



EQUAL EMPLOYMENT OPPORTUNITY
(EEO)

**PROGRAM STATUS
REPORT MANAGEMENT
DIRECTIVE (MD)-715**

FISCAL YEAR 2020

REPORT CERTIFIED BY:

David S. Ferriero, *Archivist of the United States*
Erica Pearson, *Director of the Office of Equal Employment Opportunity
Programs*

MD-715 ASSESSMENT CONDUCTED BY:

The Office of Equal Employment Opportunity Programs (NEEO)

REPORT SUBMITTED TO:

The Equal Employment Opportunity Commission (EEOC)

MD-715
Parts A Through E

Part A - Department or Agency Identifying Information

Agency	Second Level Component	Address	City	State	Zip Code (xxxxx)	Agency Code (xxxx)	FIPS Code (xxxx)
National Archives and Records Administration	N/A	8601 Adelphi Road	College Park	MD	20740	NQ00	N/A

Part B - Total Employment

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	2578	47	2625

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

Agency Leadership	Name	Title
Head of Agency	David S. Ferriero	Archivist of the United States

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

EEO Program Staff	Name	Title	Occupational Series (xxxx)	Pay Plan and Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
Principal EEO Director/Official	Erica Pearson	Equal Employment Opportunity Director	0260	GS-15	(301) 837-0939	Erica.pearson@nara.gov
Affirmative Employment Program Manager	Erica Pearson	Equal Employment Opportunity Director	0260	GS-15	(301) 837-0939	Erica.pearson@nara.gov
Complaint Processing Program Manager	Tammie Johnson	Complaints Program Manager	0260	GS-14	(301) 837-1986	Tammie.johnson@nara.gov
Diversity & Inclusion Officer	Erica Pearson	Equal Employment Opportunity Director	0260	GS-15	(301) 837-0939	Erica.pearson@nara.gov
Hispanic Program	N/A	N/A	N/A	N/A	(000) 000-0000	N/A

Manager (SEPM)						
Women's Program Manager (SEPM)	N/A	N/A	N/A	N/A	(000) 000-0000	N/A
Disability Program Manager (SEPM)	Tyrone Gaines	Disability Program Manager	0260	GS-11	(301) 837- 1830	Tyrone.gaines@nara.gov
Special Placement Program Coordinator (Individuals with Disabilities)	Frances Sandbothe	Human Capital Staff	0201	GS-14	(314) 801- 2501	Frances.sandbothe@nara.gov
Reasonable Accommodation Program Manager	Tyrone Gaines	Disability Program Manager	0260	GS-11	(301) 837- 1830	Tyrone.gaines@nara.gov
Anti-Harassment Program Manager	Tanya Shorter	Anti-Harassment Program Manager	0260	GS-13	(301) 837- 3096	Tanya.shorter@nara.gov
ADR Program Manager	Naheed Khandekar	Assistant General Counsel and Director of Resolve	0905	GS-13	(301) 837- 2926	Naheed.khandekar@nara.gov
Compliance Manager	Tammie Johnson	EEO Complaints Manager	0260	GS-14	(301) 837- 1986	Tammie.johnson@nara.gov
Principal MD-715 Preparer	Erica Pearson	Equal Employment Opportunity Director	0260	GS-15	(301) 837- 0939	Erica.pearson@nara.gov
Other EEO Staff	Shaun Walker	EEO Specialist	0260	GS-11	(301) 347-8801	Shaun.walker@nara.gov
Other EEO Staff	Duane Tobias	EEO Specialist	0260	GS-12	(301) 837- 1902	Duane.tobias@nara.gov
Other EEO Staff	Dawn Evans	AEP/D&I Manager	0260	GS-13	(301) 837- 0939	Dawn.evans@nara.gov

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

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

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

Subordinate Component	City	State	Country (Optional)	Agency Code (xxxx)	FIPS Codes (xxxxx)

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

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

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

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

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

Part E.1 - Executive Summary: Mission

The National Archives and Records Administration (NARA) is an independent agency established in 1934 to identify, protect, preserve, and make publicly available the historically valuable records of all three branches of the Federal government. NARA manages the Federal government's archives, administers a system of Presidential Libraries, operates museums, conducts education and public programs, provides oversight of government-wide records management activities, and provides temporary storage of other agencies' records on their behalf. NARA publishes the Federal Register and makes grants through the National Historical Publications and Records.

Commission. NARA provides for the appropriate declassification of classified national security information, mediating Freedom of Information Act disputes, and overseeing agency actions regarding classified and controlled, unclassified information. As the nation's records keeper, NARA's mission is to drive openness, cultivate public participation, and to strengthen our nation's democracy through public access to Federal government records of historical value.

EEOC FORM 715-01 PART F	U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT
--	---

**CERTIFICATION of ESTABLISHMENT of CONTINUING
EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS**

I, Erica Pearson, EEO Director GS-0260-15 am the

(Insert name above) (Insert official title/series/grade above)

Principal EEO Director/Official for National Archives and Records Administration
(Insert Agency/Component Name above)

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

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

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

Erica Pearson

7/29/2021

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

Date

[Handwritten Signature]

29 July 2021

Signature of Agency Head or Agency Head Designee

Date

MD-715 - PART G

Agency Self-Assessment Checklist

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

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





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

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

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



FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

MD-715 - PART G Agency Self-Assessment Checklist



Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.			
 Compliance Indicator		Measure Met? (Yes/No/NA)	Comments
 Measures			
A.1 – The agency issues an effective, up-to-date EEO policy statement.			
A.1.a	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency’s commitment to EEO for all employees and applicants? If “yes”, please provide the annual issuance date in the comments column. [see MD-715, II(A)]	Yes	August 4, 2020
A.1.b	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]	Yes	
A.2 – The agency has communicated EEO policies and procedures to all employees.			
 Compliance Indicator		Measure Met? (Yes/No/NA)	Comments
 Measures			
A.2.a	Does the agency disseminate the following policies and procedures to all employees:	Yes	
A.2.a.1	Anti-harassment policy? [see MD 715, II(A)]	Yes	
A.2.a.2	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	No	
A.2.b	Does the agency prominently post the following information throughout the workplace and on its public website:		
A.2.b.1	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]	Yes	
A.2.b.2	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	Yes	
A.2.b.3	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	Yes	https://www.archives.gov/global-pages/accessibility New procedures were developed in FY2021
A.2.c	Does the agency inform its employees about the following topics:		
A.2.c.1	EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often.	Yes	New Employee Orientation

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

			biweekly and Supervisory training as needed
A.2.c.2	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	Yes	New Employee Orientation biweekly and Supervisory training as needed
A.2.c.3	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	Yes	New Employee Orientation biweekly and Supervisory training as needed
A.2.c.4	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.	Yes	New Employee Orientation biweekly and Supervisory training as needed
A.2.c.5	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] If “yes”, please provide how often.	Yes	New Employee Orientation biweekly and Supervisory training as needed





 Compliance Indicator	A.3 – The agency assesses and ensures EEO principles are part of its culture.	Measure Met? (Yes/No/NA)	Comments
 Measures			New Compliance Indicator
A.3.a	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section.	Yes	-Supervisory critical element -Outstanding critical element
A.3.b	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	Yes	

Essential Element B: INTEGRATION OF EEO INTO THE AGENCY’S STRATEGIC MISSION
This element requires that the agency’s EEO programs are structured to maintain a workplace that is free from discrimination and support the agency’s strategic mission.

 Compliance Indicator	B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.	Measure Met? (Yes/No/NA)	Comments
 Measures			
B.1.a	Is the agency head the immediate supervisor of the person (“EEO Director”) who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes	
B.1.a.1	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If “yes,” please provide the title of the agency head designee in the comments.	N/A	

EEOC FORM
U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

B.1.a.2	Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes	
B.1.b	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]	Yes	
B.1.c	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comments column.	Yes	
B.1.d	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]	Yes	
 Compliance Indicator  Measures	B.2 – The EEO Director controls all aspects of the EEO program.	Measure Met? (Yes/No/NA)	Comments New Compliance Indicator
B.2.a	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)]	Yes	
B.2.b	Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR §1614.102(c)(4)]	Yes	
B.2.c	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes	
B.2.d	Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes	
B.2.e	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	Yes	
B.2.f	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]	Yes	
B.2.g	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2) and (c)(3)]	N/A	
 Compliance Indicator  Measures	B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.	Measure Met? (Yes/No/NA)	Comments
B.3.a	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues,	Yes	





EEOC FORM
U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT





	including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]		
B.3.b	Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.	Yes	Goal 1: Connecting with Customers Goal 2: Build Our Future Through Our People
Compliance Indicator			
Measures			
B.4	The agency has sufficient budget and staffing to support the success of its EEO program	Measure Met? (Yes/No/NA)	Comments
B.4.a	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:		
B.4.a.1	to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	Yes	
B.4.a.2	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	No	
B.4.a.3	to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	Yes	
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.	Yes	
B.4.a.5	to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]	No	
B.4.a.6	to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	Yes	
B.4.a.7	to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section.	No	EEO Complaint tracking system
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]	No	
B.4.a.9	to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes	
B.4.a.10	to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]	Yes	

EEOC FORM
U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT



B.4.a.11	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	Yes	
B.4.b	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	Yes	
B.4.c	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Yes	
B.4.d	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?	Yes	
B.4.e	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	Yes	
 Compliance Indicator  Measures	B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.	Measure Met? (Yes/No/NA)	Comments New Indicator
B.5.a	Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:		
B.5.a.1	EEO Complaint Process? [see MD-715(II)(B)]	No	
B.5.a.2	Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]	No	
B.5.a.3	Anti-Harassment Policy? [see MD-715(II)(B)]	Yes	
B.5.a.4	Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	Yes	
B.5.a.5	ADR, with emphasis on the federal government’s interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	Yes	
 Compliance Indicator  Measures	B.6 – The agency involves managers in the implementation of its EEO program.	Measure Met? (Yes/No/NA)	Comments New Indicator
B.6.a	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	No	
B.6.b	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	No	
B.6.c	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	No	
B.6.d	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR § 1614.102(a)(5)]	No	

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY			
This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency's EEO Program and Plan.			
 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
C.1.a	C.1 – The agency conducts regular internal audits of its component and field offices.	No	
	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.		
C.1.b	C.1 – The agency conducts regular internal audits of its component and field offices.	No	
	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.		
C.1.c	C.1 – The agency conducts regular internal audits of its component and field offices.	N/A	
	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]		
 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments New Indicator
C.2.a	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Yes	
	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]		
C.2.a.1	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Yes	
	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]		
C.2.a.2	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Yes	
	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]		
C.2.a.3	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Yes	
	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]		
C.2.a.4	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Yes	
	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [see Enforcement Guidance, V.C.]		
C.2.a.5	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Yes	
	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <i>Complainant v. Dep't of Veterans Affairs</i> , EEOC Appeal No. 0120123232 (May 21, 2015); <i>Complainant v. Dep't of Defense (Defense Commissary Agency)</i> , EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the		



EEOC FORM
U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

	percentage of timely-processed inquiries in the comments column.		
C.2.a.6	Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR 1614.203(d)(2)]	Yes	
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)]	Yes	
C.2.b.1	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)]	Yes	
C.2.b.2	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	No	Hired an EEO Supervisor at the close of FY2020 to supervise the Disability Program Manager
C.2.b.3	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR 1614.203(d)(1)(ii)(B)]	Yes	
C.2.b.4	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR 1614.203(d)(3)(i)(M)]	No	New procedures were developed in FY2021
C.2.b.5	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed requests in the comments column.	No	82% Timely Processed
C.2.c	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]	Yes	
C.2.c.1	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column.	Yes	
 Compliance Indicator  Measures	C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.	Measure Met? (Yes/No/NA)	Comments New Indicator
C.3.a	Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	Yes	
C.3.b	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:		
C.3.b.1	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]	Yes	

EEOC FORM
U.S. Equal Employment Opportunity Commission



FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT



C.3.b.2	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	Yes	
C.3.b.3	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	Yes	
C.3.b.4	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	Yes	
C.3.b.5	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	Yes	
C.3.b.6	Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(8)]	Yes	
C.3.b.7	Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]	Yes	
C.3.b.8	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]	Yes	
C.3.b.9	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	Yes	
C.3.c	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	Yes	
C.3.d	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	Yes	
 Compliance Indicator  Measures	C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.	Measure Met? (Yes/No/NA)	Comments
C.4.a	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	Yes	
C.4.b	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]	No	
C.4.c	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	Yes	
C.4.d	Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	Yes	

EEOC FORM
U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

C.4.e	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:		
C.4.e.1	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	Yes	
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	Yes	
C.4.e.3	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	Yes	
C.4.e.4	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	No	
C.4.e.5	Assist in preparing the MD-715 report? [see MD-715, II(C)]	Yes	







 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
	C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.		
C.5.a	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)]	Yes	
C.5.b	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Yes	
C.5.c	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [see MD-715, II(C)]	Yes	

 Compliance Indicator  Measures		Measure Met? (Yes/No/NA)	Comments
	C.6 – The EEO office advises managers/supervisors on EEO matters.		
C.6.a	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If “yes”, please identify the frequency of the EEO updates in the comments column.	Yes	Monthly
C.6.b	Are EEO officials readily available to answer managers’ and supervisors’ questions or concerns? [see MD-715 Instructions, Sec. I]	Yes	

Essential Element D: PROACTIVE PREVENTION
This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.



EEOC FORM
U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

 Compliance Indicator  Measures	D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.	Measure Met? (Yes/No/NA)	Comments
D.1.a	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	Yes	
D.1.b	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I]	No	
D.1.c	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]	No	
 Compliance Indicator  Measures	D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	Measure Met? (Yes/No/NA)	Comments New Indicator
D.2.a	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	Yes	
D.2.b	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	Yes	
D.2.c	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	Yes	
D.2.d	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] If “yes”, please identify the data sources in the comments column.	No	
 Compliance Indicator  Measures	D.3 – The agency establishes appropriate action plans to remove identified barriers.	Measure Met? (Yes/No/NA)	Comments New Indicator
D.3.a.	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	No	



EEOC FORM
U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

D.3.b	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	No	
D.3.c	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	No	
 Compliance Indicator	D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.	Measure Met? (Yes/No/NA)	Comments New Indicator
 Measures			
D.4.a	Does the agency post its affirmative action plan on its public website? [see 29 CFR 1614.203(d)(4)] Please provide the internet address in the comments.	Yes	
D.4.b	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]	Yes	
D.4.c	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]	Yes	
D.4.d	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR 1614.203(d)(7)(ii)]	Yes	



Essential Element E: EFFICIENCY

This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency’s EEO programs and an efficient and fair dispute resolution process.

 Compliance Indicator	E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.	Measure Met? (Yes/No/NA)	Comments
 Measures			
E.1.a	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	No	
E.1.b	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	Yes	
E.1.c	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(l)?	Yes	
E.1.d	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(l)? If so, please provide the average processing time in the comments.	No	72% were within the 60-day time frame
E.1.e	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?	Yes	





EEOC FORM
U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

E.1.f	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	No	
E.1.g	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	No	
E.1.h	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	No	
E.1.i	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?	Yes	
E.1.j	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comments column.	Yes	The EEO Office notifies the contractor of any modifications necessary and provides them with a timeframe for corrections
E.1.k	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes	
E.1.l	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Yes	
 Compliance Indicator  Measures	E.2 – The agency has a neutral EEO process.	Measure Met? (Yes/No/NA)	Comments Revised Indicator
E.2.a	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)]	Yes	
E.2.b	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If "yes", please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.	Yes	The attorney that NGC assigns to conduct the review of each ROI will not be assigned to handle any litigation related to the complaint. The attorney is at Building A2 in College Park, MD and resides in the Office of General Counsel
E.2.c	If the EEO office relies on the agency's defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]	Yes	







EEOC FORM
U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

E.2.d	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]	Yes	
E.2.e	If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)]	Yes	
 Compliance Indicator  Measures	E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.	Measure Met? (Yes/No/NA)	Comments
E.3.a	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	Yes	
E.3.b	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	Yes	
E.3.c	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	Yes	
E.3.d	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Yes	
E.3.e	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	Yes	
E.3.f	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Yes	
 Compliance Indicator  Measures	E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.	Measure Met? (Yes/No/NA)	Comments
E.4.a	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:		
E.4.a.1	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	No	
E.4.a.2	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	Yes	
E.4.a.3	Recruitment activities? [see MD-715, II(E)]	Yes	
E.4.a.4	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]	Yes	
E.4.a.5	The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]	Yes	
E.4.a.6	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious	Yes	



EEOC FORM
U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

	Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]		
E.4.b	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Yes	
 Compliance Indicator  Measures	E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.	Measure Met? (Yes/No/NA)	Comments
E.5.a	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	Yearly using the MD-715, Ad Hoc meetings, and during recurring meetings with staff
E.5.b	Does the agency review other agencies’ best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	Small Agency Council-EEO Directors Meeting-Ad Hoc meetings/surveys with other agencies
E.5.c	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	Yes	
Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.			
 Compliance Indicator  Measures	F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.	Measure Met? (Yes/No/NA)	Comments
F.1.a	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	Yes	
F.1.b	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	Yes	
F.1.c	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes	
F.1.d	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Yes	
F.1.e	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	Yes	
 Compliance Indicator  Measures	F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.	Measure Met? (Yes/No/NA)	Comments Indicator moved from E-III Revised

EEOC FORM
U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

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

EEOC FORM
 U.S. Equal Employment Opportunity Commission
 FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

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

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

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

1. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
A.2.a.2	The agency did not communicate reasonable accommodation procedures to all employees.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2020	Communicate reasonable accommodation procedures.	09/30/2021		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Communicate reasonable accommodation procedures.	Yes		09/30/2021

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	Working with the Policy office to publish and review reasonable accommodation procedures.

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

2. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
B.4.a.2	The agency does not have sufficient budget or staffing to support the success of its EEO program to conduct a thorough barrier analysis of its workforce.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2020	Hire Affirmative Employment Supervisor.	09/30/2021		09/28/2020

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Hire an Affirmative Employment Supervisor.	Yes		09/28/2020

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	Hired an Affirmative Employment Supervisor on 09/28/2020.

3. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
B.4.a.5	The agency does not have sufficient budget and staffing to support the success of its EEO program to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices.

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/31/2018	Conduct EEO program field audits.	09/30/2020	09/30/2022	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Staff	EEO Staff	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2022	Identify audit criteria and partner with Field Offices to develop a schedule.	No		

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	Hired three additional staff members to support the EEO Program Office staffing needs. <ul style="list-style-type: none"> Affirmative Employment Supervisor (Hired 09/2020) EEO Specialist (Hired 07/2020) EEO Counselor (Hired 07/2020)

4. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
B.4.a.7	The agency does not have sufficient budget and staffing to support the success of its EEO program to maintain accurate data collection and tracking systems for the following types of data: complaint tracking system.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

04/30/2017	Identify and fund an EEO Complaint Tracking System.	09/30/2017		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2017	Secure an EEO Complaint Tracking System for the EEO Office.	No	09/30/2023	

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	Working closely with Information Services to obtain an EEO Complaint Tracking System. The proposed implementation date is 2023 if funding is approved.

5. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
B.4.a.8	The agency does not have sufficient budget and staffing to support the success of its EEO program to effectively administer its special emphasis programs.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/31/2018	Develop Special Emphasis Program (SEP).	09/30/2020	09/30/2022	

Responsible Official(s)

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
EEO Staff	EEO Staff	Yes
Senior Leaders	Senior Leaders	No

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Submit SEP proposal to senior leadership for approval.	Yes	09/30/2021	09/13/2019
09/30/2020	Market the SEP program to NARA management and staff.	No	09/30/2022	
09/30/2020	Select and train SEP.	No	09/30/2022	

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	Hired Affirmative Employment Supervisor.

5. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
B.5.a.1	All managers and supervisors have not received training on their responsibilities under the following areas under the agency EEO program: EEO complaint process.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/01/2020	Add EEO complaint process training to annual required training.	09/30/2021		

Responsible Official(s)

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Complaints Manager	Tammie Johnson	Yes
EEO Director	Erica Pearson	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2021	Train all managers and supervisors on the EEO Complaint process.	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	Developed training for all managers and supervisors.

6. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
B.5.a.2	All managers and supervisors have not received training on their responsibilities under the following areas under the agency EEO program: Reasonable Accommodation Procedures.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/01/2020	Add Reasonable Accommodation training to annual required training.	09/30/2021		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
Disability Program Manager	Tyrone Gaines	Yes

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2021	Train all managers and supervisors on Reasonable Accommodation Procedures.	Yes		
09/30/2020	Increase outreach, recruitment, hiring, and retention of PWD.	Yes	09/30/2022	

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	This training is currently being reviewed and will be implemented in FY21.

7. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
B.6.a	Senior managers are not involved in the implementation of Special Emphasis Programs.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/31/2018	Coordinate Senior Management involvement on the implementation of the SEP.	09/30/2020	09/30/2022	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
EEO Staff	EEO Staff	Yes
Senior Leaders	Senior Leaders	No

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Market the SEP program to NARA's management and staff.	No	09/30/2022	
09/30/2020	Select and Train Special Emphasis Program Managers (SEPM).	No	09/30/2022	
09/30/2020	Advance NARA's workforce knowledge about SEPM duties.	No	09/30/2022	

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	Reviewed SEP proposal with the Human Resource Working Group.

8. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
B.6.b	Senior managers do not participate in the barrier analysis process.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/31/2018	Develop a barrier analysis process with participation roles for senior leaders.	09/30/2020	09/30/2022	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
Senior Leaders	Senior Leaders	No

Planned Activities Toward Completion of Objective

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Develop MD-715 roles and responsibilities.	No	09/30/2022	
09/30/2020	Market the MD-715 Report to NARA's management and staff.	No	09/30/2022	
09/30/2020	Develop action plans with stakeholder concurrence.	No	09/30/2022	

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	

9. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
B.6.c	Senior managers do not assist in developing agency EEO action plans.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/31/2018	Create roles for senior leaders to assist with developing barrier analysis action plans.	09/30/2020	09/30/2022	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
Senior Leaders	Senior Leaders	No

Planned Activities Toward Completion of Objective

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Monitor and assess all plan implementation and for measurable results.	No	09/30/2022	
09/30/2020	Develop action plans with stakeholders concurrence.	No	09/30/2022	

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	

10. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
B.6.d	Senior managers do not implement EEO action plans and incorporate the EEO action plan Objectives into agency strategic plan.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/13/2018	Explore opportunities to incorporate EEO action plans into Agency Strategic plans.	09/30/2020	09/30/2022	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
Senior Leaders	Senior Leaders	No

Planned Activities Toward Completion of Objective

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2022	Establish partnerships with senior leaders to assist in incorporating EEO action plans into Agency Strategic Plan.	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	

11. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
C.1.a	The agency does not regularly assess its component and field offices for possible EEO program deficiencies.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/31/2018	Conduct field audits yearly.	09/30/2021	09/30/2022	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
EEO Staff	EEO Staff	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2021	Develop partnerships with field offices.	Yes	09/30/2022	
09/30/2021	Develop field office assessment criteria.	Yes	09/30/2022	

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	

12. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
C.1.b	The agency does not regularly assess its component and field offices on their efforts to remove barriers from the workplace.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/31/2018	Conduct barrier analysis on field offices.	09/30/2021	09/30/2022	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Staff	EEO Staff	Yes
EEO Director	Erica Pearson	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2021	Develop partnerships with field offices.	Yes	09/30/2022	
09/30/2021	Develop field office assessment criteria.	Yes	09/30/2022	

Report of Accomplishments

Fiscal Year	Accomplishments

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

FY20	
------	--

13. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
C.2.b.2	The agency has not established a firewall between the Reasonable Accommodation Program Manager and the EEO Director.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/01/2019	Establish a wall between the EEO Director and RA Program.	09/30/2021		09/28/2020

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2021	Hire an Affirmative Employment Supervisor.	Yes		09/28/2020

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	Hired an Affirmative Employment Supervisor (09/28/20).

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

14. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
C.2.b.4	The reasonable accommodation procedures do not clearly state the agency should process the request within a maximum amount of time (e.g.30 days).

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/01/2020	Clearly state maximum RA processing time in updated RA procedures.	09/30/2021		01/05/2021

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2021	Revise NARA 303, RA Procedures and submit to EEOC for approval.	Yes		01/05/2021
09/30/2020	Publish to the internal/public webpage.	Yes		09/11/2019

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	Revised NARA 303 RA Procedures to be compliant on 01/05/2021.

15. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
C.2.b.5	The agency does not process all accommodation requests within the time frame set forth in its reasonable accommodation procedures.

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/01/2020	Process all accommodation requests within the timeframe set forth in the RA procedures.	09/30/2021		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2021	Revise RA Procedures and submit to EEOC for approval.	Yes		01/04/2021
09/30/2021	Train all staff on the RA Process.	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	

16. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
C.4.b	The agency has not established timetables/schedules review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

10/30/2019	Establish timetables or ticker systems to review NARA policy procedures for barriers.	09/30/2020	09/30/2022	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
Human Capital Staff	Human Capital Staff	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Reinvigorate the partnerships with Human Capital Staff to identify barriers to promotion, employee recognition, and employee development programs.	No	09/30/2022	

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	We reviewed the Awards and Recognitions policy for barriers. As a result, we changed our award policy to issue performance awards that are now the same for all grades.

17. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
C.4.e.4	The EEO office does not collaborate with the Human Capital Office to: identify and remove barriers to equal opportunity in the workplace.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)

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

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

10/31/2018	Collaborate with the Human Capital Office to identify policies, practices, or procedures with barriers to employment.	09/30/2020	09/30/2022	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
Human Capital Staff	Human Capital Staff	No

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Explore more opportunities to communicate about policy, actions, and decisions.	No	09/30/2022	
09/30/2020	Collaborate with Human Capital to review barriers using a schedule.	No	09/30/2022	

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	Human Capital and EEO continue to explore different ways to collaborate on outreach and recruiting initiatives that are aimed at building a diverse pipeline for the next generation of archivists and other mission critical occupations. Initiatives include partnering with professional organizations, enhancing our partnership with VA's compensated work therapy program, building out our support to managers, supervisors, and work units to better acclimate staff to work underrepresented groups and with persons with targeted disabilities.

18. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency

EEOC FORM
U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

D.1.b	The agency does not regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs.
--------------	--

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/31/2019	Collect and review data consistently.	09/30/2020	09/30/2022	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
Human Capital Staff	Human Capital Staff	No

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Explore more opportunities to collect and review data.	No	09/30/2022	

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	

19. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
D.1.c	The agency does not conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities.

Objective(s) and Dates for EEO Plan

EEOC FORM
U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2019	Develop questions for PWD exit interviews.	09/30/2020	09/30/2021	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
Human Capital Staff	Human Capital Staff	No
Disability Program Manager	Tyrone Gaines	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Develop strategies to track exit interview data.	Yes	09/30/2022	
09/30/2020	Implement the Affirmative Action Plan for Hiring and Retention of Individuals with Disabilities.	Yes	09/30/2022	

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	Reviewed the Affirmative Action Plan with stakeholders.

20. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
D.2.d	The agency does not regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs.

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2019	Develop stronger strategies to collect and review data consistently.	09/30/2020	09/30/2022	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
Human Capital Staff	Human Capital Staff	No

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Identify more opportunities to collect and review data.	No	09/30/2022	

Report of Accomplishments

Fiscal Year	Accomplishments

21. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
D.3.a	The agency does not effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

09/30/2019	Conduct barrier analysis.	09/30/2020	09/30/2022	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
Human Capital Staff	Human Capital Staff	No

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Explore opportunities to communicate about policy, actions, and decisions.	No	09/30/2022	

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	As more EEO staff were hired we began collaborating with Human Capital.

22. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
D.3.b	The agency did not identify one or more barriers during the reporting period.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2020	Conduct a barrier analysis to establish an agency baseline.	09/30/2021		

Responsible Official(s)

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
Human Capital Staff	Human Capital Staff	No

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Implement the MD-715 to include data analysis.	No	09/30/2022	
09/30/2020	Track results of analysis and plans.	No	09/30/2022	

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	Hired an Affirmative Employment Supervisor (09/28/2020).

23. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
D.3.c	The agency did not periodically review the effectiveness of the plans.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2018	Conduct barrier analysis.	09/30/2020	09/30/2022	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
Human Capital Staff	Human Capital Staff	No

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2019	Conduct barrier analysis.	No	09/30/2022	

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	

24. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
E.1.a	The agency did not timely provide EEO counseling.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2020	Timely provide EEO Counseling pursuant to 29 CFR;1614.105.	09/30/2022		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Complaints Manager	Tammie Johnson	Yes
EEO Director	Erica Pearson	Yes

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Funding & Staffing?	Modified Date	Completion Date (mm/dd/yyyy)

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(mm/dd/yyyy)		(Yes or No)	(mm/dd/yyyy)	
09/30/2020	Hire additional EEO staff to support timely EEO counseling.	Yes		07/30/2020
09/30/2023	Acquire a tracking system.	No		

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	Hired three additional EEO Staff to support the EEO Office.

25. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
E.1.d	The agency did not issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days).

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2020	Timely issue EEO accept/dismiss letters pursuant to MD-110.	09/30/2022		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Complaints Manager	Tammie Johnson	Yes
EEO Director	Erica Pearson	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Hire additional EEO Staff to support the processing of accept/dismiss letters.	Yes		07/30/2020

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

09/30/2023	Acquire a tracking system.	No		
------------	----------------------------	----	--	--

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	The EEO Office hired an EEO Specialist in July 2020, targeting improved the timeframe for acceptance/dismissals.

26. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
E.1.f	The agency did not timely complete investigations, pursuant to 29 CFR.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2020	Timely complete investigations pursuant to 29 CFR.	09/30/2022		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Complaints Manager	Tammie Johnson	Yes
EEO Director	Erica Pearson	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Hire additional EEO staff to support the processing of investigations.	Yes		07/30/2020
09/30/2023	Acquire a tracking system.	No		

Report of Accomplishments

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Fiscal Year	Accomplishments
FY20	

27. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
E.1.g	The agency did not notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2020	Timely notify complainants of investigation completion and right to request a hearing pursuant to 29 CFR.	09/30/2021		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Complaints Manager	Tammie Johnson	Yes
EEO Director	Erica Pearson	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2022	Hire additional EEO staff to support formal complaint processing.	Yes		
09/30/2023	Acquire a tracking system.	No		

Report of Accomplishments

Fiscal Year	Accomplishments

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

FY20	The EEO Office hired an EEO Specialist in July 2020 to monitor the cases at the investigative stage including providing the notice of rights in a timely manner.
------	--

28. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
E.1.h	The agency did not timely issue the final agency decision, pursuant to 29 CFR.

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2018	Timely issue Final Agency Decisions pursuant to 29 CFR.	09/30/2022		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Complaints Manager	Tammie Johnson	Yes
EEO Director	Erica Pearson	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2022	Monitor Final Agency Decisions completion for timeliness.	Yes		

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	The EEO Office hired an EEO Specialist in July 2020 to assist in working toward the timely processing of FADs. In addition, a work plan was developed to assist in moving FADs faster.

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

--	--

29. Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
E.4.a.1	The agency does not have effective and accurate data collection systems in place to evaluate its EEO program: Complaint activity

Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2015	Procure an effective and accurate data collection system to track all EEO complaints.	09/30/2018	09/30/2023	

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes

Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2018	Identify and purchase an EEO complaint tracking system for the EEO office.	Yes	09/30/2023	
09/30/2018	Train staff on the EEO complaint tracking system.	Yes	09/30/2023	

Report of Accomplishments

Fiscal Year	Accomplishments
FY20	The EEO Office was notified that it is on schedule to obtain a tracking system in 2023. Staff will be trained at that time.

MD-715 – Part I Agency EEO Plan to Eliminate Identified Barriers

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

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

Hispanic or Latino Males - HM
Hispanic or Latino Females - HF
White Males - WM
White Females - WF
Black Males - BM
Black Females - BF
Asian Males - AM
Asian Females - AF
American Indian or Alaska Native Males - AIANM
American Indian or Alaska Native Females - AIANF
Native Hawaiian or Other Pacific Islander Males - NHOPIM
Native Hawaiian or Other Pacific Islander Females - NHOPIF
Two or More Races Males - TMM
Two or More Races Females - TMF

1. Statement of Condition That Was a Trigger for a Potential Barrier:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Underrepresentation of HM and HF New Hires in the Permanent Workforce	A1	HM Males new hires represent 2.96% which is below their CLF benchmark of 5.17%. HF new hires represent 4.07% which is below their CLF benchmark of 4.79%. HM represents 1.63% of the permanent which is below their CLF 5.17%. HF represents 1.55% of the permanent workforce which is below their CLF 4.79%.

EEO Group(s) Affected by Trigger

EEO Group(s)
HM
HF

Barrier(s) Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	(Table A1) Total Workforce by Race, Ethnicity, and Sex
Complaint Data (Trends)	No	

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	No	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	No	

Status of Barrier(s) Analysis Process

Barrier(s) Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
No	No

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
Underrepresentation of HM and HF in the Total Workforce

Objective(s) and Date(s) for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Collaborate with Human Capital and hiring officials to determine strategies to enhance the recruitment efforts.	10/01/2021	10/01/2022	Yes		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
Human Capital Staff	Human Capital Staff	Yes
Senior Leaders	Senior Leaders	Yes

Planned Activities Toward Completion of Objective(s)

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

10/01/2021	Collaborate with Human Capital and hiring officials on recruitment efforts.	10/01/2022	
------------	---	------------	--

Report of Accomplishment(s)

Fiscal Year	Accomplishment(s)

2. Statement of Condition That Was a Trigger for a Potential Barrier:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Underrepresentation in Awards and Recognition for Total Workforce Males	A9	Total Workforce Males represent 46.27% of the total time-off awards which is below their CLF benchmark of 50.12%.

EEO Group(s) Affected by Trigger

EEO Group(s)
HM
WM
BM
AM
NHOPIM
AIANM
TMM

Barrier(s) Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	(Table A9) Employee Recognition and Awards by Race, Ethnicity, and Sex
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	No	

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	No	

Status of Barrier(s) Analysis Process

Barrier(s) Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
No	No

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
Underrepresentation of Total Workforce Males in the Awards and Recognition Category

Objective(s) and Date(s) for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Increase awards distribution for Total Workforce Males.	10/01/2021	10/01/2022	Yes		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
Human Capital Staff	Human Capital Staff	Yes
Senior Leaders	Senior Leaders	Yes

Planned Activities Toward Completion of Objective(s)

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
10/01/2021	Promote awards and recognition opportunities to senior leaders.	10/01/2022	

Report of Accomplishment(s)

Fiscal Year	Accomplishment(s)

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

--	--

3. Statement of Condition That Was a Trigger for a Potential Barrier:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data	A-4 Participation Rates for SES	<ul style="list-style-type: none"> HM, HF, AM, NHOPIM, NHOPIF, AIANM, AIANF and TMM and TMF are not represented in the SES population. WM and WF represent 45.83% and 33.33% of the SES population in comparison to their respective participation in the workforce at 34.29% and 28.65%. NARA has one BM and three BF SES, who each represent 4.17% and 12.50% of the SES population in comparison to their respective participation in the workforce at 11.73% and 16.84%. NARA also has one AF SES, who represents 4.17% of the SES population. Their participation in the workforce is 1.98%.

EEO Group(s) Affected by Trigger

EEO Group
HM
HF
BM
BF
WF
AM
AIANM
AIANF
NHOPI
NHOPIF
TMM
TMF

Barrier(s) Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	(Table A-4) Participation Rates for SES

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	No	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	No	

Status of Barrier(s) Analysis Process

Barrier(s) Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
No	No

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
Lack of RNO participation in the SES population

Objective(s) and Date(s) for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Consult with external third parties for recruitment and retention strategies for those groups that are not represented in the SES population to identify potential barriers.	10/01/2019	10/31/2022	Yes		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
Human Capital Staff	Human Capital Staff	Yes
Senior Leaders	Senior Leaders	Yes

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Planned Activities Toward Completion of Objective(s)

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Review and analyze the GS-14 and GS-15 SES applicant pool to determine if any barriers exist.	09/30/2022	

Report of Accomplishment(s)

Fiscal Year	Accomplishment(s)

4. Statement of Condition That Was a Trigger for a Potential Barrier:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
PWD and PWTD New Hire Participation across MCO	B6/B7	<p>All MCO are below the federal benchmark of 12% for PWD applicants that were identified, applied, and qualified except 0301-Miscellaneous Programs and Administration at 12.40% and 12.98%.</p> <p>All MCO are below the federal benchmark of 12% for PWD applicants that were selected.</p> <p>All MCO are above the federal benchmark of 2% for PWTD applicants that were identified, applied, and qualified.</p> <p>All MCO are below the federal benchmark of 2% for PWTD applicants that were selected except for 1421-Archives Technicians at 5.71%.</p>

EEO Group(s) Affected by Trigger

EEO(s) Group
Persons With Disability
Persons With Targeted Disability

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Barrier(s) Analysis Process

Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	(Table B6) Mission Critical Occupations by Disability, (Table B7) Applicant flow – New Hires for Major Occupations
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	No	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	No	

Status of Barrier(s) Analysis Process

Barrier(s) Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
No	No

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
PWD and PWTB are not being selected although they have representation as identified, applied, and qualified applicants

Objective(s) and Date(s) for EEO Plan

Objective(s)	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Publish the updated Disability Strategic Plan.	02/28/2018	09/30/2022	Yes		
Develop Schedule A fact sheet for supervisors.	01/31/2020	09/30/2022	Yes		
Collaborate with Human Capital to conduct training on the different hiring authorities	10/01/2021	09/30/2022	Yes		

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

(Schedule A and others) that are available for hiring officials to use for PWD and PWTD.					
Collaborate with Human Capital and disABILITY EAG on advertising and awareness of hiring authorities to use to hire PWD and PWTD.	10/01/2021	09/30/2022	Yes		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
Human Capital Staff	Human Capital Staff	Yes
Senior Leaders	Senior Leaders	Yes

Planned Activities Toward Completion of Objective(s)

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2022	Review and publish the Disability Strategic Plan.		
09/30/2022	Develop Schedule A fact sheet for supervisors.		
09/30/2022	Collaborate with Human Capital to conduct training on the different hiring authorities (Schedule A and others) that are available for hiring officials to use for PWD and PWTD.		
09/30/2022	Collaborate with Human Capital and disABILITY EAG on advertising and awareness of hiring authorities to use to hire PWD and PWTD.		

Report of Accomplishment(s)

Fiscal Year	Accomplishment(s)

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

5. Statement of Condition That Was a Trigger for a Potential Barrier:

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
PWD and PWTD Voluntarily and Involuntarily Separations	B1-2	PWD represents 4.13% and PWTD represents 13.75% of voluntary separations. PWD and PWTD are voluntarily leaving the agency at a higher rate than PWOD at 3.70%. PWD represents 6.34% and PWTD represents 7.50% of involuntary separations. PWD and PWTD are involuntarily leaving the agency at a higher rate than PWOD at 4.83%.

EEO Group(s) Affected by Trigger

EEO(s) Group
Persons With Disability
Persons With Targeted Disability

Barrier(s) Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	(Table B1-2) Total Workforce by Disability Status
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	No	

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	No	

Status of Barrier(s) Analysis Process

Barrier(s) Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)
No	No

Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
PWD and PWTD are voluntarily and involuntarily separating from the agency at a higher rate than PWOD

Objective(s) and Date(s) for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Establish an exit interview process for all separating personnel that includes an identifying question regarding disability status, reason for separating from the agency and track all results.	10/01/2021	09/30/2022	Yes		

Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes

EEOC FORM
U.S. Equal Employment Opportunity Commission
FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Human Capital Staff	Human Capital Staff	Yes
Senior Leaders	Senior Leaders	Yes

Planned Activities Toward Completion of Objective(s)

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2022	Collaborate with Human Capital to establish an Exit Interview process.		

Report of Accomplishment(s)

Fiscal Year	Accomplishment(s)

MD-715 – Part J

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

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 C.F.R. § 1614.203(d)(7)) requires agencies to establish specific numerical goals for increasing the participation of persons with reportable and 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) | Yes | No X |
| b. Cluster GS-11 to SES (PWD) | Yes X | No |

Table B4P: General Schedule (GS) Grades by Disability

Cluster GS-1 to GS-10

NARA's PWD = 18.85%

NARA has no PWD representation at the GS-10 grade level; however there are three GS-10s in the workforce.

NARA's PWD is well represented in the GS-1 – GS-10 cluster at 18.85%. This is an increase compared to 2019 at 12.51%.

Cluster GS-11 to SES

NARA's PWD = 10.13%

NARA's GS-11 to SES PWD are below the 12% benchmark at 10.13%. This is an increase compared to 2019 at 7.39%.

NARA's GS-11 to SES PWD is represented at GS-11 (11.50%); GS-12 (11.62%); GS-13 (10.26%); GS-14 (8.70%); GS-15 (5.49%); and SES (4.17%) which are all below the 12% benchmark.

EEOC FORM
U.S. Equal Employment Opportunity Commission
 Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

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

- | | | |
|---------------------------------|-----|--|
| a. Cluster GS-1 to GS-10 (PWTD) | Yes | No <input checked="" type="checkbox"/> |
| b. Cluster GS-11 to SES (PWTD) | Yes | No <input checked="" type="checkbox"/> |

Cluster GS-1 to GS-10
 NARA's PWTD = 4.33%
 NARA's PWTD is well represented at the GS-1 to GS-10 at 4.33%. This is an increase compared to 2019 at 3.29%.

Cluster GS-11 to SES
 NARA's PWTD = 2.06%
 NARA's GS-11 to SES PWTD is above the 2% federal benchmark at 2.06%. This is an increase compared to 2019 at 1.94%
 NARA's GS-11 to SES PWTD is represented at GS-11 (1.50%); GS-12 (1.52%); GS-14 (1.93%); GS-15 (1.10%); and SES (0.00%) which are all below the 2% federal benchmark. NARA is represented at GS-13 (3.52%) which is above the 2% federal benchmark.

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

FY 2020 NARA communicated our hiring goals for PWD and PWTD by posting information on the Internal Collaboration Network (ICN).

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

EEOC FORM

U.S. Equal Employment Opportunity Commission

Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

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

Yes X No

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	8 + contractor staff			Frances Sandbothe, Selective Placement Program Coordinator (SPPC), Human Capital, Frances.sandbothe@nara.gov
Answering questions from the public about hiring authorities that take disability into account	8 + contractor staff		1	Frances Sandbothe, SPPC, Human Capital, Frances.sandbothe@nara.gov Full time: Tyrone Gaines, Disability Program Manager (DPM), NEEO, Tyrone.gaines@nara.gov
Processing reasonable accommodation requests from applicants and employees	1			Tyrone Gaines, DPM, NEEO, Tyrone.gaines@nara.gov
Section 508 Compliance	1			Eric Chaskes, IT Specialist, Development and

EEOC FORM
 U.S. Equal Employment Opportunity Commission
 Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

				Tools Management Division, Eric.chaskes@nara.gov
Architectural Barriers Act Compliance	1			Mark Sprouse, Facilities & Materials Management Officer, Facility and Property Management Division, Mark.sprouse@nara.gov
Special Emphasis Program for PWD and PWTB			1	Tyrone Gaines, DPM, NEEO Tyrone.gaines@nara.gov

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

Yes No

For FY 2020, the DPM participated in the following trainings:
 Contractor Officer Representative Course - April 4 - 5, 2020
 Question & Answer COVID-19 and Reasonable Accommodation (RA) - August 12, 2020
 Invoice Processing Platform Invoice Approver - September 2, 2020

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Yes X No

Section III: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. § 1614.203(d)(1)(i) and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency’s recruitment program plan for PWD and PWTD.

A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES

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

Currently job applicants with disabilities apply to job vacancy announcements like all other applicants. Those who are qualified for Schedule A are put on a non-competitive certificate for review by the hiring manager. We are working on several new strategies to do more outreach to persons with disabilities, which will be included in a new agency strategic performance goal in the agency's next strategic plan to improve diversity.

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.

Since conversion to Human Capital shared services in May 2019, Schedule A language appears in Merit Promotion announcements, which include instructions for PWD and PWTD applying below Schedule A.

EEOC FORM

U.S. Equal Employment Opportunity Commission

Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

3. When individuals apply for a position below 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 below 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.

(1) The determination of eligibility for appointment below one of the hiring authorities that take disability into account is made through the documentation provided by the applicant, i.e. their resume, transcripts (if required by the position), officially signed Schedule A disability letter, DD-214, and/or veterans disability letter. (2) The individual's name is added to a certificate created from the job announcement posting and forwarded to the Selecting 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.

Yes No

Human Capital Specialists provide training to all new managers and supervisors during the New Supervisor Development Program conducted two times a year. NARA's shared services center for Staffing – Administrative Resource Center (ARC), conducts a Strategic Recruitment Conversation with the hiring manager and this includes discussing alternate hiring authorities, to include Schedule A disability appointments.

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.

Currently job applicants with disabilities apply to job vacancy announcements like all other applicants. Those who are qualified for Schedule A are put on a non-competitive certificate for review by the hiring manager. We are working on several new strategies to do more outreach to persons with disabilities, which will be included in a new agency strategic performance goal in the agency's next strategic plan to improve diversity.

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 Trigger(s): below.

- | | | |
|---|-----|--|
| a. New Hires for Permanent Workforce (PWD) | Yes | No <input checked="" type="checkbox"/> |
| b. New Hires for Permanent Workforce (PWTD) | Yes | No <input checked="" type="checkbox"/> |

Table B1-1: Total Workforce New Hires by Disability

NARA’s FY 2020 percentages are:

PWD - 24.07%

PWD new hires increased compared to 2019 at 13.46%

PWTD - 7.41%

PWTD new hires decreased compared to 2019 at 10.58%

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 Trigger(s): below.

- | | | |
|-----------------------------|---|----|
| a. New Hires for MCO (PWD) | Yes <input checked="" type="checkbox"/> | No |
| b. New Hires for MCO (PWTD) | Yes <input checked="" type="checkbox"/> | No |

Table B7: Applications and Hires Applicant Flow Data & Pivots

Qualified Applicant Pool (QAP)

EEOC FORM
U.S. Equal Employment Opportunity Commission
Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

	PWD QAP Benchmark	Total PWD New Hires	Total PWD Percentage QAP F3
	F1	F2	
301	12.98%	0.00%	-12.98%
343	6.74%	0.00%	-6.74%
1001	8.99%	12.5%	3.51%
1420	6.32%	0.00%	-6.32%
1421	7.63%	9.14%	1.51%
2210	7.21%	0.00%	-7.21%
<p>Trigger(s): We are below the benchmark in four of six MCO for PWD (301 (-12.98%), 343 (-6.74%), 1420 (-6.32%), and 2210 (-7.21%))</p>			
<hr/> <p>Qualified Applicant Pool (QAP)</p>			

EEOC FORM

U.S. Equal Employment Opportunity Commission

Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

	PWTD QAP Bench mark	Total PWTD New Hires F2	Total PWD Percentage QAP F3
	F1		
301	2.70%	0.00%	-2.70%
343	5.34%	0.00%	-5.34%
1001	2.78%	0.00%	-2.78%
1420	1.25%	6.25%	5.00%
1421	3.54%	3.15%	-0.39%
2210	4.41%	0.00%	-4.41%

Trigger(s): We are below the benchmark in five of six MCO for PWTD (301 (-2.70%), 343 (-5.34%), 1001 (-2.78%), 1421 (-0.39%), and 2210 (-4.41%))

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 Trigger(s): below.

a. Qualified Applicants for MCO (PWD) Yes X No

EEOC FORM
U.S. Equal Employment Opportunity Commission
Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

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

EEOC FORM

U.S. Equal Employment Opportunity Commission

Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

	PWD Relevant Applicant Pool F1	PWD Qualified Internal Applicants F2	Total PWD Percentage Relevant Applicant Pool F3
301	14.09%	15.20%	0.93%
343	9.03%	6.74%	-2.29%
1001	13.62%	9.40%	5.78%
1420	7.29%	6.53%	-0.76%
1421	9.96%	11.78%	1.82%
2210	8.88%	8.92%	0.04%

Trigger(s): We are below the benchmark in two of six MCO for PWD (343 (-2.29%) and 1420(-0.76%)).

	PWTD Relevant Applicant Pool F1	PWTD Qualified Internal Applicants F2	Total PWTD Percentage of the Relevant Applicant Pool F3
301	5.37%	5.26%	-0.11%
343	5.32%	5.06%	-0.26%
1001	7.98%	10.45%	2.47%
1420	1.12%	2.61%	1.49%
1421	6.04%	7.15%	1.11%
2210	4.98%	5.37%	0.39%

EEOC FORM

U.S. Equal Employment Opportunity Commission

Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Trigger(s): We are below the benchmark in two of six MCO for PWTB (301 (0.11%) and 343 (-0.26%))

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTB among employees promoted to any of the mission-critical occupations (MCO)? If "yes", please describe the Trigger(s): below.

- a. Promotions for MCO (PWD) Yes X No
- b. Promotions for MCO (PWTB) Yes X No

	PWD Qualified Internal Promotions F1	PWD Selected for Promotions F2	Total PWD Percentage of the Qualified Applicant Pool F3
301	0.00%	0.00%	0.00%
343	0.00%	0.00%	0.00%
1001	50.00%	100.00%	50.00%
1420	3.28%	0.00%	-3.28%
1421	11.84%	10.34%	-1.50%
2210	10.47%	0.00%	-10.47%

Trigger(s): We are below the benchmark in five of six MCO for PWD (301 (0.00%), 343 (0.00%), 1420 (-3.28%), 1421 (-1.50%), and 2210 (-10.47%)).

	PWTB Qualified Internal Promotions F1	PWTB Selected for Promotions F2	Total PWTB Percentage of the Qualified Applicant Pool F3
301	0.00%	0.00%	0.00%
343	0.00%	0.00%	0.00%
1001	25.00%	0.00%	-25.00%

EEOC FORM
U.S. Equal Employment Opportunity Commission
 Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

1420	1.64%	0.00%	-1.64%
1421	6.14%	6.90%	0.76%
2210	7.56%	0%	-7.56%

Trigger(s): We are below the benchmark in five of six MCO for PWTD (301 (0.00%), 343 (0.00%), 1001 (-25.00%), 1420 (-1.64%), and 2210 (-7.56%)

Section IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities

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

A. ADVANCEMENT PROGRAM PLAN

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

NARA currently does not have a plan in place specifically for PWD and PWTD. However, the programs offered by the Learning & Development Division are for all employees. Currently job applicants with disabilities apply to job vacancy announcements like all other applicants. Those who are qualified for Schedule A are put on a non-competitive certificate for review by the hiring manager. We are working on several new strategies to do more outreach to persons with disabilities, which will be included in a new agency strategic performance goal in the agency’s next strategic plan to improve diversity.

EEOC FORM
 U.S. Equal Employment Opportunity Commission
 Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

B. CAREER DEVELOPMENT OPPORTUNITIES

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

NARA offers a Supervisory Development Program to all new supervisors; also, a number of “cross training detail assignments” designated as durational (90 days -1 year) for employees to gain experience toward career advancement. These details are offered to all employees.

Leadership and development programs are offered by competition to all employees based on grade level:

- Excellence in Government (GS 13-14)
- Cross Training (all grade levels)
- Preparing to Lead (GS 7-11)

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 No internship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Fellowship Programs Excellence in Gov. Program suspended for FY 2020 due to the Pandemic.	N/A	N/A	N/A	N/A	N/A	N/A
Mentoring Programs No mentoring Programs	N/A	N/A	N/A	N/A	N/A	N/A

EEOC FORM

U.S. Equal Employment Opportunity Commission

Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Coaching Programs Preparing to Lead Program suspended for FY 2020 due to the Pandemic	N/A	N/A	N/A	N/A	N/A	N/A
Training Programs Supervisor Development Program	74	74	13.51%	13.51%	1.35%	1.35%
Detail Programs Cross Training	22	22	22.73%	22.73%	0.00%	0.00%
Other Career Development Programs None	N/A	N/A	N/A	N/A	N/A	N/A

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 triggers in the text box.

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

NARA's FY 2020 percentages are:

For the Supervisor Development Program, PWD applied and is selected at a rate of 13.51%, above the 12% benchmark; and PWD applied and is selected for the Cross-~~Training~~detail assignments at a rate of 22.73%, also above the 12% benchmark.

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If "yes", describe the triggers in the text box.

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

EEOC FORM
 U.S. Equal Employment Opportunity Commission
 Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

In FY 2020, trigger(s) did exist for PWTD in two of the career development programs.

PWTD applied and was selected at a rate below the 12% federal benchmark for the Supervisor Development Program (1.35%) and the Cross-Training detail (0.00%).

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 triggers in the text box.

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

Table B-9 - Employee Recognition and Awards by Disability

Time-Off Awards PWD

	PWD	PWOD
Total Time-Off 1-10 hours	27.27%	28.22%
Total Time-Off 11-20 hours	2.75%	5.15%
Total Time-Off 21-30 hours	11.29%	12.51%
Total Time-Off 31-40 hours	4.41%	7.18%

Cash Awards PWD	PWD	PWOD
Total Cash Awards \$500 and below	94.21%	83.02%
Total Cash Awards \$501 - \$999	17.36%	23.79%
Total Cash Awards \$1000 - \$1999	23.14%	27.95%
Total Cash Awards \$2000 - \$2999	5.79%	11.56%
Total Cash Awards \$5000 or more	0.83%	1.40%

Trigger(s):

EEOC FORM
U.S. Equal Employment Opportunity Commission
 Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

There is trigger(s) in eight award categories (Time-Off Awards 1-10, 11-20, 21-30, 31-40, and Cash Awards \$500-\$999, \$1000-\$1999, \$2000-\$2999 and \$5000-more), where the inclusion rate of PWD receiving awards is lower than the inclusion rate of PWOD receiving awards.

Comparison of inclusion rates between PWTD and PWOD

Time-Off Award PWTD

	PWTD	PWOD
Total Time-Off 1-10 hours	22.50%	28.22%
Total Time-Off 11-20 hours	3.75%	5.15%
Total Time-Off 21-30 hours	13.75%	12.51%
Total Time-Off 31-40 hours	1.25%	7.18%

Cash Awards PWTD

	PWTD	PWOD
Total Cash Awards \$500 and below	95.00%	83.02%
Total Cash Awards \$501 - \$999	15.00%	23.79%
Total Cash Awards \$1000 - \$1999	18.75%	27.95%
Total Cash Awards \$2000 - \$2999	3.75%	11.56%

Trigger(s):

There is trigger(s) in six award categories (Time-Off Awards 1-10, 11-20, 31-40 and Cash Awards \$501-\$999, \$1000-\$1999, and \$2000-\$2999) where the inclusion rate of PWTD receiving awards is lower than the inclusion rate of PWOD receiving awards.

EEOC FORM
 U.S. Equal Employment Opportunity Commission
 Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If “yes”, please describe the trigger(s) in the text box.

- | | | |
|-------------------------|---|--|
| a. Pay Increases (PWD) | Yes | No <input checked="" type="checkbox"/> |
| b. Pay Increases (PWTD) | Yes <input checked="" type="checkbox"/> | No |

Table B9-1: Employee Recognition and Awards by Disability		
	PWD	PWOD
Quality Step Increases (QSI)	0.83%	0.63%
Trigger(s): There is no PWTD who received QSI.		

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

- | | | |
|--------------------------------------|-----|--|
| a. Other Types of Recognition (PWD) | Yes | No <input checked="" type="checkbox"/> |
| b. Other Types of Recognition (PWTD) | Yes | No <input checked="" type="checkbox"/> |

No other 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.

a. SES

- | | | |
|--|-------|----|
| i. Qualified Internal Applicants (PWD) | Yes X | No |
| ii. Internal Selections (PWD) | Yes X | No |

b. Grade GS-15

- | | | |
|--|-------|----|
| i. Qualified Internal Applicants (PWD) | Yes X | No |
| ii. Internal Selections (PWD) | Yes X | No |

c. Grade GS-14

- | | | |
|--|-------|----|
| i. Qualified Internal Applicants (PWD) | Yes X | No |
| ii. Internal Selections (PWD) | Yes X | No |

d. Grade GS-13

- | | | |
|--|-------|----|
| i. Qualified Internal Applicants (PWD) | Yes X | No |
| ii. Internal Selections (PWD) | Yes X | No |

EEOC FORM
U.S. Equal Employment Opportunity Commission
Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

PWD Qualified Internal Applicants for Promotion.

GS-15 = 9.22%

GS-13 = 5.13%

PWD Internal Selectees for Promotion.

There are a total of seven selections. Out of the seven selections, no PWD were selected.

Trigger(s):

There is no PWD participation in grades SES and GS-14 for qualified internal applicants.

There is no PWD participation in grades SES, GS-15, GS-14, and GS-13 for internal selections.

EEOC FORM

U.S. Equal Employment Opportunity Commission

Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

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.

a. SES

- | | | |
|---|-------|----|
| i. Qualified Internal Applicants (PWTD) | Yes X | No |
| ii. Internal Selections (PWTD) | Yes X | No |

b. Grade GS-15

- | | | |
|---|-------|----|
| i. Qualified Internal Applicants (PWTD) | Yes X | No |
| ii. Internal Selections (PWTD) | Yes X | No |

c. Grade GS-14

- | | | |
|---|-------|----|
| i. Qualified Internal Applicants (PWTD) | Yes X | No |
| ii. Internal Selections (PWTD) | Yes X | No |

d. Grade GS-13

- | | | |
|---|-------|----|
| i. Qualified Internal Applicants (PWTD) | Yes X | No |
| ii. Internal Selections (PWTD) | Yes X | No |

EEOC FORM
U.S. Equal Employment Opportunity Commission
Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Total PWTD Qualified Internal Applicants for Promotion.

GS-15 = 6.80%

GS-13 = 2.56%

Total PWTD Internal Selectees for Promotion.

There are a total of seven selections. Out of the seven selections, no PWTD were selected.

Trigger(s):

There is no PWTD participation in grade levels SES and GS-14 for qualified internal applicants.

There is no PWTD participation in grades SES, GS-15, GS-14 and GS-13 for internal selections.

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.

- | | | |
|-----------------------------|-------|----|
| a. New Hires to SES (PWD) | Yes X | No |
| b. New Hires to GS-15(PWD) | Yes X | No |
| c. New Hires to GS-14 (PWD) | Yes X | No |
| d. New Hires to GS-13(PWD) | Yes X | No |

EEOC FORM
U.S. Equal Employment Opportunity Commission
Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Percentage of PWD New Hires

There are a total of seven PWD qualified applicants at grade GS-15. There were no other PWD qualified applicants.

Trigger(s): There is no PWD new hires participation at grades SES, GS-15, GS-14 and GS13.

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.

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

Percentage of PWTD New Hires

GS 15 = 6.80%

There were 14 PWTD qualified applicants at grade GS-15. There were no other PWTD qualified applicants.

There is no PWTD new hires participation at grades SES, GS-15, GS-14 and GS13.

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.

EEOC FORM
U.S. Equal Employment Opportunity Commission
Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

a. Executives

- | | | |
|--|-------|----|
| i. Qualified Internal Applicants (PWD) | Yes X | No |
| ii. Internal Selections (PWD) | Yes X | No |

b. Managers

- | | | |
|--|-------|----|
| i. Qualified Internal Applicants (PWD) | Yes X | No |
| ii. Internal Selections (PWD) | Yes X | No |

c. Supervisors

- | | | |
|--|-------|----|
| i. Qualified Internal Applicants (PWD) | Yes X | No |
| ii. Internal Selections (PWD) | Yes X | No |

Percentage of PWD Qualified Internal Applicants for Promotion.

GS-15 = 9.22%

GS-13 = 5.13%

There are no PWD Internal Selectees for Promotion.

Trigger(s):

There is no PWD participation in grades SES and GS-14 for qualified internal applicants.

There is no PWD participation in grades SES, GS-15, GS-14, and GS-13 for internal selections.

EEOC FORM

U.S. Equal Employment Opportunity Commission

Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

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.

a. Executives

i. Qualified Internal Applicants (PWTD) Yes X No

ii. Internal Selections (PWTD) Yes X No

b. Managers

i. Qualified Internal Applicants (PWTD) Yes X No

ii. Internal Selections (PWTD) Yes X No

c. Supervisors

i. Qualified Internal Applicants (PWTD) Yes X No

ii. Internal Selections (PWTD) Yes X No

EEOC FORM
U.S. Equal Employment Opportunity Commission
Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Percentage of PWTD Qualified Internal Applicants for Promotion.

1420

GS-13 = 3.13%

2210

GS-15 = 7.56%

There are no PWTD Internal Selectees for Promotion.

Trigger(s):

There is no PWTD participation in MCO 1420 for grades GS-14 and GS-15 and 2210 for grades GS-13 and GS-14 for qualified internal applicants.

There is no PWTD participation in MCO 0301, 0343, 1001, and 1421 for qualified internal applicants.

There is no PWTD participation in MCO 0301, 0343, 1001, 1420, 1421, and 2210 for internal selections.

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.

- | | | |
|------------------------------------|-------|----|
| a. New Hires for Executives (PWD) | Yes X | No |
| b. New Hires for Managers (PWD) | Yes X | No |
| c. New Hires for Supervisors (PWD) | Yes X | No |

EEOC FORM
U.S. Equal Employment Opportunity Commission
 Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

There are a total of seven PWD qualified applicants at grade GS-15. There were no other PWD qualified applicants.

Trigger(s): There is no PWD new hires participation at grades SES, GS-15, GS-14 and GS13.

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.

- | | | |
|-------------------------------------|-------|----|
| a. New Hires for Executives (PWTD) | Yes X | No |
| b. New Hires for Managers (PWTD) | Yes X | No |
| c. New Hires for Supervisors (PWTD) | Yes X | No |

There are four PWTD qualified applicants at grade GS-15. There were no other PWTD qualified applicants.

There is no PWTD new hires participation at grades SES, GS-15, GS-14 and GS13.

Section V: Plan to Improve Retention of Persons with Disabilities

To be a 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 personal 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.

Yes No X

EEOC FORM
 U.S. Equal Employment Opportunity Commission
 Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

There were 40 Schedule A hires during the two-year period 10/01/2018 to 9/30/2020; as of September 30, 2020, of the 13 eligible for conversion, six were converted as of 9/4/2020.

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

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

Table B1-2 Separations by type of Separation

	PWD	PWOD
PWD Workforce Separations	10.19%	8.53%
PWD Removals	0.28%	0.32%
PWD Resignations	2.48%	1.35%
PWD Retirement	1.65%	2.35%
PWD Other Separations	5.79%	4.51%

Trigger(s): PWD inclusion rates are higher than PWOD in total workforce separations, resignations, and other separations.

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

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

EEOC FORM
U.S. Equal Employment Opportunity Commission
 Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Table B1-2 Separations by type of Separation

	PWTD	PWOD
PWTD Workforce Separations	15.00%	8.53%
PWTD Removals	1.25%	0.32%
PWTD Resignations	6.25%	1.35%
PWTD Retirement	1.25%	2.35%
PWD Other Separations	6.25%	4.51%

Trigger(s):

PWTD inclusion rates are higher than PWOD in total workforce separations, removal, resignation, and other separations.

PWTD inclusion rates are lower than PWOD in retirement.

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.

At this time we do not collect exit interview data.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 C.F.R. § 1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights below 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 below Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

EEOC FORM

U.S. Equal Employment Opportunity Commission

Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

The notice of rights can be located here (<https://www.archives.gov/global-pages/accessibility>). Information to file a complaint is located here (<https://www.archives.gov/eo/policy/508-aba-rights>).

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

The notice of rights can be located here (<https://www.archives.gov/global-pages/accessibility>). Information to file a complaint is located here (This page provides information about the Architectural Barriers Act (ABA) and the Access Board that is responsible for enforcing the ABA. Additionally, the website provides a link for individuals to access information on the Access Board's standards (www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards), and a link for information about filing a complaint (<https://www.access-board.gov/enforcement/>) which provides individuals with the following options to file a complaint below the ABA:

1. Online ABA Complaint Form
2. Email to enforce@access-board.gov
3. Fax to 202-272-0081
4. Mail to:
Compliance and Enforcement Section
Office of the General Counsel
U.S. Access Board
1331 F Street, NW, Suite 1000
Washington, DC 20004-1111

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

EEOC FORM
U.S. Equal Employment Opportunity Commission
Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

The DPM continues to monitor assistive technology needs of NARA's workforce by tracking RA requests from employee's requiring assistive technology as a form of an accommodation such as listening devices, digital timesheets, magnifying vision software, keyboards, mouse, voice recognition software and assistive equipment for hearing.

The DPM and disABILITY EAG posted various accessibility articles and blogs on NARA's ICN such as:

ICN Post: In continuing Franklin D. Roosevelt legacy of inclusiveness, the Franklin D. Roosevelt Presidential Library and Museum in Hyde Park, NY, looked for ways to improve accessibility and worked with ThinkDIFFERENTLY, an initiative that encourages organizations to accommodate people with special needs.

ICN Post: Listed tips to make social media posts more accessible to people with disabilities.

Discussion Panel: The disABILITY EAG hosted a panel discussion that focused on Disability Perspectives in the Workforce, reflections and a discussion with NARA's staff panel members. The panel consisted of an employee that enjoys the use of assistive technology as an accommodation.

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.)

FY 2020 average processing time is 28.18 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.

NARA monitors the timely processing of RA requests and trends by tracking all requests in our excel database. Additionally, we monitor accommodation trends quarterly, which tracks accommodations that are approved, denied, and withdrawn from the RA process. NARA's Interim Guidance 303-1, Reasonable Accommodation Policy and Procedures are approved and posted as a resource to all managers and supervisors on the internal and external websites. We also provide ad-hoc training for managers.

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

Pursuant to 29 C.F.R. § 1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide 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.

There were no requests for PAS during FY 2020. NARA's Interim Guidance 303-1, Reasonable Accommodation Policy and Procedures remain published and posted on the internal website as a resource to all managers and supervisors which includes information on PAS and procedures.

Section VI: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Yes No

EEOC FORM
U.S. Equal Employment Opportunity Commission
Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

PWD complaints alleging harassment = 33.33%

During FY 2020, NARA had two PWD (one- disability (mental) and one applicant - physical) file formal complaints alleging harassment. PWD filed formal complaints at a rate of 33.33% which is above the government wide average of 20.82%.

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

Yes No

Three formal complaints alleging harassment based on disability status resulted in settlement agreements. There are no findings of discrimination.

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.

In FY 2020, there were no findings of discrimination.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Yes No

PWD complaints alleging failure to accommodate = 18.20%

During FY 2020, NARA had two complaints alleging failure to accommodate 18.20%, which is above the government-wide average of 14.02%.

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

Yes No

EEOC FORM
 U.S. Equal Employment Opportunity Commission
 Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

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.

In FY 2020, there were no findings of discrimination.

Section VII: Identification and Removal of Barriers

Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Yes No X

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

Yes No X

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.

Trigger 1	<p>Promotion of PWD and PWTD into Managerial Positions</p> <p>Table B3: Occupational Categories by Disability</p> <p>Trigger(s): Officials and Managers is below the federal benchmark of 12% for PWD at 9.14%.</p> <p>Trigger(s): Executives is below the federal benchmarks of 12% for PWD (4.95%) and 2% for PWTD (0.99%).</p>
------------------	--

EEOC FORM
 U.S. Equal Employment Opportunity Commission
 Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

	<p>Trigger(s): Managers is below the federal benchmark of 12% for PWD (14/8.33%)</p> <p>Trigger(s): Out of eight occupational categories, six are below the federal benchmark of 12% for PWD:</p> <p>Technicians (0%), Sales Workers (0%), Craft Workers (0%), Operatives (0%), Laborers & Helpers (0%), and Service Worker (0%).</p> <p>Out of the eight occupational categories, six are below the federal benchmark of 2% for PWTD.</p> <p>Technicians (0%), Sales Workers (0%), Craft Workers (0%), Operatives (0%), Laborers & Helpers (0%), and Service Worker (0%).</p> <p>Table B4: General Schedule (GS) Grades by Disability</p> <p>Trigger(s): NARA GS 11-SES cluster (1264 employees) is below the PWD benchmark of 12% at 10.13%.</p> <p>Table B6: Mission-Critical Occupations by Disability</p> <p>Trigger(s): PWD is below the federal benchmark of 12% in the 301, 343, 1420, 1421, and 2210 series.</p> <p>PWTD is below the federal benchmark of 2% in the 301, 343, and 2210 series.</p>	
Barrier(s)	None	
Objective(s)	Enhance Employee Development	
	Responsible Official(s)	Performance Standards Address the Plan? (Yes or No)
	Valorie Findlater, Chief Human Capital Officer	Yes

EEOC FORM

U.S. Equal Employment Opportunity Commission

Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Erica Pearson, Equal Employment Opportunity Director		Yes		
Tyrone Gaines, Disability Program Manager, NEEO		Yes		
Barrier(s) Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)		
No		No		
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected		
Workforce Data Tables	Yes	Table B3: Occupational Categories by Disability, Table B4: General Schedule (GS) Grades by Disability, Table B6: Mission-Critical Occupations by Disability		
Complaint Data (Trends)	No			
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	No			
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)				
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)

EEOC FORM

U.S. Equal Employment Opportunity Commission

Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

		(Yes or No)		
02/28/2018	Publish the updated Disability Strategic Plan.	Yes	09/30/2022	
01/31/2020	Develop Schedule A fact sheet for supervisors.	Yes	06/30/2021	
09/30/2020	Collaborate with Human Capital and ARC to create a Pilot Program for Schedule A hiring.	Yes	09/30/2022	
09/30/2021	Collaborate with Human Capital and ARC to create a tickler system for conversions.	Yes		
10/01/2020	Market the RA Procedures.	Yes	09/30/2021	
Fiscal Year	Accomplishments			
2020	NARA's Human Capital appointed a new SPPC after the departure of the previous SPPC. Officially designated 9/28/2020.			
2020	NARA's Human Capital developed strategic recruitment proposals in partnership with NEEO for increasing diversity including Schedule A.			
2020	The EEO Director posted a COVID-19 Fact Sheet for People with Disabilities on the ICN. The documents included questions and answers regarding updated COVID-19 information and potential accommodations that people with disabilities may require.			
2020	The EEO Director posted a COVID-19 Fact Sheet for People with Disabilities on the ICN. The documents included questions and answers regarding updated COVID-19 information and potential accommodations that people with disabilities may require.			
2020	Advertised via ICN post that the U.S. Department of Defense's Diversity Management Operations Center, Disability Programs Directorate, a partner in Workforce Recruitment Program, host a virtual tour of the Smithsonian Institution's disability history collection on July 23 from 12:00 p.m.-1:30 p.m. ET. During the celebration of the 30th anniversary of the ADA, Smithsonian Historian Dr. Katherine Ott displayed the National Museum of American History's disability exhibit.			

EEOC FORM
U.S. Equal Employment Opportunity Commission
 Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

2020	Posted information on the ICN in celebration of ADA 30th Anniversary. The post provided information about ADA and a link to obtain additional information.
2020	The disABILITY EAG participated in a presentation that provided awareness and insight about the affinity group to the Field Records Division - Accessioning, Basic Processing & Holdings Security Branch.
2020	In continuing Franklin D. Roosevelt’s legacy of inclusiveness, the Franklin D. Roosevelt Presidential Library and Museum in Hyde Park, NY, looks for ways to improve accessibility and has recently worked with ThinkDIFFERENTLY, an initiative that encourages organizations to accommodate people with special needs. The Dutchess County Workforce Investment Board and the Think Jobs Committee recognized the museum and education specialist Jeff Urbin. Urban received the Think Jobs’ Partner award for his commitment to ThinkDIFFERENTLY and embracing the values of inclusion through education, and the museum received the Think Jobs’ Business Award, given to local businesses that have opened their hiring practices to provide vocational training and/or employment opportunities for people of all abilities.
2020	The disABILITY EAG hosted a panel discussion that focused on Disability Perspectives in the Workforce, reflections and a discussion with NARA's staff panel members.
2020	Posted tips to make social media posts more accessible to people with disabilities on the ICN.

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

Due to the COVID-19 Pandemic we were unable to complete some of the plan.

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

EEOC FORM
 U.S. Equal Employment Opportunity Commission
 Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Due to the COVID-19 Pandemic we were unable to identify any barriers.

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.

NARA will continue to show improvements in FY 2021. The DPM plans to collaborate with Human Capital in implementing the strategies for improving recruitment of people with disabilities and Schedule A hiring efforts. Additionally, the DPM will engage with the disABILITY EAG to seek assistance in accomplishing the plan activities.

Trigger 2	<p>Advancement of PWD and PWTD</p> <p><u>New MCO Hires:</u> We are below the benchmark in four of six MCO for PWD (301, 343, 1420, and 2210); We are below the benchmark in five of six MCO for PWTD (301, 343, 1001, 1421, and 2210).</p> <p><u>MCO Internal Promotions:</u> We are below the benchmark in five of six MCO for PWD (301, 343, 1420, 1421 and 2210); We are below the benchmark in three of six MCO for PWTD (301, 343, and 2210).</p>	
Barrier(s)	None	
Objective(s)	Increase advancement for PWD and PWTD in MCO	
Responsible Official(s)	Performance Standards Address the Plan? (Yes or No)	
Valorie Findlater, Chief Human Capital Officer	Yes	
Erica Pearson, Equal Employment Opportunity Director	Yes	
Tyrone Gaines, Disability Program Manager, NEEO	Yes	

EEOC FORM

U.S. Equal Employment Opportunity Commission

Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Barrier(s) Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)		
No		No		
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected		
Workforce Data Tables	Yes	Table B1: Total Workforce by Disability, Table B6: Mission Critical Occupations by Disability, Table B7: Applicant flow for internal competitive promotions by disability		
Complaint Data (Trends)	No			
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	No			
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	No			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
10/31/2019	Reestablish recruitment Tiger Team.	Yes	09/30/2022	02/26/2020

EEOC FORM
U.S. Equal Employment Opportunity Commission
 Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

03/31/2020	Review potential problem areas in policies, practices, or procedures limiting recruitment and/or selection of qualified PWD and PWTD (i.e. advertising, selection, hiring officials).	Yes	09/30/2022	
08/31/2020	Conduct focus groups on PWD hiring experience.	Yes	09/22/2022	
06/30/2020	Draft questions to guide discussion(s) on the PWD hiring experience.	Yes	09/30/2022	
03/31/2020	Partner with DPM, disABILITY EAG and Human Capital staff to participate in Job Fairs and to more effectively market career development programs.	Yes	09/22/2022	
06/30/2020	Provide disability sensitivity training to the hiring officials. Partner with Human Capital.	Yes	09/30/2022	
10/01/2020	Train all staff on the RA process.	Yes	09/30/2022	
Fiscal Year	Accomplishments			
2020	At the initiation of recruitment actions the full range of hiring authorities available to hiring managers including Schedule A, is discussed.			
2020	Job opportunity announcements solicited Schedule A applicants and are referred amongst all qualified non-competitive applicants.			

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

Due to the COVID-19 Pandemic we were unable to complete some of the plan.

EEOC FORM
 U.S. Equal Employment Opportunity Commission
 Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

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

Due to the COVID-19 Pandemic we were unable to identify any barriers.

9. 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.

NARA will continue to show improvements in FY 2021. The DPM plans to collaborate with Human Capital in implementing the strategies for improving recruitment of people with disabilities and Schedule A hiring efforts. Additionally, the DPM will engage with the disABILITY EAG to seek assistance in accomplishing the plan activities.

Trigger 3	Table B9: Employee Recognition and Awards by Disability Trigger(s): There is trigger(s) in eight award categories Time off 1-10, 11-20, 21-30, 31-40, and Cash Awards \$500-\$999, \$1000-\$1999, \$2000-\$2999 and \$5000-more where the inclusion rate of PWD receiving awards is lower than the inclusion rate of PWOD receiving awards. Trigger(s): There is trigger(s) in six award categories Time off 1-10, 11-20, 31-40 and Cash Awards \$501-\$999, \$1000-\$1999, and \$2000-\$2999 where the inclusion rate of PWTD receiving awards is lower than the inclusion rate of PWOD receiving awards.	
Barrier(s)	None	
Objective(s)	Increase award distribution to PWD and PWTD	
Responsible Official(s)	Performance Standards Address the Plan? (Yes or No)	

EEOC FORM
 U.S. Equal Employment Opportunity Commission
 Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

Valorie Findlater, Chief Human Capital Officer		Yes		
Erica Pearson, Equal Employment Opportunity Director		Yes		
Tyrone Gaines, Disability Program Manager		Yes		
Barrier Analysis Process Completed? (Yes or No)		Barrier(s) Identified? (Yes or No)		
No		No		
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected		
Workforce Data Tables	Yes	Table B9: Employee Recognition and Awards by Disability		
Complaint Data (Trends)	No			
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	No			
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	No			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)

EEOC FORM
 U.S. Equal Employment Opportunity Commission
 Federal AGENCY ANNUAL EEO PROGRAM STATUS REPORT

		& Funding (Yes or No)		
10/01/2021	Promote awards and recognition opportunities to Senior Leaders	Yes	10/01/2022	
Fiscal Year	Accomplishments			

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

Due to the COVID-19 Pandemic we were unable to complete some of the plan.

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

Due to the COVID-19 Pandemic we were unable to identify any barriers.

12. 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.

NARA will continue to show improvements in FY 2021. The DPM plans to collaborate with Human Capital and the disABILITY EAG to develop strategies for improving award distribution recruitment for people with disabilities.