) Identified?<br/>(Yes or No)</b> |
|--|---|
| Yes  | Yes   |

**Statement of Identified Barrier(s)**

| <b>Description of Policy, Procedure, or Practice</b>   |
|--|
| Lack of organization-wide practices for improving retention and wellness in the workplace.   |
| FWS does not have a procedure to engage all supervisors on a regular basis on national expectations related to DEIA and related topics (for example: topics such as accountability, reprisal, and intercultural competencies). |
| Requirements for Qualification for the 0485 and 0486 Occupational Series are restrictive and hinder minorities from qualifying.  |

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

| <b>Objective</b> | <b>Date Initiated<br/>(mm/dd/yyyy)</b> | <b>Target Date<br/>(mm/dd/yyyy)</b> | <b>Sufficient Funding &amp; Staffing?<br/>(Yes or No)</b> | <b>Modified Date<br/>(mm/dd/yyyy)</b> | <b>Date Completed<br/>(mm/dd/yyyy)</b> |
|------------------|--|-------------------------------------|---|---------------------------------------|--|
|                  |  |                                     |   |                                       |  |

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| <b>Objective</b>   | <b>Date Initiated<br/>(mm/dd/yyyy)</b> | <b>Target Date<br/>(mm/dd/yyyy)</b> | <b>Sufficient Funding &amp; Staffing?<br/>(Yes or No)</b> | <b>Modified Date<br/>(mm/dd/yyyy)</b> | <b>Date Completed<br/>(mm/dd/yyyy)</b> |
|--|--|-------------------------------------|---|---------------------------------------|--|
| Encourage managers and supervisors to use Stay Interviews.   | 12/31/2021                             | 12/31/2022                          | Yes   | 3/31/2023                             |  |
| Implement Executive Order 13932 to improve the process for job announcement development by creating a strategy that puts less emphasis on the 5-scale rating in the self-assessment for vacancy announcements. | 12/31/2022                             | 09/30/2023                          | Yes   |                                       |  |
| Develop recommendations for FWS Leadership to reduce any barriers found after review of basic education requirements for GS-0485.  | 12/31/2022                             | 06/30/2023                          | Yes   |                                       |  |
| Recommend a standardized process to engage supervisors on national expectations related to DEIA and related topics (for example, via standardized supervisor connect forums).                                  | 12/31/2022                             | 04/01/2023                          | Yes   |                                       |  |

**Responsible Official(s)**

| <b>Title</b>   | <b>Name</b>     | <b>Performance Standards Address the Plan?<br/>(Yes or No)</b> |
|--|-----------------|--|
| Principal Deputy Director Exercising the Delegated Authority of the Director | Martha Williams | Yes  |
| Deputy Director  | Stephen Guertin | Yes  |
| Deputy Director  | Wendi Weber     | Yes  |
| DEIA Committee Chair   | Wendi Weber     | Yes  |
| Assistant Director, Management and Administration                            | Janine Velasco  | Yes  |
| EEO Director   | Inez Uhl        | Yes  |

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**Planned Activities Toward Completion of Objective**

| <b>Target Date</b> | <b>Planned Activities</b>   | <b>Modified Date</b> | <b>Completion Date</b> |
|--------------------|---|----------------------|------------------------|
| 12/31/2022         | 1. ODIWM will brief the DEIA Committee and Directorate with the results of the FY 2021 Diversity and Inclusion Workplace Assessment, specifically reporting on experiences related to people of color.                    |                      | 04/27/2022             |
| 12/31/2022         | 2. ODIWM will conduct equity training for entire workforce incorporating workforce triggers, barrier analysis, and barrier removal.   |                      | 09/30/2022             |
| 12/31/2022         | 3. ODIWM will establish a central process to track and fulfill regional and program requests for facilitation of conversations related to DEIA.   |                      | 12/01/2022             |
| 12/31/2022         | 4. ODIWM will advocate for JAO to conduct literature review of “stay interview” promising practices   |                      | 09/30/2022             |
| 12/31/2022         | 5. ODIWM will develop standard question flow for managers and supervisors to conduct stay interviews.   |                      | 09/30/2022             |
| 12/31/2022         | 6. ODIWM will work with Deputies to incorporate stay interview promising practices  | 3/31/2023            |                        |
| 12/31/2022         | 7. ODIWM will recommend Regional Directors have Leadership and Employee Development coordinators.   |                      | 10/29/2021             |
| 09/30/2023         | 8. HR will implement Executive Order 13932 to improve the process for job announcement development by creating a strategy that puts less emphasis on the 5-scale rating in the self-assessment for vacancy announcements. |                      |                        |
| 06/30/2023         | 9. HR will review the basic education requirements for the GS-0485 series and will develop recommendations for leadership to reduce any barriers found.   |                      |                        |
| 04/01/2023         | 10. ODIWM recommended to the Directorate a standardized process to engage supervisors on national expectations related to DEIA and related topics (for example, via standardized supervisor connect forums).              |                      |                        |

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**Report of Accomplishments**

| Fiscal Year | Accomplishments  |
|-------------|--|
| 2022        | <ol style="list-style-type: none"> <li>1. 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.</li> <li>2. 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.</li> <li>3. 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.</li> <li>4. ODIWM conducted a literature review and created a Stay Interview Guide for managers &amp; supervisors.</li> <li>5. The Stay Interview Guide includes a standard question flow for managers and supervisors to utilize during these conversations.</li> <li>6. ODIWM will disseminate the Stay Interview Guide to managers and supervisors via SharePoint.</li> <li>7. The team of Employee Engagement and Leadership Development (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.</li> </ol> <p>Additional accomplishments in FY 2022</p> <ul style="list-style-type: none"> <li>• The FWS Deputies' Group conducted an extensive analysis of hiring practices, barriers and biases, and finalized an implementation plan for increased use of special hiring authorities for entry level positions. Additionally, the Deputies' Group led the coordination of regional targeted recruitment plans and designated regional coordinators to improve consistency in recruitment and hiring</li> </ul> |

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|  |  |
|--|--|
|  | <p>strategies across the Service.</p> <ul style="list-style-type: none"><li>• HR formed a working group to review the basic education requirements for the GS-0485 series and will make recommendations for changes, as needed. The workgroup began regular meetings and will develop recommendations for Service Leadership in Spring 2023.</li></ul> |
|--|--|

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MD-715 – Part I

**Agency EEO Plan to Eliminate Identified Barrier**  
**Hispanic/Latinx Participation**

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

If the agency did not conduct barrier analysis during the reporting period, please check the box.

**Statement of Condition That Was a Trigger for a Potential Barrier:**

| <b>Source of the Trigger</b> | <b>Specific Workforce Data Table</b> | <b>Narrative Description of Trigger</b>  |
|------------------------------|--------------------------------------|--|
| Workforce Data Tables        | Table A-1                            | Hispanic/Latinx employees make up 6.8% of permanent workforce versus the Organizational CLF of 8.5%.   |
| Workforce Data Tables        | Table A-1                            | 7.4% (76/1031) of permanent hires in the workforce were Hispanic/Latinx.   |
| Workforce Data Tables        | Table A-6                            | The overall participation of Hispanic/Latinx law enforcement officers in the permanent workforce is 8.3%, which is below their CLF of 14.4%. |
| Workforce Data Tables        | Table A-7                            | Hispanic/Latinx employees make up 5.7% of the Senior/Executive Permanent Workforce (GS/GM 13-15 & SES).                                      |

**EEO Group(s) Affected by Trigger**

| <b>EEO Group</b>                                |
|---|
| All Men   |
| All Women                                       |
| Hispanic or Latino Males X                      |
| Hispanic or Latino Females X                    |
| White Males                                     |
| White Females                                   |
| Black or African American Males                 |
| Black or African American Females               |
| Asian Males                                     |
| Asian Females                                   |
| Native Hawaiian or Other Pacific Islander Males |

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| <b>EEO Group</b>                                  |
|---|
| Native Hawaiian or Other Pacific Islander Females |
| American Indian or Alaska Native Males            |
| American Indian or Alaska Native Females          |
| Two or More Races Males                           |
| Two or More Races Females                         |

**Barrier Analysis Process**

| <b>Sources of Data</b>  | <b>Source Reviewed?<br/>(Yes or No)</b> | <b>Identify Information Collected</b>   |
|---|---|---|
| Workforce Data Tables   | Yes                                     | The FY 2022 Barrier Analysis Team (BAT) identified triggers in MD-715 A tables. See triggers outlined above.  |
| Complaint Data (Trends)   | Yes                                     | No claims were filed alleging discrimination on the basis of National Origin.   |
| Grievance Data (Trends)   | Yes                                     | Grievance data does not differentiate or give details into race or national origin. However, harassment allegations and actions include 126 total grievances from 2017-2022, and 41 instances of misconduct, which highlights need to continue efforts directed towards workplace inclusion.  |
| Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes) | Yes                                     | No findings of discrimination in FY 2022 and no findings of discrimination by race since 2015.  |
| Climate Assessment Survey (e.g., FEVS)  | Yes                                     | <p>For the FY 2022 Diversity and Inclusion Workplace Assessment employees who identified as a race other than White responded significantly less favorably than respondents who identified as White on 24 climate items. The top six significantly less favorable items were:</p> <ul style="list-style-type: none"> <li>• “I can disclose a suspected violation of any law, rule or regulation without fear of reprisal.” (-16% difference)</li> <li>• FWS senior leaders demonstrate support for equal opportunity, anti-discrimination, diversity and inclusion policies. (-16% difference)</li> <li>• FWS leaders are committed to a workforce representative of all segments of society. (-15% difference)</li> <li>• Employees are treated fairly in my organization. (-15% difference)</li> <li>• I can talk openly with managers and supervisors</li> </ul> |



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| Sources of Data                                | Source Reviewed?<br>(Yes or No) | Identify Information Collected   |
|--|---------------------------------|--|
|  |                                 | <p>about concerns relating to issues of diversity and inclusion<br/>(-15% difference)</p> <ul style="list-style-type: none"> <li>Prohibited Personnel Practices are not tolerated. (-14% difference).</li> </ul>   |
| Exit Interview Data                            | Yes                             | <p>Employee exit survey responses.</p> <ul style="list-style-type: none"> <li>18% of Hispanic/Latinx respondents disagreed with the statement, “The organization as a whole demonstrates zero tolerance towards discrimination”.</li> <li>15% of Hispanic/Latinx respondents disagreed with the statement, “The organization’s management has a commitment to workforce diversity”.</li> <li>For all respondents, lack of promotion and/or career advancement opportunity; pay; dissatisfaction with work environment; and dissatisfaction with supervisor were in the top six reasons identified for leaving.</li> </ul>  |
| Focus Groups                                   | Yes                             | <p>The FY 2022 Barrier Analysis Team (BAT) consisted of a sub-team that focused on Hispanic or Latinx employees through discussions and worked through the barrier analysis progress. Barriers identified included: fear of reprisal, concerns with discussing diversity and inclusion with supervisor, the need for more multi-lingual materials/signage, concerns with lack of family friendly culture, lack of career advancement and detail opportunities, FWS favors those who are willing and able to relocate, and lack of welcoming and inclusive work environment and appreciation of cultural heritage.</p> <p>The FY 2021 BAT conducted focus groups with EEO counselors to understand and discover any persistent trends. The focus group discussed employee frustrations with management communication and the subtle nature of discrimination.</p> |
| Interviews                                     | Yes                             | <p>The FY 2022 BAT conducted interviews with employees from FWS employee resource groups and communities of practice, Joint Administrative Operations and HR, National Conservation Training Center, ODIWM Complaints Program, and the FWS National Recruitment Team.</p>  |
| Reports (e.g., Congress, EEOC, MSPB, GAO, OPM) | Yes                             | OPM Focus Group Report 2020  |

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| <b>Sources of Data</b>  | <b>Source Reviewed?<br/>(Yes or No)</b> | <b>Identify Information Collected</b>   |
|-------------------------|---|---|
|                         |   | Met Group – Values Listening Sessions Report 2022 (contracted report)   |
| Other (Please Describe) | Yes                                     | Analyzed Directorate Resource Assistant Fellows Program (DFP): 11.3% (7) of FY 2022 DFP hires were Hispanic/Latinx. |

**Status of Barrier Analysis Process**

| <b>Barrier Analysis Process Completed?<br/>(Yes or No)</b> | <b>Barrier(s) Identified?<br/>(Yes or No)</b> |
|--|---|
| Yes  | Yes   |

**Statement of Identified Barrier(s)**

| <b>Description of Policy, Procedure, or Practice</b>   |
|--|
| Lack of organization-wide practices for improving retention and wellness in the workplace.   |
| Requirements for Qualification for the 0485 and 0486 Occupational Series are restrictive and hinder minorities from qualifying.  |
| FWS does not have a procedure to engage all supervisors on a regular basis on national expectations related to DEIA and related topics (for example: topics such as accountability, reprisal, and intercultural competencies). |

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

| <b>Objective</b>  | <b>Date Initiated</b> | <b>Target Date</b> | <b>Sufficient Funding &amp; Staffing?<br/>(Yes or No)</b> | <b>Modified Date</b> | <b>Date Completed</b> |
|---|-----------------------|--------------------|---|----------------------|-----------------------|
| Encourage managers and supervisors to use Stay Interviews.  | 12/31/2021            | 12/31/2022         | Yes   | 3/31/2023            |                       |
| Improve the process for job announcement development by creating a strategy that puts less emphasis on the 5-scale rating in the self-assessment for vacancy announcements. | 12/31/2022            | 09/30/2023         | Yes   |                      |                       |
| Develop recommendations for FWS Leadership to reduce any barriers found after review of basic education requirements  | 12/31/2022            | 06/30/2023         | Yes   |                      |                       |

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| <b>Objective</b>  | <b>Date Initiated</b> | <b>Target Date</b> | <b>Sufficient Funding &amp; Staffing?<br/>(Yes or No)</b> | <b>Modified Date</b> | <b>Date Completed</b> |
|---|-----------------------|--------------------|---|----------------------|-----------------------|
| for GS-0485.  |                       |                    |   |                      |                       |
| Recommend a standardized process to engage supervisors on national expectations related to DEIA and related topics (for example, via standardized supervisor connect forums). | 12/31/2022            | 04/01/2023         | Yes   |                      |                       |

**Responsible Official(s)**

| <b>Title</b>                                      | <b>Name</b>     | <b>Performance Standards Address the Plan?<br/>(Yes or No)</b> |
|---|-----------------|--|
| Director  | Martha Williams | Yes  |
| Deputy Director                                   | Stephen Guertin | Yes  |
| Deputy Director                                   | Wendi Weber     | Yes  |
| DEIA Committee Chair                              | Wendi Weber     | Yes  |
| Assistant Director, Management and Administration | Janine Velasco  | Yes  |
| EEO Director                                      | Inez Uhl        | Yes  |

**Planned Activities Toward Completion of Objective**

| <b>Target Date</b> | <b>Planned Activities</b>  | <b>Modified Date</b> | <b>Completion Date</b> |
|--------------------|--|----------------------|------------------------|
| 12/31/2022         | 1. ODIWM will brief the DEIA Committee and Directorate with the results of the FY 2021 Diversity and Inclusion Workplace Assessment, specifically reporting on experiences related to Hispanic or Latinx employees |                      | 04/27/2022             |
| 12/31/2022         | 2. ODIWM will conduct equity training for entire workforce incorporating workforce triggers, barrier analysis, and barrier removal.  |                      | 09/30/2022             |

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|            |   |           |            |
|------------|---|-----------|------------|
| 12/31/2022 | 3. ODIWM will establish a central process to track and fulfill regional and program requests for facilitation of conversations related to DEIA.   |           | 12/01/2022 |
| 12/31/2022 | 4. ODIWM will advocate for JAO to conduct literature review of "stay interview" promising practices   |           | 11/01/2022 |
| 12/31/2022 | 5. ODIWM will develop standard question flow for managers and supervisors to conduct stay interviews.   |           | 09/30/2022 |
| 12/31/2022 | 6. ODIWM will work with Deputies to incorporate stay interview promising practices  | 3/31/2023 |            |
| 12/31/2022 | 7. ODIWM will recommend Regional Directors have Leadership and Employee Development coordinators.   |           | 10/29/2021 |
| 09/30/2023 | 8. HR will implement Executive Order 13932 to improve the process for job announcement development by creating a strategy that puts less emphasis on the 5-scale rating in the self-assessment for vacancy announcements. |           |            |
| 06/30/2023 | 9. HR will review the basic education requirements for the GS-0485 series and will develop recommendations for leadership to reduce any barriers found.   |           |            |
| 04/01/2023 | 10. ODIWM recommended to the Directorate a standardized process to engage supervisors on national expectations related to DEIA and related topics (for example, via standardized supervisor connect forums).              |           |            |

**Report of Accomplishments**

| Fiscal Year | Accomplishments  |
|-------------|--|
| 2022        | 1. ODIWM briefed the DEIA Committee and Directorate with the results of the FY 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. |

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|  |  |
|--|--|
|  | <ol style="list-style-type: none"><li>2. 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.</li><li>3. 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.</li><li>4. ODIWM conducted a literature review and created a Stay Interview Guide for managers &amp; supervisors.</li><li>5. The Stay Interview Guide includes a standard question flow for managers and supervisors to utilize during these conversations.</li><li>6. ODIWM will disseminate the Stay Interview Guide to managers and supervisors via SharePoint.</li><li>7. The team of Employee Engagement and Leadership Development (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.</li></ol> <p>Additional accomplishments in FY 2022</p> <ul style="list-style-type: none"><li>• The FWS Deputies' Group conducted an extensive analysis of hiring practices, barriers and biases, and finalized an implementation plan for increased use of special hiring authorities for entry level positions. Additionally, the Deputies' Group led the coordination of regional targeted recruitment plans and designated regional coordinators to improve consistency in recruitment and hiring strategies across the Service.</li><li>• HR formed a working group to review the basic education requirements for the GS-0485 series and will make recommendations for changes, as needed. The workgroup began regular meetings and will develop recommendations for Service Leadership in Spring 2023.</li></ul> |
|--|--|

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MD-715 – Part I

**Agency EEO Plan to Eliminate Identified Barrier**  
**Women Participation**

Please describe the status of each plan that the agency implemented to identify possible barriers in policies, procedures, or practices for employees and applicants by race, ethnicity, and gender.

If the agency did not conduct barrier analysis during the reporting period, please check the box.

**Statement of Condition That Was a Trigger for a Potential Barrier:**

| <b>Source of the Trigger</b> | <b>Specific Workforce Data Table</b> | <b>Narrative Description of Trigger</b>  |
|------------------------------|--------------------------------------|--|
| Workforce Data Tables        | Table A-1                            | Women make up 42.8% of permanent workforce versus the Organizational CLF of 46.3%.                 |
| Workforce Data Tables        | Table A-6                            | Women make up 41.9% of biology workforce versus the Occupational CLF of 48.0%.                     |
| Workforce Data Tables        | Table A-6                            | The participation rate for women Law Enforcement Officers is 11%, which is below the CLF of 25.3%. |

**EEO Group(s) Affected by Trigger**

| <b>EEO Group</b>                                  |
|---|
| All Men   |
| All Women X                                       |
| Hispanic or Latino Males                          |
| Hispanic or Latino Females                        |
| White Males                                       |
| White Females                                     |
| Black or African American Males                   |
| Black or African American Females                 |
| Asian Males                                       |
| Asian Females                                     |
| Native Hawaiian or Other Pacific Islander Males   |
| Native Hawaiian or Other Pacific Islander Females |

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| <b>EEO Group</b>                         |
|--|
| American Indian or Alaska Native Males   |
| American Indian or Alaska Native Females |
| Two or More Races Males                  |
| Two or More Races Females                |

**Barrier Analysis Process**

| <b>Sources of Data</b>  | <b>Source Reviewed?<br/>(Yes or No)</b> | <b>Identify Information Collected</b>  |
|---|---|--|
| Workforce Data Tables   | Yes                                     | <p>The FY 2022 Barrier Analysis Team (BAT) identified triggers in the MD-715 A Tables. See triggers outlined above.</p> <p>The overall participation of women in the law enforcement officer workforce are low when compared to their availability in similar occupations in CLF 2018.</p>   |
| Complaint Data (Trends)   | Yes                                     | Six complaints were filed alleging discrimination on the basis of sex (female).  |
| Grievance Data (Trends)   | Yes                                     | Grievance data does not differentiate or give details into race or national origin. However, harassment allegations and actions include 126 total grievances from 2017-2022, and 41 instances of misconduct, which highlights need to continue efforts directed towards workplace inclusion.   |
| Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes) | Yes                                     | No findings of discrimination based on sex (female) in FY 2022.  |
| Climate Assessment Survey (e.g., FEVS)  | Yes                                     | <p>FY 2022 Diversity and Inclusion Workplace Assessment Survey</p> <ul style="list-style-type: none"> <li>• Women responded significantly less favorably than men on these climate items: <ul style="list-style-type: none"> <li>○ “FWS is a welcoming and inclusive place to work for employees of all races and ethnicities.” (-13% difference)</li> <li>○ “FWS offers sufficient training in diversity and inclusion (D&amp;I).” (-11% difference)</li> <li>○ “FWS is a welcoming and inclusive place to work for all employees.” (-10% difference)</li> <li>○ “FWS is a welcoming and inclusive place to work for employees of all genders.” (-9% difference)</li> </ul> </li> </ul> <p>FY 2022 Federal Employee Viewpoint Survey (FEVS) for all</p> |

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| Sources of Data                                | Source Reviewed?<br>(Yes or No) | Identify Information Collected  |
|--|---------------------------------|---|
|  |                                 | respondents: <ul style="list-style-type: none"> <li>○ I have similar access to advancement opportunities (e.g., promotion, career development, training) as others in my work unit. (68.6% positive response)</li> <li>○ In my work unit, excellent work is similarly recognized for all employees (e.g., awards, acknowledgements). (71.3% positive response)</li> <li>○ My organization's management practices promote diversity (e.g., outreach, recruitment, promotion opportunities). (72.4% positive response)</li> </ul> |
| Exit Interview Data                            | Yes                             | For all respondents, lack of promotion and/or career advancement opportunity, pay, dissatisfaction with work environment, and dissatisfaction with supervisor were in the top six reasons identified for leaving.   |
| Focus Groups                                   | Yes                             | The FY 2022 BAT consisted of a sub-team that focused on Women through discussions and worked through the barrier analysis progress. Barriers identified included: fear of reprisal, lack of advancement, lack of training and detail opportunities, lack of information on FWS-wide benefits, a rigid hiring process, and the need for consistency of flexible schedules/telework options.  |
| Interviews                                     | Yes                             | The FY 2022 BAT conducted interviews with employees from FWS employee resource groups and communities of practice, Joint Administrative Operations and HR, National Conservation Training Center, ODIWM Complaints Program, and the FWS National Recruitment Team.  |
| Reports (e.g., Congress, EEOC, MSPB, GAO, OPM) | Yes                             | OPM Focus Group Report 2020<br><br>Met Group – Values Listening Sessions Report 2022 (contracted report)<br><br>Special Emphasis Observance Survey-Barrier Analysis Questions   |
| Other (Please Describe)                        | Yes                             | Analyzed Directorate Resource Assistant Fellows Program (DFP): 75.8% (47) of FY 2022 DFP hires were identified as female.   |

**Status of Barrier Analysis Process**

|   |  |
|---|--|
| <b>Barrier Analysis Process Completed?</b><br>(Yes or No) | <b>Barrier(s) Identified?</b><br>(Yes or No) |
|---|--|



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|   |  |
|---|--|
| <b>Barrier Analysis Process Completed?</b><br>(Yes or No) | <b>Barrier(s) Identified?</b><br>(Yes or No) |
| Yes   | Yes  |

**Statement of Identified Barrier(s)**

|  |
|--|
| <b>Description of Policy, Procedure, or Practice</b>   |
| Lack of organization-wide practices for improving retention and wellness in the workplace.   |
| FWS does not have a procedure to engage all supervisors on a regular basis on national expectations related to DEIA and related topics (for example: topics such as accountability, reprisal, and intercultural competencies). |
| Requirements for Qualification for the 0485 and 0486 Occupational Series are restrictive and hinder women from qualifying.   |

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

| <b>Objective</b>  | <b>Date Initiated</b><br>(mm/dd/yyyy) | <b>Target Date</b><br>(mm/dd/yyyy) | <b>Sufficient Funding &amp; Staffing?</b><br>(Yes or No) | <b>Modified Date</b><br>(mm/dd/yyyy) | <b>Date Completed</b><br>(mm/dd/yyyy) |
|---|---------------------------------------|------------------------------------|--|--------------------------------------|---------------------------------------|
| Encourage managers and supervisors to use Stay Interviews.  | 12/31/2021                            | 12/31/2022                         | Yes  | 3/31/2023                            |                                       |
| Improve the process for job announcement development by creating a strategy that puts less emphasis on the 5-scale rating in the self-assessment for vacancy announcements.   | 12/31/2022                            | 09/30/2023                         | Yes  |                                      |                                       |
| Develop recommendations for FWS Leadership to reduce any barriers found after review of basic education requirements for GS-0485.   | 12/31/2022                            | 06/30/2023                         | Yes  |                                      |                                       |
| Recommend a standardized process to engage supervisors on national expectations related to DEIA and related topics (for example, via standardized supervisor connect forums). | 12/31/2022                            | 04/01/2023                         | Yes  |                                      |                                       |

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**Responsible Official(s)**

| Title   | Name            | Performance Standards<br>Address the Plan?<br>(Yes or No) |
|---|-----------------|---|
| Director, FWS                                     | Martha Williams | Yes   |
| Deputy Director, FWS                              | Stephen Guertin | Yes   |
| Deputy Director, FWS                              | Wendi Weber     | Yes   |
| DEIA Committee Chair                              | Wendi Weber     | Yes   |
| Assistant Director, Management and Administration | Janine Velasco  | Yes   |
| EEO Director                                      | Inez Uhl        | Yes   |

**Planned Activities Toward Completion of Objective**

| Target Date<br>(mm/dd/yyyy) | Planned Activities   | Modified Date<br>(mm/dd/yyyy) | Completion Date<br>(mm/dd/yyyy) |
|-----------------------------|--|-------------------------------|---------------------------------|
| 12/31/2022                  | 1. ODIWM will brief the DEIA Committee and Directorate members with the results of the FY 2021 Diversity and Inclusion Workplace Assessment, specifically reporting on experiences related to Women. |                               | 04/27/2022                      |
| 12/31/2022                  | 2. ODIWM will conduct equity training for entire workforce incorporating workforce triggers, barrier analysis, and barrier removal.  |                               | 09/30/2022                      |
| 12/31/2022                  | 3. 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.           |                               | 12/01/2022                      |
| 12/31/2022                  | 4. ODIWM will partner with JAO to conduct literature review of "stay interview" promising practices  |                               | 09/30/2022                      |
| 12/31/2022                  | 5. ODIWM will develop standard question flow for managers and supervisors to conduct stay interviews.  |                               | 12/31/2022                      |

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|            |   |           |            |
|------------|---|-----------|------------|
| 12/31/2022 | 6. ODIWM will work with Deputies to incorporate stay interview promising practices  | 3/31/2022 |            |
| 12/31/2022 | 7. ODIWM will recommend Regional Directors have Leadership and Employee Development coordinators and include them in the regional leadership teams.   |           | 10/29/2021 |
| 09/30/2023 | 8. HR will implement Executive Order 13932 to improve the process for job announcement development by creating a strategy that puts less emphasis on the 5-scale rating in the self-assessment for vacancy announcements. |           |            |
| 06/30/2023 | 9. HR will review the basic education requirements for the GS-0485 series and will make recommendations for changes, as needed.   |           |            |
| 04/01/2023 | 10. ODIWM recommend to the Directorate a standardized process to engage supervisors on national expectations related to DEIA and related topics (for example, via standardized supervisor connect forums).                |           |            |

**Report of Accomplishments**

| Fiscal Year | Accomplishments  |
|-------------|--|
| 2022        | <ol style="list-style-type: none"> <li>1. 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.</li> <li>2. 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.</li> <li>3. 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.</li> </ol> |

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|  |   |
|--|---|
|  | <ol style="list-style-type: none"><li>4. ODIWM conducted a literature review and created a Stay Interview Guide for managers &amp; supervisors.</li><li>5. The Stay Interview Guide includes a standard question flow for managers and supervisors to utilize during these conversations.</li><li>6. ODIWM will disseminate the Stay Interview Guide to managers and supervisors via SharePoint.</li><li>7. The FWS team of Employee Engagement and Leadership Development (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.\</li></ol> <p>Additional accomplishments:</p> <ul style="list-style-type: none"><li>• The FWS Deputies' Group conducted an extensive analysis of hiring practices, barriers, and biases, and finalized an implementation plan for increased use of special hiring authorities for entry level positions. Additionally, the Deputies' Group led the coordination of regional targeted recruitment plans and designated regional coordinators to improve consistency in recruitment and hiring strategies across the Service.</li><li>• HR formed a working group to review the basic education requirements for the GS-0485 series and will make recommendations for changes, as needed. The workgroup began regular meetings and will develop recommendations for Service Leadership in Spring 2023.</li></ul> |
|--|---|

# 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<br>(Name, Title, Office, Email)  |
|--|-------------------------------------|-----------|-----------------|---|
|  | Full Time                           | Part Time | Collateral Duty |   |
| Processing applications from PWD and PWTD  |                                     | 36        |                 | Human Resources Specialists,<br>Division of Human Resources<br>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<br><a href="mailto:Bill_Fuller@fws.gov">Bill_Fuller@fws.gov</a>  |
| Processing reasonable accommodation requests from applicants and employees                     |                                     | 13        |                 | Rick Greenblat,<br>Employee-Management Relations Chief, Joint Administrative Operations (JAO),<br><a href="mailto:rick_greenblat@fws.gov">rick_greenblat@fws.gov</a>                                |
| Section 508 Compliance   | 1                                   |           | 11              | Keon Sheffield,<br>National Section 508 Coordinator,<br>Email: <a href="mailto:Keon_sheffield@fws.gov">Keon_sheffield@fws.gov</a>   |
| Architectural Barriers Act Compliance  | 7                                   |           |                 | Bobbea Burnette Cadena, Public Civil Rights Manager, Office of Diversity and Inclusive Workforce Management (ODIWM),<br><a href="mailto:Bobbea_Cadena@fws.gov">Bobbea_Cadena@fws.gov</a>            |
| Special Emphasis Program for PWD and PWTD  |                                     | 5         |                 | Bobbea Burnette Cadena,<br>Disability Program Manager,<br>Office of Diversity and Inclusion Workforce Management (ODIWM),Email:<br><a href="mailto:Bobbea_Cadena@fws.gov">Bobbea_Cadena@fws.gov</a> |

**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 PWTB, 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.

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

| 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"> <li>37% of PWD indicated that a lack of promotion/career advancement opportunities was the primary reason for separating</li> <li>70% of PWD felt they were provided adequate technology, tools, and equipment to effectively perform their job</li> <li>47% of PWD felt executives/senior leaders were effective in motivating and leading the workforce</li> </ul>  |
| 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"> <li>Arbitrary physical requirements preventing PWD from applying for jobs</li> <li>Pervasive stigma creating an unwelcome environment</li> <li>Lack of awareness and resources available for reasonable accommodations</li> <li>Safety within the workplace</li> <li>Ensuring full access to employment and community involvement</li> </ul> |
| 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<br>Met Group – Values Listening Sessions Report 2022<br>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"> <li>• Lack of supervisory knowledge on reasonable accommodations</li> <li>• Lack of professional development</li> <li>• Ability to remote work</li> <li>• A specific barrier was the driver's license requirement for positions</li> </ul> <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                   |

|                         |  |     |  |  |
|-------------------------|--|-----|--|--|
|                         | 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 |  |  |
| <b>Fiscal Year 2022</b> | <b>Accomplishments</b>   |     |  |  |
|                         | <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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</li> </ol> |     |  |  |

|  |  |
|--|--|
|  | <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"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul> |

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.