

Affirmative Action 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 |

Notes: a. The percentage of Employees coded as a PWD in the GS-1 to GS-10 cluster was 10.82% in FY 2019. The percentage of Employees coded as: (01 – I do not wish to identify my disability or serious health condition) was 12.47%. Total of PWD was 23.29%. b. The percentage of Employees coded as a PWD in the GS-1 to GS-10 cluster was 6.33% in FY 2019. The percentage of Employees coded as: (01 – I do not wish to identify my disability or serious health condition) was 7.64%. Total of PWD was 13.97%.

*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 |

a. Trigger not identified. The percentage of PWTD in the GS-1 to GS-10 cluster was 2.48% in FY 2019, which is above the goal of 2%. (12.47% of employees did not identify their Disability; unknown percentage of PWTD in the 12.47%). b. The percentage of PWTD in the GS-11 to SES cluster was 1.04% in FY 2019, which falls below the goal of 2%. Analysis should be conducted to identify the 7.64% of employees coded as 01 – I do not wish to identify my disability or serious health condition.

Grade Level Cluster(GS or Alternate Pay Planb)	Total		Reportable Disability		Targeted Disability	
	#	%	#	%	#	%
Numerical Goal	--	12%				2%
Grades GS-1 to GS-10						
Grades GS-11 to SES						

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

The Office of Policy and Strategic Initiative (OPSI) communicates with the Human Resources leadership in the field to share the

Department of Interior’s hiring goals for an increase which is disseminated down to the managers through the human resources consultation process when recruitment efforts are discussed regarding hiring flexibilities to include Schedule A and veterans’ recruitment authority.

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

- 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 No

The Workforce and Inclusion Director assigned Katrina Williams, Human Resource Specialist as the Disability Coordinator in May 2020.

- 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	Marianne_Weiner@nps.gov
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Marianne_Weiner@nps.gov
Processing reasonable accommodation requests from applicants and employees	1	0	0	Stephen_Schubart@nps.gov
Section 508 Compliance	1	0	0	Bernard Gordon Section 508 Coordinator Bernard_Gordon@nps.gov
Architectural Barriers Act Compliance	0	0	0	VACANT
Special Emphasis Program for PWD and PWTD	0	0	0	VACANT

- 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 No

The plan is to hire a Disability Program Manager/Coordinator that will be responsible for developing a training program.

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 No

The plan is to have a Disability Program Manager/Coordinator and sufficient staff to implement the disability program.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	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.		
Objective	The NPS will allocate sufficient funding and qualified staffing to successfully implement the EEO program.		
Target Date	Dec 31, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Dec 31, 2019		The EEO Director will collaborate with the senior leadership team to get approval to backfill three GS-13 EEO Specialist positions.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2020	10/07/2019 The EEO Director received approval from the senior leadership to hire three GS-13 EEO Specialists. 12/08/2019 The OEOP hired a GS-13, EEO Specialist.	
Objective	The NPS will allocate sufficient funding and qualified staffing to successfully implement the EEO program.		
Target Date	Dec 31, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Dec 31, 2019		The EEO Director will collaborate with the senior leadership team to get approval to backfill three GS-13 EEO Specialist positions.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2020	The EEO Director received approval from the senior leadership to hire three GS-13 EEO Specialists on Oct 7, 2019.	
	2020	The NPS Office of EO Programs hired one GS-13, EEO Specialist on Dec 8, 2019.	

Brief Description of Program Deficiency	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]		
Objective	The NPS will allocate sufficient funding and qualified staffing to effectively administer its special emphasis programs (such as, Federal Women’s and Hispanic Employment Program).		
Target Date	Dec 31, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Dec 31, 2019		The EEO Director will collaborate with the senior leadership team to get approval to backfill three GS-13 EEO Specialist positions.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2020	10/07/2019 The EEO Director received approval from the senior leadership to hire three GS-13 EEO Specialists. 12/08/2019 The OEOP hired a GS-13, EEO Specialist. 02/07/2020 The NPS announced two GS-13, EEO Specialist positions on USAJOBS.	

Brief Description of Program Deficiency	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]		
Objective	The NPS will implement the Affirmative Action Plan for Individuals with Disabilities.		
Target Date	Jun 30, 2020		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jun 30, 2020		The Office of Equal Opportunity Programs will collaborate with the Chief, Talent Acquisition Officer to implement the Affirmative Action Plan for Individuals with Disabilities.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2019	Hiring goals were established on Sep 15, 2019	

Section IV: 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.

The Office of Policy and Strategic Initiative (OPSI) will update the OPM Selective Placement Program Coordinator (SPPC) contact list for the NPS. The NPS SPPC will obtain applications from candidates interested in being hired using the Schedule A Hiring Authority.

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

NPS hired 92 PWD/PWTD and promoted 8 PWD/PWTD employees.

- 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.

Candidates send their Schedule A applications with documentation to the NPS SPPC and/or the Servicing Human Resources Office (SHRO) when a position is advertised. NPS accepts documentation from licensed medical professionals (e.g., a physician or medical professional certified by a state, District of Columbia, or a U.S. territory to practice medicine); licensed vocational rehabilitation specialists (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. The SPPC or SHRO will review the application package to ensure it meets qualifications of the position as well as the hiring authority then forward to either the SHRO and/or hiring manager for an established position. If the hiring manager has an interest in the candidate, they will negotiate an effective date and hire at the beginning of the pay period.

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

NPS conducts a virtual conference in addition to classroom training for supervisors on hiring flexibilities.

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.

The plan is to appoint a Disability Program Manager and Selective Placement Program Coordinator to establish a plan to ensure these efforts are being conducted service wide.

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

NOTE: a. No – 9.57% of new hires identified as a PWD plus 28.38% identified as 01 – I do not wish to identify my disability or serious health condition bringing the total of PWD to 37.95% b. No - PWTD new hires represented 2.2% which is above the 2% goal 28.38% of new hires did not identify their Disability. The percentage of PWTD out of the 28.38% could not be determined.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	0				
% of Qualified Applicants	0				
% of New Hires	0				

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.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	

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

a. 43% of the MCOs had a relevant applicant pool below the goal of 12% for PWD. b. 67% of the MCOs had a relevant applicant pool below the goal of 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 V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

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

A. ADVANCEMENT PROGRAM PLAN

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

The plan is to hire a Disability Program Manager and Selective Placement Program Coordinator to establish a plan to ensure these efforts are being conducted service wide.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

NPS provides a variety of career development opportunities such as Federal Executive Institute (FEI); Roger Kennedy Fellowship Certificate Program; Aspiring Leaders Program (ASLP), GS-07-11; New Supervisor Development Program (Supervisory Skills Workshop); New Division Chief Leadership Development Program; New Superintendents Academy; Albright-Wirth Grant Program and Generating Organizational Advancement and Leadership (GOAL) Academy.

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						
Fellowship Programs		2		0		0
Mentoring Programs						
Coaching Programs						
Training Programs		96		9.37		0
Detail Programs						
Other Career Development Programs						

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 Yes

Applicant data was not provided to determine the percentage of PWD and PWTD in the total participant group. The NPS will conduct a quarterly analysis of Career Development Opportunities from the Program Managers in FY21. The selection rate for PWD and PWTD was below the relevant applicant pool percentage.

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 N/A

Insufficient data was available to identify triggers among PWTD for Career Development Opportunities. No applicant data was provided. The NPS will conduct a quarterly analysis of Career Development Opportunities from the Program Managers in FY21.

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 Yes

Awards, Bonuses, & Incentives were below the inclusion rate for all of the award groups except awards less than \$999 and time off awards of 21-30 hours.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards					

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

a.The inclusion rate for PWD receiving QSIs was 14.03% and the participation rate was 19.6%. b.The inclusion rate for PWTD receiving QSIs was 1.36% and the participation rate was 1.80%.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Performance Based Pay Increase	0	0.00	0.00	0.00	0.00

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

The NPS does not have other types of employee recognition programs.

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

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

Qualified Internal Applicant pool data was not available in FY19. The NPS will begin quarterly analysis of senior level promotions in FY21. Trigger for Internal selection rate of GS-15 was 0% for PWD.

2. Does your agency have a trigger involving PWTB 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 (PWTB) Answer N/A
 - ii. Internal Selections (PWTB) Answer Yes
- b. Grade GS-15
 - i. Qualified Internal Applicants (PWTB) Answer N/A
 - ii. Internal Selections (PWTB) Answer Yes
- c. Grade GS-14
 - i. Qualified Internal Applicants (PWTB) Answer N/A
 - ii. Internal Selections (PWTB) Answer Yes
- d. Grade GS-13
 - i. Qualified Internal Applicants (PWTB) Answer N/A
 - ii. Internal Selections (PWTB) Answer Yes

Qualified Internal Applicant pool data was not available in FY19. The NPS will begin quarterly analysis of senior level promotions in FY21. Trigger for Internal selection rate for GS-13 was 1.12% and relevant rate was 1.29% Trigger for Internal selection rate for GS-14, GS-15, and SES for PWTB was 0%.

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

Data was not available for new hires to the grades of GS-13, GS-14, GS-15, and SES. Quarterly data will be gathered in FY21 in order to conduct a Barrier Analysis.

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

Data was not available for new hires to the grades of GS-13, GS-14, GS-15, and SES. Quarterly data will be gathered in FY21 in order to conduct a Barrier Analysis.

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 No
 - c. Supervisors
 - i. Qualified Internal Applicants (PWD) Answer N/A
 - ii. Internal Selections (PWD) Answer Yes

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. Internal Selection rate for Supervisors was below the Relevant Applicant Pool %.

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

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. Internal Selection rate for all groups was 0% for PWTD.

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

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.

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

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.

Section VI: 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 C.F.R. § 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 rate for voluntary and involuntary separations exceeded the inclusion rate for PWD.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
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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 rate for voluntary and involuntary separations exceeded the inclusion rate for PWTD.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
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4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

The exit interview only asked if the employee was a PWTD; not a PWD. Not enough data in the exit interview to explain why the employees left the NPS.

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

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>

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

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, 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.)

Generally, initial requests for reasonable accommodation are processed in five work days or less.

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 VII: 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 governmentwide 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.

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.

Section VIII: 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.

NPS does not have a Disability Program Manager and qualified staff to conduct the barrier analysis process mandated by the EEOC.

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

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.
