## 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  $\S1614.203(d)(7)$ ) 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

\*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

EEO Director will share FY22, 23, and 24 reports with ACHP managers to increase awareness of regulatory goals and existing PWD and PTWD numbers.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable	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.

EEO Director participates in regular managers' meetings to communicate this information. EEO Director will also meet as needed with the Executive Director to engage agency leadership in additional EEO efforts. ACHP staff is invited to attend DOI BSEE training on reasonable accommodation and other EEO and HR topics throughout the year.

## 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

Through an IAA with the Department of the Interior, Bureau of Safety and Environmental Enforcement's (BSEE), BSEE assists with disability recruiting.

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 Employn	nent Status	Responsible Official (Name, Title,
Disability Program Task	Full Time	Part Time	Collateral Duty	Office Email)
Processing applications from PWD and PWTD	35	0	0	Laura Kidwell HR Operations Branch Manager
Architectural Barriers Act Compliance	0	1	0	Rhonda Owens EEO Complaints Manager
Processing reasonable accommodation requests from applicants and employees	7	0	0	Mark Guberman ELR Branch Manager
Section 508 Compliance	0	0	1	Robert Garcia Enterprise Web Manager
Answering questions from the public about hiring authorities that take disability into account	35	0	0	Laura Kidwell HR Operations Branch Manager
Special Emphasis Program for PWD and PWTD	0	1	0	Kenyatta Dilosa Management Initiatives Program Manager

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

Answer Yes

The EEO Division, Human Resources Office and bureaus around the Department of the Interior hosted several training sessions throughout the year. Topics included 508 Compliance, Reasonable Accommodation Campaign, Accessible Documents, Accessible Meetings. and several ASL sessions.

#### 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

Through an IAA with BSEE, BSEE has appointed a reasonable accommodation coordinator. ACHP works BSEE to address and implement a disability program for hiring and retention.

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

Brief Description of Program	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715,
Deficiency	[II(C)]

<b>Brief Description of Program</b>	E.4.b. Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions,
Deficiency	Sec. I]

#### 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.

Through an IAA, BSEE continues to utilize the following programs and resources. BSEE continued to utilize the following programs and resources during the fiscal year. Handshake: BSEE HR has started using "Handshake". The campaign includes the Handshake Premium application, an online recruiting platform for higher education students and alumni. Handshake partners with universities and employers to streamline and simplify the recruiting process. The platform is embedded in more than 1,500 US colleges and universities reaching more than 15 million students and recent alumni. The platform allows the creation of hiring events that can be focused to specific career paths of industry interests, includes powerful analytic tools, and include a TikTok-like Feed for marketing videos. The platform also facilitates reporting of Federal job applicant demographics, and allows for focused, underrepresented student campaigns. WRP Program: The Workforce Recruitment Program (WRP) is a recruitment and referral program managed by the Department of Labor and the Department of Defense. The WRP helps federal employers hire people with disabilities for temporary or permanent jobs through access to a database of more than 2,000 college students, graduate students, and recent graduates with disabilities representing all majors, who are eligible under Schedule A hiring authority. The database is updated annually with new candidates and the WRP is recognized by OPM as a model strategy regarding the recruitment and hiring of people with disabilities.

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

BSEE HR Office utilized hiring paths through USA JOBS to help make positions more easily identifiable. These announcements are easily identified for individuals with targeted disabilities that are eligible for the appointment. We have also provided guidance to our staffing specialists to always ensure they are using the correct/applicable hiring paths in every announcement. Additionally, BSEE HR utilized the Schedule A hiring authority whenever possible and feasible to reach PWD and PWTD. Utilization of the WRP Program has help to employ individuals with targeted disabilities.

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.

BSEE HR requires candidates to submit the proper documentation. Instructions for how to do this are included in our vacancy announcements. Such documentation is used to verify that the individual being hired is indeed a person with an intellectual disability, severe physical disability, or psychiatric disability. This documentation must be provided to the hiring agency before an individual can be hired. Documentation of eligibility for employment under Schedule A can be obtained from a licensed medical professional (e.g., a physician or other medical professional certified by a state, the District of Columbia, or a U.S. territory to practice medicine); a licensed vocational rehabilitation specialist (i.e., state or private); or any Federal agency, state agency, or agency of the District of Columbia or a U.S. territory that issues or provides disability benefits. We then review the documentation and place the individuals on the appropriate certificates to send to the hiring managers.

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

HR duties handled via existing IAA with BSEE. BSEE advises ACHP managers on hiring authorities. BSEE HR continues hold information sessions, conduct individual recruitment consultations with the hiring managers and HR Specialists, as well as provides one-on-one discussions with management on the use of this hiring authority.

#### 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.

Through the IAA with BSEE, BSEE assists ACHP. BSEE HR utilizes the Workforce Recruitment Program (WRP). The WRP helps federal employers hire people with disabilities for temporary or permanent jobs through access to a database of more than 2,000 college students, graduate students, and recent graduates with disabilities representing all majors, who are eligible under Schedule A hiring authority. The database is updated annually with new candidates and the WRP is recognized by OPM as a model strategy regarding the recruitment and hiring of people with disabilities.

#### 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 Yes

Zero new hires with PWTD were hired to the permanent workforce.

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

- 11	Preservation	Thistoric		F 1 2024
	Applicants			
	% of New Hires			

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)

Advisory Council on Historic

Answer N/A

b. New Hires for MCO (PWTD)

Answer N/A

Through the BSEE IAA, a system has not been established to monitor a PWD and PWTD qualified applicant pool for new hires into mission critical occupations. BSEE continues to work with the Department of the Interior to implement a system.

	Tatal	Reportable Disability	Targetable Disability
New Hires to Mission-Critical Occupations	Total	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 N/A

b. Qualified Applicants for MCO (PWTD)

Answer N/A

Through the BSEE IAA, BSEE has not established a system to monitor the PWD and PWTD relevant applicant pool for internal qualified applicants into mission critical occupations. The agency will work with the Department of the Interior to implement a system.

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

a. Promotions for MCO (PWD)

Answer N/A

b. Promotions for MCO (PWTD)

Answer N/A

Through the BSEE IAA, BSEE has not established a system to monitor the PWD and PWTD internal qualified applicants promoted into mission critical occupations. The agency will work with the Department of the Interior to implement a system.

# 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.

Through IAA with BSEE, ACHP developed this plan in FY24. It was issued by the Executive Director/agency head via email to all staff on 4-26-2024.

#### B. CAREER DEVELOPMENT OPPORTUNITES

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

The Advisory Council on Historic Preservation (ACHP) in Washington, D.C., has internship opportunities available for undergraduate or graduate students, as well as individuals at an early stage of their career and professional development. The internship Program Coordinator is Judy Rodenstein, at jrodenstein@achp.gov.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/ approval to participate.

Come Development	Total Participants		PWD		PWTD	
Career Development Opportunities	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Detail Programs	0	0	0	0	0	0
Internship Programs	250	16	0	0	0	0
Fellowship Programs	0	0	0	0	0	0
Other Career Development Programs	0	0	0	0	0	0
Mentoring Programs	0	0	0	0	0	0
Coaching Programs	0	0	0	0	0	0
Training 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 N/A

b. Selections (PWD)

Answer N/A

This information is not currently available for the ACHP's internship program.

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

a. Applicants (PWTD)

Answer N/A

b. Selections (PWTD)

Answer N/A

This information is not currently available for the ACHP's internship 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 No

b. Awards, Bonuses, & Incentives (PWTD)

Answer Yes

Zero awards provided to PWTD staff.

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

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

a. Pay Increases (PWD)

Answer No

b. Pay Increases (PWTD)

Answer No

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

a. Other Types of Recognition (PWD)

Answer N/A

b. Other Types of Recognition (PWTD)

Answer N/A

#### **D. PROMOTIONS**

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

a. SES

i. Qualified Internal Applicants (PWD)

Answer N/A

ii. Internal Selections (PWD)

Answer N/A

b. Grade GS-15

i. Qualified Internal Applicants (PWD)

Answer N/A

ii. Internal Selections (PWD)

Answer N/A

c. Grade GS-14

i. Qualified Internal Applicants (PWD)

Answer N/A

ii. Internal Selections (PWD)

Answer N/A

d. Grade GS-13

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

Through an IAA, BSEE has not established a system to accurately monitor the PWD qualified internal applicants into applicants and/or selectees for promotions for positions GS-13 and above. BSEE will work with the Department of the Interior to implement a system.

Answer

N/A

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

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

b. Grade GS-15

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

ii. Internal Selections (PWTD) Answer N/A

c. Grade GS-14

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

ii. Internal Selections (PWTD) Answer N/A

d. Grade GS-13

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

ii. Internal Selections (PWTD) N/A Answer

Through an IAA, BSEE has not established a system to accurately monitor the PWTD qualified internal applicants into applicants and/or selectees for promotions for positions GS-13 and above. BSEE will work with the Department of the Interior to implement a system.

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.

N/A a. New Hires to SES (PWD) Answer

b. New Hires to GS-15 (PWD) Answer N/A

c. New Hires to GS-14 (PWD) Answer N/A

d. New Hires to GS-13 (PWD) Answer N/A

Through the IAA, BSEE has not established a system to monitor the PWD qualified internal applicants into applicants and/or selectees for promotions to the senior grade levels. BSEE will work with the Department of the Interior to implement a system.

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

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

Through the IAA, BSEE has not established a system to monitor the PWTD qualified internal applicants into applicants and/or selectees for promotions to the senior grade levels. BSEE will work with the Department of the Interior to implement a system.

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.

Answer N/A

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

c. Supervisors

ii. Internal Selections (PWD)

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

Through an IAA, BSEE has not established a system to monitor the PWD qualified internal applicants into applicants and/or selectees for promotions to the senior grade levels. BSEE will work with the Department of the Interior to implement a system.

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

Through an IAA, BSEE has not established a system to monitor the PWTD qualified internal applicants into applicants and/or selectees for promotions to the senior grade levels. BSEE will work with the Department of the Interior to implement a system.

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

Through an IAA, BSEE has not established a system to monitor the PWD qualified internal applicants into applicants and/or selectees for promotions to the senior grade levels. BSEE will work with the Department of the Interior to implement a system.

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

Will be addressed via IAA with BSEE.

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

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

#### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer No

The ACHP was not aware of any eligible employees or positions during the reporting period.

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 No

b.Involuntary Separations (PWD)

Answer No

			Without Reportable
Seperations	Total #	Reportable Disabilities %	Disabilities %

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 No

b.Involuntary Separations (PWTD)

Answer No

			Without Targeted Disabilities
Seperations	Total #	Targeted Disabilities %	%

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.

Not applicable.

#### 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.

ACHP has posted Section 508 and Architectural Barriers Act notices on its website under the EEO page: https://www.achp.gov/eeo.

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.

ACHP has posted Section 508 and Architectural Barriers Act notices on its website under the EEO page: https://www.achp.gov/eeo.

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.

No other accessibility issues identified.

#### 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.)

Through an IAA with the Department of the Interior, Bureau of Safety and Environmental Enforcement's (BSEE) Reasonable Accommodation Coordinator(s) are made available to assist individuals and to provide guidance and assistance on the Reasonable Accommodation Process. The average processing time was 13.2 days.

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

Through an IAA with the Department of the Interior, Bureau of Safety and Environmental Enforcement's (BSEE) Reasonable Accommodation Coordinator(s) are made available to assist individuals and to provide guidance and assistance on the Reasonable Accommodation Process. Employees received a decision on a RA request within 13 days, on average, from the date that documentation supporting the employee's request is received by the supervisor. Supervisors and employees were regularly offered training on requesting, supporting and assessing RA requests.

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

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

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

The ACHP's PAS policy is available here: https://www.achp.gov/sites/default/files/2023-11/ACHP%20Personal%20Assistance%20Services%2011-27-23.pdf.

## Section VII: EEO Complaint and Findings Data

#### A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer No

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

Answer No

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

There were no discrimination complaints filed and no findings in FY24.

#### B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer No

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

Answer No

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

There were no discrimination complaints filed and no findings in FY24.

#### Section VIII: Identification and Removal of Barriers

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

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

Answer No

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

Answer N/A

- 3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments
- 4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

NA

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

NA

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.

NA