

## 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 Yes |

The participation rate for GS-11 to SES in the permanent workforce is 11.7%

\*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 No |

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numarical 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.

Prior to a position being advertised, a pre-recruitment consultation (PRC) is conducted where an assessment of a vacant position, including numerical goals, alternative position management and recruitment methods, the sharing of statistical workforce data, and targeted recruitment options for advertisement such as PWD, PWTD, veterans, and upward mobility are discussed between Human Resources (HR), EEO professionals, and the hiring official.

### 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 No

To ensure that Reclamation provides adequate staff to promote the hiring, advancement, and retention of qualified individuals with disabilities in the workforce, we need to enhance the role and responsibilities of the Disability Program Manager for Reclamation-wide program development. Currently, there are insufficient resources dedicated to outreach recruitment, retention, and advancement initiatives such as the development and maintenance of mentoring programs for employees with disabilities. Additional SEPMs for PWD and PWTD in each region need to be selected and trained. Efforts also need to be increased to hire a Section 508 Coordinator for Reclamation.

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	
Answering questions from the public about hiring authorities that take disability into account	50	0	0	Erica Settlemyer Reclamation Staffing Program Manager esettlemyer@usbr.gov
Processing reasonable accommodation requests from applicants and employees	7	0	0	David Williams HR Specialist dwilliams@usbr.gov
Special Emphasis Program for PWD and PWTD	1	0	1	James Kirkland Equal Employment Specialist jkirkland@usbr.gov
Section 508 Compliance	0	6	0	The position is currently vacant.
Processing applications from PWD and PWTD	50	0	0	Erica Settlemyer Reclamation Staffing Program Manager esettlemyer@usbr.gov
Architectural Barriers Act Compliance	1	0	4	Vacant Civil Rights Analyst

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

In FY19 the CRD Civil Rights Analyst attended training hosted by the National Park Service on compliance with the Architectural Barriers Act. The Diversity and Inclusion Manager attended barrier analysis training at the EEOC’s annual EXCEL conference, and CRD’s Presidential Management Fellow attended similar training hosted by DOI. Two additional CRD employees, both EEO specialists, attended the 2019 Federal Dispute Resolution training conference which covered reasonable accommodation.

**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

To enhance the role of Reclamation’s Disability Program Manager, Reclamation will also provide sufficient funding for training and internship programs that lead directly to employment for individuals with disabilities.

### Section III: Program Deficiencies In The Disability Program

<b>Brief Description of Program Deficiency</b>	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)]		
<b>Objective</b>	Create Reclamation specific standards that align with the revised, Department level policy.		
<b>Target Date</b>	Sep 30, 2021		
<b>Completion Date</b>			
<b>Planned Activities</b>	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2021		Collaborate with HR Manager to establish a comprehensive reasonable accommodation policy/ procedures.
<b>Accomplishments</b>	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2020	New element. No action taken.	

### 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 PWTDD

#### 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 Workforce Recruitment Program (WRP) is a recruitment and referral program that connects employers with qualified job applicants for positions. Applicants are postsecondary students with disabilities who are eager to prove their abilities in the workforce. Through the WRP, employers have access to candidates across the nation, the ability to source candidates who are disabled veterans, pre-screened job candidates, and flexibility to appoint those with disabilities to internships or temporary and permanent positions. Reclamation supports partnerships with state rehabilitation offices, veterans’ networks, and many disability workforce recruiting organizations that provide workshops and training to secure employment for their participants in the workforce. These programs are designed to develop, enhance, and/or provide an entryway back into the workforce while providing managers an opportunity to sponsor internships while going through the process of filling vacant position. Reclamation’s Regional HRO’s frequently send vacancy announcements to many organizations including, but not limited to: 29 veterans organizations, eight vocational rehabilitation contacts, three youth organizations, 17 employee organizations and partner organizations, 15 diversity/job service organizations, and over 150 colleges and universities. These vacancy notifications reinforce Reclamation’s commitment to becoming a model employer of people with disabilities. Reclamation works closely with the Wounded Warrior Project and the Feds Hire Vets to develop job search training and increase opportunities for disabled veterans to obtain employment. Reclamation’s Technical Services Center (TSC) has initiated a recruitment relationship with the National Technical Institute for the Deaf (NTID) located at the Rochester Institute of Technology in New York. A recruitment team from TSC and HR has participated in 3 consecutive career fairs at NTID, including one in October 2019, and successfully recruited engineering students to participate in the Resource Assistant Internship Program hosted by the TSC.

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

During the PRC phase of Reclamation’s hiring practice, the servicing EEO and HR Offices provide the hiring official with information on diversity statistics within the Region and their office. These statistics include information on PWD and PWTD. The hiring official is provided with 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 Appointment (VRA) Authority.

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 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 Veterans 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 Department of Veterans Affairs (VA) letter 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.

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

New supervisors learn about these hiring authorities during a weeklong supervisor training course, “Reclamation Strategies for Successful Supervision.” They are also reminded of these authorities during the PRC process, described above.

**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.

Reclamation has been successful involving managers and supervisors in recruitment activities addressing barriers and identifying solutions to overcome barriers while recruiting a diverse workforce. In all regions, Pre-Recruitment Consultations (PRCs) are held with hiring officials for all advertised positions. These consultations provide information regarding under-represented groups of individuals in the workforce and identify potential source audiences, workforce centers, schools and learning institutions, as well as tribal, colleges and organizations, veterans’ groups, and community-based diversity programs where sources of diverse candidates may be found. In FY 2019 recruiting relationships were expanded and enhanced with the VA VR&E office in Denver as well as the Center on Employment at NTID.

**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

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 Yes
- b. New Hires for MCO (PWTD) Answer Yes

When comparing the qualified applicant pool benchmark and the selection rate, triggers exist for the following MCO’s: 510 Accounting: PWD = 0.00%, PWTD = 0.00% 810 Civil Engineering: PWD = 2.0%, PWTD = 0.00% 830 Mechanical Engineering: PWD = 0.00%, PWTD = 0.00% 850 Electrical Engineering: PWD = 0.00%, PWTD = 0.00% 1102 Contracting: PWD = 5.00%, PWTD = 2.50% 2810 High Voltage Electrician: PWD = 0.00%, PWTD=0.00% 5352 Industrial Equip Mech: PWD=4.35%, PWTD =0.00% 5407 Electric Power Controlling: PWD = 0.00%, PWTD = 0.00% Note: This data is based only upon voluntary self-identification of disability within the application process and therefore does not likely include all PWD/PWTD

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 No
- b. Qualified Applicants for MCO (PWTD) Answer No

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 No
- b. Promotions for MCO (PWTD) Answer No

## 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.

Prior to the recruitment of a position, hiring officials discuss upward mobility options with HR and EEO staff. 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. Reclamation continues to exceed Federal goals for employment of people with disabilities, with a total workforce for FY19 consisting of 14.9% PWD and 3.9% PWTD. To ensure continued success, the Civil Rights Division will lead efforts to establish additional recruitment partnerships in the regions with the Veterans Benefits Administration, Office of Vocational Rehabilitation and Employment as well as partnerships with state disability employment offices to assist individuals with disabilities in securing gainful employment commensurate with their abilities. Participation in the Workforce Recruitment Program (WRP) will also be coordinated by the Civil Rights Division. The WRP is a recruitment and referral program that connects Federal and private sector employers nationwide with highly motivated college students and recent graduates with disabilities seeking temporary or permanent jobs. WRP is managed by the U.S. Department of Labor and U.S. Department of Defense. In observance of National Disability Employment Awareness Month, senior leadership communicates the importance and benefits of hiring and retaining PWD/PWTD employees, and the Civil Rights Division and regional EEO offices host events featuring several brown bag training sessions focusing on disability issues. These events will highlight significant contributions of people with disabilities, inform the workforce of the value of diversity, and prepare individuals for interviews by offering mock interview workshops. Reclamation will continue an annual campaign that allows employees to review and update their self-identification disability status.

### B. CAREER DEVELOPMENT OPPORTUNITES

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

Reclamation has two development programs in place: Exploring Supervision at Reclamation (ESaR) and the Reclamation Leadership Development Program (RLDP). ESaR introduces non-supervisory employees with information on supervisory responsibilities. The training provides an overview of supervisory and human resource competencies that new supervisors need to master as they transition from an individual contributor role to a supervisor role and being a supervisor in the Federal Government. The RLDP provides a variety of developmental experiences to broaden perspectives and competencies in leadership and management for dynamic self-starters with proven management and communication skills at the GS-13 and GS-14 or equivalent levels who have demonstrated significant potential for serving in higher level leadership positions. These include attendance at the Office of Personnel Management’s (OPM) Leadership Assessment Program, courses in leading organizations, budgetary policies and processes, internal controls, and two of OPM’s leadership development courses that include a minimum 60-day developmental assignment in a leadership position. RLDP is a competitive opportunity with an in-depth selection process.

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 (%)
Training Programs	95	95	24	24	2	2
Internship Programs						
Fellowship Programs						

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Mentoring Programs						
Coaching Programs						
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 No
- b. Selections (PWD) Answer No

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 No
- b. Selections (PWTD) Answer No

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

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

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

9.9% of QSIs were given to PWD; 1.2% of QSIs were given to PWTD.

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

**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 No
  - ii. Internal Selections (PWD) Answer No
- b. Grade GS-15
  - i. Qualified Internal Applicants (PWD) Answer No
  - ii. Internal Selections (PWD) Answer No
- c. Grade GS-14
  - i. Qualified Internal Applicants (PWD) Answer No
  - ii. Internal Selections (PWD) Answer No
- d. Grade GS-13
  - i. Qualified Internal Applicants (PWD) Answer No
  - ii. Internal Selections (PWD) Answer No

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 No
  - ii. Internal Selections (PWTD) Answer No
- b. Grade GS-15

i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	No
c. Grade GS-14		
i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	No
d. Grade GS-13		
i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	No

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

Reclamation does not currently have access to the requisite data to analyze this information.

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

Reclamation does not currently have access to the requisite data to analyze this information.

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	N/A

b. Managers

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

ii. Internal Selections (PWD) Answer N/A

c. Supervisors

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

ii. Internal Selections (PWD) Answer N/A

Reclamation does not currently have access to the requisite data to analyze this information.

6. Does your agency have a trigger involving PWTB 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 (PWTB) Answer N/A

ii. Internal Selections (PWTB) Answer N/A

b. Managers

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

ii. Internal Selections (PWTB) Answer N/A

c. Supervisors

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

ii. Internal Selections (PWTB) Answer N/A

Reclamation does not currently have access to the requisite data to analyze this information.

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

Reclamation does not currently have access to the requisite data to analyze this information.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB 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 (PWTB) Answer N/A

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

c. New Hires for Supervisors (PWTD)

Answer N/A

Reclamation does not currently have access to the requisite data to analyze this information.

## 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 No

As of the end of FY 2019, there were 4 Schedule A employees who were not converted into the competitive service. CRD will request additional information from HR to determine if these employees were eligible for conversion based on satisfactory service.

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 No

For voluntary separations in the permanent workforce, the rate of resignations for PWD was 19.9% and the rate of other separations (e.g. transfers to other federal agencies) was 17.4% compared with the inclusion rate of 14.8%.

Separations	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 No

For voluntary separations in the permanent workforce, the rate of other separations (e.g. transfers to other federal agencies) for PWTD was 4.6%, higher than the inclusion rate of 3.8%.

Separations	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.

An analysis of 25 exit survey responses from December 2016 to June 2019 for PWD and PWTD revealed that these groups responded less favorably than other minority and non-minority groups to the following survey topics: recommending Reclamation as a good place to work; the work environment was inclusive and engaging; executives/high level management strived to improve

the work environment for employees; everyone in my workgroup was treated equitably regarding employment practices; I could disclose a suspected violation of any law, rule, or regulations without fear of reprisal; and overall communication was clear and effective. Due to a survey design flaw, respondents were not able to self-identify as a PWD prior to January 2019, when this flaw was corrected. This error helps explain why there is such a small number of PWD and PWTD responses (25 out of a total of 320 responses) during the survey time frame. An analysis of FEVS 2018 data revealed a significant trend: PWD responses were lower than average favorable responses in 76 out of 77 survey items. Among the greatest differences (-14% to -10%) were topics relating to opportunities to demonstrate leadership skills, telework, employee development, and utilization of talent. Additional analysis of New Inclusion Quotient subsets of the FEVS revealed that PWD gave significantly lower responses (between -5% and -10%) when evaluating the following characteristics of an inclusive environment: fairness, openness, and empowerment.

## 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.

Reclamation's Accessibility Policy <https://www.usbr.gov/main/access.html>

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.

This public website is located at the following address: <https://www.usbr.gov/crd/complaints.html>

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 Civil Rights Division is completing a major revision re-establishing directives and standards to implement the Federally conducted program compliance with the Architectural Barriers Act, Section 504 of the Rehabilitation Act, and 43 CFR 17 at CRM 03-01 in the Reclamation Manual. CRD is also acquiring a new database to track barriers, transition plans, and accessibility reviews. Reclamation is also planning to hire a Section 508 Coordinator.

## 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.)

Though all accommodations are different, initial processing time to enter into the interactive process is normally within 10 days. In FY19 70 out of 71 initial requests were processed within 10 days.

2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

Training for managers and supervisors is done on a quarterly basis. Scheduled classes are focused to provide each manager and

supervisor insight into the accommodation process. Classes include, how to recognize a request for accommodation, how to engage in the interactive process, how to meet timelines, ensure proper documentation throughout the process. The RA policy is an effective overview of the entire process. Local training provides more in-depth detail of the process.

**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.

The Department of Interior implemented procedures for personal assistance services with Personnel Bulletin No. 17-18, dated January 10, 2018. The Personnel Bulletin directs Bureaus to provide personal assistance services to employees who, because of targeted disabilities, require such assistance during work hours or to participate in work-related travel. These procedures have been disseminated to the regions for immediate implementation. To date, Reclamation has yet to receive any PAS requests.

**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.

Reclamation did not have a finding of discrimination based on disability status during FY19.

**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.

Reclamation did not have a finding of discrimination based on disability status during FY19.

## 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 Yes

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

Answer Yes

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments

<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>Using the relevant and qualified applicant pools as benchmarks, triggers exist for PWD and PWTD among the qualified internal applicants for mission-critical occupations (MCO).</p>							
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>							
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>Barrier analysis began in FY2018 and continued through FY2019.</p>							
<p><b>Objective</b></p>	<p>Increase percentage of PWD and PWTD being promoted in MCOs to reach inclusion rates.</p> <table border="1" data-bbox="440 953 1495 1104"> <tr> <td><b>Date Objective Initiated</b></td> <td>Jan 30, 2018</td> </tr> <tr> <td><b>Target Date For Completion Of Objective</b></td> <td>Sep 30, 2020</td> </tr> </table>				<b>Date Objective Initiated</b>	Jan 30, 2018	<b>Target Date For Completion Of Objective</b>	Sep 30, 2020
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<p><b>Responsible Officials</b></p>	<p>Gayle Kunkel-Shields Manager, Human Resources Policy and Programs Division</p> <p>Lara Grillos Manager, Civil Rights Division</p> <p>James Kirkland Diversity and Inclusion Specialist</p>							
<p><b>Target Date (mm/dd/yyyy)</b></p>	<p><b>Planned Activities</b></p>	<p><b>Sufficient Staffing &amp; Funding (Yes or No)</b></p>	<p><b>Modified Date (mm/dd/yyyy)</b></p>	<p><b>Completion Date (mm/dd/yyyy)</b></p>				
<p>05/01/2019</p>	<p>Solicit nominations for Special Emphasis Program Manager for PWD. Review applications and issue appointment letter.</p>	<p>Yes</p>		<p>08/25/2019</p>				
<p>08/15/2019</p>	<p>Conduct an in-depth barrier analysis Reclamation-wide by reviewing workforce statistics and other information sources (e.g., complaint data; climate assessments; focus groups; exit interview data) to identify triggers and root causes.</p>	<p>Yes</p>	<p>09/30/2023</p>					
<p>06/28/2019</p>	<p>Conduct PWD focus group before National Disability Employment Awareness month (October).</p>	<p>Yes</p>	<p>09/30/2021</p>					
<p>08/30/2019</p>	<p>Develop action plan based on results of barrier analysis.</p>	<p>Yes</p>	<p>09/30/2023</p>					
<p>09/30/2019</p>	<p>Reclamation's Diversity and Inclusion Council and Diversity Change Agents will assess current mentorship program and develop action plan to enhance it.</p>	<p>Yes</p>	<p>09/30/2023</p>					
<p><b>Fiscal Year</b></p> <p>2019</p>	<p><b>Accomplishments</b></p> <p>A new Denver-based SEPM was appointed for the People with Disabilities Employment Program. This is a new collateral duty position, and the appointee will serve up to 10% of their work time performing diversity and inclusion assignments. A review of the merit promotion data for FY19 did not surface any triggers for MCOs. The relatively low numbers of PWD and PWTD employees who applied for these vacancies made it extremely difficult to identify any issues with the selection process. Next year, the analysis will include efforts to identify reasons why employees with disabilities may not be applying for these promotion opportunities.</p>							



<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>Using the qualified applicant pool as the benchmark, triggers exist for PWD and/or PWTD among new hires for mission-critical occupations (MCOs)</p>				
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>				
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>					
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>Barrier analysis began in FY2018 and continued through FY2019.</p>				
<p><b>Objective</b></p>	<p>Increase hiring rates of PWD and PWTD new hires for MCOs to match total hiring rate benchmarks for these occupations.</p> <table border="1" data-bbox="487 966 779 1113"> <tr> <td><b>Date Objective Initiated</b></td> <td>Oct 1, 2018</td> </tr> <tr> <td><b>Target Date For Completion Of Objective</b></td> <td>Sep 30, 2020</td> </tr> </table>	<b>Date Objective Initiated</b>	Oct 1, 2018	<b>Target Date For Completion Of Objective</b>	Sep 30, 2020
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<p><b>Responsible Officials</b></p>	<p>Lara Grillos Manager, Civil Rights Division (CRD)</p> <p>James Kirkland Diversity and Inclusion Specialist, Civil Rights Division</p> <p>Gayle Kunkel-Shields Manager, Human Resources Policy and Programs Division</p>				

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
01/25/2019	Establish recruitment relationship with VA Regional Office of Vocational Rehabilitation and Employment (VRE) in Denver. Explore feasibility of enrolling disabled veterans in VA training/work experience programs at Reclamation sites.	Yes		09/30/2019
03/01/2019	Review and consider revising training module on special hiring authorities for PWD/PWTD for managers and supervisors.	Yes	09/30/2021	
04/19/2019	Develop recruitment strategies for MCOs using Workforce Recruitment Program at post-secondary schools in proximity to Reclamation worksites.	Yes	09/30/2021	
06/03/2019	Draft multi-year PWD/PWTD recruitment plan for MCOs.	Yes	09/30/2021	
02/08/2019	Assemble team to create recruitment plan for PWD/PWTD, including hiring manager(s) of MCOs; representatives from CRD, HRPPD, and HR Operations; and SMEs from regional offices.	Yes	09/30/2021	
02/22/2019	Create focus group(s) of hiring officials for highest demand MCOs and identify methods to increase PWD/PWTD hiring rates.	Yes	09/30/2021	
03/29/2019	Develop recruitment materials that address MCO career opportunities within Reclamation.	Yes	09/30/2021	
04/12/2019	CRD and HRPPD managers will finalize and implement MCO recruitment plan for PWD/PWTD.	Yes	09/30/2021	
01/31/2020	Implement revised BOR Diversity and Inclusion Strategic Plan.	Yes	09/30/2022	
09/30/2019	Work with Diversity and Inclusion Council to draft updated BOR Diversity and Inclusion Strategic Plan.	Yes	09/30/2022	
02/01/2019	Determine workforce characteristics of MCO employees (length of service, projected retirement rates, turnover rates, etc.) in support of business case for targeted MCO outreach recruitment.	Yes	12/30/2020	
03/08/2019	Draft MCO recruitment plan for PWD/PWTD.	Yes	09/30/2021	
04/30/2019	Launch (revised) training module on special hiring authorities for PWD/PWTD for managers and supervisors.	Yes	09/30/2021	
07/10/2019	Diversity and Inclusion Program Manager, HR recruiters, and Diversity Change Agents register as WRP recruiter(s) beginning 6/03/2019.	Yes	09/30/2021	
<b>Fiscal Year</b>	<b>Accomplishments</b>			
2019	<p>CRD collaborated with VA's Office of Vocational Rehabilitation and Employment (VR&amp;E) in Denver to provide a workshop on processes to hire veterans with disabilities. Recruiting relationships were expanded and enhanced with the VA VR&amp;E office in Denver as well as the Center on Employment at the National Technical Institute for the Deaf.</p> <p>Permanent new hire rates for PWD (16.9%) exceeded the inclusion goal for PWD (12%). New hires of PWD in the permanent workforce exceeded the inclusion goal in the following MCOs: Natural Resources/Biological Science (13.3%); Budget Analysis (14.3%); Electrical Engineering (23.1%); and Contracting (14.3%);</p> <p>Participation levels for PWD were higher than the inclusion goal for the following MCOs: Human Resources Management (15.7%) and Contracting (3.6%).</p> <p>Permanent new hire rates for PWTD (2.5%) exceeded the inclusion goal for PWTD (2%). New hires of PWTD in the permanent workforce exceeded the inclusion goal in the following MCOs:</p> <p>Participation levels for PWTD were higher than the inclusion goal for the following MCOs: Human Resources Management (9.1%); Natural Resources/Biological Science (3.4%); Electrical Engineering (3.9%); Contracting (3.7%); High Voltage Electrician (3.0%); Industrial Equipment Mechanic (5.2%), and Electric Power Controlling (2.7%).</p>			

<p><b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b></p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>PWD involuntary separation rate (50% of involuntary separations) exceeded the inclusion rate (14.6%).</p>							
<p><b>STATEMENT OF BARRIER GROUPS:</b></p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p>							
<p><b>BARRIER ANALYSIS:</b></p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p><b>STATEMENT OF IDENTIFIED BARRIER:</b></p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>Barrier analysis began in FY2018 and continued through FY2019.</p>							
<p><b>Objective</b></p>	<p>Increase retention rates for PWD while determining if any discriminatory or unconsciously biased employment practices are contributing to high involuntary separation rates for PWD.</p> <table border="1" data-bbox="483 953 1495 1100"> <tr> <td data-bbox="483 953 646 1010"> <p><b>Date Objective Initiated</b></p> </td> <td data-bbox="646 953 1495 1010"> <p>Jan 30, 2019</p> </td> </tr> <tr> <td data-bbox="483 1016 646 1100"> <p><b>Target Date For Completion Of Objective</b></p> </td> <td data-bbox="646 1016 1495 1100"> <p>Sep 30, 2020</p> </td> </tr> </table>				<p><b>Date Objective Initiated</b></p>	<p>Jan 30, 2019</p>	<p><b>Target Date For Completion Of Objective</b></p>	<p>Sep 30, 2020</p>
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<p><b>Target Date (mm/dd/yyyy)</b></p>	<p><b>Planned Activities</b></p>	<p><b>Sufficient Staffing &amp; Funding (Yes or No)</b></p>	<p><b>Modified Date (mm/dd/yyyy)</b></p>	<p><b>Completion Date (mm/dd/yyyy)</b></p>				
<p>07/31/2019</p>	<p>Conduct in-depth barrier analysis Reclamation-wide. Review workforce statistics, including detailed analysis of involuntary separation data, as well as other information sources (e.g., complaint data; climate assessments; focus groups) to identify triggers and root causes.</p>	<p>Yes</p>	<p>09/30/2023</p>					
<p>01/31/2019</p>	<p>Explore reasons why no exit survey respondents self-identified as PWD. If survey methodology is flawed, implement fix(es) to provide PWD exit survey data.</p>	<p>Yes</p>		<p>01/30/2019</p>				
<p>08/02/2019</p>	<p>Develop action plan based on results of barrier analysis.</p>	<p>Yes</p>	<p>09/30/2023</p>					

Fiscal Year	Accomplishments
2019	<p>The D &amp; I Manager initiated research into potential barriers to employment faced by SEP groups. While analyzing employee exit survey data, the D &amp; I Manager discovered a lack of data from individuals with disabilities. After reviewing the survey design, improvements were adopted into the survey questions addressing this gap as well as updating criteria for individuals with targeted or severe disabilities. After being implemented in January 2019, exit survey data from individuals with disabilities has been collected and analyzed for inclusion with MD-715 2019/2020 reporting and planning.</p> <p>An analysis of Exit Survey responses and 2018 Federal Employee Viewpoint Survey (FEVS) results identified significant trends and perceptions that exist among employees with disabilities. This trend was shared during the Reclamation Diversity and Inclusion Council meeting in March 2019.</p> <p>A review of separation data for FY19 revealed that the rate for involuntary separations for PWD and PWTD was not a trigger. However, for voluntary separations in the permanent workforce, the rate of resignations for PWD was 19.9% and the rate of other separations (e.g. transfers to other federal agencies) was 17.4% compared with the inclusion rate of 14.8%.</p> <p>For voluntary separations in the permanent workforce, the rate of other separations (e.g. transfers to other federal agencies) for PWTD was 4.6%, higher than the inclusion rate of 3.8%.</p>

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

The Civil Rights Division was understaffed in FY19 due to turnover, and thus only able to complete aspects of a complete barrier analysis. Although participation in barrier analysis by Regional EEO Offices was encouraged, assistance did not materialize. Additional analyses will be completed as described in the above action plans.

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

Re-staffing the Civil Rights Division allowed the office to complete portions of barrier analysis and plan out the remainder for upcoming fiscal years.

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.

Target dates have been modified in action plans to reflect more realistic attainment of program improvements.