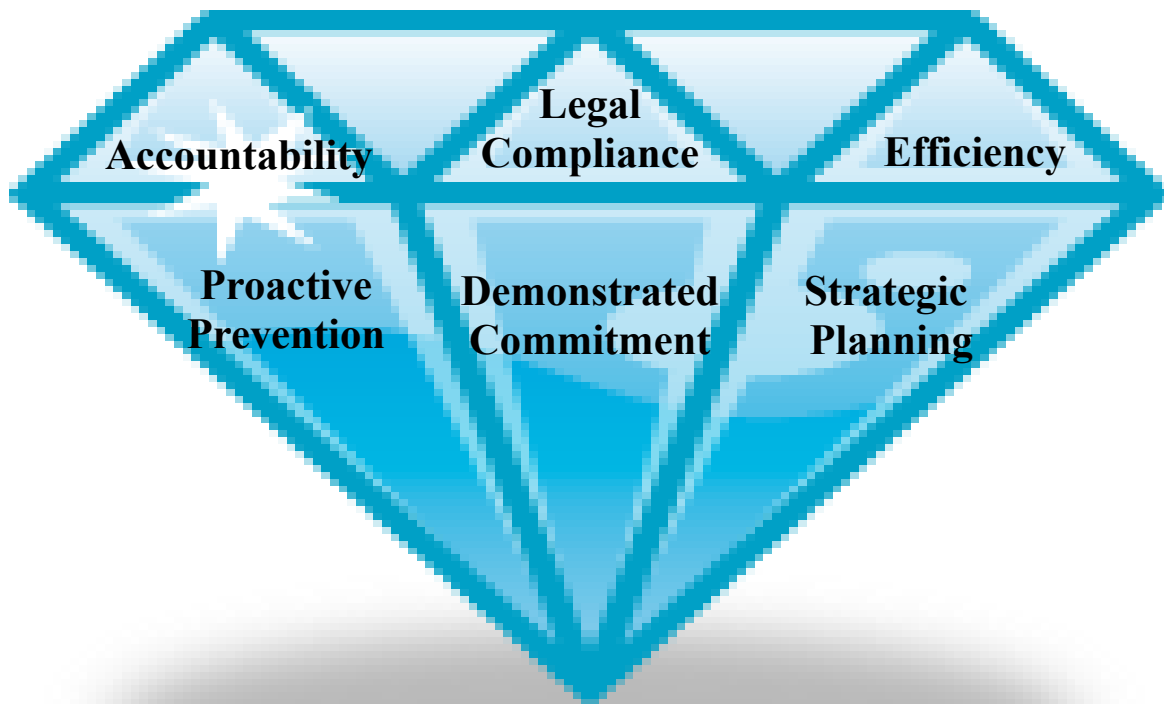




National Park Service  
U.S. Department of the Interior

**Equal Employment Opportunity Commission (EEOC)  
Management Directive 715 (EEO Program Status) Report  
Fiscal Year 2020**

**Six Essential Elements of a Model EEO Program**



Prepared by the Office of Equal Opportunity Programs

<b>EEOC FORM 715-01 PART F</b>	<i>U.S. Equal Employment Opportunity Commission</i> <b>FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT</b>
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**CERTIFICATION of ESTABLISHMENT of CONTINUING  
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS**

I,

Rose Blankenship, Director, Office of Equal  
Opportunity Programs (GS-260-15)

am the

Principal EEO  
Director/Official for

National Park Service

The agency 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.

The agency has also analyzed its work force 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.

*Rose Blankenship*

02/11/2021

Rose Blankenship  
Director, Office of Equal Opportunity Programs

Date

Signature of Principal EEO Director/Official  
Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.

*Shawn Bengé*

2/16/2021

Shawn Bengé  
Deputy Director, Operations  
Exercising the Delegated Authority of the Director of the  
National Park Service  
Signature of Agency Head or Agency Head Designee

Date

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

<b>PART A</b> Department or Agency Identifying Information	<b>1. Agency</b>	1. DOI National Park Service		
	<b>1.a</b> 2nd level reporting component	National Park Service		
	<b>2. Address</b>	2. 1849 C Street		
	<b>3. City, State, Zip Code</b>	3. Washington , DC 20240		
	<b>4. Agency Code</b>   <b>5. FIPS code(s)</b>	<b>4. IN10</b>	<b>5. 10</b>	

<b>PART B</b> Total Employment	<b>1. Enter total number of permanent full-time and part-time employees</b>	<b>1. 15533</b>
	<b>2. Enter total number of temporary employees</b>	<b>2. 5375</b>
	<b>3. TOTAL EMPLOYMENT [add lines B 1 through 2]</b>	<b>4. 20908</b>

<b>PART C</b>	<b>Title Type</b>	<b>Name</b>	<b>Title</b>
Agency Official(s) Responsible For Oversight of EEO Program(s)	Head of Agency	Scott A, de la Vega	Acting Secretary of the Department of Interior
	Head of Agency Designee	Shawn Bengé	Deputy Director, Operations Exercising the Authority of the Director
	Principal EEO Director/Official	Rose Blankenship	EEO Director
	Affirmative Employment Program Manager	Cleveland Williams	EEO Manager
	Complaint Processing Program Manager	Kuldip Kang	EEO Manager
	Hispanic Program Manager (SEPM)	Priscilla Jones-Estes	EEO Specialist
	Women's Program Manager (SEPM)	Lynda Orbik	EEO Specialist
	Disability Program Manager (SEPM)	Lynda Orbik	EEO Specialist
	Special Placement Program Coordinator (Individuals with Disabilities)	Katrina Williams	Management & Program Analyst
	Reasonable Accommodation Program Manager	Stephen Schubart	Employee & Labor Relations Specialist
	Anti-Harassment Program Manager	Kenneth Brodie	Employee & Labor Relations Specialist
	Principal MD-715 Preparer	Lynda Orbik	EEO Specialist
Other EEO Staff	Gina Edelen	Public Civil Rights Program Manager	

For period covering October 1, 2019 to September 30, 2020

<b>PART D</b> List of Subordinate Components Covered in This Report	<b>Subordinate Component and Location (City/State)</b>	<b>Country</b>	<b>Agency Code</b>
	DOI National Park Service Lakewood, CO	United States	IN10
	DOI National Park Service Omaha, NE	United States	IN10
	DOI National Park Service Washington, DC	United States	IN10
	DOI National Park Service Atlanta, GA	United States	IN10
	DOI National Park Service Anchorage, AK	United States	IN10
	DOI National Park Service San Francisco, CA	United States	IN10
	DOI National Park Service Philadelphia, PA	United States	IN10

<b>EEOC FORMS and Documents</b>	<b>Required</b>	<b>Uploaded</b>	
Anti-Harassment Policy and Procedures	Y	Y	
EEO Policy Statement	Y	Y	
Organization Chart	Y	Y	
Personal Assistance Services Procedures	Y	Y	
Reasonable Accommodation Procedure	Y	Y	
Agency Strategic Plan	Y	Y	
Alternative Dispute Resolution Procedures	Y	Y	
Diversity Policy Statement	N	N	
Disabled Veterans Affirmative Action Program (DVAAP) Report	N	N	
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	N	N	
EEO Strategic Plan	N	N	
Federal Equal Opportunity Recruitment Program (FEORP) Report	N	N	
Human Capital Strategic Plan	N	N	

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

**EXECUTIVE SUMMARY: MISSION**

The National Park Service (NPS) is the largest bureau within the Department of the Interior (DOI). On August 25, 1916, President Woodrow Wilson signed the act creating the NPS. The mission of the NPS is to conserve the scenery and natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations. The National Park Service is comprised of twelve regions, the Washington Area Servicing Office (WASO), the Denver Service Center and Harpers Ferry Center. The National Park System covers more than 85 million acres and is comprised of 418 units with at least 19 different designations located in all 50 states, the District of Columbia, and U.S. territories. These include 150 related areas, and numerous programs that assist in conserving the nation's natural and cultural heritage for the benefit of current and future generations. With the help of volunteers and partners, the NPS safeguards these special places and share their stories with more than 318 million visitors every year. More than 20,000 strong, the uncommon men and women of the National Park Service share a common trait: a passion for caring for the nation's special places and sharing their stories.

The National Park Service tells the stories of America's diverse cultural heritage which shapes the contours of our workforce. Pragmatically, the challenges of the 21<sup>st</sup> Century call upon a workforce that adapts to rapid demographic changes in society. Diversity is no longer just sound public policy; it has evolved into a strategic imperative for the long-term success of the NPS and a crucial part of business planning activities. Diversity is strategically linked to achieving the mission and business needs relative to employees, visitors, partners and other stakeholders.

EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

Summary:

The National Park Service is focused on creating a workplace environment that embraces and celebrates the diversity and multiculturalism of the people it serves. This goal is specified in the Director's Call to Action (action item 36), which calls for the development "of a workforce that values diversity and an inclusive work environment so that the Service can recruit, hire, and retain diverse employees." The NPS will use every available resource to create a work environment that is free of harassment, discrimination and one where all employees can advance to their highest level based on merit.

In a letter dated July 27, 2018, the EEOC requested that the NPS provide an update in its next MD- 715 report on its Special Emphasis Programs and barrier analysis activities and next steps. In FY 2020, the Office of Equal Opportunity Programs (OEOP), hired two EEO Manager GS-14s, two EEO Specialist, GS-13s, and a Disability Program Manager. In August 2020, the OEOP announced two EEO Specialist GS-12 positions and selections were made. The incumbents were completing the onboarding process at the end of the fiscal year.

The EEO Director appointed six Regional EEO Managers, three Special Emphasis Program Managers and the Affirmative Employment Program Manager to sufficiently staff the NPS Barrier Analysis Team and the Special Emphasis Program (SEP). Some of the SEP events were Dr. Martin Luther King Jr., African American/Black History Month, Women's History Month, Asian/Pacific Islander Heritage Month, Women's Equality Day and Hispanic Heritage Month.

The NPS continued to take progressive actions to increase recruitment efforts at Historically Black Colleges and Universities (HBCUs), Hispanic Serving Institutions (HSIs), Tribal Colleges and Universities (TCU) and other Minority Serving Institutions (MSIs) through collaboration between the EEO Office, Youth Programs, Human Resources, and internal/external stakeholders. This collaborative effort resulted in numerous outreach events that established partnerships in which NPS employment opportunities were widely dispersed when advertised.

The National Park Service committed over 19 million dollars to support outreach, partnerships, youth programs and minority serving colleges and universities. Approximately 10 million dollars was awarded to minority serving colleges and universities (Historically Black Colleges and Universities-\$9,015,182; Hispanic Serving Institutions-\$406,374; Asian America and Pacific Islanders Institutions-\$303,052; and Tribal Colleges and Universities-\$36,380).

The Barrier Analysis team conducted quarterly meetings with a focus on reviewing and updating deficiencies identified by the EEOC Program Evaluation and MD-715. Listed below are some of the actions that were implemented to eliminate Part G (Self-Assessment Checklist) deficiencies:

- The Office of Equal Opportunity Programs (OEOP) analyzed the MD-715 tables and identified some triggers to ascertain why members of diverse groups are leaving the NPS. The Barrier Analysis Team (BAT) is conducting the barrier identification and elimination process pursuant to EEOC MD-715. The OEOP collaborated with the Workforce and Inclusion Directorate (Human Resources) to obtain Exit Interview and Disciplinary Action data to conduct the barrier analysis process. Exit interviews were not conducted due to the conversion to Microsoft Office. Once the Workforce and Inclusion Directorate resumes exit interviews the barrier analysis team will continue the barrier analysis process to determine why members of diverse groups are leaving the NPS.
- The barrier analysis team identified an issue with demographic data in the NPS database. There were 3.1% of permanent employees that had "None Specified" as their Ethnicity & Race Indicator (ERI). There were 14.6% of permanent employees that either had an obsolete Disability code or had not identified their Disability. These percentages severely impacted the ability of the BAT to accurately measure if the NPS is meeting its hiring and

EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

retention goals. The OEOP collaborated with the Workforce and Inclusion Directorate (Human Resources) to conduct an Ethnicity & Race Indicator (ERI) and Disability resurvey to get more accurate data.

- The OEOP collaborated with the NPS Fire Management Division to analyze the recruitment and retention of employees in Fire Management. Triggers identified in the Fire Management analysis will be used by the BAT in FY 2021 to determine if any barriers exist for members of diverse groups.
- The Preservation Training Collaborative Division requested applicant flow data so that they could analyze the recruitment of employees in the Preservation career field. The results of the analysis will be used by the BAT in FY 2021 to determine if any barriers exist for members of diverse groups.
- The OEOP identified an issue with retrieving data by certain disciplines (Superintendents, Park Rangers (P), Park Rangers (I), employees in the Fire Program, employees in Natural Resources, etc.) from the NPS database system. The OEOP has been working with the Interior Business Center to correct the occupational series in an effort to conduct the barrier identification and elimination process pursuant to MD-715.

The NPS is committed to providing employment opportunities to people with disabilities. On October 24, 2019, DOI, Human Capital and Office of Civil Rights issued a memorandum establishing goals for "Hiring People with Disabilities." The NPS has adopted the Department's numerical goals and are working to achieve this by establishing internal processes to ensure standard practices for hiring, placing, retaining, and advancing people with disabilities by September 30, 2023. The four (4) DOI hiring goals are:

Goal 1: Employees with disabilities will occupy twelve percent of the positions at the GS-1 through GS-10 grade levels.

Goal 2: Employees with targeted disabilities will occupy two percent of the positions at the GS-1 through GS-10 grade levels.

Goal 3: Employees with disabilities will occupy twelve percent of the DOI positions at the GS-11 through Senior Executive Service grade levels.

Goal 4: Employees with targeted disabilities will occupy two percent of the DOI positions at the GS-11 through Senior Executive Service grade levels.

DOI relies on the collective efforts of DOI Bureaus/Offices to ensure a fair and equitable workplace. DOI Bureaus/Offices are encouraged to engage their respective workforces to support DOI-wide hiring goals in the following ways:

- Review their Bureau/Office's current disability employment data and address areas of improvement.
- Increase hiring and retention of people with disabilities through recruitment efforts and utilization of flexible hiring authorities.
- Encourage employees to update their current disability selection in Employee Express to assist DOI in capturing an accurate number of employees in these categories. Participation is voluntary.
- Register as a recruiter or employer for the Workforce Recruitment Program (WRP). Federal employers can gain access to the WRP database to fill temporary or permanent staffing needs.

In addition, the Disability Program Manager (EEO) collaborated with the Disability Coordinator, Workforce &

EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

Inclusion Directorate and the Acting Deputy Associate Director, Workforce & Inclusion Directorate to develop and submit a corrective action plan that will establish numerical goals for the hiring of people with disabilities. The plan will be included in Part J of this report.

On July 21, 2020, a memorandum was sent to all NPS employees inviting them to voluntarily self- identify any existing disability. The Disability Program Manager (EEO), Disability Coordinator and the Acting Deputy Associate Director, Workforce & Inclusion Directorate meet quarterly to determine if the NPS is meeting numerical goals for the hiring of people with disabilities.

The Office of Equal Opportunity Programs (OEOP) met with the Employees for the Advancement of People with Disabilities (EAPWD) Employee Resource Group (ERG) leadership to identify issues that negatively impact members of the disability community. The information obtained will be used by the Barrier Analysis Team (BAT) in FY 2021 to determine if any barriers exist for members of the disability community.

The EEOC conducted a program evaluation of the NPS from August 2018 to October 2019. One of the findings identified there was insufficient funding for the EEO Program. The EEO Director continued to address this deficiency with the previous NPS Acting Director to request increased funding for the EEO and Affirmative Employment Program over a three- year period. On August 7, 2020, the Secretary of the Department of Interior designated Margaret Everson to exercise the delegated authority of the director of the National Park Service. On September 23, 2020, the EEO Director presented the State of EEO briefing to the newly appointed NPS leader. During this meeting the EEO Director discussed increased funding for the EEO Program.

#### ANNUAL SELF ASSESSMENT CHECKLIST

The EEOC, through its Management Directive (MD)-715, identifies six compliance indicators of a Model EEO Program. The Six Essential Elements serve as a foundation upon which each agency shall build its model program as required by federal law at 29 CFR Part 1614. The EEOC provides a self-assessment checklist that all agencies use to assess compliance with the essential elements of the program. In addition, EEOC MD-715 requires all agencies with 1,000 or more full-time employees to conduct analyses of workforce demographics and determine to what degree the workforce may have low participation rates when compared to either the National Civilian Labor Force (NCLF) or a more “relevant” labor force comparison. The checklist requires agencies to document whether or not they have “met” the actions required in each of the 156 individual measures. Use of the checklist assists in identifying and tracking trends in programs and practices. Action plans are required for any “unmet” measures.

Listed below is a summary of the six compliance indicators of a Model EEO program with FY 2020 successes and areas identified for improvement (those areas answered as a “NO” for the self- assessment).

#### ELEMENT A: Demonstrated Commitment from Agency Leadership

The NPS achieved compliance in 86% of the measures (12 of 14).

##### Successes:

The Deputy Director, Exercising Authority for the Director, reaffirmed his commitment to support a workforce free of discrimination and harassment by issuing a variety of policy letters.

The Deputy Director, Exercising Authority for the Director, reaffirmed his commitment to increasing workforce diversity and inclusion by participating in numerous special emphasis programs. His lead by example engagement immensely increased employee awareness of the importance of diversity and demonstrated his commitment to a Model EEO workplace within the NPS.



EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

Areas Identified for Improvement:

The NPS will continue to inform employees about what behaviors are inappropriate in the workplace and that inappropriate behavior may result in disciplinary action.

ELEMENT B: Integration of EEO into Agency's Strategic Mission

The NPS achieved compliance in 97% of the measures (36 of 37).

Successes:

The EEO Director conducted the "State of the Agency" briefing with the Counselor to the Secretary, Exercising the Delegated Authority of the Director of the National Park Service on September 23, 2020.

The EEO Director meets with the Counselor to the Secretary biweekly to discuss issues related to the EEO program.

The EEO Director conducts a monthly meeting with regional EEO Managers to inform them of the effectiveness, efficiency and legal compliance of the regional offices' EEO program.

Areas Identified for Improvement:

The NPS will ensure that EEO officials are involved in critical workplace decisions and participate in meetings where critical personnel decisions regarding management and the deployment of Human Resources are made.

The NPS will allocate sufficient qualified staff and resources to the EEO program to ensure quality customer service and a workplace free of discrimination to its employees. This includes mandatory EEO training for managers, supervisors and EEO staff to prevent harassment and discrimination.

ELEMENT C: Management of Program Accountability

The NPS achieved compliance in 95% of the measures (42 of 44).

Successes:

All NPS 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.

The NPS provides managers and supervisors with initial and regular refresher training to understand their responsibilities under civil rights laws, including Alternate Dispute Resolution (ADR), and how those responsibilities figure into the success of the agency's EEO program and overall mission.

The NPS ensures that personnel policies and procedures, rules of conduct, promotion, evaluation and training systems are routinely reviewed to ensure that they are clearly defined, well-communicated, consistently applied and fairly implemented.

Areas Identified for Improvement:

The NPS will conduct technical assistance visits to regional EEO offices. Technical assistance visits are designed to identify strengths and opportunities for improvement based on the shared perceptions about formal or informal policies, practices, and procedures in the organization.

EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F

ELEMENT D: Proactive Prevention of Unlawful Discrimination

The NPS achieved compliance in 86% of the measures (12 of 14).

Successes:

The EEO Director appointed an EEO Alternate Dispute Resolution (ADR) Team to increase awareness and utilization rate for the ADR Program. The ADR Team developed an action plan that will be updated quarterly. The ADR Team consists of a WASO Senior EEO Specialist and five Regional EO Managers from across the country.

The NPS ensures that all employees are informed of and have access to services administered by the EEO Program. All programs and procedures are available on the NPS website.

Areas Identified for Improvement:

The NPS will develop a tracking system for reasonable accommodation requests to ensure that 90% of accommodation requests are processed within the timeframe set forth in its procedures.

ELEMENT E: Efficiency

The NPS achieved compliance in 93% of the measures (29 of 31).

Successes:

The EEO staff continues to evaluate the EEO complaint resolution process to ensure it is efficient, fair, and impartial. Complaint processing times were consistently monitored to ensure compliance with applicable federal statutes. Specifically, the NPS achieved 100% timeliness rating for EEO and Public Civil Rights investigations completed. This is the first time that the NPS has accomplished timely processing regarding EEO investigations.

The NPS ensures that the investigation and adjudication function of its complaint resolution process are separate from its legal defense arm or other offices with conflicting or competing interests.

The NPS has a system for ensuring timely and complete compliance with EEOC orders, as well as the orders of other adjudicatory bodies, and implementation of the provisions of settlement/resolution agreements.

Areas Identified for Improvement:

The NPS will continue to develop its data collection system to track applicant flow data for each selection made by the agency identified by race, national origin, sex, and, where known, disability, as well as disposition of each application pursuant to 29 C.F.R. § 1607 and EEOC Management Directive 715.

ELEMENT F: Responsiveness and Legal Compliance

The NPS achieved compliance in 100% of the measures (12 of 12).

Successes:

The NPS is accountable for timely compliance with orders issued by the Equal Employment Opportunity Commission (EEOC) Administrative judges.

**EXECUTIVE SUMMARY: ESSENTIAL ELEMENT A-F**

The NPS system of management controls ensure that the Service timely completes all ordered corrective actions and submits its compliance reports to EEOC within thirty days of such completion.

Areas Identified for Improvement:

The NPS will continue to ensure that it is responsive and accountable for timely compliance with orders issued by the Equal Employment Opportunity Commission (EEOC) Administrative Judges.

The NPS will continue to ensure that its system of management controls timely completes all ordered corrective action and submits its compliance reports to EEOC within thirty days of such completion.

## EXECUTIVE SUMMARY: WORKFORCE ANALYSES

## WORKFORCE ANALYSIS OVERVIEW

The EEO Office conducted demographic review of the NPS workforce. The review was conducted using data self-reported by NPS employees with regard to their racial and ethnic identity, gender, and disability status. The review is based on measurement areas as required by the MD-715. These measurement areas comprise a significant portion of any organization's total human resource life cycle. The Federal Personnel Payroll System (FPPS) reflects that the NPS' workforce for FY 2020 consisted of 20,908 employees; 15,533 permanent and 5,375 temporary. The NPS has seven Regional Directors to assist in managing its mission, responsibilities and goals.

## Gender Distribution

In FY 2020, males comprised 62.0 percent (9,633) of the permanent workforce, an increase of 141 but a slight decrease in overall percentage from 62.5 percent in FY 2019. In FY 2020, females comprised 38.0 percent (5,900) of the permanent workforce, an increase of 193 and a slight increase in overall percentage from 37.5 percent in FY 2019.

## Ethnic and Race Indicators

In FY 2020, African American/Black males represented 4.0 percent (616) of the workforce, an increase of 11 while the overall percentage remained the same from FY 2019. African American/Black females were 2.8 percent (429) of the workforce compared to 2.9 percent in FY 2019. There was a 0.1 percentage decrease and the number of African American/Black females decreased by 8.

American Indian/Alaskan Native males represented 1.5 percent (233) of the workforce. Although the percent remained the same, there was an increase of 4 compared to FY 2019. American Indian/Alaskan Native females were 1.0 percent (157) of the workforce with an increase of one and the percentage remaining the same as in FY 2019.

Asian American males represented 1.1 percent (168) of the workforce. Although the percentage remained stagnant, there was an increase of three compared to FY 2019. Asian

American females were 1.2 percent (188) of the workforce; an increase of 17 and 0.1 percentage compared to FY 2019.

Hispanic males represented 3.5 percent (544) of the workforce. The number of Hispanic males increased by 17 while the overall percentage remained the same compared to FY 2019.

Hispanic females comprised 2.2 percent (347) of the workforce. There was a slight decrease of overall percentage by 0.1 percent and an increase of five Hispanic females compared to FY 2019.

Native Hawaiian/Pacific Islander males represented 0.5 percent (74) of the workforce. Although the percentage remained stagnant, there was an increase of 4 compared to FY 2019.

Native Hawaiian/Asian Pacific Islander females comprised 0.3 percent (40) of the workforce, a slight percent (0.1) increase from FY 2019. The number of Native Hawaiian/Asian Pacific Islander females increased by three compared to FY 2019.

White males represented 49 percent (7,608) of the workforce compared to 50 percent in FY 2019. The number of White males increased by nine with an overall 1.0 percentage decrease. White females comprised 29.1 percent (4,515) of the workforce compared to 29.0 percent in FY 2019. The number of White females increased by 116 and

EXECUTIVE SUMMARY: WORKFORCE ANALYSES

a 0.1 percent increase.

EEOC provides an opportunity for federal employees and applicants to self-identify as having "Two or more Races." Men having "Two or more Races" represented 0.2 percent (36) of the workforce and the percentage remained the same as in FY 2019. Two or more Races males increased by one compared to last year. "Two or more Races" females comprised 0.2 percent (24) of the workforce and the percentage remained the same as in FY 2019. Two or more Races females increased by two compared to last year.

Note: There was a change to the category to capture data for "None Specified" employees. Last year, "None Specified" employees were put in the White employees' category. This year, "None Specified" employees are depicted in the Two or More Races category.

In FY 2020, "None Specified" male employees represented 4.7% (986) and "None Specified" female employees comprised 2.7% (555) of the total workforce. In FY 2019, "None Specified" male employees represented 4.2% (897) and "None Specified" female employees comprised 2.5% (537) of the total workforce. This change resulted in a 0.5% increase for "None Specified" male employees and a 0.2% increase for "None Specified" female employees.

Corrective Action Plan:

The Office of Equal Opportunity Programs (OEOP) will submit a request to the Workforce and Inclusion (Human Resources) Directorate to contact the employees with unidentified Ethnicity and Race and encourage them to submit a SF-256 to their Servicing Human Resources Office or update their Ethnicity and Race themselves in Employee Express to improve the accuracy of the data.

PERSONS WITH DISABILITIES (PWD) AND TARGETED DISABILITIES (PWTD)

DISABILITY WORKFORCE ANALYSIS

EEOC MD-715 requires a separate review of the state of EEO for persons with disabilities (PWD) along the same dimensions of human capital management as those explored for racial, gender, and ethnic groups. There are two relevant groups when examining the presence of PWD in the federal government. The first are those individuals who identify themselves as having a disability. These include anyone who has a condition that impairs their ability to perform a major life function. The second group includes individuals who, in addition to having a condition impairing their ability to perform a major life function, have impairment in one of the twelve categories (targeted disabilities): (1) developmental disabilities, (2) traumatic brain injuries, (3) deafness or serious difficulty hearing, (4) blindness or serious difficulty seeing, (5) missing extremities, (6) significant mobility impairments, (7) partial or complete paralysis, (8) epilepsy and other seizure disorders, (9) intellectual disabilities, (10) significant psychiatric disorders, (11) dwarfism, and (12) significant disfigurement.

DISABILITY HIRING AND REPRESENTATION

The employment of persons with targeted disability (PWTD) across the federal workforce has steadily declined over the last decade. To address this issue, the EEOC established a goal to increase the representation of PWTD to 2% of the federal workforce.

In FY 2020, 8.4% (1,176) of the NPS workforce reported having a disability compared to 8.6% (1,823) last year. The number of employees that reported having a targeted disability comprised 1.9% (390) of the workforce. The percentage of PWTD increased by 0.05% and the number of PWTD employed by the NPS increased by five compared to FY 2019.

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

**EXECUTIVE SUMMARY: WORKFORCE ANALYSES**

The EEO Disability Program Manager continues to meet with the Disability Coordinator to develop strategies to increase the hiring of people with disabilities.

EXECUTIVE SUMMARY: ACCOMPLISHMENTS

REGIONAL REPORTS

The role and function of the regional offices are to provide employees with specialized expertise and tools that will foster growth, development, and safety of regional park service employees, volunteers, and partners. The regional missions depend upon widely dispersed, highly talented professionals operating from a wide variety of locations. These individuals expect and deserve an environment that respects and leverages the value found in a diversity of viewpoint and experiences, which aids the region in developing a collaborative approach to solving the diversity and inclusion challenges facing the National Park Service.

The EEOC Management Directive (MD) 715 sets forth specific requirements for conducting analyses of our employment policies, practices, and procedures in support of establishing and maintaining a model EEO program. The following examples highlight efforts that were made service-wide to establish a Model EEO Program and create the conditions for a more diverse and inclusive organization where all employees can advance to their highest level based on merit.

Interior Region 1 (Northeast Region)

Equal employment opportunity is not only the law, but a fundamental business practice which helps us to achieve the National Park Service (NPS) mission. The contributions of each member of the NPS Interior Region 1 are vital to the overall success of our region. An environment where people feel welcomed, respected and valued is a necessary condition for employees to reach their fullest potential.

Interior Region 1 believes inclusive behavior enlightens the community by removing barriers, inspiring creativity and driving innovation to achieve our mission. Today's more culturally complex environment strengthened our obligation to the principles of equal employment opportunity, diversity and inclusion for everyone.

1. The regional office acknowledges that Equal Employment Opportunity (EEO) Counselors are essential and play a vital role in promoting the goals and objectives of equal employment opportunity. The EEO office collateral duty counselors participated in a virtual training that provided participants with tools and techniques to assist management in resolving complaints at the lowest level. In addition, the EEO office secured additional EEO counselors to decrease the wait time for counselor assignment.
2. The regional EEO Share Point site serves as an informational portal for resources on the EEO program. Some of the resources are contract counselors contact information, EEO policies, current EEO information from EEO News Releases, reasonable accommodation information, disability resources and additional resources to ensure that employees have a centralized place to retrieve information to address workplace concerns.
3. The Office of Communications maintains the Monday Mashup newsletter that reaches all employees. The Monday Mashup is a way for management to share information with the entire region in a systematic manner that improves overall communications. The Monday Mashup provides information on upcoming deadlines and data calls, budget information, training, career development opportunities, communications tips as well as highlights of success stories from parks and programs.
4. The region acknowledges the importance of effective leadership in developing and maintaining a diverse, inclusive and engaged workforce. The region's Learning and Development office facilitated another successful 21st Century Leadership cohort. Although Covid-19 hindered some training initiatives, the training office adapted and scheduled a virtual Orientation for Superintendents and Division Chiefs which included a session on recruitment and retention. Additionally, Superintendents were able to attend monthly virtual training on topics such as Ethics, EEO, and Employment & Labor Law. WebEx sessions were also scheduled and covered topics such as Reasonable Accommodation, 508 Compliance and Supervisor Essentials.

EXECUTIVE SUMMARY: ACCOMPLISHMENTS

5. The region aims to increase the awareness of the Schedule A Hiring Authority to recruit and hire individuals with disabilities. An EEO Specialist serves as a recruiter for The Workforce Recruitment Program (WRP). WRP is a recruitment program that connects federal sector employers with college students and recent graduates with disabilities through a database that is accessible to all federal agencies. The database provides access to WRP candidates that are all self-identified as Schedule A eligible as well as veterans. Federal employees at a GS-9 or higher may apply to serve as a recruiter for WRP. Federal employers can search the database for qualified individuals that can be hired under the Schedule A Hiring Authority for temporary or permanent positions. The region sends out information about WRP and how to access the database via all employee meeting and the weekly Monday Mashup newsletter.
6. The region acknowledges the importance of advancing agency diversity, equity, and inclusion goals, as well as resource management goals, by creating opportunities to engage youth in resource stewardship employment opportunities. In FY2020, parks throughout the region partnered with youth-serving 21st Century Service Corps organizations to employ youth that worked on 52 Public Land Corps (PLC) and Youth Partnership Program (YPP) projects totaling \$2.4 million in project funding.
7. The region supported parks in planning for future youth employment opportunities to advance diversity, equity and inclusion goals. The region provided Rec Fee 20% Public Land Corps funding technical assistance and informational sessions to 70 staff across the region, resulting in 19 projects, totaling \$1.02 million in project funding, to fund FY 2022 youth engagement and employment programs.
8. The region supported youth in advancing their career goals of working on public lands by issuing 22 Public Land Corps (PLC) Certificates of Eligibility to diverse youth who successfully completed 640 hours of service on appropriate conservation projects as defined by Public Land Corps Act of 1993.

Interior Region 2 (Southeast Region)

Interior Region 2 oversees sites in nine states as well as the U.S. Virgin Islands and Puerto Rico. Per the region's policy on Equal Employment Opportunity and Diversity (EEO), the region is committed to improving the diversity of the workforce and creating an inclusive environment where all employees feel they are valued and are contributing to the mission of the organization, as well as providing workplaces free of discrimination and harassment of any kind.

Although a number of parks have produced creative means in which to recruit, as a whole, the region continues to have a number of EEO groups whose participation rates in the total workforce are below participation rates in those same occupations in the national civilian labor force. At 8.2% for their total workforce for persons with disabilities, they showed an increase of 2.2% from FY19 regarding employing Individuals with Targeted Disabilities (IWTDs). There continues to be an under-representation of females, Hispanic, and Asian employees in the region's workforce.

This fiscal year they faced an even bigger challenge with the COVID-19 virus pandemic. Many parks and offices were closed, hindering both recruitment and hiring. Though enveloped in challenging times, several parks rose above it and developed means in which to thrive.

A region-wide working group consisting of the Deputy Regional Directors, Assistant Regional Director of EEO/Diversity, Assistant Regional Director for Communications/Legislative Affairs, and two park superintendents formed a working group to develop region-wide initiatives to address racial and social justice within the region. The group is continuing to work with the Regional Director to implement some of the initiatives in fiscal year 2021.

The regional manager of Interpretation and Education formed an advisory and work team in the interpretation community to ensure effective practices in interpreting race and social justice. The work team is charged with identifying challenges, opportunities, and actions for advancing race and social justice through interpretation by drawing on the experiences of participants.



DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

**EXECUTIVE SUMMARY: ACCOMPLISHMENTS**

Parks and offices have been proactive in providing training opportunities for all employees, both virtually and in person. Although some diversity, equity and inclusion training scheduled for the latter half of the year was canceled, park employees were able to complete training related to diversity, equal employment opportunity, and preventing discrimination in the workplace.

Parks and offices continue to attract diverse visitors and increase participation in park activities and programs by diverse and underserved communities. Parks held activities such as unique interpretive programs, summer camps, and other activities to engage the local community.

During the pandemic, parks shifted to virtual programming to reach the public. In Puerto Rico, they created a cleanup event at the community of La Perla and at Fort El Cañuelo to encourage more participation in park programs and create awareness of the NPS mission and significance of San Juan National Historic Site, including park jobs and employment opportunities. Youth Conservation Corp recruitment focused on local youth from La Perla and Puerta de Tierra communities.

The region acknowledges the importance of effective leadership in developing and maintaining a diverse, inclusive and engaged workforce. As such, the region's Learning and Development Office rolled out its fifth cohort of the blended Future Leaders Program in FY 20. The program has proven to be a great success as it grooms the next generation of managers to address current leadership challenges and gain tools in which to successfully handle these challenges.

The ten months of blended learning encompasses various aspects of supervision and leadership and includes a one-month detail assignment. Participants receive training in equal employment and diversity, managing human resources effectively, as well as other subjects important in leading the workforce of the future. Those selected to participate in the program were very diverse regarding race, gender, work location as well as job assignment.

The region continues to take progressive actions to increase recruitment efforts at Historically Black Colleges and Universities (HBCUs) and other Minority Serving Institutions (MSIs). Interns continue to play a vital role throughout the region and in opportunities that benefit both the intern and the park. One park continues to work with the History Departments at Jackson State University and Alcorn State University to recruit candidates for HBCU Internships. The goal is to move towards including Pathways appointments for outstanding candidates. Others have looked towards building partnerships in the area.

One such partnership is with the Penn Center and seeks to recruit candidates from HBCUs in South Carolina who will work with the National Park Service and Penn Center staff. The Penn Center will be able to provide housing and opportunities for potential recruits.

Additionally, they're working directly with the HBCUs in South Carolina to develop an internship program which will support the park and the newly created Reconstruction Era National Historic Network. Potential interns or fellowship candidates can work in their areas of study to support park and network stories.

Another park is working to develop internship position descriptions, scopes of work, etc. to better engage and recruit from university degree programs with internship requirements. This unique program, called Community Stewards Leadership Program was implemented by having a task agreement with Groundworks USA and Greening Youth Foundation. Local students were selected from Tuskegee University and Alabama State University to work as interns in Cultural Resources, Maintenance, and Interpretation.

There is also a new partnership with Stetson University and Atlantic Center for the Arts on Young Sound seekers

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

**EXECUTIVE SUMMARY: ACCOMPLISHMENTS**

and Artist-in-Residence program. A Louisiana park is working with a number of Service-wide youth programs including Conservation Legacy, Greening Youth Foundation, Student Conservation Association, and Community Youth Ambassador as they assist the park with recruitment efforts, allowing them to strengthen the park's relationships with Dillard, Xavier, Southern and University of New Orleans. Each year they have hired up to a dozen interns; park staff participate in citizen science and research projects with teachers and students in addition to volunteering time to participate in job fairs and career workshops at these local universities.

The region continues to explore opportunities through Handshake and career fairs on both the high school and college levels by engaging students with a platform to learn about the National Park Service and its offerings. In addition, the Latino Heritage Internship Program (LHIP) provided two parks with interns to assist with interpretative programs. Other opportunities supporting diversity include the Cultural Resource Diversity Internship which was utilized by two parks as well as five parks participating in the Mosaics in Science Internship program.

The region strives to fill positions reflective of our country by continuing nonprofit partnerships with groups such as the American Conservation Experience Work Crews, Student Conservation Association and Conservation Legacy which have proven to be advantageous to the mission of the Service.

Challenges remain in remote areas as incentives to prospective applicants are lacking especially those without park housing. Additionally, some found that, even with economically challenged areas, local residents are not applying for positions. Staffing limitations make it difficult to pursue more than a few career/employment outreach opportunities during the year.

**Interior Regions 3, 4, and 5 (Midwest Region)**

Interior Regions 3,4,5, like all of the National Park Service (NPS) faced unprecedented times with the COVID-19 pandemic, with closures and cancellations. However, their Regional park leadership and employees rallied to the challenge and accomplished many special projects in support of equal opportunity and diversity. Interior Regions 3,4,5 continued its active involvement with Historically Black Colleges and Universities (HBCU) and Latino Heritage interns, utilizing the skills of three individuals in three different parks.

Pullman National Monument (PULL) was awarded an intern through a program with HBCUs and the Greening Youth Foundation. This in-person internship pivoted to a virtual internship, with a few site visits by intern Malik Fowler. Mr. Fowler recently graduated from Tuskegee University and returned to northern Illinois. He collaborated with park staff to develop a "Virtual Volunteer Program" with suggestions for recruitment and employment opportunities. He provided input for social media posts and represented the monument during the introduction of the first virtual "Labor Day 2020" Facebook live event on September 8, 2020.

Katie A. Kull served as an American Conservation Experience (ACE) intern with the region's Heartland Inventory and Monitoring Network, located at Wilson's Creek National Battlefield (WICR). Ms. Kull published original research on the Royal Catchfly in the July 2020 edition of American Midland Naturalist, a national scientific journal. Ms. Kull also presented her research at the 2020 Missouri Natural Resources Conference.

Another intern from ACE Cultural Resources Diversity program worked at Homestead National Monument (HOME), contributing to women's suffrage programs at the park in honor of the 100th anniversary of the 19th Amendment. She was instrumental in helping the park's historian research lesser known stories of women homesteaders and the suffrage movement. She also helped draft social media posts and assisted with park operations. Indiana Dunes National Park (INDU) utilized the skills and knowledge of a Latino Heritage Program intern this year in partnership with Environment for the America. Due to the pandemic, the internship was delayed and eventually became a virtual opportunity for the intern. She assisted in translating various publications, press

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

**EXECUTIVE SUMMARY: ACCOMPLISHMENTS**

releases and products into Spanish. She also created an excellent, fun video titled, “Discover the Dunes in Spanglish” for Hispanic Heritage month. INDU also initiated a new partnership with VOCART, which focuses on creating accessibility for people of all abilities. This partner funded a portion of one of the Pathways interns this summer to put an emphasis on marketing and publicizing the accessibility equipment and resources available in the park. This intern created web content, conducted training for other staff, and designed a rack card to showcase the park’s accessibility resources. VOCART also partners with the park to provide a variety of assistive devices for wheelchair users to operate on the park’s trails.

The Region’s newly hired Special Emphasis Program Manager (SEPM) completed Disability Program Manager training, preparing her to partner more closely with other Regional offices in relation to accessibility and disability awareness. During the fiscal year, parks and organizations appointed a total of 15 employees under the Schedule A hiring authority. To assist in increasing awareness of different hiring authorities along with various cultures, a Special Emphasis Program Coordinators (SEPC) Network has been established, collaborating with park employees to encourage education and awareness in parks throughout the Region. Many virtual diversity programs were disseminated to Interior Regions 3,4,5 employees from NPS Employee Resource Groups (ERGs), providing excellent programs on various cultures. Their Complaints Program Manager (CPM) has designed a quarterly newsletter covering important Equal Employment Opportunity (EEO) topics for superintendents and managers. Distribution will be expanded to all Interior Regions 3,4,5 employees in FY 2021, ensuring a broader coverage of valuable information about the EEO process. While they only conducted two virtual training programs in FY 2020 due to the pandemic, their Equal Opportunity Team met in August to strategically plan its direction for FY 2021, when they plan to increase the number of virtual training opportunities for EEO, discrimination and harassment.

**Interior Regions 6, 7, and 8 (Intermountain Region)**

The National Park Service (NPS), Department of the Interior (DOI) Arkansas-Rio Grande-Texas- Gulf (Interior Region 6), Upper Colorado Basin (Interior Region 7), and Lower Colorado Basin (Interior Region 8) contain 90 parks, monuments, recreation areas and other NPS sites within eight states of the American West. These regions span the states of Colorado, Texas, Oklahoma, New Mexico, Utah, Wyoming, Arizona, Montana and portions of southern California and southern Nevada. A regional office in Denver (Lakewood), Colorado serves the parks and other NPS sites of these regions. It provides guidance, professional service, technical assistance, policy direction, consultation, and oversight to the parks, their partners and others who support the NPS mission.

With over 11.2 million acres of public lands, the regions host over 57 million visitors annually. The region employs nearly 5,000 full-time talented professionals—a quarter of the total NPS workforce, in addition to hundreds of term, temporary and seasonal professionals who continue to make great contributions to the region’s overall mission and goals. Furthermore, the region hosts more than 25,500 volunteers during peak travel seasons.

In Fiscal Year 2020, NPS, Interior Regions 6,7 & 8 did not waver in its efforts to diversify its workforce and promote a more inclusive and equitable work environment for all, despite the many challenges posed by COVID-19 restrictions. The new and permanently assigned Regional Director (RD), Michael T. Reynolds reaffirmed NPS EEO Policy Statement, to include his expectations around diversity, equity, and inclusion principles. These reaffirmations have taken place through the following mediums: “InterCOMM” (regional e-Newsletter sent out to all employee groups), Executive Team Meetings, All Superintendents and Division Leads calls, and All-employee calls.

**Policies and Procedures:** The Equal Employment Opportunity (EEO) office conducted a comprehensive review of all affiliated policies (DOI, NPS, and regional) to ensure ongoing compliance. Regional policies include: EEO and Zero Tolerance of Discrimination; Sexual Harassment Prevention/Anti-Harassment; Reasonable Accommodation for Individuals with Disabilities; and Alternative Dispute Resolution (ADR) Process in Resolving EEO Complaints.

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

**EXECUTIVE SUMMARY: ACCOMPLISHMENTS**

From their regional Servicing Human Resources Office (SHRO), the SHRO continued its partnership with its serviced parks in strategic hiring, employee development, and succession planning, with an emphasis on increasing workforce diversity at all levels, particularly for higher graded positions. An annual review of the Merit Program Policy and Procedures was accomplished by the SHRO for identifying potential barriers to full participation of promotion opportunities with an emphasis on underrepresentation. Furthermore, the regional SHRO adapted its procedures for alignment with the new NPS HR Central platform. The HR Central platform enhanced HR processes and procedures across the service to reduce the time to hire, increase transparency into the process for hiring managers and established a consistent way of doing business across the service.

From their Employee Relations (ER)/Labor Relations (LR) office, the ER/LR staff has continued its diligence in working to ensure full compliance with the NPS Anti-Harassment Policy and Procedures and continued its partnership with the DOI Office of the Solicitor (SOL) for review of procedural matters. Of note, the region continues to have a full-time ER specialist serving in the role of Anti-Harassment Program coordinator, ensuring procedural consistency throughout the region. From their Learning & Development (L&D) area, a variety of courses focusing on the prevention of workplace harassment and unlawful discrimination and promotion of diversity, equity and inclusion in the workplace were made available, 185 employees attended from across various levels with the region. Additionally, L&D made available a variety of supervisor and manager related classes for opportunities to learn/improve on a variety of critical skills. There were 371 participants. Last, but not least, L&D coordinated on a virtual class (two segments) entitled, "Role of Supervisors and Managers in EEO" that had a comprehensive agenda that included: Diversity, equity and inclusion; MD-715; and EEO subject matters.

From their Youth, Young Adult and Volunteer Programs (YYAVP) office, the staff provided a presentation on the Public Land Corp Hiring Authority for the national Community Volunteer Ambassador Program to educate this diverse group of participants about opportunities with the NPS. From their Tribal Liaison Office (TLO) area, the liaison team worked with 33 parks to fulfill their legal compliance under the Native American Graves Protection and Repatriation Act (NAGPRA). A Standard Operating Protocol (SOP) was developed to inform our parks about necessary steps when inadvertent discoveries are at issue to ensure compliance with the NAGPRA. The resource inspired some parks to more closely collaborate/consult with affiliated tribes around other facets of park management activities as well. The TLO office staff also participated in providing training for the Cultural Resources Inventory System-Ethnographic Resources (CRIS- ER) database, over 500 entries for eight parks were published, greatly increasing the tribal contact database.

From the Grand Canyon National Park (GRCA) Employee and Organization Development (EOD) Office, they redesigned New Employee Orientation to be delivered digitally via SharePoint due to COVID-19, to include a variety of other EEO, Anti-Harassment and diversity, equity, and inclusion related training sessions. They held regular meetings of the GRCA Diversity Council to plan events and raise awareness.

Complaints Processing: From their EEO office, the EEO staff continued to evaluate the EEO complaint resolution process to ensure it was efficient, fair, and impartial. Complaint processing times were consistently monitored to ensure compliance with applicable federal statutes, DOI and NPS policies. Additionally, the EEO staff made available for each counselee, Alternate Dispute Resolution (ADR) options toward efforts to facilitate early, effective, neutral, and efficient informal resolution of disputes.

Furthermore, the EEO staff used the iComplaints Case Management System extensively for identifying, monitoring and reporting any significant trends reflected by complaint processing activity. The Regional Executive Team received frequent updates throughout this reporting period on the status of EEO activities for their on-going awareness and consideration for their appropriate actions. In addition to having an ongoing efficient and effective EEO complaint resolution process, Interior Regions 6,7 & 8 has also continued the implementation of a comprehensive Anti- Harassment process through the coordination and guidance of the ER/LR staff. Furthermore,

**EXECUTIVE SUMMARY: ACCOMPLISHMENTS**

the ER/LR staff: provided countless other complaint/grievance advisory services to employees and supervisors alike, many of which were outside of the Anti-Harassment category/intake requirements, totaling 60+ complaints; provided advisory services on 120+ diverse ER related matters. Interior Regions 6,7 & 8 employees continued to have multiple avenues of redress.

**Special Emphasis Programs and Outreach:** Within the regional SHRO, the HR staff accomplished extensive veteran outreach and at least 50 veterans were hired, of which 34 were Veterans Recruitment Appointment (VRA) Authority, non-disability. In addition to external outreach, the HR staff continued to consult with supervisors and selecting officials about veteran organizations and obtains resumes from veterans' group networks. The SHRO staff continued to encourage the use of the region's Outreach and Recruitment Handbook that identifies several Minority Serving Institutions (e.g. HBCUs, HSIs, TCUs) and other entities that provide employment support services to underrepresented populations within the workforce. From their Tribal Liaison Office, the staff hired a graduate student during the summer as a NAGPRA intern who is a member of the Hopi Tribe, the staff lauded the intern as a superb source information that will be beneficial to the service's NAGPRA compliance endeavors.

The YYAVP office continued their support of the Denver Urban Ranger program and hired 10 high school and college students from communities traditionally underrepresented in the outdoors to lead educational outdoor programming for other students across the Denver Metro Area. While the majority of programming was virtual due to COVID-19 restrictions, the Urban Rangers were still successful in engaging other students and families in their communities and participated in extensive professional development opportunities. This program is a partnership between the NPS, Environmental Learning for Kids, Colorado Parks & Wildlife, and Denver Parks and Recreation. A regional office team, with field staff submissions and support as well as donor assistance from Rocky Mountain Conservancy, developed a fully accessible virtual video submission to Denver's Pride Parade in support of the NPS mission to tell the stories of all Americans. Additionally, several regional parks and program areas participated in and supported several internships including Latino Heritage, Mosaics in Science, Future Park Leaders and Historically Black Colleges and Universities Internship Program. Last, but not least, the YYAVP staff continued its participation in the Ancestral Lands across various parks in their region and attended DOI Tribal Consultation Training.

From the Glacier National Park (GLAC) AmeriCorps VISTA program area, prior to COVID-19 related restrictions, the staff hosted several events in the local community from October 2019 to March 2020. Native America Speaks (NAS) Presentations were hosted at the Museum of the Plains Indian, once per month for the Blackfeet community and students. Two NAS Programs were hosted at the Medicine Spring Library on the Blackfeet Community College Campus. The Education Program out of East Glacier worked closely with schools on and around the Blackfeet Nation. Prior to COVID-19, these programs included educational hikes and snowshoe trips with over 1,500 contacts from all activities. The Education Staff now leverages the use of videos to maintain a presence with the tribal schools. The media staff have audio transcribed and closed captioned four NAS programs that were previously filmed. They can now be viewed on GLAC's website and YouTube Channel for educational purposes for staff and in the local community. Several presenters have been given the opportunity to transcribe the Blackfeet Language in their films for this project.

The GRCA Employee and Organization Development (EOD) Office attended the following recruitment events to reach out to underrepresented groups and share information about GRCA jobs and how to apply: Northern Arizona University Fall and Spring Career Expos; Navajo Technical University Spring and Fall Job Expo; and Grand Canyon School Job Fair. The staff provides notifications to tribes regarding scientific and law enforcement work (mission critical occupations) near reservation boundaries. GRCA hired Ancestral Lands crews in Trails, Interpretation, and resources programs to build a pipeline of diverse talent for future employment. GRCA also has in progress, Desert View Watchtower Intertribal Culture and Heritage Site. Completion of this project is responsive to stated objectives of associated tribes and the NATIVE Act directive to "develop innovative visitor portals for parks,

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

**EXECUTIVE SUMMARY: ACCOMPLISHMENTS**

landmarks, heritage and cultural sites, and assets that showcase and respect the diversity of the indigenous peoples of the United States.” Furthermore, the GRCA staff has ongoing collaboration with Pueblo of Zuni on grant development for site mitigation and implementation, to include developing mitigations for the humpback chub removal. Last, but not least, the staff also has ongoing collaborations with the Intertribal Buffalo Council.

Disability Program: From the regional SHRO outreach and recruitment information, the following were hired throughout the region: 10 Veterans Recruitment Appointments (VRA) with disability and six VRA/Veterans Employment Opportunity Act (VEOA) appointments with 30% service- connected disability. The SHRO utilizes the following services and partners with the following entities around disability related outreach and recruitment: local and state committees on the Employment of People with Disabilities; State Vocational Rehabilitation Centers; Department of

Labor (DOL), Office of Disability Employment Policy (ODEP), Workforce Recruitment Program (WRP); and other relevant advocacy organizations in an effort to increase the representation of individuals with disabilities. Our region is committed to achieving 12% and 2% goals respectively for People with Disabilities and People with Targeted Disabilities. Along with the respective SHRO, the ER/LR staff not only continued collaboration to ensure reasonable accommodation requests are attended to per the guidelines outlined in policy, but they provided assistance on numerous occasions to employees throughout the region inquiring about reasonable accommodation and job search assistance. From the L&D area, training sessions that included Schedule A and 30% disabled veterans hiring authorities were made available to supervisors and managers.

From the YYAVP office, the staff continued to support/collaborate with the American Sign Language (ASL) conservation corps crews to include the Deaf and Hard of Hearing (DHOH) community in youth programs and the NPS as a whole. The ASL conservation corps crews has continued with Rocky Mountain Youth Corps – New Mexico in collaboration with three parks. The National Park Foundation selected the project for additional philanthropic support.

From GRCA EOD, a staff member continues to serve as Board Member for Employees for the Advancement of People with Disabilities Employee Resource Group. Other accomplishments include: Presented webinar on Reasonable Accommodation; served as panel member on Webinar Dialogue for People with Disabilities; Contracted with private company to ensure 508 compliance of all training documents.

Diversity and Workplace Best Practices: From the Regional Equal Opportunity (EO) Office, at the request of the Regional Director, the Regional EO Manager has coordinated on and assembled a Relevancy, Diversity and Inclusion (RDI) Advisory Group to the Regional Executive Team (Regional Director, two Deputy Regional Directors and four Associate Regional Directors). The Current Goals of the advisory group are: 1) Realignment of the Equal Opportunity Office for reporting to the Regional Director (accomplished as of October 1, 2020); 2) Grow RDI Advisory Group scope and capacity; 3) Improve outreach, recruitment and retention; 4) Implement accountability mechanisms/metrics for RDI; and 5) Engage external communities and form partnerships. The current members include a diverse cross-section of regional office employees who are also “Allies for Inclusion” facilitators and Employee Resource Group members. Meetings are held monthly for this initiative.

From the SHRO, all staffing specialists completed Office of Personnel Management (OPM) training on hiring flexibilities and HR Consultation, to enhance outreach and advice to hiring officials. The staff also advised their customers on the use of Contiguous and Remote/Isolated hiring authorities to allow direct hire of Native-Americans residing in surrounding Nations.

From GRCA Employee and Organization Development (EDO) office, coordinated on and held a 2- day Public Lands for All Inclusion Summit in November 2019, which included topics such as Implicit Bias, Interrupting

**EXECUTIVE SUMMARY: ACCOMPLISHMENTS**

Offensive Language and Behavior, Restorative Justice, and Ally Conversation Toolkit. Participants included over 120 federal, state and local government employees, tribal members, non-profit organizations and educational institutions from across the Colorado Plateau. Other accomplishments include: 1) Hosting of Native-American Heritage Day and other Native-American focused events ; 2) Implementation of 5-Year Strategic Plan including values such as respect & inclusion, and foci such as Thriving Workplace and Employees, Skilled and Developed Workforce, and Tribal Outreach; 3) Expanded members of Diversity Council to include other parks and federal agency partners (U.S. Forest Service).

From the YYAVP office, the staff partnered with several other regions nation-wide to develop a natural training schedule for NPS staff working with youth. Trainings funded included: Compassion in the Workplace, Supervising Youth, Youth Development 101, Cultural Competency, Equity in Community Building, and many other Diversity, Equity and Inclusion-related trainings. From GLAC AmeriCorps VISTA program, the staff created a cultural resource guide designed to supply incoming park staff an overview of the nearby Tribal Nations and park's relationship with them.

This resource is designed to help decrease initial barriers and misunderstandings between park employees and those who call Glacier home. This project was used in presentations for incoming law enforcement rangers and is being used in training all GLAC's Interpretation Staff. Last, but not least, GLAC is working towards using Native Land Acknowledgements at any/all events within GLAC and the surrounding community.

From the Tribal Liaison office, the staff contacted the tribes associated with the parks in the region to determine their availability for working with NPS during COVID-19 and provided the information to a WASO database accessible by NPS employees. Additionally, the staff began researching Indigenous research methods, shared information about them on the Traditional Ecological Knowledge (TEK) website, participated in an NPS cultural anthropology panel about them, and incorporated them as methods to use in a Traditional Use Study.

**Interior Regions 8, 9,10 and 12 (Pacific West)**

Interior Regions 8, 9, 10 and 12 oversees sites in eight states as well as three U.S. territories in the Pacific on the region's policy on Equal Employment Opportunity and Diversity (EEO), the region is committed to improving the diversity of the workforce and creating an inclusive environment where all employees can advance to their highest level based on merit, as well as providing workplaces free of discrimination and harassment of any kind. Listed below are some the region's noteworthy accomplishments:

1. The region launched a Certificate of Posting Campaign to ensure current, relevant posters and policy statements were placed in conspicuous locations throughout the workplace, including electronic notices on park internal websites to ensure inclusion of employees who telework on a regular basis.
2. The region launched a series of short video clips (3-4 min. each) of people describing how and why their identity matters. Viewers were provided an opportunity to journal their learned new perspectives about cultural identity and gain a better understanding of why labels matter. Topics included Asian, Men, LGBTQ, Disability, Black, Latinx, Women, White, and Native Americans.
3. The regional senior leadership team participated in facilitated dialogue sessions on various topics related to race relations. Their goal was to create a safe space to discuss and increase awareness of implicit bias, microaggressions, systemic racism and equality. Additionally, it was an opportunity for senior leadership to communicate their personal commitments as change agents to create and maintain a more equitable and inclusive work environment.

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

## EXECUTIVE SUMMARY: ACCOMPLISHMENTS

4. Some parks conducted orientation training (one or two weeks) to prepare staff for the influx of new seasonal employees. The training included gun safety, boat safety, bear safety, computer security and EEO. Unfortunately, many of the parks were unable to conduct orientation training due to the COVID-19 pandemic. The region developed presentations for supervisors to use to ensure that seasonal employees understand behaviors that may constitute harassment, their rights, responsibilities and role in preventing harassment and tools to report harassment.
5. The region initiated quarterly training sessions to develop an efficient and effective cadre of collateral duty counselors. The training equipped collateral-duty counselors with the tools to be proficient in their counseling responsibilities.
6. The region redesigned their EEO Share Point pages to provide employees with one-stop resource to obtain information on anti-harassment policy, anti-discrimination policy, and retention strategies. Additional information on the website included EEO newsletters, cultural awareness, building diverse and inclusive workplace relationships.
7. The Regional Accessibility Coordinator managed an interdisciplinary team that conducted five park accessibility transition plans which identified architectural and programmatic barriers to people with disabilities, including drafting recommendations for solutions, establishing time frames and identifying individuals responsible to ensure that the barrier is removed.
8. The Regional Accessibility Coordinator collaborated with park accessibility coordinators to provide training to employees. The purpose of the training was to ensure that people with disabilities have full and equal access to park programs, activities and services. The training was focused on accessibility awareness and some of the challenges that people with disabilities encounter in the workplace.
9. The Regional Accessibility Coordinator collaborated with division directors to advocate for people with disabilities regarding accessibility challenges.
10. The region hired an accessibility intern to improve the efficiency and effectiveness of the regional accessibility program. Some of the duties included training, outreach to disability organizations, and identifying methods for strengthening relationships with the disability community to better address methods for providing best access to park visitors with disabilities.
11. The Regional Accessibility Coordinator collaborates with accessibility specialists in the Denver Service Center to keep abreast of changes in accessibility code, and to help ensure that the NPS practices address universal design, best practices and accessibility requirements as applicable.
12. The region's Allies for Inclusion Lead facilitated two dialogues this year. The "Engaging Youth Committee" session was focused on current events related to the racial justice movement. The "We Need to Talk" Juneteenth program was a general conversation on diversity, equity and inclusion.
13. The Volunteer program lead collaborated with the WASO Volunteer Program office (Conversation Legacy) and an inter-regional team of colleagues to develop a Community Volunteer Ambassador Equity Fellowship Program. The goal of the program is to hire roughly 50 park interns over four years, with the goal of helping to diversify the NPS workforce by employing, mentoring and supporting diverse cohorts of youth.
14. The Volunteer program lead coordinated a series of COVID-19 roundtable discussions with their volunteer program coordinators. The EEO Program Manager confirmed that the guidance given to participants ensured that volunteers are to be treated with the same dignity and respect as employees.
15. The co-chair of the Employees for the Advancement of People with Disabilities employee resource group regularly collaborates with San Francisco Bay Area organizations to provide American Sign Language (ASL) services. The region provides ASL services for applicants to participant in the job interview process.

## Interior Region 11 (Alaska Region)

In 2020, Interior Region 11 staunchly committed to increasing workforce diversity and inclusion by earnestly engaging in youth programs, universities, district schools, job fairs, the military community (including veterans), and



**EXECUTIVE SUMMARY: ACCOMPLISHMENTS**

the Alaska Native community to recruit from a diverse pool of candidates. Due to COVID-19 restrictions, engagements were conducted virtually.

The region established a Relevancy, Diversity and Inclusion Employee Resource Group to actively work towards increasing workplace diversity, along with fostering an inclusive work environment and a sense of belonging for all employees. The Associate Regional Director for Administration and the Bering Land Bridge National Preserve Superintendent are co-chairs and group members are comprised of enthusiastically committed park and regional staff advocates.

Further, to increase outreach and recruitment, Interior Region 11 created an outreach and recruitment base in Washington State to engage with local colleges and universities. The location is also more conducive for traveling to Historically Black Colleges and Universities and other Minority Serving Institutions, versus traveling from Alaska to the Lower 48.

Although COVID-19 precluded in-person participation with many of our outreach programs, all parks were able to auspiciously engage virtually. Particularly noteworthy, the Center for Interactive Learning and Collaboration bestowed the 2019-2020 Pinnacle Award to Glacier Bay National Park and Preserve, for their long-distance program connecting teachers and students through an interactive virtual venue to learn more about the park. Also, Katmai National Park and Preserve reached over 10 million virtual visitors worldwide through their online resources.

The region is firmly committed to accommodating disabled employees and resolutely worked on Section 508 compliance to help with website accessibility, along with continuing to safely modify structures to provide accessibility to disabled employees and park visitors.



Parks are increasingly committed to using the local hiring authority to provide opportunities to Alaska Natives. Parks have also actively continued to interact frequently with tribal communities to foster collaborative working relationships and engender goodwill.

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

Agency Self-Assessment Checklist



Essential Element: A Demonstrated Commitment From agency Leadership

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	A.1. The agency issues an effective, up-to-date EEO policy statement.				
	A.1.a. 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)]		X		Last issuance of the NPS EEO policy statement is dated 07/05/2018 under the signature of the person Exercising the Authority of the Director. 7/5/2018
	A.1.b. 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)] If the EEO policy statement covers any additional bases (e.g., marital status, veteran status and political affiliation), please list them in the comments column.	X			

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020



Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	A.2. The agency has communicated EEO policies and procedures to all employees.				
	A.2.a. Does the agency disseminate the following policies and procedures to all employees:				
	A.2.a.1. Anti-harassment policy? [see MD 715, II(A)]	X			
	A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]	X			
	A.2.b. Does the agency prominently post the following information throughout the workplace and on its public website:				
	A.2.b.1. 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)]	X			
	A.2.b.2. Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 CFR §1614.102(b)(5)]	X			
	A.2.b.3. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	X			Procedures will be posted when the revised NPS website is completed. DOI website is <a href="https://www.doi.gov/accesscenter/accommodations">https://www.doi.gov/accesscenter/accommodations</a>
	A.2.c. Does the agency inform its employees about the following topics:				
	A.2.c.1. EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If "yes", please provide how often and the means by which such training is delivered.	X			NPS informs employees about the EEO complaint process during on-boarding and annually.
	A.2.c.2. ADR process? [see MD-110, Ch. 3(II)(C)] If "yes", please provide how often.	X			NPS informs employees about the ADR process during on-boarding and annually.
	A.2.c.3. Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If "yes", please provide how often.	X			Annual notice sent to employees in January.
	A.2.c.4. 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.	X			Periodically and most recently through a series of messages and webinars.
	A.2.c.5. Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR §2635.101(b)] If "yes", please provide how often.	X			They are posted on the website throughout the year.

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

Agency Self-Assessment Checklist



 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	A.3. The agency assesses and ensures EEO principles are part of its culture.			N/A	
	A.3.a. 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. .	X			DOI Secretary's Diversity Award, National Capitol Region Diversity Award, and Midwest Region Diversity Award
	A.3.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]'	X			

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

Agency Self-Assessment Checklist





Essential Element: B Integration of EEO into the agency's Strategic Mission

 <b>Compliance Indicator</b>		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 <b>Measures</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.1.a. 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)]		X			
B.1.a.1. 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.				X	The agency head is the immediate supervisor of the EEO Director.
B.1.a.2. Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]		X			
B.1.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]		X			
B.1.c. 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 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comments column.		X			September 23, 2020
B.1.d. Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]		X			

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020


Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	B.2. The EEO Director controls all aspects of the EEO program.				
	B.2.a. 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)] If not, identify the office with this authority in the comments column.	X			
	B.2.b. Is the EEO Director responsible for overseeing the completion of EEO counseling? [see 29 CFR §1614.102(c)(4)]	X			
	B.2.c. 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.]	X			
	B.2.d. 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.]	X			
	B.2.e. Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	X			
	B.2.f. 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)]	X			
	B.2.g. 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); (c)(3)]	X			
 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures	B.3. The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.	Yes	No	N/A	
	B.3.a. 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)]		X		
	B.3.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.	X			Adopted DOI's plan to create a more diverse and inclusive workplace.

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020





Agency Self-Assessment Checklist

 Compliance Indicator	Measures	Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
	B.4. The agency has sufficient budget and staffing to support the success of its EEO program.				
	B.4.a. 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.4.a.1. to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	X			
	B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]	X			
	B.4.a.11. to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	X			
	B.4.a.2. to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	X			
	B.4.a.3. 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)]	X			
	B.4.a.4. 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.	X			
	B.4.a.5. 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)]	X			
	B.4.a.6. to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	X			
	B.4.a.7. 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.	X			
	B.4.a.8. 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]	X			
	B.4.a.9. 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]	X			
	B.4.b. Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	X			
	B.4.c. Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	X			
	B.4.d. 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?	X			
	B.4.e. 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?	X			

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	B.5. The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills				
	B.5.a. Pursuant to 29 CFR §1614.102(a)(5), have all managers and supervisors received orientation, training, and advice on their responsibilities under the following areas under the agency EEO program:				
	B.5.a.1. EEO complaint process? [see MD-715(II)(B)]	X			
	B.5.a.2. Reasonable Accommodation Procedures? [see 29 CFR § 1614.102(d)(3)]	X			
	B.5.a.3. Anti-harassment policy? [see MD-715(II)(B)]	X			
	B.5.a.4. 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)]	X			
	B.5.a.5. 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)]	X			
 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	B.6. The agency involves managers in the implementation of its EEO program.				
	B.6.a. Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	X			
	B.6.b. Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	X			
	B.6.c. 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]	X			
	B.6.d. 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)]	X			





DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

Agency Self-Assessment Checklist



Essential Element: C Management and Program Accountability

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	C.1. The agency conducts regular internal audits of its component and field offices.				
	C.1.a. 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.	X			Monthly
	C.1.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.	X			Quarterly
	C.1.c. Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]	X			

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020



Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	C.2. The agency has established procedures to prevent all forms of EEO discrimination.				
	C.2.a. 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)]	X			
	C.2.a.1. 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]	X			
	C.2.a.2. 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)]	X			
	C.2.a.3. 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)]	X			
	C.2.a.4. 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.]	X			
	C.2.a.5. 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 Complainant v. Dep't of Veterans Affairs, EEOC Appeal No. 0120123232 (May 21, 2015); Complainant v. Dep't of Defense (Defense Commissary Agency), EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.	X			
	C.2.a.6. Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR §1614.203(d)(2)]	X			
	C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR §1614.203(d)(3)]	X			The NPS adopted the DOI's RA procedures.
	C.2.b.1. 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)]	X			
	C.2.b.2. Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	X			
	C.2.b.3. 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)]	X			
	C.2.b.4. 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)]	X			
	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, 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, excluding ongoing interpretative services, in the comments column.		X		The NPS does not have a tracking system to determine if all requests are processed timely.
	C.2.c. 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)]	X			

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020



Agency Self-Assessment Checklist

C.2.c.1. 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.		X			The NPS adopted DOI PAS procedures- PB 17-18. The DOI website is: https://www.doi.gov/accesscenter/accomodations
 <b>Compliance Indicator</b>	C.3. The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	<b>Measure Has Been Met</b>			<b>For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report</b>
 <b>Measures</b>		Yes	No	N/A	
C.3.a. 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?		X			
C.3.b. Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:					
C.3.b.1. Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]		X			
C.3.b.2. Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]		X			
C.3.b.3. Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]		X			
C.3.b.4. 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]		X			
C.3.b.5. Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]		X			
C.3.b.6. Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]		X			
C.3.b.7. Support the EEO program in identifying and removing barriers to equal opportunity?. [see MD-715, II(C)]		X			
C.3.b.8. Support the anti-harassment program in investigating and correcting harassing conduct?. [see Enforcement Guidance, V.C.2]		X			
C.3.b.9. 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)]		X			
C.3.c. 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)]		X			
C.3.d. When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]		X			

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020





Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	C.4. The agency ensures effective coordination between its EEO program and Human Resources (HR) program.				
	C.4.a. 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)]	X			
	C.4.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]	X			
	C.4.c. Does the EEO office have timely access to accurate and complete data (e.g., demographic data for the workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	X			
	C.4.d. 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)]	X			
	C.4.e. Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:				
	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	X			
	C.4.e.2. Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	X			
	C.4.e.3. Develop and/or provide training for managers and employees? [see MD-715, II(C)]	X			
	C.4.e.4. Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	X			
	C.4.e.5. Assist in preparing the MD-715 report? [see MD-715, II(C)]	X			

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

Agency Self-Assessment Checklist





 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	C.5. Following a finding of discrimination, the agency explores whether it should take a disciplinary action.				
	C.5.a. 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 Douglas v. Veterans Administration, 5 MSPR 280 (1981)]	X			
	C.5.b. When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If "yes", please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	X			There was one occurrence of finding of discrimination that is pending before the EEOC/OFO; thus no disciplinary action was issued or needed until OFO either Affirms or Reverses the decision.
	C.5.c. 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 (e.g., post mortem to discuss lessons learned)? [see MD-715, II(C)]	X			
 Compliance Indicator	C.6. The EEO office advises managers/supervisors on EEO matters.	Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	C.6.a. 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.	X			Quarterly
	C.6.b. Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [see MD-715 Instructions, Sec. I]	X			

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

Agency Self-Assessment Checklist





Essential Element: D Proactive Prevention

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	D.1. The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.			N/A	
	D.1.a. Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	X			
	D.1.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; and/or external special interest groups? [see MD-715 Instructions, Sec. I]	X			
	D.1.c. 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)]	X			
 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures	D.2. The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	Yes	No	N/A	
	D.2.a. Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	X			
	D.2.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)]	X			
	D.2.c. 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)]			X	The NPS did not undergo a re-organization or realignment during FY20.
	D.2.d. 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, and/or external special interest groups? [see MD-715 Instructions, Sec. I] If "yes", please identify the data sources in the comments column.	X			Employee Resource Groups, Exit Surveys, Disciplinary data, workforce tables, and Employee Viewpoint Surveys.

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

Agency Self-Assessment Checklist



 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	D.3. The agency establishes appropriate action plans to remove identified barriers.	Yes	No	N/A	
	D.3.a. 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)]	X			
	D.3.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)]	X			
	D.3.c. Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	X			
 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures	D.4. The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.	Yes	No	N/A	
	D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.		X		Procedures will be posted when the revised NPS website is completed.
	D.4.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)]	X			
	D.4.c. 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)]	X			
	D.4.d. 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)]	X			

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

Agency Self-Assessment Checklist

Essential Element: E Efficiency



 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	E.1. The agency maintains an efficient, fair, and impartial complaint resolution process.				
E.1.a. Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?		X			
E.1.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)?		X			
E.1.c. Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?		X			
E.1.d. 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.		X			16 days
E.1.e. Does the agency ensure that 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)?		X			
E.1.f. Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?		X			
E.1.g. 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)?				X	The NPS does complete investigations timely per E.1.f.
E.1.h. When the complainant did not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?				X	Final Agency Decisions are issued by the DOI Office of Civil Rights.
E.1.i. 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)?		X			
E.1.j. 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.		X			It is annotated in the Statement of Work.
E.1.k. 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)]		X			
E.1.l. 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)]		X			



DOI National Park Service

For period covering October 1, 2019 to September 30, 2020





Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	E.2. The agency has a neutral EEO process.			N/A	
E.2.a. Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)] If "yes", please explain.		X			The Department of the Interior's Employment & Labor Law Unit (ELLU) assigns EO complaint cases to solicitors.
E.2.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.		X			NPS sends an email to the Department of the Interior's Employment & Labor Law Unit, General Law (ELLU) with the subject line titled Legal Sufficiency Review
E.2.c. 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)]		X			
E.2.d. 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)]		X			
E.2.e. If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, Attaining a Model Agency Program: Efficiency (Dec. 1, 2004)]		X			The legal counsel has 5 days to complete the sufficiency review

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020



Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 Measures	E.3. The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.				
	E.3.a. 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)]	X			
	E.3.b. Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	X			
	E.3.c. Does the Agency encourage all employees to use ADR, where ADR is appropriate? [See MD-110, Ch. 3(IV)(C)]	X			
	E.3.d. 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)]	X			
	E.3.e. Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	X			
	E.3.f. Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	X			
 Compliance Indicator		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 Measures		Yes	No	N/A	
	E.4. The agency has effective and accurate data collection systems in place to evaluate its EEO program.				
	E.4.a. Does the agency have systems in place to accurately collect, monitor, and analyze the following data:				
	E.4.a.1. Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	X			
	E.4.a.2. The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]		X		
	E.4.a.3. Recruitment activities? [see MD-715, II(E)]	X			
	E.4.a.4. External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]	X			
	E.4.a.5. The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(4)]		X		
	E.4.a.6. 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]	X			
	E.4.b. Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	X			

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

Agency Self-Assessment Checklist





 Compliance Indicator		Measure Has Been Met			
 Measures		Yes	No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
E.5.a. 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.	E.5. The agency identifies and disseminates significant trends and best practices in its EEO program.	X			The EEO Director meets with the NPS Director and senior leadership weekly. The EEO Director meets with the seven regional EEO offices monthly.
E.5.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.		X			NPS adopted the EEO staffing structure from another bureau
E.5.c. Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]		X			

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

Agency Self-Assessment Checklist



Essential Element: F Responsiveness and Legal Compliance

 <b>Compliance Indicator</b>		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
		Yes	No	N/A	
 <b>Measures</b>	F.1. The agency has processes in place to ensure timely and full compliance with EEOC orders and settlement agreements.				
	F.1.a. 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)]	X			
	F.1.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)]	X			
	F.1.c. Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	X			
	F.1.d. Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	X			
	F.1.e. 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)]	X			
 <b>Compliance Indicator</b>		Measure Has Been Met			For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
 <b>Measures</b>		Yes	No	N/A	
	F.2.a. Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	X			
	F.2.a.1. 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)]	X			
	F.2.a.2. 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]	X			
	F.2.a.3. 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)]	X			
	F.2.a.4. Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	X			

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

Agency Self-Assessment Checklist

 Compliance Indicator		Measure Has Been Met			
 Measures		Yes	No	N/A	For all unmet measures, provide a brief explanation in the space below or complete and attach an EEOC FORM 715-01 PART H to the agency's status report
	F.3. The agency reports to EEOC its program efforts and accomplishments.				
	F.3.a. Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	X			
	F.3.b. Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	X			

Essential Element:  Other

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.1

Brief Description of Program Deficiency:	A.1.a. 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)]
--	---

The NPS did not issue a signed and dated EEO policy statement on agency letterhead that clearly communicated the agency's commitment to EEO for all employees and applicants.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
10/01/2020	02/28/2021			The NPS will 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.

Responsible Officials

Title	Name	Standards Address the Plan?
Office of Policy	Alma Ripps	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date

Accomplishments

Fiscal Year	Accomplishment

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
12/15/2019	09/30/2020	09/30/2021		The OEOP submitted policy letters for review and signature to the Office of Policy in December 2019.

Responsible Officials

Title	Name	Standards Address the Plan?
Office of Policy	Alma Policy	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
02/28/2021	The EEO Director will collaborate with the Office of Policy to ensure that EEO Policy Letters are reviewed and signed by the NPS Director.	Yes		

Accomplishments

Fiscal Year	Accomplishment

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.2

Brief Description of Program Deficiency:	B.3.a. 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)]
--	--

EEO program officials did not 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.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
10/01/2020	03/31/2021			EEO program officials will 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.

Responsible Officials

Title	Name	Standards Address the Plan?
Reasonable Accommodation Coordinator	Stephen Schubart	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
03/31/2021	The EEO Director will collaborate with the senior leadership team to ensure that 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.	Yes		

Accomplishments

Fiscal Year	Accomplishment

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.3

Brief Description of Program Deficiency:	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, 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, excluding ongoing interpretative services, in the comments column.
--	---

The NPS does not have an automated tracking system to determine if all accommodation requests were processed within the time frame set forth in its reasonable accommodation procedures.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
10/01/2020	09/30/2021			The NPS will process all accommodation requests within the time frame set forth in its reasonable accommodation procedures

Responsible Officials

Title	Name	Standards Address the Plan?

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2021	The EEO Director will collaborate with the Reasonable Accommodation Coordinator to ensure all accommodation requests are processed within the time frame set forth in its reasonable accommodation procedures.	Yes		

Accomplishments

Fiscal Year	Accomplishment



DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.4

Brief Description of Program Deficiency:	D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.
The NPS did not post its affirmative action plan on its public website	

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
10/01/2020	02/28/2021			The NPS will post its affirmative action plan on its public website when the redesign to the NPS website is completed.

Responsible Officials

Title	Name	Standards Address the Plan?
Office of Communications	Suki Skye	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
02/28/2021	The EEO Director will collaborate with the Office of Communications to ensure that the affirmative action plan is posted on the NPS website when the redesign is completed.	Yes		

Accomplishments

Fiscal Year	Accomplishment

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.5

Brief Description of Program  
Deficiency:

E.4.a.5. The processing of requests for reasonable accommodation? [29 CFR §1614.203(d)(4)]

The NPS does not have a tracking system to capture if reasonable accommodation requests are processed within prescribed time limits.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
10/01/2020	09/30/2021			The NPS will implement a tracking system to capture if reasonable accommodation requests are processed within prescribed time limits.

Responsible Officials

Title	Name	Standards Address the Plan?
Reasonable Accommodation	Stephen Schubart	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
10/01/2020	The EEO Director will collaborate with the Reasonable Accommodation Coordinator to ensure that the NPS implements a tracking system to capture if reasonable accommodation requests are processed within prescribed time limits.	Yes		

Accomplishments

Fiscal Year	Accomplishment
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DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

Plan to Attain Essential Elements

PART H.6

Brief Description of Program Deficiency: E.4.a.2. The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]  
The NPS did not resurvey the workforce (race, national origin and sex) to ensure that the NPS had accurate data collection systems in place to evaluate its EEO program.

Objectives for EEO Plan

Date Initiated	Target Date	Date Modified	Date Completed	Objective Description
10/01/2020	03/31/2021			The EEO Director will collaborate with the Human Resources Director to ensure that the NPS resurveys the workforce (race, national origin and sex) to make sure that the NPS has accurate data collection systems in place to evaluate its EEO program.

Responsible Officials

Title	Name	Standards Address the Plan?
Human Resources Director	Marlon Taubenheim	Yes

Planned Activities

Target Date	Planned Activity	Sufficient Staffing & Funding?	Modified Date	Completion Date
03/31/2021	The NPS plans to resurvey the workforce regarding race, national origin and sex in FY 2021.	Yes		

Accomplishments

Fiscal Year	Accomplishment
2019	On 09/15/2020, the NPS resurveyed the workforce for Disability status.

DOI National Park Service

For period covering October 1, 2019 to September 30, 2020

Plan to Eliminate Identified Barriers

PART I.1

<b>Source of the Trigger:</b>	Workforce Data (if so identify the table)				
<b>Specific Workforce Data Table:</b>	Workforce Data Table - A1				
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	Black or African American Males, Black or African American Females, and Asian Males were underrepresented in the Total Workforce, had a high removal rate, and a low entry rate for FY19.				
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i> Black or African American Males Black or African American Females Asian Males				
<b>Barrier Analysis Process Completed?:</b>	N				
<b>Barrier(s) Identified?:</b>	N				
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b>		<b>Description of Policy, Procedure, or Practice</b>		
<b>Objective(s) and Dates for EEO Plan</b>					
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>
<b>Responsible Official(s)</b>					
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>	
<b>Planned Activities Toward Completion of Objective</b>					
<b>Target Date</b>	<b>Planned Activities</b>			<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>
<b>Completion Date</b>					
<b>Report of Accomplishments</b>					
<b>Fiscal Year</b>	<b>Accomplishments</b>				

**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), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

**Section I: Efforts to Reach Regulatory Goals**

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

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

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

• The percentage of PWD in the GS-1 to GS-10 cluster was 11.54%\* in FY 2020. Goal is 12%. \*15.21% of GS-1 to GS-10 employees were coded 01: I do not wish to identify my disability or serious health condition. • The percentage of PWD in the GS-11 to SES cluster was 7.66%\*\* in FY 2020. Goal is 12%. \*\*8.45% of GS-11 to SES employees were coded 01: I do not wish to identify my disability or serious health condition.

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

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

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

• The percentage of PWTD in the GS-1 to GS-10 cluster was 2.72% in FY 2020. Goal is 2%. • The percentage of PWTD in the GS-11 to SES cluster was 1.53%\* in FY 2020. Goal is 2%. \*8.45% of GS-11 to SES employees were coded 01: I do not wish to identify my disability or serious health condition. It is unknown how many of those employees with a disability have a Targeted Disability.

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

Alaska Region – When a manager identifies a need to fill a vacant position, the HR Specialist assigned holds a strategic consultation meeting. During the consultation, the HR Specialist discusses the hiring flexibilities available like Schedule A. Intermountain Region – The SHRO staff provide information on hiring authorities and resources that target people with disabilities. Schedule A appointments are discussed and WRP information are provided to the hiring managers. The SHRO does promote and encourage recruitments that solicit applicants from individuals with disabilities as well as leverages all non-competitive hiring authorities. Moving forward, the SHRO plans to work closer with leadership and selecting officials in communicating the targeted hiring goals. It is our job to create more awareness to the selecting officials and meet these federal sector-wide goals. As part of our “Action Plan” moving forward, we will start with a memo from our ARD of Workforce Management to ensure that all managers/supervisors regarding the people with disabilities and people with targeted disabilities hiring goals/percentages. Midwest Region – Interior Regions 3, 4, 5 requires all hiring officials to complete a formal Recruitment Plan for all permanent status positions, entry level through GS-11, GL-9, and WG-9, WL-7, and below. The plan must be approved by the Superintendent, Associate Regional Directors, and the Interior Regions 3, 4, 5 Recruitment Program Manager before a vacancy announcement can be posted. The intent of the plan is to inform and assist managers in recruiting and exploring other ways to attract, recruit, and retain the current and future workforce through the use of tools such as career ladders, formal NPS development programs, and on-paid training programs funded by other agencies to include hiring people with targeted disabilities through the use of Schedule A and 30% or more Disabled Veterans hiring authorities. National Capital Region – During the initial consultation with the hiring manager, the SHRO Specialists informs the manager of all the hiring flexibilities. This includes, but not limited to Schedule A, WRP, Veterans with 30 or more disabled vets. Northeast Region – IR-1 communicates hiring goals to managers via regular recurring (monthly) communications with the field and during the consultation with managers. Pacific West Region – During the pre-recruitment discussions, HR Specialists discuss the hiring authorities for PWD and PWTD. These discussions highlight a general responsibility for hiring managers to consider these flexibilities and diversity in their hiring decisions, but the numerical goals are not typically relayed. Our region will develop a strategy to communicate specific regional priorities to hiring managers and/or recruiters, regarding their responsibilities for the annual hiring goal for PWD and PWTD. The numerical goal will be provided to managers annually. Southeast Region - We are advising management during the consultation phase for the recruitment of specific goals for NPS and targeting People with Disabilities for all vacancy announcements. WASO - When Hiring Managers submit their recruitment requests and Staffing Specialists consult with Hiring Managers prior to recruitment, the availability of all Hiring Flexibilities (including recruitment using Schedule A or 30% Disabled Veterans) is discussed. With the hiring of a Veterans Recruitment POC and Schedule A POC for the Bureau, the Washington Area Support Office (WASO) will solicit their guidance and assistance to reach any Bureau/Agency goals.

**Section II: Model Disability Program**

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

**A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM**

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

Answer Yes

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	1	0	0	Katrina Williams Human Resources Specialist Katrina_Williams@nps.gov
Special Emphasis Program for PWD and PWTD	1	0	0	Lynda Orbik Equal Employment Specialist Lynda_Orbik@nps.gov
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Katrina Williams Human Resources Specialist Katrina_Williams@nps.gov
Processing reasonable accommodation requests from applicants and employees	0	0	1	Stephen Schubart Human Resources Specialist (ER/LR) Stephen_Schubart@nps.gov
Section 508 Compliance	1	0	0	Bernard Gordon IT Specialist (ENTARCH) Bernard_Gordon@nps.gov
Architectural Barriers Act Compliance	1	0	0	Jeremy Buzzell Supvy Accessibility Program Manager Jeremy_Buzzell@nps.gov

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

Answer Yes

Alaska Region – Yes, the staffing and recruitment staff are well versed in the use of the special hiring authorities. Intermountain Region – Yes, the region provided the opportunity to be trained on the Workforce Recruitment Program (WRP). The designated HR representative also provides email updates to the staff with reminders of what the program can provide. The HR Staff is required to take annual training on hiring flexibilities that target veterans with service-connected disabilities. Included in that training is the 30% authority and Schedule A. The HR Office servicing regions 6, 7, and 8 have designated experts for these programs. We have identified HR Specialists to be on-site experts for the veteran’s programs that afford a qualifying and eligible veteran to be placed in a WRP program or the VA’s non-paid work experience program. These designated HR Specialists are the “go to” for other HR Specialists or hiring officials when there is interest in one of these programs. Midwest Region – Yes, nearly all members of the Interior Region 3, 4, 5 attended training offered by the Graduate School USA addressing the topic of hiring flexibilities, which included guidance on the use of Schedule A. A recruitment and retention strategy has been drafted to provide a more focused and strategic guidance that will assist the regional director, deputy regional director, associate regional directors, division managers, project leaders, managers and supervisors, and their employees in an effort to build and maintain a highly qualified workforce and identifies the use of Schedule A hiring authority for people with disabilities and Veteran Hiring Authorities as part of the strategy to recruit and retain an effective workforce. National Capital Region –Yes, HR Staffing Specialists received training from the OPM and the NPS on special hiring authorities. Additionally, the Servicing Human Resource Officer Supervisor continually emphasized the use of special hiring and all the HR Staffing Specialists are trained on the aspects of candidates with disabilities. Northeast Region – Yes, the HR staff received comprehensive HR staffing training which included hiring flexibilities. The region had approximately 85% of our full complement of Staffing and Recruiting Specialists. Southeast Region – Yes, all HR Specialists completed training on special hiring authorities through formal training classes, refresher training and one on one training. Pacific West Region – Yes, all of the HR Specialists are trained and educated in the use of the special hiring authorities for PWD and PWTD. Washington Office (WASO) – The WASO staffing specialists received Hiring Flexibilities and Veterans Preference training courses from the Graduate School. Funding was set aside so that newly appointed staffing specialists and assistants will receive the training courses in FY 2021. Additionally, the WASO has eight staffing professionals that are trained and qualified to discuss and implement the use of special hiring authorities.

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

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

Answer Yes

**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 APPLICATIONS WITH DISABILITIES**

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



Alaska Region – The region formed an employee resource group to increase awareness and meet the DOI numerical goals for persons with disabilities and persons with targeted disabilities. Some of the initiatives are listed below: 1) Stand up Alaska portion of place-based based outreach and recruitment initiative: a) Lean into Local Hire. b) Develop Local Hire Training. c) Academic Outreach. d) Veteran Outreach in Alaska. e) Vocational Outreach. f) Outreach to Service Organizations. g) Outreach to Tribes and Native Corporations. h) Leverage Potential Direct Hire Authority with ANSEP (still under development with AKRO Resources staff, ANSEP personnel, and WASO and R11 HR). 2) Stand up Washington portion of place-based based outreach and recruitment initiative: a) College/University Outreach Initiative. b) Foster Relationships; c) Establish DOI/NPS Presence; d) Network and Recruit; e) Identify Recruitment Resources. f) Identify Recruitment Resources. g) Veterans Outreach Initiative. h) Leverage Career Fair Engagement; i) Network and Recruit; j) Identify Recruitment Resources. k) Vocational and Trades Outreach Initiative. l) Outreach to Community and Service Organizations. Intermountain Region – The Servicing Human Resource Offices (SHRO) utilize the Workforce Recruitment Program to identify potential applicants for positions in the parks. The SHROs have improved their relationships with veteran groups by providing veteran placement in paid positions with placement options at the completion of the agreement. Managers are encouraged to utilize the hiring authorities that permit non-competitive eligible veterans to apply. Midwest Region – The region hired qualified individuals with disabilities using competitive and non-competitive hiring authorities. The region will continue to use the Workforce Recruitment Program (WRP) to identify Disabled Veterans for non-competitive appointments. The region encouraged hiring officials to participate in the Pathways program to provide internship opportunities for college students with disabilities and participated in virtual recruitment fairs and similar events that were targeted to Veterans with Disabilities. National Capital Region – The Workforce Recruitment Program (WRP) web link was sent to each park for their use and HR Specialists consults with hiring managers. Two parks hired employees from the WRP. The Servicing Human Resources Office frequently collaborated with the Department of Defense and Veterans Affairs Disability Coordinators for possible candidates. Due to the pandemic, the region did not have much success this year. Northeast Region – The region includes information on accessibility for applicants with disabilities in all job announcements. Additionally, the region hosted webinars on disability recruitment, 30% or more Disabled Veterans, and Schedule A Hiring. Pacific West Region – The region collaborated with hiring managers and local veteran's programs to connect with eligible applicants under special hiring authorities for PWD and PWTD. The region increased coordination between the human resources specialists, hiring officials, and equal opportunity program officials. Additionally, the goals of the collaboration is increased recruitment strategies, reached more applicants with disabilities and targeted disabilities, shared best practices for recruiting individuals with disabilities and targeted disabilities, developed collaborative partnerships with community, academic and governmental groups that connected with individuals with disabilities and targeted disabilities, and increased the use of the special hiring authorities to provide work experience and conversion opportunities for individuals with disabilities and targeted disabilities. The collaboration fostered partnerships with academic student career services at colleges and universities and other placement offices to increase awareness of the NPS and Pacific West Region to identify applicants/candidates with disabilities and targeted disabilities. Increase regional participation at recruitment events, conferences, and career fairs sponsored by organizations serving individuals with disabilities and targeted disabilities to reach a larger pool of potential candidates. Initiate contact with students with disabilities and targeted disabilities listed in the Workforce Recruitment Program (WRP) annual online recruitment list; share resumes with hiring officials to fill vacancies (special hiring authorities). Expand the use of recruitment sources of applicants with disabilities and targeted disabilities, such as Non-Paid Work Experience Program, military transition programs, etc. to provide work experience and potential job opportunities for

individuals with disabilities and targeted disabilities. Southeast Region - 90% of the vacancies that are posted to USAJOBS as merit promotion announcements include the ability for those who are eligible to apply under special hiring authority. Managers are also encouraged to use the Workforce Recruitment Program (WRP) database as a resource to find students and recent graduates with disabilities and offer non-competitive appointment for positions.

Washington Office (WASO) – The WASO provides the Merit promotion and Delegated examining announcements to persons with disabilities to apply to NPS positions without having government experience, provided they qualify with experience and provide the appropriate supporting documentation. In addition, the WASO Servicing Human Resources Office collaborated with the Office of Relevancy, Diversity, and Inclusion to develop a Bureau-wide Diversity Recruitment Initiative. The initiative will leverage the grassroots employee diversity networks to assist with the recruitment of diverse populations, including people with disabilities.

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

Alaska Region – The region advocates the use of special hiring authorities extensively. It is the number one option provided to selecting officials.  
Intermountain Region – The region used Schedule A hiring as one of the hiring paths in many of the vacancy announcements that were advertised under Merit Promotion. The region has also appointed, without competition, employees who were Schedule A eligible and veterans with service-connected disabilities of 30% or more.  
Midwest Region – In addition to targeted recruitment at colleges and universities, the Relevancy, Diversity and Inclusion Program Manager participated in diversity recruiting events with agencies, organizations, and groups that work with and provide services for Veterans and Veterans with Disabilities.  
National Capital Region – The region has hired several Schedule A employees during this fiscal year. Because of the pandemic, the region was not able to target any positions to candidates with disabilities.  
Northeast Region – The region has used various hiring authorities, particularly Schedule A hiring as appropriate.  
Pacific West Region - During the pre-recruitment process, HR Specialists discuss hiring authorities for PWD and PWTD and encourage hiring managers to consider these flexibilities and diversity in their hiring decisions. The hiring official is informed of recruitment strategies to increase the number of PWD and PWTD that includes hiring candidates using Schedule A, 30% or More Disabled Veteran Authority, and the Veterans Recruitment Authority.  
Southeast Region – The region did not conduct any targeted recruitment.  
Washington Office (WASO) – The WASO staffing specialists use the schedule A and 30% or more disabled veterans hiring authorities in their government wide and public announcements and forwards eligible and qualified applicants to be considered for a noncompetitive appointment to hiring managers. In FY 2020, eight (8) individuals were hired under the Schedule A hiring authority and two (2) individuals were hired under the 30% disabled veterans hiring authority without competition.

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.

Applicants for Schedule A appointments are specifically identified as a targeted hiring authority and provided information on the required documentation to include in an application packet. Alaska Region – When we receive an applicant that is claiming eligibility, we review supporting documentation to ensure validity, then review applicant’s resume to ensure they have met the qualification standards before referring the applicant to the selecting official. Intermountain Region- Applicants for Schedule A appointments are specifically identified as a targeted hiring authority and provided information on the required documentation to include in an application packet. Applicants are referred under a non-competitive certificate with other non-competitive eligible for equitable consideration. Hiring officials are not provided with the Schedule A letter nor are they provided the specific hiring authority used to determine eligibility for other candidates. Midwest Region- Unsolicited applications from those who claim Schedule A are provided to/accepted by Interior Regions 3, 4, 5 Human Resources. An employee from HR, who has DEU training is assigned to review unsolicited Schedule A applications as they are received. Review consists of verifying Schedule A eligibility at the minimum. If eligible, the applicant is retained for one year from the date of receipt. National Capital Region – If the candidate meets the minimum qualifications, the candidate is referred on the non-competitive certificate for consideration by the hiring manager. If the hiring manager selects the candidate, the candidate would be appointed to the position with the entrance on duty date established by the hiring manager. Northeast Region – Individuals who apply under a hiring authority are evaluated by our trained HR staff for compliance with statutory regulations and job qualifications, etc. The specialists consult with managers to ensure that they understand the hiring flexibilities, limitations, expectations, etc. Pacific West Region- Schedule A is the main platform to hire people with disabilities. Applicants can be identified through numerous avenues such as vacancy announcements, recruitment fairs, vocational rehabilitation centers, special emphasis programs, or by word of mouth. When a person with a disability applies for a position in a vacancy announcement, the HR Specialist will review the applicant’s hiring package to determine their eligibility and qualifications. The applicant must submit documentation of their disability. Documentation of eligibility for employment under Schedule A can be obtained from a licensed medical professional (e.g., a physician or other medical professional certified by a state, the District of Columbia, or a U.S. territory to practice medicine); a licensed vocational rehabilitation specialist (i.e., state or private); or any Federal agency, state agency, or agency of the District of Columbia or a U.S. territory that issues or provides disability benefits. If the proper documentation has been submitted and the applicant is determined to be qualified for the position, they are referred non-competitively to the hiring official. Under Schedule A, veterans’ preference does apply, and the veterans’ preference is annotated on the selection certificate. Another hiring authority that is used is the 30% or More Disabled Veteran Authority. As with Schedule A, applicants can be identified through various avenues such as those listed above or through veterans’ organizations or through the Department’s Veterans’ hiring programs. The applicant must provide a copy of their letter from the Veterans Administration showing they are a 30% or more compensable veteran. The veteran must be found qualified. If qualified, the veteran may be referred to the hiring official. Southeast Region - Since 90% of the vacancies that are posted to USAJOBS are merit promotion announcements and include the ability for those who are eligible to apply under special hiring authority, those applicants possessing the required specialized experience or education and who are disabled will be referred to the hiring manager based on those qualifications as a noncompetitive candidate. Washington Office (WASO) - For Merit Promotion Assessment procedures: Eligible applicants under the disability authorities that are qualified for the positions they apply to, are placed on a noncompetitive certificate of eligible applicants, which includes Schedule A and 30% or more disabled veteran eligible applicants For Delegated Examining Assessment Procedures: Non-Competitive (includes schedule A) and 30% or more disabled veteran certificates are issued before a BQ certificate is issued. Hiring managers are

not authorized to pass over a 30% without significant justification.

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

Answer Yes

Alaska Region – Yes, WASO has provided training in FY 2020 on special hiring authorities. Intermountain Region – Yes, Schedule A is discussed during the hiring consultation in advance of recruiting for a position. Schedule A is included in the Hiring Flexibilities Guide that is provided to all supervisors when they are exploring to fill a position. Schedule A is discussed in the supervisory trainings along with other hiring authorities for veterans with service-connected disabilities. Midwest Region – No, however the Interior Region 3, 4, 5 Recruitment and Retention Strategy addresses the importance of incorporating required training to hiring officials as key to an effective and optimal path forward. National Capital Region – Yes, each time a vacancy announcement is produced, the hiring manager is advised of the special hiring authorities. From time to time, HR has gone out to the parks and trained the hiring officials on the aspects of hiring to include candidates with disabilities. Northeast Region – Yes, the Staffing and Recruiting specialists have received training on all aspects of hiring authorities. Pacific West Region - For every position that is to be recruited the HRS and Hiring manager meet for a pre-recruitment discussion. At that time, they discuss hiring authorities for PWD and PWTD and the Human Resources staff encourages hiring managers to consider these flexibilities and diversity in their hiring decisions. The hiring official is informed of recruitment strategies to increase the number of PWD and PWTD that includes hiring candidates using Schedule A, 30% or More Disabled Veteran Authority, and the Veterans Recruitment Authority. Additionally, the EEO and EDO offices offer many opportunities throughout the year for formal and informal EEO and Diversity training that includes hiring authorities for PWD and PWTD. Southeast Region - Yes, we frequently provide training to management on all hiring authorities including Schedule A and VRA. Washington Office (WASO)- In FY20, the newly established Hiring Fundamentals for New Supervisors presentation has been used to provide supervisors with information on the hiring process to include special hiring authorities, such as Schedule A and 30% disabled Veterans.

**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.

Alaska Region- • ANSEP works with kids from the 8th grade through college. Region 11 Alaska proponents will continue to build on groundwork laid with ANSEP and the WASO Direct Hire Authority office to link ANSEP into the Resource Assistant Internship-DHA Program and the former interns to get direct hiring authority. This mechanism could well serve for future targeted outreach and recruitment activities • Stand up supporting regional policies in support of expanded/clarified RII Local Hire policy that expands agency authority in Alaska to focus increased outreach to Alaska rural residents to include diverse populations inclusive to individuals with disabilities. • Multiple efforts are underway for R11 where new group initiatives are being stood up, policies and procedures are a possible outcome. Intermountain Region – The targeted recruitment for non-veterans with disabilities has focused mostly on the WRP program due to limited travel under COVID. Limited job fairs have occurred during this period of time and job service agency presence has also been limited in the current environment. Midwest Region – During FY 2020, the region continued to work with the WRP and local veteran organizations to identify potential candidates. For FY 2021, the region will look into creating more partnerships with job centers, the National Association with the School of the Deaf, MERS Goodwill, and the Job Accommodation Network (JAN). National Capital Region – Our HR office participates in varying events such as job fairs, open house, or military transition offices and make presentations. We have not targeted people with disabilities yet, but make the presentation open to all. We explain that we offer reasonable accommodation for people with disabilities. Northeast Region- The region promoted EEO observances/ activities, updated and maintained on-line regional EEO site, offered micro-sessions of Operational Leadership training each quarter and conducted a session for new Superintendents and Division Chiefs during each orientation. Pacific West Region- The parks maintain relationships with organizations and as a region we will work to increase regional partnerships with community, academic and governmental groups that can reach individuals with disabilities and targeted disabilities. Foster partnerships with academic student career services at colleges and universities and other placement offices to increase awareness of the NPS and Pacific West Region (PWR) to identify applicants/ candidates with disabilities and targeted disabilities. Increase PWR participation at recruitment events, conferences, and career fairs sponsored by organizations serving individuals with disabilities and targeted disabilities to reach a larger pool of potential candidates. We will initiate contact with students with disabilities and targeted disabilities listed in the Workforce Recruitment Program (WRP) annual online recruitment list; share resumes with hiring officials to fill vacancies (special hiring authorities). Our plan is to also, expand the use of recruitment sources of applicants with disabilities and targeted disabilities, such as Non-Paid Work Experience Program, military transition programs, etc. to provide work experience and potential job opportunities for individuals with disabilities and targeted disabilities. Washington Office (WASO)- WASO Staffing Specialists are encouraged to discuss the various hiring flexibilities available to hiring managers during the consultation process of a recruitment request. The National Park Service will monitor the results from the contacts used by the Regions and to the extent it becomes necessary to make modifications to those contacts—the below PWDs/PWTDs serving institutions are a part of our consideration/plan for contacting/building relationships: • American Council of the Blind (ACB) – ACB strives to increase the independence, security, equality of opportunity, and quality of life for people who are blind and/or have low vision. <https://www.acb.org/> • American Foundation for the Blind (AFB) – AFB expands possibilities and promotes independent and healthy living for people with vision loss by providing them and their families with relevant and timely resources. <https://www.afb.org/> • Bobby Dodd Institute (BDI) – BDI’s mission is to empower people with differing abilities to maximize their potential by securing economic self-sufficiency, independence and inclusion within their communities. <https://bobbydodd.org/> • Career One Stop-Veterans Resources – This program connects veterans and transitioning service members and PWDs with high quality career planning, training, and job search resources available at local One-Stop Career Centers.

<https://www.careeronestop.org/> · Center for the Visually Impaired-Atlanta – Georgia’s largest comprehensive, fully accredited, private facility providing rehabilitation services for individuals of all ages who are blind or visually impaired. <https://cviga.org/> · Council of State Administrators of Vocational Rehabilitation (CSAVR) – Program of public vocational rehabilitation services which empowers individuals with disabilities to achieve employment, economic self-sufficiency, independence, and inclusion and integration into our communities. <https://www.csavr.org/> · Deaf In Government (DIG) – DIG’s mission is to empower deaf and hard of hearing government employees at the local, state and federal levels. DIG address communication barriers, accessibility issues and promote a full inclusive work environment through networking, fostering professional growth, and career advancement. <https://deafingov.org/> · Gallaudet University – A university located in Washington, D.C. for the deaf and hard of hearing. <https://www.gallaudet.edu/> · National Federation of the Blind (NFB) - <https://www.nfb.org/> · Paralyzed Veterans of America (PVA) - <https://pva.org/> · Southwest Collegiate Institute for the Deaf (SWCID) at Howard College – A college located in Texas for the deaf and hard of hearing. <https://howardcollege.edu/swcd/> · The Arc – Advocates for all people with intellectual and developmental disabilities and their families. <https://thearc.org> Wounded Warrior Project – Helps severely injured service members to aid and assist each other, and to provide unique, direct programs and services to meet the needs of severely injured service members. <https://www.woundedwarriorproject.org/>



## 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)  | Answer | No |
| b. New Hires for Permanent Workforce (PWTD) | Answer | No |

PWD new hires represented 31.58% (coded 01) and 10.91% which is above the 12% goal. PWTD new hires represented 2.89% which is above the 2% goal. Ref: Table B1-1

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- |                             |        |     |
|-----------------------------|--------|-----|
| a. New Hires for MCO (PWD)  | Answer | N/A |
| b. New Hires for MCO (PWTD) | Answer | N/A |

Insufficient data was available to identify triggers among MCO new hires. The NPS will conduct a quarterly analysis of new hires applicant flow data in FY21. The applicant flow data will be analyzed for the specific new hire appointment.

3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- |  |        |     |
|--|--------|-----|
| a. Qualified Applicants for MCO (PWD)  | Answer | Yes |
| b. Qualified Applicants for MCO (PWTD) | Answer | Yes |

19% of MCOs had a relevant applicant pool below 12% for PWD. 66.6% of MCOs had a relevant applicant pool below 2% for PWTD.

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- |                              |        |     |
|------------------------------|--------|-----|
| a. Promotions for MCO (PWD)  | Answer | N/A |
| b. Promotions for MCO (PWTD) | Answer | N/A |

Insufficient data was available to identify triggers among MCO promotions. The NPS will conduct a quarterly analysis of promotion applicant flow data in FY21. The applicant flow data will be analyzed for the specific promotion action.

## 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.

Alaska Region – Region 11 strategically leverages turnover to develop our staff. We do this through 120 temporary detail/promotion opportunities. Additionally, hiring managers are encouraged to review their positions and determine if recruiting at a lower level and advertising in a career ladder is feasible. Intermountain Region – The SHROs discuss Schedule A appointing authorities during the recruitment consultation. Current employees hired under Schedule A are also encouraged to reach out to hiring officials about potential opportunities for advancement as vacancies arise. The SHRO monitors Schedule A appointments and coordinates the conversion to competitive service with the hiring officials and/or park leadership. Managers pursuing Schedule A appointments are also advised on building career ladder opportunities when using this direct hiring authority to address competency gaps. All employees in Interior Region 6, 7, 8 are invited to be a part of all career development opportunities. Announcements for any opportunities are sent to all IMR employees mailing list. Employees with disabilities are always encouraged to apply and are accommodated as necessary for training/career development/mentoring. Midwest Region – All employees have the opportunity to apply for training. Employees selected for developmental training programs are given the opportunity to identify needed reasonable accommodations. If identified, we seek to make those accommodations. Regions 3, 4, 5 announce training opportunities generally to all employees within a specific job field or all employees at a specific location where training will be held. Those selected are made aware of the procedures to request reasonable accommodation. In FY 2020, as a result of increased emphasis upon virtual training, we are stepping up training coordinator awareness of 508 compliance requirements and solutions for virtual training events. The Midwest Region’s Special Emphasis Program Manager completed the Disability Manager Training this FY and has established relationships with HR and ELR staff to ensure cross-communication. National Capital Region – During the initial hiring of Schedule A or 30% or more disabled veterans, the hiring managers are advised that they have the ability to convert them to permanent positions after two years or sooner if their performance warrants such an action. In addition, our announcements are opened to all candidates, regardless of whether they have a disability or not. Northeast Region – All IR-1 employees are provided an opportunity for advancement. After selections are made, a Welcome Letter is sent to selectees to include course information to determine if any reasonable accommodations are required. If so, we provide for that accommodation so that no employees are excluded from development opportunities. Pacific West Region - At the beginning of each fiscal year, employees are given the option to create an Individual Development Plan (IDP), which assists employees in career and personal development. IDPs help employees reach short and long-term goals, as well as improve current job performance. In addition, prior to the recruitment of a position, hiring officials discuss upward mobility options with HR and EEO staff. All employees are provided an opportunity for advancement. The only regional program that PWR employees participate in is the SER Future Leaders Program. After a selection is made, a Welcome Letter is sent to the selectees to include course information and to determine if reasonable accommodations are required. If reasonable accommodations are needed, they provide for that accommodation, so no employee is ever excluded from development opportunities. Southeast Region - We currently have a partnership with our EEO office to ensure those with disabilities have sufficient opportunity for advancement. We have also created a new position, Diversity Program Manager, in which the incumbent will be focused on specific goals for recruitment of these individuals as part of their job duties. All employees are provided with an opportunity for advancement. After selections are made, a Welcome Letter is sent to selectees to include course information and to determine if reasonable accommodation is needed. We provide for the accommodation, so no employee is excluded from developmental opportunities. WASO - WASO SHRO staffing specialists will continue to provide guidance to their hiring managers and HR Liaisons on these hiring authorities and will continue to implement the use of these hiring authorities their Job Opportunity Announcements to government wide and public

audiences. With the implementation of the newly established Disability and Veteran program managers, the WASO SHRO will be able to assist with new initiatives that will increase awareness of the disability hiring authorities.

## B. CAREER DEVELOPMENT OPPORTUNITES

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

Alaska Region – Region 11 strategically leverages turnover to develop our staff. We do this thru 120 temporary detail/promotion opportunities. Additionally, hiring managers are encouraged to review the position and determine if recruiting at a lower level and advertising in a career ladder is feasible. Intermountain Region – The region has a robust detail/temporary promotion opportunity program that provides all employees with the opportunity to gain experience in the hire graded work or in a different career field that promotes acquiring advanced skill sets. Employees can claim this higher graded experience as they compete for permanent advancement. Training opportunities and IDPs are highly encouraged for all employees to identify competency gaps and paths toward career goals. These opportunities are provided to all employees through all employee distribution mailing lists. We have a variety of training throughout the year. (e.g. GOAL Academy, Future Leaders, 21st Century Leaders, details/temporary promotions.) All are advertised to all IMR employees. Midwest Region – The Interior Region 3, 4, 5 Student Academy was established to provide a vehicle in which to institute an incentive-based diversity recruitment program that works with targeted institutions of higher learning. The academy's approach to increasing the diversity of our workforce is by building and sustaining a talented and conservation oriented entry-level workforce. Regions 3, 4, 5 provide career development opportunities such as technical skill-based training, leadership skill-based training, details, temporary promotions, and promotion opportunities. National Capital Region – From time to time, our region offers career ladder promotions and the upward mobility program. Our region's Employee Development Officers counsel employees on how to develop their career to move upward and how to reach their goals. This is further enhanced by the employees' IDP. Northeast Region – 21 LS Program Pacific West Region – Future Leaders Program Southeast Region – Future Leaders Program, 21st Century 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 (#)
Internship Programs						
Detail Programs						
Fellowship Programs	unk	3	unk	33%	unk	0
Other Career Development Programs	unk	62	unk	11.3%	unk	0
Mentoring Programs	unk	3	unk	66%	unk	0
Coaching Programs						
Training Programs	unk	60	unk	16.6%	unk	1.6%

3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWD) Answer N/A
- b. Selections (PWD) Answer No

Insufficient data was provided to analysis the overall applicant pool and the percentages of PWD. The OEOP will continue to collaborate with Workforce and Inclusion to collect applicant data in FY21. Applicant data was provided by one Region for the Future Leaders Program (Training Programs) and 21st Century Leaders Program (Other Career Development Programs); however, other programs under those headings did not provide applicant data and complete applicant analysis cannot be conducted. The NPS did very well in the percentage of PWD in the selectees of Career Development Programs with only one program falling below the selection goal of 2%.

4. Do triggers exist for PWTd among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. Applicants (PWTd) Answer N/A
- b. Selections (PWTd) Answer Yes

Insufficient data was provided to analysis the overall applicant pool and the percentages of PWTd. The OEOP will continue to collaborate with Workforce and Inclusion to collect applicant data in FY21. Applicant data was provided by one Region for the Future Leaders Program (Training Programs) and 21st Century Leaders Program (Other Career Development Programs); however, other programs under those headings did not provide applicant data and complete applicant analysis cannot be conducted. The selection rate for PWTd was below the selection goal of 2% in all Career Development Programs.

**C. AWARDS**

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

- a. Awards, Bonuses, & Incentives (PWD) Answer Yes
- b. Awards, Bonuses, & Incentives (PWTd) Answer No

The percentage of time-off awards and cash awards for PWD is below the inclusion rate. The percentage of time-off awards and cash awards for PWTd is above the inclusion rate.

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) Answer Yes
- b. Pay Increases (PWTd) Answer Yes

QSI rate for both PWD and PWTd is below the inclusion rate.

3. If the agency has other types of employee recognition programs, are PWD and/or PWTd recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If "yes", describe the employee recognition program and relevant data in the text box.

- a. Other Types of Recognition (PWD) Answer N/A
- b. Other Types of Recognition (PWTd) Answer N/A

**D. PROMOTIONS**

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

- a. SES
  - i. Qualified Internal Applicants (PWD) Answer N/A
  - ii. Internal Selections (PWD) Answer Yes
- b. Grade GS-15
  - i. Qualified Internal Applicants (PWD) Answer N/A
  - ii. Internal Selections (PWD) Answer No
- c. Grade GS-14

i. Qualified Internal Applicants (PWD)	Answer	N/A
ii. Internal Selections (PWD)	Answer	Yes
d. Grade GS-13		
i. Qualified Internal Applicants (PWD)	Answer	N/A
ii. Internal Selections (PWD)	Answer	No

SES: Selection rate for PWD was 0 and Relevant Applicant Pool was 15.42%  
 GS-14: Selection rate was 7.5% while Relevant Applicant Pool was 15.14%  
 Applicant Flow Data was not available for internal applicants for promotions.  
 The NPS will analysis AFD quarterly in FY21.

2. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. SES		
i. Qualified Internal Applicants (PWTD)	Answer	N/A
ii. Internal Selections (PWTD)	Answer	Yes
b. Grade GS-15		
i. Qualified Internal Applicants (PWTD)	Answer	N/A
ii. Internal Selections (PWTD)	Answer	Yes
c. Grade GS-14		
i. Qualified Internal Applicants (PWTD)	Answer	N/A
ii. Internal Selections (PWTD)	Answer	Yes
d. Grade GS-13		
i. Qualified Internal Applicants (PWTD)	Answer	N/A
ii. Internal Selections (PWTD)	Answer	Yes

SES: Selection rate for PWTD was 0 and Relevant Applicant Pool was 0.5%  
 GS-15: Selection rate for PWTD was 0 and Relevant Applicant Pool was 2.3%  
 GS-14: Selection rate for PWTD was 0 and Relevant Applicant Pool was 1.13%  
 GS-13 Selection rate for PWTD was 0.73% and Relevant Applicant Pool was 1.56%  
 Applicant Flow Data was not available to analysis Qualified Internal Applicants for promotions. The NPS will analysis AFD quarterly in FY21.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires to SES (PWD)	Answer	N/A
b. New Hires to GS-15 (PWD)	Answer	N/A
c. New Hires to GS-14 (PWD)	Answer	N/A
d. New Hires to GS-13 (PWD)	Answer	N/A

The NPS Office of EO Programs and HR are collaborating to gather Applicant Flow Data quarterly in FY21. AFD will be used to identify triggers involving PWD among new hires to the senior grade levels.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires to SES (PWTD)	Answer	N/A
b. New Hires to GS-15 (PWTD)	Answer	N/A
c. New Hires to GS-14 (PWTD)	Answer	N/A
d. New Hires to GS-13 (PWTD)	Answer	N/A

The NPS Office of EO Programs and HR are collaborating to gather Applicant Flow Data quarterly in FY21. AFD will be used to identify triggers involving PWTD among new hires to the senior grade levels.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

i. Qualified Internal Applicants (PWD) Answer N/A

ii. Internal Selections (PWD) Answer No

b. Managers

i. Qualified Internal Applicants (PWD) Answer N/A

ii. Internal Selections (PWD) Answer Yes

c. Supervisors

i. Qualified Internal Applicants (PWD) Answer N/A

ii. Internal Selections (PWD) Answer No

Internal selection rate for Managers was 10.53% PWD while the relevant applicant rate was 15.57% Applicant Flow Data was not available to analysis the Qualified Internal Applicants. Quarterly data will be gathered in FY21 in order to conduct a Barrier Analysis.

6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Executives

i. Qualified Internal Applicants (PWTD) Answer N/A

ii. Internal Selections (PWTD) Answer Yes

b. Managers

i. Qualified Internal Applicants (PWTD) Answer N/A

ii. Internal Selections (PWTD) Answer Yes

c. Supervisors

i. Qualified Internal Applicants (PWTD) Answer N/A

ii. Internal Selections (PWTD) Answer Yes

Internal selection rate for Executives was 0 for PWTD and the Relevant Applicant Pool was 1.52%. Internal selection rate for Managers was 0.88% for PWTD and the Relevant Applicant Pool was 1.59%. Internal selection rate for Supervisors was 0.86% for PWTD and the Relevant Applicant Pool was 1.76%. Applicant Flow Data was not available to analysis the Qualified Internal Applicants. Quarterly data will be gathered in FY21 in order to conduct a Barrier Analysis.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires for Executives (PWD) Answer N/A

b. New Hires for Managers (PWD) Answer N/A

c. New Hires for Supervisors (PWD) Answer N/A

The NPS established a Barrier Analysis Team (BAT) this fiscal year and the BAT is in the process of conducting the barrier identification and elimination process pursuant to EEOC MD-715. The NPS expects to complete this section in FY 2021.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. New Hires for Executives (PWTD) Answer N/A

b. New Hires for Managers (PWTD) Answer N/A

The NPS established a Barrier Analysis Team (BAT) this fiscal year and the BAT is in the process of conducting the barrier identification and elimination process pursuant to EEOC MD-715. The NPS expects to complete this section in FY 2021.

## Section V: Plan to Improve Retention of Persons with Disabilities

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

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer Yes

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

a. Voluntary Separations (PWD)

Answer Yes

b. Involuntary Separations (PWD)

Answer Yes

The inclusion rate for PWD permanent employees was 9.62%. The inclusion rate for permanent employees coded as 01 - did not identify their disability or serious health condition was 12.61% a. Voluntary separation rate for resignations for PWD was 12.24 %. Voluntary separation rate for resignations for employees coded 01 was 25.52%. Voluntary separation rate for retirements for PWD was 10.84%. Voluntary separation rate for retirements for employees coded 01 was 5.42%(below the inclusion rate). b. Involuntary separation rate for removals for PWD was 18.64%. Involuntary separation rate for removals for employees coded 01 was 25.42%

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)

Answer Yes

b. Involuntary Separations (PWTD)

Answer Yes

The inclusion rate for PWTD permanent employees was 2.11%. a. Voluntary separation rate for resignations for PWTD was 2.45 %. Voluntary separation rate for retirements for PWTD was 2.62%. b. Involuntary separation rate for removals for PWTD was 5.08%.

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

Exit Interview data was not available for analysis for FY20. Exit Interview data will become available beginning Oct 1, 2020 and will be used to conduct a barrier analysis of PWD and PWTD separations.

### B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

[www.nps.gov/aboutus/accessibilityforvisitors.htm](http://www.nps.gov/aboutus/accessibilityforvisitors.htm)

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.

<http://www.nps.gov/aboutus/accessibilityforvisitors.htm>



The Accessibility in the NPS Strategic Plan 2015-2020 has three goals: Goal 1: Create a welcoming environment by increasing the ability of the National Park Service to serve visitors and staff with disabilities. Strategies: Develop an external communication plan to improve information presented to the public about accessible experiences in the National Park Service. Highlight these accessible experiences to encourage visitation. Reach out to members of the disability community to create a dialogue about accessibility needs, priorities, and accomplishments. Develop a multipronged training plan aimed at sparking organizational culture change (akin to operational leadership) and increasing the understanding and capability of National Park Service staff to meet the legal obligations, as well as identify opportunities for advocacy on accessibility. Create new course offerings to fill training gaps, such as programmatic accessibility. Use existing courses, such as NPS Fundamentals and the Superintendents Academy, to increase accessibility understanding, and develop a quick reference guide to incorporate accessibility topics within existing courses. Topics may range from cultural sensitivity to complying with legal requirements. Ensure that all training course are provided in accessible formats. Engage park partners and concessioners to make them an integral part of the implementation of this accessibility strategy. Support their efforts to make facilities, services, and programs accessible. Collaborate with them to share successes and challenges so that we can learn from and encourage each other. Goal 2: Ensure that new facilities and programs are inclusive and accessible to people with disabilities. Strategies: Define roles and opportunities for when and how accessibility technical assistance and resources, such as the National Accessibility Branch, Denver Service Center, and Harpers Ferry Center, provide assistance to parks during planning for new facilities or programs. Ensure the criteria and available resources are known to parks and programs. Ensure the criteria and available resources are known to parks and programs, and encourage their use during project planning and review processes. Build park and regional capacity to create, review, and budget for facility and program project plans to ensure barriers are not created. Engage specialists, as needed, to support project scope and budget development, planning, and design processes to ensure both programmatic and physical accessibility needs are properly addressed. Create knowledgeable regional teams to review projects prior to regional and national Developmental Advisory Board reviews. Partner with national advocacy groups and disability organizations to assure new projects are universally designed and accessible to people with disabilities. Identify formal and informal ways to include the input of people with disabilities into the planning and design states and evaluate implementation of projects. Explore cutting-edge technologies that would increase "virtual" accessibility when more traditional solutions are not possible. Goal 3: Upgrade existing facilities, programs, and services to be accessible to people with disabilities. Strategies: Develop a process for parks to analyze and prioritize key park visitor experiences to set priorities or accessibility improvements. This process should make use of existing planning tools, such as park asset management plans, foundation documents, long-range interpretive plans, and the Asset Priority Index. Involve the disability community in the prioritization process. In addition to the key experiences, also prioritize locations where those experiences are offered within the park based on levels of use, resources sensitivity, feasibility of providing accessibility, and other factors. Create a process for parks to self-assess at a high level the accessibility of key park visitor experiences. This hi-level assessment would identify the general state of accessibility to develop park prioritization of accessibility needs and a strategy to address those needs. Focus flexible park base funds in addition to recreation fees and concession franchise fees to target high-potential, high-impact, pure (to the degree possible) accessibility projects a high visitation areas or key park visitor experiences. Leverage available fund sources to correct priority accessibility deficiencies when a comprehensive rehabilitation or upgrade of that park facility or program is not scheduled in the near future.

## C. REASONABLE ACCOMMODATION PROGRAM

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

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

The NPS does not have a tracking system for RA requests that captures average time frame for processing initial requests for reasonable accommodations. The NPS expects to eliminate this deficiency in FY 2021.

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.

NPS has developed and provided training to supervisors on a reasonable accommodation tracking program to ensure timely processing of requests, provide resources to officials who make determinations on requests, and provide metrics on reasonable accommodation. We are in the process of developing implementation procedures to supervisors and managers on reasonable accommodation. Upon completion, we intend to implement the tracking system and provide greater training, more consistent approaches to individual requests and a more efficient and effective delivery of resources to managers and employees.

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

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

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.

NPS follows the policies of the Department concerning PAS. This is a new initiative and NPS has not had any cases to date.

## 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?

Answer No

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

Answer No

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

N/A

### B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer No

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

Answer No

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

N/A

## 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?

Answer No

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

Answer 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

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

The NPS established a Barrier Analysis Team (BAT) FY20 and the BAT is in the process of conducting the barrier identification and elimination process pursuant to EEOC MD-715. The NPS expects to complete this section in FY 2021.

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

The NPS established a Barrier Analysis Team (BAT) FY20 and the BAT is in the process of conducting the barrier identification and elimination process pursuant to EEOC MD-715. The NPS expects to complete this section in FY 2021.

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

The NPS established a Barrier Analysis Team (BAT) FY20 and the BAT is in the process of conducting the barrier identification and elimination process pursuant to EEOC MD-715. The NPS expects to complete this section in FY 2021.