Affirmative Action Plan
for the Recruitment, Hiring, Advancement, and
Retention of Persons with Disabilities

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

Section I: Efforts to Reach Regulatory Goals

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

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

   a. Cluster GS-1 to GS-10 (PWD)   Answer   No

   b. Cluster GS-11 to SES (PWD)   Answer   No

The total BLM permanent workforce includes 1161 employees with reportable disabilities. Participation rates are as follows: • Persons with Disability (PWD) 12.22% (above the federal goal of 12%). The Agency had a +0.70% increase in PWD that resulted in meeting/exceeding the federal goal compared to FY 2022 (11.52%). • Peoples with Targeted Disability (PWTD) 3.14% (above the 2.0% federal goal) and is a +0.10% increase compared to FY 2022 (3.04%). PWD representation in the GS-1 to GS-10 cluster is 13.65% (460 employees) which is 1.65% above the 12% benchmark. No triggers involving PWD at the GS-1 to GS-10 grade level cluster exist. In the GS-11 to SES cluster, there are improvements worthy of note despite still having room to grow. In FY 2023, PWD represent 11.27% (645 employees) of the cluster, an increase from FY 2022 PWD representation of 10.39% (579 employees). Trigger: A total of 11.27% (645 employees) are situated in the GS-11 to SES grade distribution falling 0.73% below the benchmark of 12%. The numerical disparity represents a trigger. Source: Table B4GSP

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

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

   a. Cluster GS-1 to GS-10 (PWTD)   Answer   No

   b. Cluster GS-11 to SES (PWTD)   Answer   No

No trigger exists. Currently representation for PWTD in the GS-1 to GS-10 cluster is 3.53% (119 employees). A total of 2.85% (163 employees) are situated in the GS-11 to SES grade distribution. Both grade level clusters exceed the 2% benchmark. Source: Table B4GSP

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

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

State and Center EEO managers brief their leadership during the State of the Agency briefing on the 12% federal goal for PWD and the 2% federal goal for PWTD and advise where there are deficiencies within each state. Additionally, the BLM Office of Civil Rights provides workforce demographic reports for all senior leaders which outline workforce representation by race/national origin, sex, and disability status. These snapshots include the numeric count and federal hiring goal percentages for individuals with reportable and targeted disabilities. Transparent reporting continues, and data on gender, race/national origin, and disability status composition of BLM's permanent workforce is published on the Building a Stronger BLM SharePoint site. The Workforce Demographics report is updated biannually (mid-year and year-end), and the Supervisor Demographics reports are updated quarterly. These snapshots include the numeric count and federal hiring goal percentages for individuals with reportable and targeted disabilities. The BLM Office of Civil Rights also provides quarterly briefings to the Executive Leadership Team to communicate the numerical goals further.

Section II: Model Disability Program

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

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

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

Answer   Yes

BLM has a full-time Selective Placement Coordinator and a full-time Reasonable Accommodation Coordinator under the HQ Human Capital Management Directorate, a designated Disability Program Manager, AEP Equity Manager and AEP/Equity Specialist under the HQ Office of Civil Rights, a collateral duty, National Special Emphasis Program Manager for the Disability Employment Program, and seven Recruiters across Bureau. Currently the BLM Diversity Officer position is vacant. Hiring for this position is managed through the BLM HQ700/HR Directorate. These internal partners collaborate on all Disability Employment efforts to include the timely processing of reasonable accommodation requests, ensuring employees and applicants are not denied the opportunity to participate in and receive benefits, advising managers about the use of special hiring authorities, working with public and private organizations that work to place applicants with disabilities, engage in community outreach and partnerships with internal/agency collaborators and advise managers and employees on all matters related to hiring, placement, and retention of individuals with disabilities in the workplace.

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 reasonable accommodation requests from applicants and employees	1	0	0	Dilene Smith, Lead Human Resources Specialist (ER/LR), HQ-711 dasmith@blm.govuman Resources Specialist (ER/LR), kgraham@blm.gov And State ER/LR POCs
Section 508 Compliance	1	0	25	Collateral Duty Lead National 508 Program Vacant Manager/National Forms Manager And Collateral Duty Coordinators across the BLM

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Architectural Barriers Act Compliance	1	0	0	Stephen Cole, Architect, NOC scole@blm.gov
Processing applications from PWD and PWTD	1	0	0	Karen Irons, National Program Coordinator for Veterans & Individuals with Disabilities-- Selective Placement Program Coordinator (SPPC), HQ-712, kirons@blm.gov State/Center Staffing Specialists process applications for PWD/PWTD under their local
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Karen Irons, National Program Coordinator for Veterans & Individuals And BLM State/Center HR Offices
Special Emphasis Program for PWD and PWTD	0	0	1	Romina Copado, Disability Program, Special Emphasis Program Manager, rcopado@blm.gov Chaene Gusman Jones, Public Civil Rights Program Manager/ Disability Employment Program Manager c2jones@blm.gov

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

<div align="center">Answer   Yes</div>

Human Resource and Employee Relations Specialists across BLM receive training on various hiring authorities, eligibility requirements and proper documentation through basic staffing training and monthly community of practice meetings. Additionally, training is delivered through webinars, in-person presentations and DOI Talent on case law, employee rights, reasonable accommodations, monthly community of practice meeting and other informal training sessions. Civil Rights staff receive training annually on the protections afforded to PWD, reasonable accommodations, targeted disabilities, and attend monthly community of practice meetings. On 04/17/2024 a total of 110 HR practitioners across the BLM received Schedule A Individuals with Disabilities training. On 05/21/2024 a total of 33 HR Officers and Hiring Managers received Workforce Recruitment Program training providing instruction on how to utilize. WRP connects federal employers with highly motivated college students, graduate students, and recent graduates with disabilities. Candidates are available for internships, part-time, or full-time employment nationwide. Undergraduate, graduate students, and recent graduates with disabilities from many academic and professional backgrounds. On 06/03/2024 a total of 44 HR Officers and Hiring Managers received Assistance Transition Program (ATP) training was completed. ATP helps service members, and their families prepare for the transition from military to civilian life. This program is called the Transition Assistance Program or TAP on the active-duty military side of our government with the Department of Defense and is intended for service members who have at least 180 days of continuous active duty and may start TAP one year before separation or two years before retirement. Throughout FY 2024, the Office of Civil Rights supported the planning and execution of a year-long Reasonable Accommodation Campaign with the Department. The campaign reached over 9,000 DOI employees (including 565 BLM employees) over six events. The campaign improved awareness and expertise related to the Reasonable Accommodation process and involved Roundtable discussions on the following topics: The DOI RA Policy, Identifying RA requests, the RA timeline and Medical Documentation, Reasonable Accommodation Best Practices and Stories of Visibility, Mental Health Conditions and Reassignment, EEO Complaints, RA case reviews and Religious Accommodation. Each event was hosted by Bureau and Department leadership and including subject matter experts from the Office of Civil Rights, Human Capital

Management, and the Disability Employment Community.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer   Yes

Sufficient budget is allocated to address both staffing and operational costs. Staffing structure and posture is detailed above in Section 1 of Part J. Resources are appropriately allocated to effectively carry out the work of the Disability Program, to conduct training, execute program objectives, organize, plan and adapt to changing conditions and objectives.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.

Section IV: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

The BLM Division of HR Policy and Programs (HQ-712) office continues to collaborate with BLM hiring officials to discuss hiring options for individuals with disabilities, performing outreach efforts and works with organizations that have applicants ready to enter the workforce, for example information about the Workforce Recruitment Program (WRP) and Agency Talent Portal (ATP) was shared across BLM, as platforms offering targeted recruitment services to help HR manages and hiring officials discover highly skilled talent they can consider non-competitively. Vacancy announcements are posted on USAJOBS indicate individuals eligible for an appointment under the special appointment authority (Schedule A for Persons with Disabilities or Veterans who are 30% or more disabled) may apply. Several BLM locations partner with state organizations that service individuals with disabilities to share job opportunities. Some BLM state/centers have been attending in-person and virtual career fairs specifically catering to individuals with disabilities, developed partnerships with military communities and Veteran serving organizations, local Departments of Rehabilitations, and Tribal Affairs Vocational Rehabilitation Agencies, conduct information interviews with recent graduates with disabilities through the Workforce Recruitment Program, and solicit resumes for VRA and Schedule A eligible candidates for vacancies prior to posting announcements on USAJOBS. EEOC FORM U.S. Equal Employment Opportunity Commission FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT 7 EEO and HR Offices have established and maintained a continuous partnership with veterans' groups and Department of Rehabilitation. These partnerships have resulted in referrals for non-competitive hiring.

2. Pursuant to 29 C.F.R. §1614.203(a)(3), describe the agency's use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce

The BLM remains focused on increasing Federal Employment of Individuals with Disabilities. A total of 82 Schedule A hires occurred in FY 2024 and a total of 46 employees on Schedule A appointments were converted to permanent career conditional appointments. Recruitment actions in USA Staffing and vacancies in USAJOBS are searched by the disability program coordinator

to increase outreach efforts to individuals with disabilities prior to or at the time variances are advertised. Vacancy announcements also include information for applicants that can be considered under special hiring authorities (e.g., Schedule A, or 30% or more disabled veterans).

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority; and, (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

When applicants apply to BLM announcements open to individuals eligible under the Schedule A hiring authority, they are required to provide a letter from their physician and/or the Department of Vocational Rehabilitation or other approved authority validating the applicants' eligibility for Schedule A hire. Applicants with eligibility as a 30% or more disabled veteran must provide their DD-214 and VA disability letter documenting their eligibility. Applicants meeting minimum qualifications for the position are referred to the selecting official for non-competitive consideration. The BLM continues to comply with the Department's DEIA requirement to include EEO and Reasonable Accommodation information and policies in all vacancy announcements posted both internally and externally.

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

Answer   Yes

Supervisors are required, annually, to take Veterans Employment training which discusses various veteran hiring authorities, including 30% or more disabled veterans. The BLM held virtual training sessions for hiring managers on reasonable accommodations throughout the fiscal year. During April 2024, the BLM Office of Civil Rights partnered with the BLM Employee Relations/Labor Relations National Program Lead to develop and provide a Reasonable Accommodation Training (with one individual session designed specifically for nonsupervisory employees delivered to 90 attendees on April 23, 2024, and another for managers and supervisors delivered to 160 attendees on April 18, 2024). Staffing Specialists discuss Schedule A and Veteran's hiring authorities during their prerecruitment consultation with hiring officials, and the use of said hiring authorities is encouraged by EEO and HR when consulted for strategic outreach efforts. These hiring authorities are also discussed with hiring managers during the recruitment process. Many State/Center offices across BLM have included information about Schedule A and 30% or more disabled hiring authorities and outreach resources as part of their Outreach and Recruitment Diversity Strategic Plans. The agency followed through with plans from FY 2023 to host a training on the Schedule A hiring authority. Training was held on April 17, 2024, to 110 attendees.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

Describe the agency's efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

The BLM continued recruitment and outreach efforts that included the use of special hiring authorities and engagement with disability groups that promote equitable employment for this target demographic. HQ-712 has a Special Placement Program (SPP) Coordinator responsible for assisting the organization to meet its recruitment and retention goals for individuals with disabilities. The SPP Coordinator coordinates with the field to support recruitment and outreach efforts and serves as a resource to provide additional information on special hiring authorities for individuals with disabilities. SHROs also work with local organizations (State Departments that service individuals with disabilities, veteran/s organizations, etc.) to increase outreach efforts. Bureau recruiters are also supporting the recruitment and onboarding efforts for candidates with disabilities through networking with local military and veteran communities. Recruiters access workforce demographics to find alignment with outreach to underrepresented race/national origin categories. BLM partners with the US Army Career Skills Program (CSP) and the Department of Defense (DoD) SkillBridge Internship Program to ensure collaboration with veteran-focused organizations. At the state and center level, Personnel Management Committees (PMC) develop recruitment strategies to address region-specific barriers and specialized recruitment plans. In addition, local offices build relationships with surrounding military installations to inform transitioning service members of BLM employment opportunities.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If "yes", please describe the triggers below.

   a. New Hires for Permanent Workforce (PWD)   Answer   No

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

PWD Workforce Statistics New Hires FY 2024 (PWD): 15.16% (234 permanent employees) New Hires FY 2023 (PWD): 12.34% (200 permanent employees) The percentage of new hires for PWD during FY 2024 continues to exceed the federal goal of 12%. Overall gains for the disabilities category are also above their workforce inclusion rate. No trigger. PWTD Workforce Statistics New Hires FY 2024 (PWTD): 3.30% (51 permanent employees) New Hires FY 2023 (PWTD): 2.59% (42 permanent employees) The percentage of new hires for PWTD during FY 2024 continues to exceed the federal goal of 2%. Overall gains for the targeted disabilities category are also above their workforce inclusion rate. No trigger.

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

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

   a. New Hires for MCO (PWD)   Answer   Yes

   b. New Hires for MCO (PWTD)   Answer   Yes

Qualified external applicant pool data was not provided for FY 2024 MD-715 Data Tables. Using Applicant Flow Data available from USAStaffing, below is a list of MCO's in which the external selections for PWD falls below the qualified applicant pool benchmark: For PWD: /0025 - 2.44% Environmental Protection Specialist/0028 – 0% Human Resources Management/0201 - 0% Human Resources Assistance/0203 - 0% /0340 – 0% /0456 - 1.56% Forestry Technician/0462 – 1.71% /0486 – 0% Mining Engineering/0880 – 0% /0965 – 0% Contracting/1102 – 0% /1170 - 6.67% General Physical Science/1301 – 0% /1350 – 0% For PWTD: /0025 – 2.44% Environmental Protection Specialist/0028 – 0% Human Resources Management/0201 - 0% Human Resources Assistance/0203 - 0% /0340 – 0% /0455 - 6.9% /0456 – 0.78% /0460 - 0.85% /0486 – 0% Mining Engineering/0880 – 0% /0965 – 0% Contracting/1102 – 0% General Physical Science/1301 – 0% /1350 – 0% Source: USAStaffing MD-715 B Tables – MCOs by Disability

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

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

   a. Qualified Applicants for MCO (PWD)   Answer   Yes

b. Qualified Applicants for MCO (PWTD)   Answer   Yes

Qualified external applicant pool data was not provided for FY 2024 MD-715 Data Tables. Using Applicant Flow Data available from USAStaffing, below is a list of MCO's in which the internal selections for PWD falls below the qualified applicant pool benchmark: For PWD: Environmental Protection Specialist/0028 – 0% Human Resources Management/0201 - 5.41% Human Resources Assistance/0203 - 0% Gen Natural Resources Mgmt & Bio Sciences/0401 – 5.88% Forestry Technician/0462 – 0% Fish Biology/0482 – 0% Petroleum Engineering Technician/0802 – 11.11% Mining Engineering/0880 – 0% Petroleum Engineering/ 0881 – 0% Contracting/1102 – 0% General Physical Science/1301 – 0% Hydrology/1315 – 0% Criminal Investigating/1811 – 0% Information Technology Management/2210 – 0% For PWTD: Environmental Protection Specialist/0028 – 0% Human Resources Management/0201 – 2.70% Human Resources Assistance/0203 - 0% Gen Natural Resources Mgmt & Bio Sciences/0401 – 1.96% Forestry Technician/0462 – 0% Fish Biology/0482 – 0% Petroleum Engineering Technician/0802 – 0% Mining Engineering/0880 – 0% Petroleum Engineering/0881 – 0% Contracting/1102 – 0% General Physical Science/1301 – 0% Hydrology/1315 – 0% Criminal Investigating/1811 – 0% Information Technology Management/2210 – 0% Source: USAStaffing MD-715 B Tables – MCOs by Disability

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

a. Promotions for MCO (PWD)   Answer   Yes

b. Promotions for MCO (PWTD)   Answer   Yes

Qualified Internal Applicant Data for MCO's was not provided on FY2024 MD-715 Data Tables. See response to previous question.

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

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

A. ADVANCEMENT PROGRAM PLAN

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

As of November 2, 2023, all employees are required to have Individual Development Plans (IDPs) in place. IDPs include formal and informal training and mentoring programs, career development opportunities, details to promotions, and similar programs that address advancement. Leadership Academy Leadership Academy Cohort 2025's application period opened May 1, 2024, and closed on August 9, 2024. The program started on September 18, 2024, and will end on September 19, 2025. Employees with a disability (PWD) continue to apply and be selected for Leadership Academy at rates higher than their BLM inclusion rate in the program's target audience for a fifth consecutive cohort. No employees with a targeted disability (PWTD) applied for the Leadership Academy 2025. Only two employees with a targeted disability have been represented in the applicant pool over the last five cohorts (occurred in 2020 and 2023 cohorts, only one selected). Moving forward, plans are to emphasize the BLM EEO statement and NTC reasonable accommodation process in communications such as training announcements, information sessions, and BLM Daily blogs to encourage applications from individuals with targeted disabilities. Applicant Demographics: 12.82% (5) of the 39 applicants for Leadership Academy 2024 identify as having a disability, but there was no representation (0%) among applicants with a targeted disability. Demographics by Eligibility: No individuals with disabilities were determined ineligible or not selected for the program. Selectee Demographics: 14.29% (5) of the 35 selectees for Leadership Academy 2024 identify as having a disability, but there was no representation among selectees with a targeted disability. Emerging Leaders Emerging Leaders Cohort 2025 program application period opened August 12, 2024, and closed September 22, 2024. Selection announcements were made the week of November 11, 2024, and the program started on 12/11/2024. Applicant Demographics: 5.71% (2) of the 35 applicants for Emerging Leaders 2025 identify as having a disability, but there was no representation (0%) among applicants with a targeted disability. Individuals with disabilities applied for the Emerging Leaders 2025 cohort at a rate lower than their representation in the

targeted audience grade levels eligible for the program (13.27% GS-7 and above PWD and 3.36% GS-7 and above PWTD). Demographics by Eligibility: No individuals with disabilities were determined ineligible for the program. All applicants were eligible for selection, therefore 5.71% (2) were individuals with a disability and consistent with the applicant inclusion rate. Selectee Demographics: All applicants with a disability and eligible for selection were selected for Emerging Leaders 2025 (5.71% or 2 employees). were individuals with a disability and consistent with the applicant inclusion rate. Representation at this phase remained consistent with the applicant inclusion rate.

B. CAREER DEVELOPMENT OPPORTUNITES

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

DOI has a Senior Executive Service (SES) candidate development program. BLM offers detail opportunities and temporary promotions across the agency. Additionally, there are two Career Development Programs: "Leadership Academy" and "Emerging Leaders" and employees are encouraged to apply/participate. Some individual states, including Idaho, Fire & Aviation, and Arizona/ New Mexico, offer a mentorship program. The Departments DOI Career Connections webpage also provides additional resources for upward mobility.

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	2104	159	141	10	73	0
Mentoring Programs	52	52			0	0
Other Career Development Programs	74	70	18.53%	20%	0	0
Coaching Programs	0	0	0	0	0	0
Training Programs	0	0	0	0	0	0
Fellowship Programs	0	0	0	0	0	0
Detail Programs	0	0	0	0	0	0

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

        a. Applicants (PWD)   Answer   Yes

        b. Selections (PWD)   Answer   No

Trigger exists for PWD applicants for the Emerging Leaders career development program in this year's cohort. This is not a consistent trend but seems to occur every two years.

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

        a. Applicants (PWTD)   Answer   Yes

        b. Selections (PWTD)   Answer   Yes

PWTD are not represented in the applicant pool for the Leadership Academy career development program and are seldomly represented in the applicants for the Emerging Leaders program. This has been a consistent trend for all previous cohorts of each program.

C. AWARDS

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

> a. Awards, Bonuses, & Incentives (PWD)   Answer   Yes
>
> b. Awards, Bonuses, & Incentives (PWTD)   Answer   Yes

Time-Off Awards 1-10 hours: PWTD 2.43% compared to 3.43% inclusion rate resulting in a trigger. Time-Off Awards 21-30 hours: PWD 7.29% and PWTD 2.08% compared to 12.91% and 3.43% inclusion rates respectively resulting in triggers for both. Time-Off Awards 40+ hours: PWTD 0.00% compared to 3.43% inclusion rate resulting in a trigger. Cash Awards $500 and Under: PWD 6.05% and PWTD 2.02% compared to 12.91% and 3.43% inclusion rates respectively resulting in triggers for both. Cash Awards $1,000 - $1,999: PWD 12.73% and PWTD 3.36% compared to 12.91% and 3.43% inclusion rates respectively resulting in triggers for both. Cash Awards $2000 to $2999: PWD 12.84% and PWTD 3.10% compared to 12.91% and 3.43% inclusion rates respectively resulting in triggers for both. Cash Awards $3000 to $3999: PWD 10.94% and PWTD 2.94% compared to 12.91% and 3.43% inclusion rates respectively resulting in triggers for both. Cash Awards $4000 to $4999: PWD 10.89% compared to 12.91% inclusion rate resulting in a trigger. Cash Awards $5000 or more: PWD 11.62% and PWTD 1.97% compared to 12.91% and 3.43% inclusion rates respectively resulting in triggers for both. Source: Table B9-2

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	247	2.75	2.47	1.79	3.09
Time-Off Awards 1 - 10 Hours: Total Hours	1948	22.25	19.22	14.88	24.79
Time-Off Awards 1 - 10 Hours: Average Hours	7.89	0.62	0.11	2.48	-0.03
Time-Off Awards 11 - 20 hours: Awards Given	274	3.06	2.57	3.27	2.98
Time-Off Awards 11 - 20 Hours: Total Hours	4703	52.60	44.22	57.14	51.03
Time-Off Awards 11 - 20 Hours: Average Hours	17.16	1.31	0.24	5.19	-0.03
Time-Off Awards 21 - 30 hours: Awards Given	192	1.07	2.19	1.19	1.03
Time-Off Awards 21 - 30 Hours: Total Hours	5160	27.60	59.16	30.36	26.65
Time-Off Awards 21 - 30 Hours: Average Hours	26.88	1.97	0.38	7.59	0.03
Time-Off Awards 31 - 40 hours: Awards Given	319	4.28	2.99	3.57	4.53
Time-Off Awards 31 - 40 Hours: Total Hours	12035	157.72	113.52	130.95	166.98
Time-Off Awards 31 - 40 Hours: Average Hours	37.73	2.82	0.54	10.91	0.02
Time-Off Awards 41 or more Hours: Awards Given	4	0.08	0.03	0.00	0.10
Time-Off Awards 41 or more Hours: Total Hours	232	3.67	1.82	0.00	4.94
Time-Off Awards 41 or more Hours: Average Hours	58	3.67	0.91	0.00	4.94

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: $501 - $999: Awards Given	1531	17.81	15.57	17.86	17.80
Cash Awards: $501 - $999: Total Amount	1188429	13713.84	12103.50	13625.60	13744.34
Cash Awards: $501 - $999: Average Amount	776.24	58.86	11.05	227.09	0.70
Cash Awards: $1000 - $1999: Awards Given	3864	37.61	40.27	38.69	37.24
Cash Awards: $1000 - $1999: Total Amount	5599169	55203.59	58397.44	55633.04	55055.14
Cash Awards: $1000 - $1999: Average Amount	1449.06	112.20	20.61	427.95	3.06
Cash Awards: $2000 - $2999: Awards Given	2485	24.39	26.91	22.92	24.90
Cash Awards: $2000 - $2999: Total Amount	5907572	58044.27	64068.77	54572.62	59244.34
Cash Awards: $2000 - $2999: Average Amount	2377.29	181.96	33.85	708.74	-0.14
Cash Awards: $3000 - $3999: Awards Given	987	8.26	11.04	8.63	8.13
Cash Awards: $3000 - $3999: Total Amount	3331237	27842.58	37347.33	29070.54	27418.11
Cash Awards: $3000 - $3999: Average Amount	3375.11	257.80	48.07	1002.43	0.40
Cash Awards: $4000 - $4999: Awards Given	349	2.91	3.99	4.17	2.47
Cash Awards: $4000 - $4999: Total Amount	1534304	12853.06	17589.15	18539.58	10887.35
Cash Awards: $4000 - $4999: Average Amount	4396.29	338.24	62.59	1324.26	-2.61
Cash Awards: $5000 or more: Awards Given	912	8.10	9.58	5.36	9.05
Cash Awards: $5000 or more: Total Amount	5389693	49402.29	57412.28	29482.14	56288.27
Cash Awards: $5000 or more: Average Amount	5909.75	466.06	85.18	1637.90	60.98

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

   a. Pay Increases (PWD)   Answer   Yes

   b. Pay Increases (PWTD)   Answer   Yes

QSI: PWD 10.81% compared to 12.91% inclusion rate benchmark results in a trigger. PWTD 1.93% compared to 3.43% inclusion rate benchmark results in a trigger. Performance based has trigger for PWTD at 0% compared to 3.43% inclusion rate benchmark. Source: Table B9-1

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	20	0.23	0.23	0.00	0.31

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

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

No other employee recognition programs evaluated.

D. PROMOTIONS

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

   a. SES

i. Qualified Internal Applicants (PWD)	Answer	No
ii. Internal Selections (PWD)	Answer	No

   b. Grade GS-15

i. Qualified Internal Applicants (PWD)	Answer	Yes
ii. Internal Selections (PWD)	Answer	Yes

   c. Grade GS-14

i. Qualified Internal Applicants (PWD)	Answer	Yes
ii. Internal Selections (PWD)	Answer	No

   d. Grade GS-13

i. Qualified Internal Applicants (PWD)	Answer	Yes
ii. Internal Selections (PWD)	Answer	Yes

No Qualified Internal Applicants data is available on the FY 2024 MD-715 data tables. Only relevant applicant pool (RAP) and selection data is provided. RAP for SES is above the federal benchmark, therefore no trigger. There were no SES internal selections in FY 2024. RAP for GS15, 14, and 13 are below the federal benchmark. Selections are below the RAP inclusion rate for GS15 and 13. Source: Tables B7

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

   a. SES

i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	No

   b. Grade GS-15

i. Qualified Internal Applicants (PWTD)	Answer	No

ii. Internal Selections (PWTD)	Answer	Yes

c. Grade GS-14

i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	No

d. Grade GS-13

i. Qualified Internal Applicants (PWTD)	Answer	No
ii. Internal Selections (PWTD)	Answer	Yes

> No Qualified Internal Applicants data is available on the FY 2024 MD-715 data tables. Only relevant applicant pool and selection data is provided. RAP for all grades listed are above the federal benchmark, therefore no trigger. There were no SES internal selections in FY 2024. Selections are below the RAP inclusion rate for GS-15 and 13. Source: Tables B7

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

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

> No Qualified Applicants data is available on the FY 2024 MD-715 data tables. Only selection data is provided. There were 2 new hires at the GS-14 level (11.11%) and 18 new hires at the GS-13 level (28.13%). Further data collection and analysis using USAStaffing is required to confirm these potential triggers. Source: Tables B7

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

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

> No Qualified Applicants data is available on the FY 2024 MD-715 data tables. Only selection data is provided. There were only 2 new hires at the GS-13 level (1.89%). Further data collection and analysis using USAStaffing is required to confirm these potential triggers. Source: Tables B7

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

a. Executives

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

    ii. Internal Selections (PWD)   Answer   N/A

b. Managers

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

    ii. Internal Selections (PWD)   Answer   N/A

c. Supervisors

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

    ii. Internal Selections (PWD)   Answer   N/A

> No Qualified Internal Applicants data is available on the FY 2024 MD-715 data tables. Only relevant applicant pool and selection data is provided. Further data collection and analysis is required to identify potential triggers. Source: Tables B7

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

    a. Executives

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

        ii. Internal Selections (PWTD)   Answer   N/A

    b. Managers

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

        ii. Internal Selections (PWTD)   Answer   N/A

    c. Supervisors

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

        ii. Internal Selections (PWTD)   Answer   N/A

> No Qualified Internal Applicants data is available on the FY 2024 MD-715 data tables. Only relevant applicant pool and selection data is provided. Further data collection and analysis is required to identify potential triggers. Source: Tables B7

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

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

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

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

> No Qualified Applicants data is available on the FY 2024 MD-715 data tables. Only selection data is provided. Further data

collection and analysis is required to identify potential triggers. Source: Tables B7

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

a. New Hires for Executives (PWTD)	Answer	N/A
b. New Hires for Managers (PWTD)	Answer	N/A
c. New Hires for Supervisors (PWTD)	Answer	N/A

No Qualified Applicants data is available on the FY 2024 MD-715 data tables. Only selection data is provided. Further data collection and analysis is required to identify potential triggers. Source: Tables B7

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

                                                                        Answer   Yes

There were 1,544 permanent new hires, and of those 82 were hired using the Schedule A hiring authority. During FY 2024, a total of 46 employees on Schedule A appointments were converted to permanent career conditional appointments.

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

a. Voluntary Separations (PWD)	Answer	Yes
b. Involuntary Separations (PWD)	Answer	Yes

Source B1-2 Permanent Workforce Removals (PWD): 5 (20%) exceeds the inclusion rate. Resignations (PWD): No trigger exists. Retirements (PWD): 43 (14.05%) exceeds the inclusion rate. Other Separations (PWD): No trigger exists. Due to removal rates being above the inclusion rate benchmark for a second consecutive year, the data suggests a potential barrier to equal employment and is crucial to continual assessment of both strategic outreach and internal inclusion practices that impact diversity inclusion and disability employment. Further analysis into the removals of PWD is needed to determine causation. No definitive barrier has been identified; however, triggers indicate that barriers may exist. Additionally, FY 2024 data shows retirement rates higher than the inclusion rate benchmark. This data suggests we will see a decline in our PWD workforce representation if not counteracted with PWD new hires and a positive retention rate.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	25	0.37	0.21
Permanent Workforce: Resignation	258	1.48	2.47

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Retirement	306	3.17	2.73
Permanent Workforce: Other Separations	425	4.87	3.73
Permanent Workforce: Total Separations	1014	9.89	9.14

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

      a.Voluntary Separations (PWTD)   Answer   Yes

      b.Involuntary Separations (PWTD)   Answer   Yes

Source B1-2 Permanent Workforce Removals (PWTD): 2 (8%) exceeds the inclusion rate. Resignations (PWTD): No trigger exists. Retirements (PWTD): 14 (4.58%) exceeds the inclusion rate. Other Separations (PWTD): 18 (4.24%) exceeds the inclusion rate. Due to removal rates being above the inclusion rate benchmark for a second consecutive year, the data identifies a potential barrier to equal employment. Further analysis into the removals of PWTD is needed to determine causation. No definitive barrier identified; however, triggers indicate that barriers may exist. FY 2024 data also shows retirement and "other separations" rates above the inclusion rate. This data suggests we will see a decline in our PWTD workforce representation if not counteracted with PWTD new hires and a positive retention rate. More information to define "other separations" is needed to explore suggested impacts further.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	25	0.57	0.22
Permanent Workforce: Resignation	258	0.85	2.40
Permanent Workforce: Retirement	306	3.99	2.75
Permanent Workforce: Other Separations	425	5.13	3.83
Permanent Workforce: Total Separations	1014	10.54	9.19

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.

Reasoning provided via the Supplemental DOI Exit Survey results (183 respondents) are as follows: lack of reasonable accommodations staffing and training, lack of clear telework guidance, telework opportunities or cultural acceptance of telework preference, and feeling micromanaged by or not believed/respected by leadership, feeling overlooked for detail opportunities, and lack of IT assistance when needed. Note: This is the first year using the survey to collect additional data specific to PWD/PWTD recruitment and retention from those exiting our workforce.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

http://www.blm.gov/info/office-of-civil-rights/public-civil-rights

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

http://www.blm.gov/info/office-of-civil-rights/public-civil-rights

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

On 02/14/2024, DOI released a comprehensive Equity Action Plan detailing strategic initiatives focused on public lands accessibility and accessibility for employee with disabilities. The BLM Division of Recreation Services in collaboration with Accessibility Coordinator David Jeppesen, the Public Civil Rights team and the Experienced Services Program launched the Data Accessibility Project. The project involves making comprehensive updates to all accessibility descriptions on all public-facing BLM recreation site pages. In addition to updating accessibility amenity descriptions and photos, the HQ430 pages are updated with Accessibility Symbols to highlight features such as accessible adaptive cycling, fishing platforms, campground grills and playgrounds. These efforts assist members of the public with disabilities to better plan and navigate recreation opportunities on BLM land and support DOI Equity Plan, Focus Area 4, Enhancing Equitable Access to Recreation Areas. The BLM Office of Civil Rights team members support the larger DOI Accessibility Working Group. In January 2024, the Accessibility Working Group made recommendations to the DOI DEIA Council organized around three topic areas: Improving the Process for Reasonable Accommodation, Building a Culture of Inclusion, and Improving Citizen-facing Equity in physical access/mobility. The AWG is working to implement the following actions in FY 2024/FY 2025; Study the FWD centralized RA model to identify opportunities for expansion to all DOI Bureaus, Review inventory of existing DOI Talent training on disability and accessibility topics to identify gaps, conduct focus groups with Schedule A hiring officials and employees to inform the planning of DEIA and Disability employment training, and Revise the DOI Lifecycle Investment Planning guidance to ensure funds for increasing facilities accessibility are well defined and available to facility planners. Each of these efforts are in progress and the BLM Public Civil Rights staff serve on AWS sub-committees and guide/promote the implementation of updated accessibility policy and practice. The DOI AWG, supported by the BLM OCR planned and delivered the National Disability Employment Awareness Month 2024, "Connecting through Accessibility" series to include events on the following topics: "Committing to an Accessible Culture: Actions and Words", "Bringing the Workforce Recruitment Program to DOI", and "Supervisor, Manager, and Leader Tactics to Actively Support Accessible Work Environments".

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.)

Excluding requests withdrawn by the employee, BLM processed 85% of RA requests timely during FY 2024 compared to 48.6% in FY 2023.

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.

Managers/Supervisors are required to work closely with employees during the reasonable accommodation process to ensure the interactive process achieves the best results for the employee without causing undue hardship to the Bureau or respective work unit. All supervisors and managers were required to complete training on the reasonable accommodation process in FY 2024 through DOI Talent. Additionally, the BLM Office of Civil Rights continued its partnership with the BLM Employee Relations to develop and provide a Reasonable Accommodation Training (with one individual session designed specifically for non-supervisory employees delivered to 90 attendees on April 23rd, 2024, and another for managers and supervisors delivered to 160 attendees on April 18th, 2024.) In FY 2024, BLM Office of Civil Rights supported the planning and execution of a year-long Reasonable Accommodation Campaign. The campaign reached over 9,000 DOI employees over six events. The campaign improved awareness and expertise related to the Reasonable Accommodation process and involved Roundtable discussions on the following topics: The DOI RA Policy, Identifying RA requests, the RA timeline and Medical Documentation, Reasonable Accommodation Best Practices and Stories of Visibility, Mental Health Conditions and Reassignment, EEO Complaints, RA case reviews and Religious Accommodation. Each event was hosted by Bureau and Department leadership and including subject matter experts from the Office

of Civil Rights, Human Capital Management, and the Disability Employment Community.

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

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

> Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

BLM provides Personal Assistance to employees with targeted disabilities who require support during work hours or to participate in work-related travel. The DOI PAS policy and resources are linked below. Personal Assistance Services (PAS) | U.S. Department of the Interior There have been no recent assessments of PAS policy effectiveness or timeliness of processing requests. In FY 2023 there were no PAS requests made. In FY 2024, there were four requests by BLM employees for service dogs and one request for a driver to assist in carrying out field-going work. The BLM is now positioned to improve PAS request tracking by using IMART by HR practitioners. All BLM supervisors receive annual training on Reasonable Accommodation to include how to address requests for PAS.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

   Answer   Yes

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

   Answer   No

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

BLM: 57.57% # of all formals claiming harassment: 16 # PWD formals claiming harassment: 10 (3 Physical/4 Mental/3 Both) = 62.50% * Source: BLM FY24 462 ReportN/A – Government-wide Average: 42.26% (as of FY 2020) * Source: EEOC Annual Report of the Federal Work Force FY 2020 (2020 Annual Report Complaints Table There were no findings of discrimination alleging harassment based on disability status during the last fiscal year.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

   Answer   Yes

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

   Answer   Yes

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.

BLM: 8.51% # of all formals claiming failure to provide RA: 4 of 47 # PWD formals claiming failure to provide RA: 4 (2 Physical/ 0 Mental/2 Both) = 8.51% * Source: BLM FY23 462 Reporting Tool Government-wide Average: 7.18% * Source: EEOC Annual Report of the Federal Work Force FY 2020 (2020 Annual Report Complaints Table) No complaints alleging harassment resulted in findings of discrimination for FY 2024.

Section VIII: Identification and Removal of Barriers

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

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

Answer   Yes

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

Answer   Yes

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

Source of the Trigger:	Workforce Data (if so identify the table)
Specific Workforce Data Table:	Workforce Data Table - B1
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	In the GS-11 to SES cluster, there are improvements worthy of note despite still having room to grow. In FY 2023, PWD represent 11.27% (645 employees) of the cluster, an increase from FY 2022 PWD representation of 10.39% (579 employees). Trigger #1: A total of 11.27% (645 employees) are situated in the GS-11 to SES grade distribution falling 0.73% below the benchmark of 12%. The numerical disparity represents a trigger. Source: Table B4GSP Trigger #2: Qualified applicant pool and selection data was limited/not provided in the FY 2023 MD-715 data tables. As a result, unable to evaluate if triggers exist for 1)PWD and/or PWTD among the new hires for any of the mission-critical occupations. 2) trigger involving PWD among the qualified internal applicants and/or selectees for promotions at all levels of the organization.

STATEMENT OF BARRIER GROUPS:	*Barrier Group*
	People with Disabilities
	People with Targeted Disabilities

Barrier Analysis Process Completed?:	N
Barrier(s) Identified?:	N

STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	**Barrier Name**	**Description of Policy, Procedure, or Practice**
	None	Further analysis is needed to identify and eliminate the existing institutional/attitudinal barriers. Further examination of data, the policies, procedures, and outreach, hiring and career development practices of the agency processes will continue.

Objective(s) and Dates for EEO Plan					
Date Initiated	**Target Date**	**Sufficient Funding / Staffing?**	**Date Modified**	**Date Completed**	**Objective Description**
09/30/2021	09/30/2023	Yes	09/30/2024		See Objectives list for Trigger 1.
09/30/2023	09/30/2024	Yes	09/30/2024		Continue to analyze career advancement opportunities such as BLM Pathways, Emerging Leaders and Leadership Academy and state mentorship programs to determine whether PWD and PWTD are participating. Establish a baseline by obtaining participation data from HR and monitor for a three-year period to determine how PWD and PWTD participation is trending.

Responsible Official(s)		
Title	**Name**	**Standards Address The Plan?**
BLM Managers and Supervisors, HR Employee Relations Specialists	EEO/CR Managers, EEO Specialists and Selective Placement Program Coordinator	Yes

Planned Activities Toward Completion of Objective				
Target Date	**Planned Activities**	**Sufficient Staffing & Funding?**	**Modified Date**	**Completion Date**
09/30/2023	Survey PWD and PWTD applicants for Emerging Leaders and Leadership Academy that were determined ineligible to identify any barriers that may exist in the ELP application process.	Yes	09/30/2024	
Report of Accomplishments				
Fiscal Year	**Accomplishment**			
2023	See Accomplishments for Trigger 1.			

Source of the Trigger:	EEO Complaint(s)
Specific Workforce Data Table:	Workforce Data Tables, Complaint Trends, Grievance Data, Climate Assessments
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	DOI Strategic Plan identified a department-wide goal to expand and/or build capacity to provide reasonable accommodations. This effort was compelled by both department-wide complaint data related to the processing of reasonable accommodations and employee/practitioner feedback around reasonable accommodation. In previous reporting periods, triggers were identified related to applicant pool data availability, PWD and IWTD representation in the GS-11 to SES grade cluster and within the Leadership Academy and Emerging Leaders programs, as well as the volume of EEO complaints filed by PWD. Progress has been noted in each of these areas as detailed above. A full-spectrum strategy approach that encompasses all aspects of the Disability Employment programs will be employed to develop objectives and planned activities that impact each of these specific trigger areas. A national barrier analysis team and Disabilityfocused sub-group will aim to address all key areas to include increasing employment opportunities for PWD, promoting workplace inclusion, providing quality support and accommodations, and enhancing skill and career development. The planned activities outlined below begin with improved coordination and communication between all Disability Employment Program stakeholders at the HQ level and down through responsible officials at the state and center levels.

STATEMENT OF BARRIER GROUPS:	***Barrier Group***
	People with Disabilities
	People with Targeted Disabilities

Barrier Analysis Process Completed?:	Y
Barrier(s) Identified?:	Y

STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	**Barrier Name**	**Description of Policy, Procedure, or Practice**
	Lack of Coordination/ Collaboration	There has been insufficient ongoing communication, coordination, and collaboration among Disability program stakeholders.

Objective(s) and Dates for EEO Plan					
Date Initiated	**Target Date**	**Sufficient Funding / Staffing?**	**Date Modified**	**Date Completed**	**Objective Description**
09/30/2024	09/30/2025	Yes			Initiate improved collaboration between BLM Disability Program Manager (Office of Civil Rights), Human Capital Management (Reasonable Accommodation Coordinators, Selective Placement Coordinators and Recruiters) to: a) Strategize way forward for Reasonable Accommodation, Selective Placement Coordinator and Disability Program Manager collaboration. b) Remove ambiguity surrounding DPM, SPPC, and RAC throughout the BLM. c) Improve relationships, partnerships, and establish a unified approach

Responsible Official(s)		
Title	**Name**	**Standards Address The Plan?**
Office of Civil Rights Director	La Shon Cole	Yes
Human Capital Management Assistant Director	Barbara Eggers	Yes
Reasonable Accommodation Coordinators	Dilene Smith	Yes
Selective Placement Coordinators	Karen Irons	Yes
Disability Program Manager	Chaene Gusman Jones	Yes

Planned Activities Toward Completion of Objective				
Target Date	**Planned Activities**	**Sufficient Staffing & Funding?**	**Modified Date**	**Completion Date**
09/30/2023	See Planned Activities for Trigger 1.	Yes		
09/30/2025	HQ700 will activate and deploy both the Skill Bridge and Schedule A data bases as resume repositories for interested service-member applicants. This provides direct and seamless access to resume archives for hiring managers.	Yes		
09/30/2025	Recruit and fill the National Section 508 Compliance Lead position	No		
09/30/2025	HQ/OCR Disability Program Manager will lead monthly collaborative meetings to include HQ700 Reasonable Accommodation Managers, Selective Placement Coordinators, OCR Equity Program representatives and the National Special Emphasis Program Manager for the Disability Employment Program.	Yes		10/01/2024
09/30/2025	RA collaborators will support the planning and delivery of DOI Disability Program and Accessibility training and awareness campaigns in FY 2025. (Support the DOI Connecting Through Accessibility Series commenced 10/1/2024)	Yes		10/01/2024
09/30/2025	BLM OCR and Disability Program Manager will develop National Barrier Analysis Sub-Group to specifically examine employment stats and trends impacting PWD and PWTD employees.	Yes		

Planned Activities Toward Completion of Objective				
Target Date	**Planned Activities**	**Sufficient Staffing & Funding?**	**Modified Date**	**Completion Date**
09/30/2025	Conduct quarterly barrier analysis of participation rates for PWD to include review of award distribution, gains/separations, and non competitive appointments.	Yes		
09/30/2025	Conduct quarterly review of Reasonable Accommodation stats and trends.	Yes		
06/01/2025	OCR in collaboration with HR Disability Partners will launch a Self-ID campaign and updated Informational Bulletin (IB 2022-003) to advise employees of voluntary self-ID (update of Race, National Origin and Disability Codes) for data collection purposes.	Yes		
Report of Accomplishments				
Fiscal Year	**Accomplishment**			
2024	Monthly DOI Disability Program Manager Meetings commenced in FY 2024. DOI now maintains a fully staffed DPM community.			
2024	Chaene Gusman Jones now serves as the designated OCR representative and BLM Disability Program Manager, effective June 2, 2024.			
2024	Romina Copado was selected to service as a National Disability Program, Special Emphasis Program Manager effective 09/26/2024.			
2024	BLM HQ 700 (Human Capital Management) provided full year (FY 2024) of Reasonable Accommodation data to OCR/Disability Program Manager for evaluation and barrier analysis to support FY 2025 Barrier Analysis initiatives and improved collaboration efforts.			
2024	DOI Office of Human Capital collected a full year of data on Reasonable Accommodation through iMart and regular review of iMart RA data will now be available to inform BLM Disability Employment Program barrier analysis and program planning.			
2022	See Accomplishments list for Trigger 1.			

Source of the Trigger:	Workforce Data (if so identify the table)
Specific Workforce Data Table:	Workforce Data Table - B1
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Trigger #3: IWTD did not apply for Leadership Academy Cohort 24 or the Emerging Leaders 2024 Program.

STATEMENT OF BARRIER GROUPS:	*Barrier Group* People with Targeted Disabilities
Barrier Analysis Process Completed?:	N
Barrier(s) Identified?:	N

STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	**Barrier Name**	**Description of Policy, Procedure, or Practice**

Objective(s) and Dates for EEO Plan

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
09/30/2021	09/30/2023	Yes	09/30/2024		Continue to analyze career advancement opportunities such as BLM Pathways, Emerging Leaders and Leadership Academy and state mentorship programs to determine whether PWD and PWTD are participating. Establish a baseline by obtaining participation data from HR and monitor for a three-year period to determine how PWD and PWTD participation is trending.

Responsible Official(s)

Title	Name	Standards Address The Plan?
See Responsible Officials list for Trigger 1.	See Responsible Officials list for Trigger 1.	Yes

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2023	See Planned Activities list for Trigger 1.	Yes		

Report of Accomplishments	
Fiscal Year	**Accomplishment**
2022	See Accomplishments for Trigger 1.

Source of the Trigger:	Workforce Data (if so identify the table)
Specific Workforce Data Table:	Workforce Data Table - B4
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	In the GS-11 to SES cluster, there are improvements worthy of note despite still having room to grow. In FY 2023, PWD represent 11.27% (645 employees) of the cluster, an increase from FY 2022 PWD representation of 10.39% (579 employees). Trigger #1: A total of 11.27% (645 employees) are situated in the GS-11 to SES grade distribution falling 0.73% below the benchmark of 12%. The numerical disparity represents a trigger. Source: Table B4GSP Trigger #2: Qualified applicant pool and selection data was limited/not provided in the FY 2023 MD-715 data tables. As a result, unable to evaluate if triggers exist for 1)PWD and/or PWTD among the new hires for any of the mission-critical occupations. 2) trigger involving PWD among the qualified internal applicants and/or selectees for promotions at all levels of the organization.

STATEMENT OF BARRIER GROUPS:	*Barrier Group*
	People with Disabilities
	People with Targeted Disabilities

Barrier Analysis Process Completed?:	N
Barrier(s) Identified?:	N

STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	**Barrier Name**	**Description of Policy, Procedure, or Practice**
		In the GS-11 to SES cluster, there are improvements worthy of note despite still having room to grow. In FY 2023, PWD represent 11.27% (645 employees) of the cluster, an increase from FY 2022 PWD representation of 10.39% (579 employees). Trigger #1: A total of 11.27% (645 employees) are situated in the GS-11 to SES grade distribution falling 0.73% below the benchmark of 12%. The numerical disparity represents a trigger. Source: Table B4GSP Trigger #2: Qualified applicant pool and selection data was limited/ not provided in the FY 2023 MD-715 data tables. As a result, unable to evaluate if triggers exist for 1)PWD and/or PWTD among the new hires for any of the mission-critical occupations. 2) trigger involving PWD among the qualified internal applicants and/or selectees for promotions at all levels of the organization.

Objective(s) and Dates for EEO Plan					
Date Initiated	**Target Date**	**Sufficient Funding / Staffing?**	**Date Modified**	**Date Completed**	**Objective Description**
09/30/2021	09/30/2023	Yes	09/30/2023		See Objectives list for Trigger 1.

Responsible Official(s)		
Title	**Name**	**Standards Address The Plan?**
See Responsible Officials list for Trigger 1	See Responsible Officials list for Trigger 1	Yes

Planned Activities Toward Completion of Objective				
Target Date	**Planned Activities**	**Sufficient Staffing & Funding?**	**Modified Date**	**Completion Date**
09/30/2022	Provide Schedule A Training for all Managers and Supervisors (mandatory completion)	Yes	09/30/2024	

Report of Accomplishments	
Fiscal Year	**Accomplishment**
2023	• During FY 2023, the BLM Office of Civil Rights partnered with the BLM Employee Relations/Labor Relations National Program Lead to provide a Reasonable Accommodation Training (with one individual session designed specifically for non-supervisory employees delivered on March 15 and another for managers and supervisors delivered on March 27.) • An instructional bulletin was issued to all BLM employees, on November 3, 2022, advising employees of the opportunity to update their Race, Ethnicity and Disability codes within the personnel system and shared periodically throughout the fiscal year. • The total BLM permanent workforce includes 1161 employees with reportable disabilities. This computes to 12.22 percent of the total workforce, 0.22 percent above the federal goal of 12 percent. The BLM is ahead of the federal goal of 2 percent for targeted disabilities, with 298 employees, 3.14 percent, identifying as individuals with a targeted disability. • Overall gains for the disability categories are slightly above their permanent workforce inclusion rates. For FY 2023 employees who identify within the general disability category represent 12.22% (1161 employees) of the total permanent workforce and represent 12.34% (200 employees) of the new hires in FY 2023. • The BLM remains focused on increasing Federal Employment of Individuals with Disabilities. A total of 44 Schedule A hires occurred in FY 2023 and a total of 33 employees on Schedule A appointments were converted to permanent career conditional appointments. The BLM Diversity Officer along with the Veteran's Program Lead expanded the use of the Skillbridge program and works closely with a community of practice that is committed to identifying employment opportunities for Veterans and persons with disabilities. • Improved transparent reporting continues as data on gender, race/national origin, and disability composition of BLM's permanent workforce is published on the Building a Stronger BLM, Together SharePoint site. The site is open to all employees. The Workforce Demographics report is updated biannually, and the Supervisor Demographics reports are updated quarterly. • During FY 2023, a total of 99 RA requests were processed. The BLM started using I-MART to track RA requests resulting in an 8.8% improvement in processing times. BLM processed 48.6% of RA requests timely during FY 2023 compared to 39.8% in FY 2022. • During FY 2023 all BLM Managers and Supervisors were required to complete a 2-hour Reasonable Accommodation for Supervisors and Managers webinar in DOI-Talent. • The BLM engaged with the Department to support the development of the new Reasonable Accommodation (RA) Policy. The Agency released the updated RA Policy effective October 24, 2022. Socialization of the new policy, website, and tracking system occurred. • The BLM Human Capital and Office of Civil Rights collaborated to develop examples of disability-based harassment to include as part of the agency's anti-harassment policy training. The materials were finalized and implemented during FY 2023. • A total of 98% of the BLM employees completed the DOI Responding to Discrimination and Harassing Conduct training by the required deadline of December 30, 2022. The course included examples of disability-based harassment. • Hiring managers and SHROs will continue to strengthen partnerships with organizations like Operation War Fighter, which allows the BLM to host transitioning wounded, ill and disabled veterans for internship opportunities that could lead to permanent employment via Scheule A or other hiring authorities. BLM also plans on expanding use of the Department of Defense (DoD) Skill Bridge program. • Permanent full-time AEP/Equity Program Manager and AEP/Equity Program Specialist hired on 2/26/2023. • BLM Diversity Officer hired in December 2022. • A total of 5 Recruiters were hired across the BLM during FY 2023. • The BLM Office of Civil Rights, Public Civil Right Specialist served as the Disability Program Manager during FY 2023.

Source of the Trigger:	Workforce Data (if so identify the table)
Specific Workforce Data Table:	Workforce Data Table - B1
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Trigger: Using the inclusion rate as the benchmark, triggers exist involving PWD and/or PWTD for quality step increases or performance based pay increases, as follows: QSI: PWD 1.81% and PWTD 1.06% compared to 2.30% inclusion rate benchmark results in a trigger. Performance based has triggers for both PWD and PWTD at .10% for PWD and 0.00% for PWTD compared to 0.19% inclusion rate benchmark.
STATEMENT OF BARRIER GROUPS:	*Barrier Group* People with Disabilities People with Targeted Disabilities
Barrier Analysis Process Completed?:	N
Barrier(s) Identified?:	N

STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	**Barrier Name**	**Description of Policy, Procedure, or Practice**
		There are some very slight increases for PWD, but the feeder pool is decreasing for PWD. With the numbers being so small to begin with, any trend downward will impact the feeder pool for grades GS-11 to SES. Opportunities for advancement for PWD and PWTD may not include advancement to higher grades. This barrier may be leading to PWD and PWTD leaving the organization for advancement opportunities in other federal agencies. It appears PWD and PWTD are stagnating in the lower grades.

Objective(s) and Dates for EEO Plan					
Date Initiated	**Target Date**	**Sufficient Funding / Staffing?**	**Date Modified**	**Date Completed**	**Objective Description**
09/30/2021	09/30/2023	Yes	09/30/2023		See Objectives list for Trigger 1.

Responsible Official(s)		
Title	**Name**	**Standards Address The Plan?**
See Responsible Officials list for Trigger 1.	See Responsible Officials list for Trigger 1.	Yes

Planned Activities Toward Completion of Objective				
Target Date	**Planned Activities**	**Sufficient Staffing & Funding?**	**Modified Date**	**Completion Date**
09/30/2023	See Planned Activities list for Trigger 1.	Yes		

Report of Accomplishments	
Fiscal Year	**Accomplishment**
2022	See Accomplishments list for Trigger 1.

Source of the Trigger:	EEO Complaint(s)
Specific Workforce Data Table:	Workforce Data Table - B1
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	DOI Strategic Plan identified a department-wide goal to expand and/or build capacity to provide reasonable accommodations. This effort was compelled by both department-wide complaint data related to the processing of reasonable accommodations and employee/practitioner feedback around reasonable accommodation. In previous reporting periods, triggers were identified related to applicant pool data availability, PWD and IWTD representation in the GS-11 to SES grade cluster and within the Leadership Academy and Emerging Leaders programs, as well as the volume of EEO complaints filed by PWD. Progress has been noted in each of these areas as detailed above. A full-spectrum strategy approach that encompasses all aspects of the Disability Employment programs will be employed to develop objectives and planned activities that impact each of these specific trigger areas. A national barrier analysis team and Disabilityfocused sub-group will aim to address all key areas to include increasing employment opportunities for PWD, promoting workplace inclusion, providing quality support and accommodations, and enhancing skill and career development. The planned activities outlined below begin with improved coordination and communication between all Disability Employment Program stakeholders at the HQ level and down through responsible officials at the state and center levels.

STATEMENT OF BARRIER GROUPS:	*Barrier Group*
	People with Disabilities
	People with Disabilities

Barrier Analysis Process Completed?:	Y
Barrier(s) Identified?:	Y

STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	**Barrier Name**	**Description of Policy, Procedure, or Practice**
	Insufficient communication, coordination, and collaboration among Disability program stakeholders.	Improved collaboration needed between BLM Disability Program Manager (Office of Civil Rights), Human Capital Management (Reasonable Accommodation Coordinators, Selective Placement Coordinators and Recruiters)

Objective(s) and Dates for EEO Plan					
Date Initiated	**Target Date**	**Sufficient Funding / Staffing?**	**Date Modified**	**Date Completed**	**Objective Description**
09/30/2024	09/30/2025	Yes			Initiate improved collaboration between BLM Disability Program Manager (Office of Civil Rights), Human Capital Management (Reasonable Accommodation Coordinators, Selective Placement Coordinators and Recruiters) to: a) Strategize way forward for Reasonable Accommodation, Selective Placement Coordinator and Disability Program Manager collaboration. b) Remove ambiguity surrounding DPM, SPPC, and RAC throughout the BLM. c) Improve relationships, partnerships, and establish a unified approach

Responsible Official(s)		
Title	**Name**	**Standards Address The Plan?**
Office of Civil Rights Director	La Shon Cole	Yes
Human Capital Management Assistant Director	Barbara Eggers	Yes
Reasonable Accommodation Coordinator	Dilene Smith	Yes
Selective Placement Coordinators	Karen Irons	Yes
Disability Program Manager	Chaene Gusman Jones	Yes
Planned Activities Toward Completion of Objective					
Target Date	**Planned Activities**	**Sufficient Staffing & Funding?**	**Modified Date**	**Completion Date**
09/30/2025	HQ700 will activate and deploy both the Skill Bridge and Schedule A data bases as resume repositories for interested service-member applicants. This provides direct and seamless access to resume archives for hiring managers.	Yes		
09/30/2025	Recruit and fill the National Section 508 Compliance Lead position.	No		
09/30/2025	HQ/OCR Disability Program Manager will lead monthly collaborative meetings to include HQ700 Reasonable Accommodation Managers, Selective Placement Coordinators, OCR Equity Program representatives and the National Special Emphasis Program Manager for the Disability Employment Program.	Yes		
09/30/2025	RA collaborators will support the planning and delivery of DOI Disability Program and Accessibility training and awareness campaigns in FY 2025. Support of DOI Connecting Through Accessibility Series commenced 10/1/2024.	Yes		
09/30/2025	BLM OCR and Disability Program Manager will develop National Barrier Analysis Sub-Group to specifically examine employment stats and trends impacting PWD and PWTD employees.	Yes		

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2025	Conduct quarterly barrier analysis of participation rates for PWD to include review of award distribution, gains/separations, and non competitive appointments.	Yes		
09/30/2025	Conduct quarterly review of Reasonable Accommodation stats and trends.	Yes		
06/01/2025	OCR in collaboration with HR Disability Partners will launch a Self-ID campaign and updated Informational Bulletin (IB 2022-003) to advise employees of voluntary self-ID (update of Race, National Origin and Disability Codes) for data collection purposes.	Yes		

Report of Accomplishments	
Fiscal Year	Accomplishment
2024	Monthly DOI Disability Program Manager Meetings commenced in FY 2024. DOI now maintains a fully staffed DPM community.
2024	Chaene Gusman Jones now serves as the designated OCR representative and BLM Disability Program Manager, effective June 2, 2024.
2024	Romina Copado was selected to service as a National Disability Program, Special Emphasis Program Manager effective 09/26/2024.
2024	DOI Office of Human Capital collected a full year of data on Reasonable Accommodation through iMart and regular review of iMart RA data will now be available to inform BLM Disability Employment Program barrier analysis and program planning.
2024	BLM HQ 700 (Human Capital Management) provided full year (FY 2024) of Reasonable Accommodation data to OCR/Disability Program Manager for evaluation and barrier analysis to support FY 2025 Barrier Analysis initiatives and improved collaboration efforts.

Source of the Trigger:	Workforce Data (if so identify the table)
Specific Workforce Data Table:	Workforce Data Table - B1
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Trigger: Using the inclusion rate as the benchmark, the percentage of PWTD among voluntary separations exceed that of persons without targeted disabilities, as follows: Source B1-2 Permanent Workforce Removals (PWTD): 4 (1.41%) exceeds the inclusion rate 0.19% benchmark. Resignations (PWTD): 10 (3.53%) exceeds inclusion rate 3.29% benchmark. Retirements (PWTD): 14 (4.95%) exceeds inclusion rate 4.0% benchmark. Other Separations (PWTD): 16 (5.65%) exceeds inclusion rate 4.18% benchmark. Due to the overall separation rates being above their respective inclusion rates in these categories, the data identifies a potential barrier to equal employment and is crucial to continual assessment of both strategic outreach and internal inclusion practices that impact diversity inclusion and disability employment. Without the consistent use of Exit Interviews, there is no mechanism in place to determine why PWTD are leaving the organization. Highly recommend the use of an Exit Interview, followed by analysis conducted by the Disability Program Manager, to determine why PWTD are leaving. Further analysis into the removals of PWTD to determine if there may be a need to provide additional assistance, possibly reasonable accommodations, to assist PWTD in performing their duties. No definitive barrier identified; however, triggers indicate that barriers may exist. Need to conduct analysis on "Other Separations", which may be transfers to other agencies or removals. Recommend further discussion with HR, as well as Exit Interview data, in order to determine whether a trigger exists. The largest number of PWTD are at the GS-11 with 70 (2.75%), followed by GS-12 with 38 (2.29%). The GS-14 level has 9 (2.64%) PWTD employees and there is one (1.23%) PWTD at the GS-15 and zero SES employees with a targeted disability.
STATEMENT OF BARRIER GROUPS:	***Barrier Group*** People with Targeted Disabilities
Barrier Analysis Process Completed?:	N
Barrier(s) Identified?:	N

STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	**Barrier Name**	**Description of Policy, Procedure, or Practice**
		There are some very slight increases for PWD, but the feeder pool is decreasing for PWD. With the numbers being so small to begin with, any trend downward will impact the feeder pool for grades GS-11 to SES. Opportunities for advancement for PWD and PWTD may not include advancement to higher grades. This barrier may be leading to PWD and PWTD leaving the organization for advancement opportunities in other federal agencies. It appears PWD and PWTD are stagnating in the lower grades.

Objective(s) and Dates for EEO Plan					
Date Initiated	**Target Date**	**Sufficient Funding / Staffing?**	**Date Modified**	**Date Completed**	**Objective Description**
09/30/2021	09/30/2023	Yes	09/30/2023		See Objectives list for Trigger 1.

Responsible Official(s)		
Title	**Name**	**Standards Address The Plan?**
See Responsible Officials list for Trigger 1.	See Responsible Officials list for Trigger 1.	Yes

Planned Activities Toward Completion of Objective				
Target Date	**Planned Activities**	**Sufficient Staffing & Funding?**	**Modified Date**	**Completion Date**
09/30/2023	See Planned Activities for Trigger 1.	Yes		
Report of Accomplishments				
Fiscal Year	**Accomplishment**			
2022	See Accomplishments list for Trigger 1.			

Source of the Trigger:	Workforce Data (if so identify the table)
Specific Workforce Data Table:	Workforce Data Table - B1
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	Due to the overall separation rates being above their respective inclusion rates for PWD and PWTD, the data identifies a potential barrier to equal employment and is crucial to continual assessment of both strategic outreach and internal inclusion practices that impact diversity inclusion and disability employment. Source B1-2 Permanent Workforce Removals (PWTD): 4 (1.41%) exceeds the inclusion rate 0.19% benchmark. Resignations (PWTD): 10 (3.53%) exceeds inclusion rate 3.29% benchmark. Retirements (PWTD): 14 (4.95%) exceeds inclusion rate 4.0% benchmark. Other Separations (PWTD): 16 (5.65%) exceeds inclusion rate 4.18% benchmark. Source B1-2 Permanent Workforce Removals (PWD): 7 (0.67%) exceeds the inclusion rate 0.19% benchmark. Resignations (PWD): 35 (3.33%) exceeds inclusion rate 3.29% benchmark. Retirements (PWD): 41 (3.90%) exceeds inclusion rate 4.0% benchmark. Other Separations (PWD): 48 (4.57%) exceeds inclusion rate 4.18% benchmark.
STATEMENT OF BARRIER GROUPS:	*Barrier Group* People with Disabilities People with Targeted Disabilities
Barrier Analysis Process Completed?:	N
Barrier(s) Identified?:	N

STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	**Barrier Name**	**Description of Policy, Procedure, or Practice**
		No definitive barrier identified; however, triggers indicate that barriers may exist.

				Objective(s) and Dates for EEO Plan	

Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
09/30/2021	09/30/2022	Yes	09/30/2023		Implement education campaigns on Reasonable Accommodations, Addressing Myths around PWTD, and a special campaign around PWTD with mental illness.
09/30/2021	09/30/2022	Yes	09/30/2023		Work with HR to obtain data to capture reasons for overall separations for PWD and PWTD. Analyze exit interview data, disciplinary actions, and any other narrative data to have a more complete picture of why there are so many involuntary separations.

	Responsible Official(s)	

Title	Name	Standards Address The Plan?
All HR Employee Relations Specialists	All HR Employee Relations Specialists	No
All Managers and Supervisors	All Managers and Supervisors	No
All EEO/Civil Rights Managers and Specialists	All EEO/Civil Rights Managers and Specialists	No

Responsible Official(s)		
Title	**Name**	**Standards Address The Plan?**
Selective Placement Program Coordinator (SPPC)	Karen Irons	No
Barrier Analysis Team	Barrier Analysis Team	No

Planned Activities Toward Completion of Objective				
Target Date	**Planned Activities**	**Sufficient Staffing & Funding?**	**Modified Date**	**Completion Date**
09/30/2022	Implement education campaigns on Reasonable Accommodations, Addressing Myths around PWTD, and a special campaign around PWTD with mental illness.	Yes	09/30/2023	
09/30/2022	Work with HR to obtain data to capture reasons for overall separations for PWD and PWTD. Analyze exit interview data, disciplinary actions, and any other narrative data to have a more complete picture of why there are so many involuntary separations.	Yes	09/30/2023	

Report of Accomplishments	
Fiscal Year	**Accomplishment**
2022	No accomplishments to report.

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

There were no barriers to addressing the planned activities established during the FY 2023 reporting period. Progress was made in each identified area and is detailed below. The Office of Civil Rights Equity Program will reengage the National Barrier Analysis Team in FY 2025. A sub-group will address Disability Program analysis and conduct targeted analysis of all aspects of the employment cycle impacting PWD. Planned activities from the FY 2023 reporting period included Providing Schedule A training to managers (mandatory training providing annually through DOI Talent), conducted review of Emerging Leaders and Leadership Academy adjudication of applicants to identify any barriers within the application and selection processes, providing Agency Talent Portal Training (completed on 01/18/2023), expanding SPPC roles (collaborative team with PCR, and Disability SEPM underway), setting up applicant supply file for Schedule A applicants (in progress), fill National Disability Program Manager position (PCR Manager serves as DPM effective June 2, 2024), and market leadership programs to PWD (completed on 05/01/2024).

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

Training provided enhanced skills and expertise of leadership and management officials as it relates to both Schedule A hiring authorities and use of the DOI Talent portal. All other planned activities support the Bureau's on-going effort to improve collaboration between Disability Management stakeholders and ensure routine barrier analysis is conducted to improve quality and consistency of service and support to the employees and individuals with disabilities.

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.

Planned activities ongoing, but no indicators suggest the need to change planned activities at this time.