



EQUAL EMPLOYMENT OPPORTUNITY  
(EEO)

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

FISCAL YEAR 2021

REPORT CERTIFIED BY:

Debra Steidel Wall, *Acting Archivist of the United States*  
Erica Pearson, *Director of the Office of Equal Employment Opportunity  
Programs*

MD-715 ASSESSMENT CONDUCTED BY:

The Office of Equal Employment Opportunity Programs (NEEO)

REPORT SUBMITTED TO:

The Equal Employment Opportunity Commission (EEOC)

**MD-715**  
**Parts A Through E**

**Part A - Department or Agency Identifying Information**

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

**Part B - Total Employment**

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	2521	46	2567

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

Agency Leadership	Name	Title
Head of Agency	Debra Steidel Wall	Acting Archivist of the United States

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

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

Manager (SEPM)						
Women's Program Manager (SEPM)	N/A	N/A	N/A	N/A	(000) 000-0000	N/A
Disability Program Manager (SEPM)	Tyrone Gaines	Disability Program Manager	0260	GS-12	(301) 837-1830	<a href="mailto:Tyrone.gaines@nara.gov">Tyrone.gaines@nara.gov</a>
Special Placement Program Coordinator (Individuals with Disabilities)	Germeka Harrison	Human Capital Staff	0201	GS-13	(314) 801-0524	<a href="mailto:Germeka.harrison@nara.gov">Germeka.harrison@nara.gov</a>
Reasonable Accommodation Program Manager	Tyrone Gaines	Disability Program Manager	0260	GS-12	(301) 837-1830	<a href="mailto:Tyrone.gaines@nara.gov">Tyrone.gaines@nara.gov</a>
Anti-Harassment Program Manager	Tanya Shorter	Anti-Harassment Program Manager	0260	GS-13	(301) 837-3096	<a href="mailto:Tanya.shorter@nara.gov">Tanya.shorter@nara.gov</a>
ADR Program Manager	Naheed Khandekar	Assistant General Counsel and Director of Resolve	0905	GS-13	(301) 837-2926	<a href="mailto:Naheed.khandekar@nara.gov">Naheed.khandekar@nara.gov</a>
Compliance Manager	Tammie Johnson	EEO Complaints Manager	0260	GS-14	(301) 837-1986	<a href="mailto:Tammie.johnson@nara.gov">Tammie.johnson@nara.gov</a>
Principal MD-715 Preparer	Erica Pearson	Equal Employment Opportunity Director	0260	GS-15	(301) 837-0939	<a href="mailto:Erica.pearson@nara.gov">Erica.pearson@nara.gov</a>
Other EEO Staff	Shaun Walker	EEO Specialist	0260	GS-11	(301) 347-8801	<a href="mailto:Shaun.walker@nara.gov">Shaun.walker@nara.gov</a>
Other EEO Staff	Duane Tobias	EEO Specialist	0260	GS-12	(301) 837-1902	<a href="mailto:Duane.tobias@nara.gov">Duane.tobias@nara.gov</a>
Other EEO Staff	Tanikka Jones	EEO Assistant	0361	GS-8	(301) 347-8344	<a href="mailto:Tanikka.jones@nara.gov">Tanikka.jones@nara.gov</a>

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

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

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

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

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

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

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

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

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

## Part E.1 - Executive Summary: Mission

We drive openness, cultivate public participation, and strengthen our nation's democracy through public access to high-value government records. Our mission is to provide public access to Federal Government records in our custody and control. Public access to government records strengthens democracy by allowing Americans to claim their rights of citizenship, hold their government accountable, and understand their history so they can participate more effectively in their government.

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

I, Erica Pearson, EEO Director GS-0260-15 am the  
 (Insert name above) (Insert official title/series/grade above)

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

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

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

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

<span style="background-color: #cccccc; padding: 5px;"><i>Erica Pearson</i></span>	<span style="background-color: #cccccc; padding: 5px;">7/28/2022</span>
Signature of Principal EEO Director/Official Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.	Date
<span style="background-color: #cccccc; padding: 5px;"><i>Debra Stuehl Wall</i></span>	<span style="background-color: #cccccc; padding: 5px;">7/28/2022</span>
Signature of Agency Head or Agency Head Designee	Date

## **MD-715 - PART G**

### **Agency Self-Assessment Checklist**

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

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

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

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



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

## MD-715 - PART G Agency Self-Assessment Checklist

<b>Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP</b>			
<b>This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.</b>			
Compliance Indicator Measures		Measure Met? (Yes/No/NA)	Comments
<b>A.1 – The agency issues an effective, up-to-date EEO policy statement.</b>			
<b>A.1.a</b>	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency’s commitment to EEO for all employees and applicants? If “yes”, please provide the annual issuance date in the comments column. [see MD-715, II(A)]	Yes	07/30/2021
<b>A.1.b</b>	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]	Yes	
<b>A.2 – The agency has communicated EEO policies and procedures to all employees.</b>			
Compliance Indicator Measures		Measure Met? (Yes/No/NA)	Comments
<b>A.2.a</b>			
<b>A.2.a.1</b>	Does the agency disseminate the following policies and procedures to all employees: Anti-harassment policy? [see MD 715, II(A)]	Yes	
<b>A.2.a.2</b>	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	No	
<b>A.2.b</b>			
<b>A.2.b.1</b>	Does the agency prominently post the following information throughout the workplace and on its public website: The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]	Yes	
<b>A.2.b.2</b>	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	Yes	
<b>A.2.b.3</b>	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	Yes	<a href="https://www.archive.s.gov/global-pages/accessibility">https://www.archive.s.gov/global-pages/accessibility</a>

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<b>A.2.c</b>	Does the agency inform its employees about the following topics:		
<b>A.2.c.1</b>	EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often.	Yes	Employees are informed of the EEO Process annually via EEO Policy Statement and in New Employee Orientation biweekly and Supervisory training as needed
<b>A.2.c.2</b>	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	Yes	Annually and when NARA gets a new employee or supervisor
<b>A.2.c.3</b>	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	Yes	New Employee Orientation biweekly and Supervisory training annually
<b>A.2.c.4</b>	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.	Yes	New Employee Orientation biweekly and Annual Required Training for all staff
<b>A.2.c.5</b>	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] If “yes”, please provide how often.	Yes	Annually
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>A.3 – The agency assesses and ensures EEO principles are part of its culture.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b> <b>New Compliance Indicator</b>
<b>A.3.a</b>	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section.	Yes	Performance ratings and performance awards
<b>A.3.b</b>	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	Yes	
<b>Essential Element B: INTEGRATION OF EEO INTO THE AGENCY’S STRATEGIC MISSION</b> This element requires that the agency’s EEO programs are structured to maintain a workplace that is free from discrimination and support the agency’s strategic mission.			







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 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
	<b>B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.</b>		
<b>B.1.a</b>	Is the agency head the immediate supervisor of the person ("EEO Director") who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes	
<b>B.1.a.1</b>	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If "yes," please provide the title of the agency head designee in the comments.	N/A	
<b>B.1.a.2</b>	Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes	
<b>B.1.b</b>	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]	Yes	
<b>B.1.c</b>	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comments column.	No	07/15/2022
<b>B.1.d</b>	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments New Compliance Indicator</b>
	<b>B.2 – The EEO Director controls all aspects of the EEO program.</b>		
<b>B.2.a</b>	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)]	Yes	
<b>B.2.b</b>	Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR §1614.102(c)(4)]	Yes	
<b>B.2.c</b>	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes	
<b>B.2.d</b>	Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes	



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<b>B.2.e</b>	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	Yes	
<b>B.2.f</b>	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]	Yes	
<b>B.2.g</b>	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2) and (c)(3)]	N/A	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.3.a</b>	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]	Yes	
<b>B.3.b</b>	Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.	Yes	Goal 2: Connecting with Customers Goal 4: Build Our Future Through Our People
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.4 -The agency has sufficient budget and staffing to support the success of its EEO program</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.4.a</b>	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:		
<b>B.4.a.1</b>	to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	Yes	
<b>B.4.a.2</b>	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	Yes	
<b>B.4.a.3</b>	to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	Yes	
<b>B.4.a.4</b>	to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.	Yes	







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<b>B.4.a.5</b>	to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]	Yes	
<b>B.4.a.6</b>	to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	Yes	
<b>B.4.a.7</b>	to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section.	No	EEO Complaint tracking system
<b>B.4.a.8</b>	to effectively administer its special emphasis programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]	Yes	
<b>B.4.a.9</b>	to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes	
<b>B.4.a.10</b>	to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]	Yes	
<b>B.4.a.11</b>	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	Yes	
<b>B.4.b</b>	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	Yes	
<b>B.4.c</b>	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Yes	
<b>B.4.d</b>	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?	Yes	
<b>B.4.e</b>	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b> <b>New Indicator</b>
<b>B.5.a</b>	Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:		
<b>B.5.a.1</b>	EEO Complaint Process? [see MD-715(II)(B)]	No	
<b>B.5.a.2</b>	Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]	Yes	
<b>B.5.a.3</b>	Anti-Harassment Policy? [see MD-715(II)(B)]	Yes	

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<b>B.5.a.4</b>	Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	Yes	
<b>B.5.a.5</b>	ADR, with emphasis on the federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.6 – The agency involves managers in the implementation of its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments New Indicator</b>
<b>B.6.a</b>	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	No	
<b>B.6.b</b>	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	No	
<b>B.6.c</b>	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	No	
<b>B.6.d</b>	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR § 1614.102(a)(5)]	No	
<b>Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY</b> <b>This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency's EEO Program and Plan.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.1 – The agency conducts regular internal audits of its component and field offices.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.1.a</b>	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	No	
<b>C.1.b</b>	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	No	
<b>C.1.c</b>	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]	N/A	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.2 – The agency has established procedures to prevent all forms of EEO discrimination.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments New Indicator</b>



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<b>C.2.a</b>	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	The Anti-Harassment Policy and Procedures were established in FY20 and approved by the EEOC on 09/24/2020, pending publishing in FY23
<b>C.2.a.1</b>	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes	
<b>C.2.a.2</b>	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	Yes	
<b>C.2.a.3</b>	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	
<b>C.2.a.4</b>	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [see Enforcement Guidance, V.C.]	Yes	
<b>C.2.a.5</b>	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <i>Complainant v. Dep't of Veterans Affairs</i> , EEOC Appeal No. 0120123232 (May 21, 2015); <i>Complainant v. Dep't of Defense (Defense Commissary Agency)</i> , EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.	Yes	
<b>C.2.a.6</b>	Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR 1614.203(d)(2)]	Yes	
<b>C.2.b</b>	Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR 1614.203(d)(3)]	No	
<b>C.2.b.1</b>	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)]	Yes	
<b>C.2.b.2</b>	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	Yes	
<b>C.2.b.3</b>	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR 1614.203(d)(1)(ii)(B)]	Yes	



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<b>C.2.b.4</b>	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR 1614.203(d)(3)(i)(M)]	No	
<b>C.2.b.5</b>	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests in the comments column.	No	87% Timely Processed
<b>C.2.c</b>	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC’s regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]	No	
<b>C.2.c.1</b>	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If “yes”, please provide the internet address in the comments column.	Yes	<a href="https://www.archive.s.gov/global-pages/accessibility#services">https://www.archive.s.gov/global-pages/accessibility#services</a>
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>  <b>New Indicator</b>
<b>C.3.a</b>	Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	Yes	
<b>C.3.b</b>	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:		
<b>C.3.b.1</b>	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]	Yes	
<b>C.3.b.2</b>	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	Yes	
<b>C.3.b.3</b>	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	Yes	
<b>C.3.b.4</b>	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	Yes	
<b>C.3.b.5</b>	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	Yes	
<b>C.3.b.6</b>	Provide disability accommodations when such accommodations do not cause an undue hardship? [ see 29 CFR §1614.102(a)(8)]	Yes	
<b>C.3.b.7</b>	Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]	Yes	







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<b>C.3.b.8</b>	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]	Yes	
<b>C.3.b.9</b>	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	Yes	
<b>C.3.c</b>	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	Yes	
<b>C.3.d</b>	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.4.a</b>	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	Yes	
<b>C.4.b</b>	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]	No	
<b>C.4.c</b>	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	Yes	
<b>C.4.d</b>	Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	Yes	
<b>C.4.e</b>	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:		
<b>C.4.e.1</b>	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	Yes	
<b>C.4.e.2</b>	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	Yes	
<b>C.4.e.3</b>	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	Yes	
<b>C.4.e.4</b>	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	No	







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<b>C.4.e.5</b>	Assist in preparing the MD-715 report? [see MD-715, II(C)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.5.a</b>	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)]	Yes	
<b>C.5.b</b>	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	N/A	
<b>C.5.c</b>	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [see MD-715, II(C)]	N/A	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.6 – The EEO office advises managers/supervisors on EEO matters.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.6.a</b>	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If “yes”, please identify the frequency of the EEO updates in the comments column.	Yes	Monthly, Quarterly and Annually
<b>C.6.b</b>	Are EEO officials readily available to answer managers’ and supervisors’ questions or concerns? [see MD-715 Instructions, Sec. I]	Yes	
<b>Essential Element D: PROACTIVE PREVENTION</b>			
<b>This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>D.1.a</b>	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	Yes	
<b>D.1.b</b>	Does the agency regularly use the following sources of information for trigger identification: workforce data;	No	





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



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<b>D.3.c</b>	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	No	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments New Indicator</b>
<b>D.4.a</b>	Does the agency post its affirmative action plan on its public website? [see 29 CFR 1614.203(d)(4)] Please provide the internet address in the comments.	Yes	<a href="https://work.nara.gov/equal-employment-opportunity/eo-reports.html">https://work.nara.gov/equal-employment-opportunity/eo-reports.html</a>  It is within the MD-715 report.
<b>D.4.b</b>	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]	Yes	
<b>D.4.c</b>	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]	Yes	
<b>D.4.d</b>	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR 1614.203(d)(7)(ii)]	Yes	



**Essential Element E: EFFICIENCY**

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





 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.1.a</b>	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	No	
<b>E.1.b</b>	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	Yes	
<b>E.1.c</b>	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(l)?	Yes	
<b>E.1.d</b>	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(l)? If	Yes	10 days

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	so, please provide the average processing time in the comments.		
<b>E.1.e</b>	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?	Yes	
<b>E.1.f</b>	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	Yes	
<b>E.1.g</b>	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	No	
<b>E.1.h</b>	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	No	
<b>E.1.i</b>	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?	Yes	
<b>E.1.j</b>	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comments column.	Yes	The EEO Office notifies the contractor of any modifications necessary and provides them with a timeframe for corrections.
<b>E.1.k</b>	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes	
<b>E.1.l</b>	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.2 – The agency has a neutral EEO process.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments Revised Indicator</b>
<b>E.2.a</b>	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)]	Yes	
<b>E.2.b</b>	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If "yes", please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.	Yes	When seeking legal reviews the EEO Office has access to legal sufficiency reviews. The Office of General Counsel is located at A2 in College Park, MD. The attorney

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			assigned to conduct the legal reviews does not handle any litigation related to the matter that is being reviewed.
<b>E.2.c</b>	If the EEO office relies on the agency's defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]	Yes	
<b>E.2.d</b>	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]	Yes	
<b>E.2.e</b>	If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [see EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.3.a</b>	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	Yes	
<b>E.3.b</b>	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	Yes	
<b>E.3.c</b>	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	Yes	
<b>E.3.d</b>	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Yes	
<b>E.3.e</b>	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	Yes	
<b>E.3.f</b>	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.4.a</b>	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:		
<b>E.4.a.1</b>	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the	No	

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	involved management official? [see MD-715, II(E)]		
<b>E.4.a.2</b>	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	Yes	
<b>E.4.a.3</b>	Recruitment activities? [see MD-715, II(E)]	Yes	
<b>E.4.a.4</b>	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]	Yes	
<b>E.4.a.5</b>	The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]	Yes	
<b>E.4.a.6</b>	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	Yes	
<b>E.4.b</b>	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Yes	
<b>Essential Element E: RESPONSIVENESS AND LEGAL COMPLIANCE</b>			
<b>This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.</b>			
 <b>Compliance Indicator</b>	<b>E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
 <b>Measures</b>			
<b>E.5.a</b>	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	Yearly using the MD-715, Ad Hoc meetings, at the end of the year AOTUS briefing, and during recurring meetings with staff
<b>E.5.b</b>	Does the agency review other agencies' best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	Small Agency Council-EEO Directors Meeting-Ad Hoc meetings/surveys with other agencies
<b>E.5.c</b>	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	Yes	
<b>Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE</b>			
<b>This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.</b>			
 <b>Compliance Indicator</b>	<b>F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
 <b>Measures</b>			
<b>F.1.a</b>	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC	Yes	

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	orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]		
<b>F.1.b</b>	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	Yes	
<b>F.1.c</b>	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes	
<b>F.1.d</b>	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Yes	
<b>F.1.e</b>	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>  Indicator moved from E-III Revised
<b>F.2.a</b>	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	Yes	
<b>F.2.a.1</b>	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]	Yes	
<b>F.2.a.2</b>	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]	N/A	
<b>F.2.a.3</b>	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC’s Office of Federal Operations? [see 29 CFR §1614.403(e)]	Yes	
<b>F.2.a.4</b>	Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.3 - The agency reports to EEOC its program efforts and accomplishments.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>F.3.a</b>	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	Yes	
<b>F.3.b</b>	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	Yes	

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

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

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

**1. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2020	Communicate Reasonable Accommodation (RA) Procedures.	09/30/2021	02/28/2023	

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
EEO Manager	Tanya Shorter	Yes
Disability Program Manager	<a href="#">Kimberly Meyer</a>	Yes

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Communicate RA procedures.	Yes	02/28/2023	

**Report of Accomplishments**

Fiscal Year	Accomplishments
FY21	The EEO office is continuing to work with the Strategy and Performance Division to review and publish the RA Policy and Procedures.

**2. Statement of Model Program Essential Element Deficiency**

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Type of Program Deficiency	Brief Description of Program Deficiency
B.1.c	The EEO Director did not present the State of the Agency briefing during the reporting period.

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2021	Present the State of the Agency briefing.	09/30/2022		07/13/2022

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2022	Present the State of the Agency briefing.	Yes		07/13/2022

**Report of Accomplishments**

Fiscal Year	Accomplishments
FY22	The State of the Agency briefing was presented on 7/13/2022. CLOSED

**3. Statement of Model Program Essential Element Deficiency**

Type of Program Deficiency	Brief Description of Program Deficiency
B.4.a.2	Although the agency has sufficient staffing to support the success of its EEO program we were unable to conduct a thorough barrier analysis of its workforce.

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2020	Hire an Affirmative Employment Supervisor.	09/30/2021		09/28/2020
11/24/2021	Recruiting for an Affirmative Employment Program Manager.	09/30/2022		



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**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Hire an Affirmative Employment Supervisor.	Yes		09/28/2020
09/30/2022	Complete reference checks and onboarding for an Affirmative Employment Program Manager.	Yes		

**Report of Accomplishments**

Fiscal Year	Accomplishments
FY20	Hired an Affirmative Employment Supervisor on 09/28/2020.
FY21	During FY21 - The Affirmative Employment supervisor is no longer with the Agency. We are recruiting for a new Affirmative Employment Program Manager. In FY22 we completed interviews and awaiting final reference checks. CLOSED

**4. Statement of Model Program Essential Element Deficiency**

Type of Program Deficiency	Brief Description of Program Deficiency
B.4.a.5	Although the agency has sufficient staffing to support the success of its EEO program we were unable to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices.

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/31/2018	Conduct EEO program field audits.	09/30/2020	09/30/2023	

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

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

**Report of Accomplishments**

Fiscal Year	Accomplishments
FY20	Hired three additional staff members to support the EEO Program Office staffing needs. <ul style="list-style-type: none"> <li>• Affirmative Employment Supervisor (Hired 09/2020)</li> <li>• EEO Specialist (Hired 07/2020)</li> <li>• EEO Counselor (Hired 07/2020)</li> </ul>
FY21	The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness. CLOSED

**5. Statement of Model Program Essential Element Deficiency**

Type of Program Deficiency	Brief Description of Program Deficiency
B.4.a.6	Although the agency has sufficient staffing to support the success of its EEO program we were unable to publish the Anti-Harassment Policy and Reasonable Accommodations Policy and Procedures.

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/16/2021	Publish the approved EEOC Anti-Harassment Policy.	11/30/2022		
03/05/2021	Publish the approved EEOC RA Policy and Procedures.	11/30/2022		

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan?
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		(Yes or No)
EEO Director	Erica Pearson	Yes
EEO Manager	Tanya Shorter	Yes
Disability Program Manager	<a href="#">Kimberly Meyer</a>	Yes

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
07/30/2022	Respond to the questions from the Strategy and Performance Division regarding the Anti-Harassment Policy and the RA Policy and Procedures.	Yes		
09/30/2022	Collaborate with the Strategy and Performance Division to develop the presentation that must be routed to leadership for feedback.	Yes		
02/28/2023	Route the Anti-Harassment Policy and the RA Policy and Procedures for publishing.	Yes		

**Report of Accomplishments**

Fiscal Year	Accomplishments

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FY21	<p>The agency distributed the Anti-Harassment Policy Statement. Developed the Fact Sheet on Sexism. Developed and posted the Frequently Asked Questions (FAQs) on Harassment. The Anti-Harassment Policy was approved by the EEOC on 09/24/2020. The Anti-Harassment Program is actively working on publishing the Anti-Harassment policy. In FY21, the RA Program had a huge increase of COVID-19 reasonable and religious accommodations. The Anti-Harassment Program assisted with the Disability Program due to the influx of cases. This impacted the RA Policy and Procedures and the Anti-Harassment Policy to be published.</p> <p>The Disability Program created a COVID-19 panel to process COVID-19 religious accommodation requests. In FY21, the EEO office lost the Disability Program Manager (DPM) and hired a new DPM in May 2022. The Disability Program is actively working on getting the RA Policy and Procedures published. Reasonable accommodation training was published in FY21. The RA Policy and Procedures was approved by the EEOC on 01/05/2021. Due to the increase in the number of cases, the EEO Director restructured the Disability Program and hired a Reasonable Accommodations Coordinator (RAC) to support the program in May 2022. CLOSED</p>
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**6. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
04/30/2017	Identify and fund an EEO Complaint Tracking System.	09/30/2017	09/30/2023	

**Responsible Official(s)**

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

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**Planned Activities Toward Completion of Objective**

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

**Report of Accomplishments**

Fiscal Year	Accomplishments
FY20	Working closely with Information Services to obtain an EEO Complaint Tracking System. The proposed implementation date is FY23 if funding is approved.
FY22	In FY22, funding in the amount of \$110,00 was budgeted for FY23.

**7. Statement of Model Program Essential Element Deficiency**

Type of Program Deficiency	Brief Description of Program Deficiency
B.4.a.8	Although the agency has sufficient staffing to support the success of its EEO program we are unable to effectively administer its special emphasis programs.

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/31/2018	Develop Special Emphasis Program (SEP).	09/30/2020	09/30/2024	

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
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09/30/2020	Submit SEP proposal to senior leadership for approval.	Yes	09/30/2021	09/13/2019
09/30/2020	Market the SEP program to NARA management and staff.	Yes	09/30/2024	
09/30/2020	Select and train SEP.	Yes	09/30/2024	

**Report of Accomplishments**

Fiscal Year	Accomplishments
FY20	Hired Affirmative Employment Supervisor. CLOSED

**8. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/01/2020	Add EEO complaints process training to annual required training	09/30/2021	11/30/22	

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
01/31/2022	Train all managers and supervisors on the EEO Complaint process.	Yes	11/30/2022	

**Report of Accomplishments**

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Fiscal Year	Accomplishments
FY20	Developed training for all managers and supervisors.
FY21	EEO Compliance for Supervisor [EEO-MS-21] was made available through LMS on April 19, 2021. Training will be made available in the Annual Supervisory Refresher Training in 2022. A job aid/takeaway titled "What to do when you get an EEO complaint?" was developed and provided to the managers and supervisors for the Supervisory Development Refresher Training. The EEO Director provided an Overview of EEO Programs and Processes, which included a review of the entire EEO complaint process, at the Supervisory Development Refresher Training. The EEO Director also served on panels where the EEO complaint process was discussed.

**9. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/01/2020	Add RA training to annual required training	09/30/2021		08/31/2021

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
EEO Manager	Tanya Shorter	Yes
Disability Program Manager	<a href="#">Kimberly Meyer</a>	Yes

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2021	Train all managers and supervisors on RA Procedures.	Yes		08/31/2021

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**Report of Accomplishments**

Fiscal Year	Accomplishments
FY21	<p>98 percent of managers and supervisors completed the Annual Mandatory Training.</p> <p>The DPM attended the Disability Law and RA Conference Workshop.</p> <p>Completed four ad hoc training sessions on RA for program offices.</p> <p>Issued guidance to managers and supervisors on the processing of COVID-19 reasonable and religious accommodations.</p> <p>Participated in the bi-weekly Office of Management and Budget (OMB) COVID call for Small Agencies meetings to stay abreast of the constant COVID-19 changes.</p> <p>Participated in several EEOC training sessions on COVID-19 updates.</p> <p>Human Capital (HC) developed a Schedule A and 30% Disabled Veteran's resume repository, which launched in early 2022. This resume repository is available to all NARA hiring managers to direct hire persons with disabilities.</p> <p>CLOSED</p>

**10. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/31/2018	Coordinate Senior Management involvement on the implementation of the SEP.	09/30/2020	09/30/2024	

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Market the SEP program to NARA's management and staff.	No	09/30/2024	



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09/30/2020	Select and Train Special Emphasis Program Managers (SEPM).	No	09/30/2024	
09/30/2020	Advance NARA's workforce knowledge about SEPM duties.	No	09/30/2024	

**Report of Accomplishments**

Fiscal Year	Accomplishments
FY20	Reviewed SEP proposal with the Human Resource Working Group.
FY21	The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness.

**11. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/31/2018	Develop a barrier analysis process with participation roles for senior leaders.	09/30/2020	09/30/2024	

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Develop barrier analysis participation roles and responsibilities.	No	09/30/2024	

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09/30/2020	Market the barrier analysis process to NARA's management.	No	09/30/2024	
09/30/2020	Develop action plans with stakeholder concurrence.	No	09/30/2025	

**Report of Accomplishments**

Fiscal Year	Accomplishments
FY21	The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness.

**12. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/31/2018	Create roles for senior leaders to assist with developing barrier analysis action plans.	09/30/2020	09/30/2024	

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)

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09/30/2020	Monitor and assess all plan implementation and for measurable results.	No	09/30/2025	
09/30/2020	Develop action plans with stakeholders concurrence.	No	09/30/2025	

**Report of Accomplishments**

Fiscal Year	Accomplishments
FY21	The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness.

**13. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/13/2018	Explore opportunities to develop and incorporate EEO action plans into Agency Strategic plans.	09/30/2020	09/30/2024	

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)

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09/30/2022	Establish partnerships with senior leaders to assist in incorporating EEO action plans into Agency Strategic Plan.	No	09/30/2024	
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**Report of Accomplishments**

Fiscal Year	Accomplishments
FY21	The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness.

**14. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/31/2018	Conduct field audits yearly.	09/30/2021	09/30/2024	

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2021	Develop partnerships with field offices.	No	09/30/2024	
09/30/2021	Develop field office assessment criteria.	No	09/30/2024	

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**Report of Accomplishments**

Fiscal Year	Accomplishments
FY21	The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness.

**15. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/31/2018	Conduct barrier analysis on field offices.	09/30/2021	09/30/2025	

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2021	Develop partnerships with field offices for barrier analysis awareness and education.	Yes	09/30/2024	
09/30/2021	Implement agency wide barrier analysis.	Yes	09/30/2025	

**Report of Accomplishments**

Fiscal Year	Accomplishments
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FY21	The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness.
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**16. Statement of Model Program Essential Element Deficiency**

Type of Program Deficiency	Brief Description of Program Deficiency
C.2.b	The agency has established but has not published reasonable accommodations procedures that comply with EEOC's regulations and guidance.

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
05/01/2017	Establish the RA Policy and Procedures that comply with EEOC's regulations and guidance.	10/31/2017	09/30/2019	09/11/2019
09/11/2019	EEOC approval of the established RA Policy and Procedures.	09/11/2020	09/30/2021	01/05/2021
01/05/2021	Publish the approved EEOC RA Policy and Procedures.	02/28/2023		

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
EEO Manager	Tanya Shorter	Yes
Disability Program Manager	<a href="#">Kimberly Meyer</a>	Yes

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
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01/31/2018	Complete revisions to draft (RA) Policy and Procedures.	Yes	09/30/2019	09/11/2019
09/11/2019	Provide the established RA Policy and Procedures to the EEOC for approval.	Yes	09/11/2020	01/05/2021
09/30/2021	Start the agency policy creation process to get the established RA Policy and Procedures approved for publishing.	Yes	07/30/2022	
07/30/2022	Respond to the questions from the Strategy and Performance Division the RA Policy and Procedures.	Yes		
09/30/2022	Collaborate with the Strategy and Performance Division to develop the presentation that must be routed to leadership for feedback.	Yes		
02/28/2023	Route the RA Policy and Procedures for publishing.	Yes		

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
FY21	<p>The EEO office is continuing to work with the Strategy and Performance Division Office to review and publish the EEOC approved RA Policy and Procedures.</p> <p>Created Standard Operating Procedures (SOPs) for the RA/Reassignment Process.</p> <p>Created FAQs for the Disability Program.</p> <p>Reasonable Accommodations Training was published in FY21.</p> <p>The RA Policy and Procedures were approved by the EEOC on 1/5/2021.</p> <p>Completed four ad hoc training sessions on RA for program offices.</p>

**17. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

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

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10/01/2019	Establish a firewall between the EEO Director and RA Program.	09/30/2021		09/28/2020
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**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

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

**Report of Accomplishments**

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

**18. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/01/2020	Clearly state maximum RA processing time in updated RA procedures.	09/30/2021		01/05/2021
03/05/2021	Publish the approved EEOC RA Policy and Procedures.	02/28/2023		

**Responsible Official(s)**



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Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
EEO Manager	Tanya Shorter	Yes
Disability Program Manager	<a href="#">Kimberly Meyer</a>	Yes

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Publish to the internal/public webpage.	Yes		09/11/2019
09/30/2021	Revise NARA 303, RA Policy and Procedures and submit to EEOC for approval.	Yes		01/05/2021
09/30/2021	Start the agency policy creation process to get the established RA Policy and Procedures approved for publishing.	Yes	07/30/2022	
07/30/2022	Respond to the questions from the Strategy and Performance Division regarding the RA Policy and Procedures.	Yes		
09/30/2022	Collaborate with the Strategy and Performance Division to develop the presentation that must be routed to leadership for feedback.	Yes		

**Report of Accomplishments**

Fiscal Year	Accomplishments
FY20	Revised NARA 303 RA Procedures to be compliant on 01/05/2021.
FY21	<p>The RA Policy and Procedures are awaiting to be published.</p> <p>The RA Policy and Procedures was approved by the EEOC on 01/05/2021.</p> <p>In FY21, the RA Program had a huge increase of COVID-19 reasonable and religious accommodations.</p> <p>The Disability Program created a COVID-19 panel to process COVID-19 religious accommodation requests.</p> <p>In FY21, the EEO office lost the DPM and hired a new DPM in May 2022.</p> <p>The Disability Program is actively working on getting the RA Policy and Procedures published.</p> <p>Reasonable accommodation training was published in FY21.</p> <p>Due to the increase in the number of cases, the EEO office restructured the Disability Program and hired DPM and RAC to support the program in May 2022.</p>

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**19. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/01/2020	Process all accommodation requests within the timeframe set forth in the RA procedures.	09/30/2021	09/30/2023	

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
EEO Manager	Tanya Shorter	Yes
Disability Program Manager	<a href="#">Kimberly Meyer</a>	Yes

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2021	Revise RA Policy and Procedures and submit to EEOC for approval.	Yes		01/04/2021
09/30/2021	Train all staff on the RA Process.	Yes	11/30/2022	

**Report of Accomplishments**

Fiscal Year	Accomplishments
FY21	87 percent of RAs were processed timely. Created SOPs for the RA/Reassignment Process. Developed FAQs for the Disability Program. Trained EEO staff on the RA Process in July 2021. The agency hired a DPM and RAC in May 2022. The DPM and RAC will be trained on the new RA Procedures by 11/30/ 2022.

**20. Statement of Model Program Essential Element Deficiency**

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Type of Program Deficiency	Brief Description of Program Deficiency
C.2.c	The agency did not establish procedures for processing requests for Personal Assistance Services (PAS) that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards.

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
05/31/2017	Create PAS procedures.	10/31/2017	07/31/2019	07/26/2019
07/26/2019	Update PAS that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards.	07/30/2022		
05/30/2022	Publish PAS procedures.	11/30/2022		

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
EEO Manager	Tanya Shorter	Yes
Disability Program Manager	<a href="#">Kimberly Meyer</a>	Yes

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
01/31/2018	Include PAS procedures in draft RA Policy (leadership review, policy review, and publish).	Yes	06/30/2022	
07/30/2022	Respond to the questions from the Strategy and Performance Division the RA Policy and Procedures to include PAS procedures.	Yes		
09/30/2022	Collaborate with the Strategy and Performance Division to develop the presentation that must be routed to leadership for feedback.	Yes		

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02/28/2023	Route the RA Policy and Procedures to include PAS procedures for publishing.	Yes		
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**Report of Accomplishments**

Fiscal Year	Accomplishments
FY21	The EEO office is continuing to work with the Strategy and Performance Division to review and publish the EEOC approved RA Policy and Procedures.

**21. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/30/2019	Establish timetables or ticker systems to review NARA policy procedures for barriers.	09/30/2020	09/30/2024	

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Reinvigorate the partnerships with HC Staff to identify barriers to promotion, employee recognition, and employee development programs.	No	09/30/2024	

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**Report of Accomplishments**

Fiscal Year	Accomplishments
FY20	We reviewed the Awards and Recognitions policy for barriers. As a result, we changed our award policy to issue performance awards that are now the same for all grades.
FY21	While there is not a formal timetable/schedule in place, HC reviews policies on an annual basis and on an ongoing basis, looks at new ways to recognize and award employees.

**22. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/31/2018	Collaborate with the HC to identify policies, practices, or procedures with barriers to employment.	09/30/2020	09/30/2024	

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Explore more opportunities to communicate about policy, actions, and decisions.	No	09/30/2024	
09/30/2020	Collaborate with HC to review barriers using a schedule.	No	09/30/2024	

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**Report of Accomplishments**

Fiscal Year	Accomplishments
FY20	HC and EEO continue to explore different ways to collaborate on outreach and recruiting initiatives that are aimed at building a diverse pipeline for the next generation of archivists and other mission critical occupations. Initiatives include partnering with professional organizations, enhancing our partnership with VA's compensated work therapy program, building out our support to managers, supervisors, and work units to better acclimate staff to work underrepresented groups and with persons with targeted disabilities.
FY21	The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness.

**23. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/31/2019	Collect and review data consistently.	09/30/2020	09/30/2023	

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)

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09/30/2020	Explore more opportunities to collect and review data.	No	09/30/2023	
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**Report of Accomplishments**

Fiscal Year	Accomplishments
FY21	The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness.

**24. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2019	Develop questions for PWD exit interviews.	09/30/2020	09/30/2021	07/30/2021
07/30/2021	Submitted questions for PWD exit interviews to HC.	09/30/2021		08/24/2021
08/24/2021	Utilization of the survey.			03/09/2022

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Director	Erica Pearson	Yes
Human Capital Staff	Human Capital Staff	No
Disability Program Manager	Kimberly Meyer	Yes
EEO Manager	Tanya Shorter	Yes

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing?	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
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		(Yes or No)		
09/30/2020	Develop strategies to track exit interview data.	Yes		03/09/2022
09/30/2020	Implement the Affirmative Action Plan for Hiring and Retention of Individuals with Disabilities.	Yes	11/30/2022	

### Report of Accomplishments

Fiscal Year	Accomplishments
FY21	<p>PWD exit interview questions were developed. Submitted PWD exit interview questions to HC to add to the agency exit survey.</p> <p>PWD exit interview questions were added to the agency survey and launched on 03/09/2022.</p> <p>Data from the PWD exit interview questions data would be shared quarterly with the DPM.</p> <p>The exit clearance process includes a SurveyMonkey exit interview that collects information about working at NARA with disabilities</p> <p>NARA's new Strategic Plan, issued in 2022, contains a strategic objective that, by FY26, NARA will increase the diversity of employees in mission-critical occupations for GS-12 and above positions to mirror the Civilian Labor Force. Strategies include expanded use of hiring authorities, including the Pathways program, to increase candidate pool diversity, providing training to hiring managers to increase diversity of the workforce, and establishing relationships with educational institutions and professional organizations to support recruiting and internship programs for members of underserved communities.</p>

### 25. Statement of Model Program Essential Element Deficiency

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

### Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2019	Develop stronger strategies to collect and review data consistently.	09/30/2020	09/30/2024	

### Responsible Official(s)



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

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Identify more opportunities to collect and review data.	No	09/30/2024	

**Report of Accomplishments**

Fiscal Year	Accomplishments
FY21	The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness.

**26. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2019	Conduct barrier analysis.	09/30/2020	09/30/2025	

**Responsible Official(s)**

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

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**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Explore opportunities to communicate about policy, actions, and decisions.	No	09/30/2025	

**Report of Accomplishments**

Fiscal Year	Accomplishments
FY20	As more EEO staff were hired we began collaborating with HC.
FY21	The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness.

**27. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2020	Conduct a barrier analysis to establish an agency baseline.	09/30/2021	09/30/2024	

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

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Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Develop barrier analysis participation roles and responsibilities.	No	09/30/2024	
09/30/2020	Market the barrier analysis process to NARA's management.	No	09/30/2024	
09/30/2020	Develop action plans with stakeholder concurrence.	No	09/30/2025	

**Report of Accomplishments**

Fiscal Year	Accomplishments
FY20	Hired an Affirmative Employment Supervisor (09/28/2020).
FY21	The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness.

**28. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2018	Conduct barrier analysis.	09/30/2020	09/30/2024	

**Responsible Official(s)**

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

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**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2019	Conduct barrier analysis.	No	09/30/2024	

**Report of Accomplishments**

Fiscal Year	Accomplishments
FY21	The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness.

**29. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2020	Timely provide EEO Counseling pursuant to 29 CFR;1614.105.	09/30/2022	09/30/2023	

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
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11/30/2022	Hire additional EEO staff to support timely EEO counseling.	Yes		
09/30/2023	Acquire a tracking system.	No		

**Report of Accomplishments**

Fiscal Year	Accomplishments
FY20	Hired three additional EEO Staff to support the EEO Office.
FY21	SOPs were drafted that included steps to ensure timeliness. An excel spreadsheet tracker was expanded to include every action/step taken in the process to ensure timeliness. Monthly timeliness meetings were established to monitor and track the status of cases. Seven or 88% of the eight cases completed were completed within the established timeframes. One or 13% was untimely. Actively recruiting more EEO counselors and currently utilizing contract EEO counselors.
FY22	In FY22, funding in the amount of \$110,000 was budgeted for FY23

**30. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2020	Timely issue EEO accept/dismiss letters pursuant to MD-110.	09/30/2022		09/30/2021

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Specialist	<a href="#">Duane Tobias</a>	Yes
EEO Complaints Manager	Tammie Johnson	Yes
EEO Director	Erica Pearson	Yes

**Planned Activities Toward Completion of Objective**

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

### Report of Accomplishments

Fiscal Year	Accomplishments
FY20	The EEO Office hired an EEO Specialist in July 2020, targeting improved the timeframe for acceptance/dismissals.
FY21	SOPs were drafted that included steps to ensure timeliness. An excel spreadsheet tracker was expanded to include every action/step taken in the process to ensure timeliness. Monthly timeliness meetings were established to monitor and track the status of cases. Acceptance letters were issued within 15 days of receipt of the Counselor's Report. The average processing time for four letters was 10 days in FY21. CLOSED

### 31. Statement of Model Program Essential Element Deficiency

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

### Objective(s) and Dates for EEO Plan

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2020	Timely complete investigations pursuant to 29 CFR.	09/30/2022		09/30/2021

### Responsible Official(s)

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

### Planned Activities Toward Completion of Objective

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

### Report of Accomplishments

Fiscal Year	Accomplishments
FY20	Office hired an additional EEO staff to support the processing of investigations.
FY21	SOPs were drafted that included steps to ensure timeliness. An excel spreadsheet tracker was expanded to include every action/step taken in the process to ensure timeliness. Monthly timeliness meetings were established to monitor and track the status of cases. As a result, three or 60% were processed within 180 days. Two or 40% were processed within 181-360 day and are considered timely due to agreements to extend for 90 days. Therefore, in FY21 investigations were 100% timely. CLOSED

### 32. Statement of Model Program Essential Element Deficiency

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

### Objective(s) and Dates for EEO Plan

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

### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Specialist	<a href="#">Duane Tobias</a>	Yes
EEO Complaints Manager	Tammie Johnson	Yes
EEO Director	Erica Pearson	Yes

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**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2022	Hire additional EEO staff to support formal complaint processing.	Yes		07/30/2020
09/30/2023	Acquire a tracking system.	No		

**Report of Accomplishments**

Fiscal Year	Accomplishments
FY20	The EEO Office hired an EEO Specialist in July 2020 to monitor the cases at the investigative stage including providing the notice of rights in a timely manner.
FY21	Developed and implemented SOPs to include a step where the Notice of Incomplete Investigation (29 CFR 1614.108(g)) will be issued on the 170-day to ensure timeliness.
FY22	In FY22, funding in the amount of \$110,000 was budgeted for FY23

**33. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
09/30/2018	Timely issue Final Agency Decisions pursuant to 29 CFR.	09/30/2023		

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
EEO Specialist	<a href="#">Duane Tobias</a>	Yes
EEO Complaints Manager	Tammie Johnson	Yes
EEO Director	Erica Pearson	Yes



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**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2022	Monitor Final Agency Decisions completion for timeliness.	Yes	09/30/2023	

**Report of Accomplishments**

Fiscal Year	Accomplishments
FY20	The EEO Office hired an EEO Specialist in July 2020 to assist in working toward the timely processing of FADs. In addition, a work plan was developed to assist in issuing timely FADs.
FY21	The EEO Staff and Office of General Counsel Staff meet monthly on a variety of topics including improving ROIs and FADs. On February 24, 2021, the Director and staff met with an EEOC AJ to discuss ROIs and FADs. In May 2021, the EEO Staff and Office of General Counsel Staff participated in a FAD Writing Training.
FY22	In FY22, funding in the amount of \$110,000 was budgeted for FY23

**34. Statement of Model Program Essential Element Deficiency**

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

**Objective(s) and Dates for EEO Plan**

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

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

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

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
FY20	The EEO Office was notified that it is on schedule to obtain a tracking system in FY23. Staff will be trained at that time.
FY22	In FY22, funding in the amount of \$110,000 was budgeted for FY23

## MD-715 – Part I

### Agency EEO Plan to Eliminate Identified Barriers

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

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

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

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

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Underrepresentation of HM and HF in the Permanent Workforce	A1	HM represent 1.60% of the permanent workforce which is below their CLF benchmark of 6.82%. HF represent 1.64% of the permanent workforce which is below their CLF benchmark of 6.16%. For new hires, HM represents 4.59% and HF represents 3.67%.

#### EEO Group(s) Affected by Trigger

EEO Group(s)
HM
HF

#### Barrier(s) Analysis Process

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	(Table A1) Total Workforce by Race, Ethnicity, and Sex
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	

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Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	No	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	No	

**Status of Barrier(s) Analysis Process**

<b>Barrier(s) Analysis Process Completed?</b> (Yes or No)	<b>Barrier(s) Identified?</b> (Yes or No)
No	No

**Statement of Identified Barrier(s)**

Description of Policy, Procedure, or Practice

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

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Collaborate with Human Capital and hiring officials to determine strategies to enhance the recruitment efforts	10/01/2021	10/01/2022	Yes	09/30/2024	

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective(s)**

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
10/01/2021	Collaborate with Human Capital and hiring officials on recruitment efforts	09/30/2024	

**Report of Accomplishment(s)**

Fiscal Year	Accomplishment(s)

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

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Underrepresentation in Awards and Recognition for HF, BM, BF, NHOPIM, NHOPIF, AIANM, AIANF, TMM	A9	HF, BM, BF, NHOPIM, NHOPIF, AIANM, AIANF and TMM are underrepresented in nine out of twelve of the awards and recognition categories in comparison to their participation rate in the workforce.

**EEO Group(s) Affected by Trigger**

EEO Group(s)
HF
BM
BF
NHOPIM
NHOPIF
AIANM
AIANF
TMM

**Barrier(s) Analysis Process**

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

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**Status of Barrier(s) Analysis Process**

<b>Barrier(s) Analysis Process Completed?</b> (Yes or No)	<b>Barrier(s) Identified?</b> (Yes or No)
No	No

**Statement of Identified Barrier(s)**

Description of Policy, Procedure, or Practice

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

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Increase awards distribution for Total Workforce Males	10/01/2021	10/01/2022	Yes	09/30/2024	

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective(s)**

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
10/01/2021	Promote awards and recognition opportunities to senior leaders	09/30/2024	

**Report of Accomplishment(s)**

Fiscal Year	Accomplishment(s)

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

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Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data	A-4 Participation Rates for SES	<ul style="list-style-type: none"> <li>• HM, HF, AM, NHOPIM, NHOPIF, AIANM, AIANF and TMM and TMF are not represented in the SES population.</li> <li>• WM and WF represent 50% (13) and 26.92% (7) of the SES population in comparison to their respective participation in the workforce at 33.80% and 28.36%.</li> <li>• BM and BF represent 3.85% (1) and 15.38% (4) of the SES population in comparison to their respective participation in the workforce at 12.26% and 17.02%.</li> <li>• AF represent 3.85%(1) of the SES population. Their participation in the workforce is 1.86%.</li> </ul>

**EEO Group(s) Affected by Trigger**

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

**Barrier(s) Analysis Process**

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	(Table A-4) Participation Rates for SES
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	No	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	No	

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**Status of Barrier(s) Analysis Process**

<b>Barrier(s) Analysis Process Completed?</b> (Yes or No)	<b>Barrier(s) Identified?</b> (Yes or No)
No	No

**Statement of Identified Barrier(s)**

<b>Description of Policy, Procedure, or Practice</b>

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

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Collaborate with Human Capital to determine career growth and development opportunities	10/01/2019	10/31/2022	Yes	09/30/2024	

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective(s)**

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Review and analyze the GS-14 and GS- 15 applicant pool to determine if any barriers exist.	09/30/2024	

**Report of Accomplishment(s)**

Fiscal Year	Accomplishment(s)



## MD-715 – Part J

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

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

#### Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 C.F.R. § 1614.203(d)(7)) requires agencies to establish specific numerical goals for increasing the participation of persons with reportable and targeted disabilities in the federal government.

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

a. Cluster GS-1 to GS-10 (PWD)	Yes	No X
b. Cluster GS-11 to SES (PWD)	Yes X	No

Table B4P: General Schedule (GS) Grades by Disability

**Cluster GS-1 to GS-10**

NARA's PWD = 19.2%

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

NARA's PWD is well represented in the GS-1 – GS-10 cluster at 19.2%. This is an increase compared to FY20 at 18.85%.

**Cluster GS-11 to SES**

NARA's PWD = 10.9%

NARA's GS-11 to SES PWD are below the 12% benchmark at 10.9%. This is a slight increase compared to FY20 at 10.13%.

NARA's GS-11 to SES PWD are represented at GS-11 (15.49%); GS-12 (12.30%); GS-13 (9.59%); GS-14 (9.18%); GS-15 (3.23%); and SES (7.69%). The GS -11 and GS-12 are above the 12% benchmark. The GS -13, GS-14, GS-15, and SES are below the 12% benchmark.

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

- |                                 |     |      |
|---------------------------------|-----|------|
| a. Cluster GS-1 to GS-10 (PWTD) | Yes | No X |
| b. Cluster GS-11 to SES (PWTD)  | Yes | No X |

Table B4P: General Schedule (GS) Grades by Disability

**Cluster GS-1 to GS-10**

NARA’s PWTD = 4.40%

NARA’s PWTD are well represented at the GS-1 to GS-10 at 4.40%. This is an increase compared to FY20 at 4.33%.

**Cluster GS-11 to SES**

NARA’s PWTD = 2.10%

NARA’s GS-11 to SES PWTD are above the 2% federal benchmark at 2.10%. This is an increase compared to FY20 at 2.06%

NARA’s GS-11 to SES PWTD are represented at GS-11 (1.88%); GS-12 (1.83%); GS-14 (1.45%); GS-15 (1.08%); and SES (0.00%), which are all below the 2% federal benchmark. NARA is represented at GS-13 (3.20%), which is above the 2% federal benchmark.

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

FY21, NARA communicated our hiring goals for PWD and PWTD by posting information on the Internal Collaboration Network (ICN).

## Section II: Model Disability Program

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

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**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.

Yes X      No

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	8 + ARC staff			NARA's responsible official for the ARC contract in the Office of Human Capital is Valorie Findlater, <a href="mailto:valorie.findlater@nara.gov">valorie.findlater@nara.gov</a>
Answering questions from the public about hiring authorities that take disability into account	8 + contractor staff		1	NARA's responsible official for the ARC contract in the Office of Human Capital is Valorie Findlater, <a href="mailto:valorie.findlater@nara.gov">valorie.findlater@nara.gov</a>  Tanya Shorter Disability Program Manager Supervisor; NEEO, <a href="mailto:Tanya.Shorter@nara.gov">Tanya.Shorter@nara.gov</a>
Processing reasonable accommodation requests from applicants and employees	1			Tyrone Gaines, DPM, NEEO, <a href="mailto:Tyrone.gaines@nara.gov">Tyrone.gaines@nara.gov</a>

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Section 508 Compliance	1			Eric Chaskes, IT Specialist, Development and Tools Management Division, <a href="mailto:Eric.chaskes@nara.gov">Eric.chaskes@nara.gov</a>
Architectural Barriers Act Compliance	1			Mark Sprouse, Facilities & Materials Management Officer, Facility and Property Management Division <a href="mailto:Mark.sprouse@nara.gov">Mark.sprouse@nara.gov</a>
Special Emphasis Program for PWD and PWTD			1	Tyrone Gaines, DPM, NEEO <a href="mailto:Tyrone.gaines@nara.gov">Tyrone.gaines@nara.gov</a>

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

Yes  No

For FY21, the DPM participated in the following trainings:

Disability Law and RA Accommodation Conference/Workshop February 22 - 25, 2021

LRP February 3, 2021

The Disability Program Manager participated in the weekly Office of Management and Budget (OMB) COVID call for Small Agencies meetings to stay abreast of the constant COVID-19 changes

The Disability Program Manager participated in several Equal Employment Opportunity training sessions on COVID-19 updates

Business Writing May 24 - 25, 2021

Leadership Skills and Techniques June 23 - 25, 2021

**B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM**

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

Yes  No

**Section III: Plan to Recruit and Hire Individuals with Disabilities**

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

**A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES**

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

Currently job applicants with disabilities may apply to any NARA job and any job using the Schedule A authority. In FY21, we developed a Schedule A and 30% Disabled Veterans resume repository, which launched in early 2022. This resume repository is available to all NARA hiring managers to direct hire persons 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.

Schedule A language appears in Merit Promotion announcements, which include instructions for PWD and PWTD applying under Schedule A. In addition, we have implemented a resume repository, which enables hiring managers to direct hire persons with disabilities using Schedule A.

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

**1)** The determination of eligibility for appointment below one of the hiring authorities that take disability into account is made through the documentation provided by the applicant, i.e. their resume, transcripts (if required by the position), officially signed Schedule A disability letter, DD-214, and/or veterans disability letter. **(2)** The individual's name is added to a certificate created from the job announcement posting and forwarded to the Selecting Official. In addition, applicants to our Schedule A resume repository are reviewed by hiring managers and, if interested, are then reviewed by ARC to determine their eligibility for Schedule A hiring. If verified, the hiring manager is notified to interview the applicant.

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

Yes X      No

Human Capital Specialists provide training to all new managers and supervisors during the New Supervisor Development Program conducted two times a year. NARA's shared services center for Staffing – Administrative Resource Center (ARC), conducts a Strategic Recruitment Conversation with the hiring manager and this includes discussing alternate hiring authorities, to include Schedule A disability appointments. In addition, training was provided to hiring managers in the use of the Schedule A and 30% Disabled Veterans resume repository.

**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 Office of Human Capital is pending OMB approval to advertise its Schedule A and 30% Disabled Veterans resume repository. We will do outreach about this tool once we receive approval.

**C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)**

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

- |   |     |      |
|---|-----|------|
| a. New Hires for Permanent Workforce (PWD)  | Yes | No X |
| b. New Hires for Permanent Workforce (PWTD) | Yes | No X |

Table B1-1: Total Workforce - Distribution by Disability Status (Participation Rate)

NARA’s FY21 percentages are:

PWD - 30.30%

PWD new hires increased compared to FY20 at 24.07%

PWTD - 5.5%

PWTD new hires decreased compared to FY20 at 7.41%

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If “yes”, please describe the Trigger(s): below.

- |                             |       |      |
|-----------------------------|-------|------|
| a. New Hires for MCO (PWD)  | Yes X | No   |
| b. New Hires for MCO (PWTD) | Yes   | No X |

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Table B6: Mission Critical Occupations (MCOs) Applicant Flow Data & Pivots

Qualified Applicant Pool (QAP)

	PWD QAP Benchmark	Total PWD New Hire	Total PWD % QAP
0301	8.22%	20.51%	12.30%
1420	8.69%	28.57%	19.88%
0343	12.71%	28.57%	15.86%
1421	16.56%	17.61%	38.49%
1001	20.16%	19.35%	-0.8%
2210	11.21%	15.07%	3.87%

Trigger(s): We are below the benchmark in all two of six MCOs for PWD: 1001 (-0.8), and 2210 (3.87%).

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Qualified Applicant Pool (QAP)

	PWTD QAP Benchmark	Total PWTD New Hire	Total PWD % QAP
0301	1.36%	10.25%	8.89%
1420	2.17%	14.28%	12.11%
0343	1.69%	8.57%	6.88%
1421	3.68%	10.32%	6.64%
1001	3.10%	13.36%	10.26%
2210	1.72%	5.47%	3.77%



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3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified *internal* applicants for any of the mission-critical occupations (MCO)? If “yes”, please describe the Trigger(s): below.

- |  |       |    |
|--|-------|----|
| a. Qualified Applicants for MCO (PWD)  | Yes X | No |
| b. Qualified Applicants for MCO (PWTD) | Yes X | No |

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Table B6: Mission Critical Occupations (MCOs) Applicant Flow Data & Pivots

	PWD Relevant Applicant Pool	PWD QIA	Total PWD % Relevant Applicant Pool
	Benchmark		
0301	3.50%	45.36%	41.86 %
0343	41.88%	43.63%	1.75%
1001	27.27%	33.33%	6.03%
1420	15.15%	0.00%	0.00%
1421	25.53%	40.00%	14.47%
2210	31.34%	40.00%	8.66%

Trigger(s): We are below the benchmark in five of six MCOs for PWD: 0343 (1.75), 1420 (0.00%) and 1001 (6.03%), 1421 (14.47%), and 2210 (8.66%).

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	PWTD Relevant Applicant Pool	PWTD QIA	Total PWTD % Relevant Applicant Pool
0301	15.78%	21.64 %	5.86 %
0343	17.94%	43.63%	0.24%
1001	18.18%	16.66%	-1.52%
1420	9.09%	0.00%	-9.09%
1421	12.76%	18.66%	5.9%
2210	20.1%	24.61%	4.51%

Trigger(s): We are below the benchmark in six of six MCOs for PWTD: 0301 (5.86%), 0343 (0.24), 1420 (-9.09%) and 1001 (-1.52%), 1421 (5.9%), and 2210 (4.51%).

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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 Trigger(s): below.

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

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Table B6: Mission Critical Occupations (MCOs) Applicant Flow Data & Pivots

	PWD Qualified Internal Promotions Benchmark	PWD Selected for Promotions	Total PWD % of Qualified Applicant Pool
0301	45.36%	0.00%	-45.36%
0343	43.63%	100.00%	56.37%
1001	33.33%	100.00%	66.67%
1420	0.00%	0.00%	0.00%
1421	40.00%	42.85%	2.85%
2210	40.00%	00.00%	-40.00

Trigger(s): We are below the benchmark in three of six MCOs for selections and promotions for PWD: 0301 (-45.36%), 1421 (2.85%), and 1420 (-40.00%).

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	PWTD Qualified Internal Promotions Benchmark	PWTD Selected for Promotions	Total PWTD% of Qualified Applicant Pool
0301	21.64%	0.00%	-21.64%
0343	18.18%	0.00%	-18.18%
1001	16.66%	0.00%	-16.66%
1420	0.00%	0.00%	0.00%
1421	18.66%	21.42%	2.76%
2210	24.61%	0.00%	-24.61%

Trigger(s): We are below the benchmark in six of six MCOs for selections and promotions for PWTD: 0301 (-21.64%), 0343 (18.18%), 1001 (-16.66%), 1421 ( 2.76%), 1420 (0.00%), and 2210 (-24.61%).

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

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

### **A. ADVANCEMENT PROGRAM PLAN**

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

NARA's new Strategic Plan, issued in 2022, contains a strategic objective that, by FY26, NARA will increase the diversity of employees in mission-critical occupations for GS-12 and above positions to mirror the Civilian Labor Force. Strategies include expanded use of hiring authorities, including the Pathways program, to increase candidate pool diversity, providing training to hiring managers to increase diversity of the workforce, and establishing relationships with educational institutions and professional organizations to support recruiting and internship programs for members of underserved communities.

### **B. CAREER DEVELOPMENT OPPORTUNITIES**

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

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

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

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

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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 (%)
Internships Programs No internship Programs	N/A	N/A	N/A	N/A	N/A	N/A
Fellowship Programs Excellence in Government (GS 13/14)	32	6	6.25%	0%	6.25%	0%
Mentoring Programs No mentoring Programs	N/A	N/A	N/A	N/A	N/A	N/A
Detail Programs Cross Training (all grade levels)	53	53	24.52%	24.52%	24.52%	24.52%
Coaching Programs Preparing to Lead (GS7-11)	27	5	14.81%	3.70%	14.81%	3.70%
Supervisor Development Program	53	53	15.09%	15.09%	15.09%	15.09%



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**C. AWARDS**

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

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

Table B-9 - Employee Recognition and Awards by Disability

Time-Off Awards PWD

	PWD	PWOD	PWTD
	Benchmark		
Total Time-Off 1-10 hours	14.68%	85.31%	3.23%
Total Time-Off 11-20 hours	11.11%	88.89%	1.11%
Total Time-Off 21-30 hours	16.99%	83%	3.26%
Total Time-Off 31-40 hours	10.29%	89%	1.47%

Cash Awards PWD

	PWD	PWOD	PWTD
	Benchmark		
Total Cash Awards \$500 and below	13.99%	86%	2.96%
Total Cash Awards \$501 - \$999	15.12%	84.87%	3.43%
Total Cash Awards \$1000 - \$1999	15.51%	84.48%	3.60%
Total Cash Awards \$2000 - \$2999	10.84%	89.15%	2.06%
Total Cash Awards \$3000 - \$3999	0.00%	100.00%	0.00%



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Total Cash Awards \$4000 - \$4999	0.00%	100.00%	0.00%
Total Cash Awards \$5000 or more	7.31 %	92.68%	0.00%

Trigger(s):

There are trigger(s) in ten award categories (Time-Off Awards 1-10, 21-30, 31-40, and Cash Awards \$500 and below, \$500-\$999, \$1000-\$1999, \$2000-\$2999, \$3000-\$3999, \$4000-\$4999 and \$5000-more), where the inclusion rate of PWD receiving awards is lower than the inclusion rate of PWOD receiving awards.

Trigger(s):

There are trigger(s) in eleven award categories (Time-Off Awards 1-10, 11-20, 21-30, 31-40, and Cash Awards \$500 and below, \$500-\$999, \$1000-\$1999, \$2000-\$2999, \$3000-\$3999, \$4000-\$4999 and \$5000-more), where the inclusion rate of PWTD receiving awards is lower than the inclusion rate of PWOD receiving awards.

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

- |                         |     |   |    |
|-------------------------|-----|---|----|
| a. Pay Increases (PWD)  | Yes | X | No |
| b. Pay Increases (PWTD) | Yes | X | No |

Table B9-1: Employee Recognition and Awards by Disability

	PWD	PWOD	PWTD
	Benchmark		
Quality Step Increases (QSI)	0%	0.72%	0%

Trigger(s): There are no PWD or PWTD who received Quality Step Increases compared to PWOD.

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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)  | Yes | No X |
| b. Other Types of Recognition (PWTD) | Yes | No X |

No other programs.

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**D. PROMOTIONS**

1. Does your agency have a trigger involving PWD among the qualified *internal* applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

a. SES

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

b. Grade GS-15

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

c. Grade GS-14

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

d. Grade GS-13

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

The relevant applicant pool data is not readily available in the format that aligns with information that is requested.

2. Does your agency have a trigger involving PWTD among the qualified *internal* applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

a. SES

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

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b. Grade GS-15		
i. Qualified Internal Applicants (PWTD)	Yes	No
ii. Internal Selections (PWTD)	Yes	No
c. Grade GS-14		
i. Qualified Internal Applicants (PWTD)	Yes	No
ii. Internal Selections (PWTD)	Yes	No
d. Grade GS-13		
i. Qualified Internal Applicants (PWTD)	Yes	No
ii. Internal Selections (PWTD)	Yes	No

The relevant applicant pool data is not readily available in the format that aligns with information that is requested.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

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

Table B7: Senior Grade Levels: Distribution by Disability (Participation Rate) Applicant Flow Data & Pivots

Trigger(s): There is no PWD new hires participation rate at grades SES, GS-15, and GS-13.

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4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box

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

Table B7: Senior Grade Levels: Distribution by Disability (Participation Rate) Applicant Flow Data & Pivots

There is no PWTD new hires participation rate at grades SES, GS-15, GS-14, and GS 13.

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.

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- a. Executives
  - i. Qualified Internal Applicants (PWD)      Yes      No
  - ii. Internal Selections (PWD)              Yes      No
- b. Managers
  - i. Qualified Internal Applicants (PWD)      Yes      No
  - ii. Internal Selections (PWD)              Yes      No
- c. Supervisors
  - i. Qualified Internal Applicants (PWD)      Yes      No
  - ii. Internal Selections (PWD)              Yes      No

The relevant applicant pool data is not readily available in the format that aligns with information that is requested.

6. Does your agency have a trigger involving PWTD among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

- a. Executives
  - i. Qualified Internal Applicants (PWTD)      Yes      No
  - ii. Internal Selections (PWTD)              Yes      No
- b. Managers
  - i. Qualified Internal Applicants (PWTD)      Yes      No
  - ii. Internal Selections (PWTD)              Yes      No
- c. Supervisors
  - i. Qualified Internal Applicants (PWTD)      Yes      No
  - ii. Internal Selections (PWTD)              Yes      No

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The relevant applicant pool data is not readily available in the format that aligns with information that is requested.

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box.
- |                                    |     |   |    |
|------------------------------------|-----|---|----|
| a. New Hires for Executives (PWD)  | Yes | X | No |
| b. New Hires for Managers (PWD)    | Yes |   | No |
| c. New Hires for Supervisors (PWD) | Yes | X | No |

Table B8: Management Positions: Distribution by Disability (Participation Rate) Applicant Flow Data & Pivots

Trigger(s): There is no PWD new hires participation at grades SES and supervisors for selectees.

Note: The agency does not capture data for managers.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box.
- |                                     |     |   |    |
|-------------------------------------|-----|---|----|
| a. New Hires for Executives (PWTD)  | Yes | X | No |
| b. New Hires for Managers (PWTD)    | Yes |   | No |
| c. New Hires for Supervisors (PWTD) | Yes | X | No |

Table B8: Management Positions: Distribution by Disability (Participation Rate) Applicant Flow Data & Pivots

Trigger: There is no PWTD new hires participation at grades SES and supervisors for selections.

Note: The agency does not capture data for managers.

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

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

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Yes                  No

There were 50 Schedule A disability hires during the period of 09/30/2019 to 9/30/2021; as of September 30, 2021, 47 were eligible for conversion, 47 were converted as of 9/27/2021.

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

- |                                  |   |  |
|----------------------------------|---|--|
| a. Voluntary Separations (PWD)   | Yes <input checked="" type="checkbox"/> | No                                     |
| b. Involuntary Separations (PWD) | Yes                                     | No <input checked="" type="checkbox"/> |

Table B1-2 Separations by type of Separation

	PWD	PWOD Benchmark
PWD Workforce Separations	9.04%	6.15%
PWD Removals (Involuntary)	0.79%	0.9%
PWD Resignations (Voluntary)	2.39%	1.25%
PWD Retirement (Voluntary)	3.45%	1.77%



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PWD Other Separations (Involuntary)	2.39%	3.03%
-------------------------------------	-------	-------

Trigger(s): PWD inclusion rates are higher than PWOD in Total Workforce Separations, Resignations, and Retirement for Voluntary Separations.

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

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

Table B1-2 Separations by type of Separation

	PWTD	PWOD Benchmark
PWTD Workforce Separations	11.25%	6.15%
PWTD Removals (Involuntary)	0%	0.093%
PWTD Resignations (Voluntary)	5%	1.25%
PWTD Retirement (Voluntary)	3.75%	1.77%
PWTD Other Separations (Involuntary)	11.25%	6.15%

Trigger(s): PWTD inclusion rates are higher than PWOD in Total Workforce Separations, Retirement, Resignation, and Other Separations.

PWTD inclusion rates are lower than PWOD in Removal Separations.

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4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

In FY21, we did not collect exit interview data. However, the exit interview data was implemented on March 9, 2022.

## **B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES**

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

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

The webpage provides a telephone number, a mailing address, and an email address for feedback. In addition, the website provides individuals with contact information for Section 508 Coordinators at other agencies to file a complaint and provides a link for contact information for the Section 508 Coordinators. The notice of rights can be located here (<https://www.archives.gov/global-pages/accessibility>). Information to file a complaint is located here (<https://www.archives.gov/eo/policy/508-aba-rights>).

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

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

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[board.gov/enforcement/](https://www.access-board.gov/enforcement/)) which provides individuals with the following options to file a complaint below the ABA:

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

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

The DPM continues to monitor assistive technology needs of NARA's workforce by tracking RA requests from employees requiring assistive technology as a form of an accommodation such as listening devices, digital timesheets, magnifying vision software, keyboards, mouse, voice recognition software and assistive equipment for hearing. In FY21, there were no requests from employees requiring assistive technology as a form of an accommodation.

The DPM and disABILITY EAG posted: NARA Notice 2022-002: Celebrating National Disability Employment Awareness Month - which celebrates the achievements of Americans with disabilities whose contributions in the workforce help ensure the strength of our nation. FY21 year's theme, "America's Recovery: Powered by Inclusion," reflects the importance of ensuring that people with disabilities have full access to employment and community involvement during the national recovery from the COVID-19 pandemic.

The Disability Program participated and hosted training and awareness on the following:

- The Reasonable Accommodations Training was published in FY21.
- The Disability Program Manager completed four (4) ad hoc training sessions for program offices.
- Developed and posted the Frequently Asked Questions (FAQs) on the Disability Program.
- 98% of managers and supervisors completed the Annual Mandatory Training.
- The Disability Program created standard operating procedures for the reasonable accommodation process.

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- The entire EEO office was trained on the reasonable accommodation process from inception to completion.
- The Disability Program Manager attended the Disability Law and Reasonable Accommodations Conference Workshop.
- The Disability Program participated in the weekly Office of Management and Budget COVID call for Small Agencies meetings to stay abreast of the constant COVID-19 changes.
- The Disability Program participated in several Equal Employment Opportunity training sessions on COVID-19 updates.
- The Disability Program hosted a series of training sessions on Modes of Communication when working with the Deaf and Hard of Hearing.

The Reasonable Accommodations Policy and Procedures was approved by the EEOC on 01/05/2021.

The Disability Program created a COVID-19 panel to process COVID-19 religious and reasonable accommodation requests.

The Disability Program issued guidance to managers and supervisors on the processing of COVID-19 reasonable and religious accommodations.

In FY21, the EEO office lost the Disability Program Manager and hired a new Disability Program Manager and Reasonable Accommodations Coordinator in May 2022.

The Disability Program is actively working on getting the EEOC approved Reasonable Accommodations Policy and Procedures published.

The Disability Program plans to launch a self-identification campaign to assist with identifying individuals with a disability and individuals with a targeted disability.

The Disability Program plans to provide training and awareness on disability matters; create a Personal Assistance Service SOP, RA Conflict of Interest SOP, Reconsideration of RA Approval/Denial Template Letters, etc.

### **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.)

FY21 average processing time is 16.48 days.

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

NARA monitors the timely processing of RA requests and trends by tracking all requests in our excel RA Tracker database. Additionally, we monitor accommodation trends quarterly, which tracks accommodations that are approved, denied, and withdrawn from the RA process. NARA's Interim Guidance 303-1, Reasonable Accommodation Policy and Procedures as a resource to all managers and supervisors on the internal and external websites. We also provide ad-hoc training for managers and Frequently Asked Questions (FAQs) managers and supervisors. We also developed Reasonable Accommodations Training that is aligned with the EEO approved policy and procedures that is currently awaiting publishing.

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

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

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

There were no requests for PAS during FY21. NARA's Interim Guidance 303-1, Reasonable Accommodation Policy and Procedures remain published and posted on the internal website as a resource to all managers and supervisors which includes information on PAS and procedures.

### **Section VI: EEO Complaint and Findings Data**

#### **A. EEO COMPLAINT DATA INVOLVING HARASSMENT**

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the government-wide average which is 22.10% for FY21?

Yes  No

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PWD complaints alleging harassment = PWD filed formal complaints at a rate of 40%.

During FY21, NARA had two PWDs (both identifying with mental disabilities) filed formal complaints alleging harassment. PWD filed formal complaints at a rate of 40% which is above the government-wide average of 22.10%.

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

Yes  No

In FY21, there were three formal complaints alleging harassment based on disability status that resulted in settlement agreements. There were no findings of discrimination.

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

In FY21, there were no findings of discrimination.

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

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average which is 14.33% for FY21?

Yes  No

PWD complaints alleging failure to provide a reasonable accommodation = PWD filed a complaint alleging failure to provide a reasonable accommodation at 40%.

During FY21, NARA had two complaints alleging failure to provide reasonable accommodation at 40%, which is above the government-wide average of 14.33%.

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

Yes  No

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

In FY21, there were no findings of discrimination.

### Section VII: Identification and Removal of Barriers

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

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

Yes                      No X

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

Yes                      No X

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

<b>Trigger 1</b>	<p><b>Promotion of PWD and PWTD into Managerial Positions</b></p> <p>Table B3: Occupational Categories by Disability</p> <p>Trigger(s): Managers are below the federal benchmark of 12% for PWD at 7.34%.</p> <p>Trigger(s): Executives are below the federal benchmarks of 12% for PWD (3.92%) and 2% for PWTD (0.98%).</p>
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	<p>Trigger(s): Out of six occupational categories, four are below the federal benchmark of 12% for PWD:</p> <p>Technicians (0%), Sales Workers (0%), Operatives (0%), and Service Workers (0%).</p> <p>Out of the six occupational categories, four are below the federal benchmark of 2% for PWTD.</p> <p>Technicians (0%), Sales Workers (0%), Operatives (0%), and Service Workers (0%).</p> <p>Table B4: General Schedule (GS) Grades by Disability</p> <p>Trigger(s): NARA GS 01-10 cluster (2484 employees) is below the PWD benchmark of 12% at 9.62%</p> <p>Trigger(s): NARA GS 11-SES cluster (2515 employees) is below the PWD benchmark of 12% at 5.44%.</p> <p>Triggers(s): NARA GS 11-SES cluster (2515) employees) is below the PWTD benchmark of 2% at 1.03%.</p> <p>Table B6: Mission-Critical Occupations by Disability</p> <p>Trigger(s): PWD is below the federal benchmark of 12% in the 0301, 1420 and 2210 series.</p> <p>PWTD is below the federal benchmark of 2% in the 0301, 0343, and 2210 series.</p>	
<b>Barrier(s)</b>	None identified	
<b>Objective(s)</b>	Enhance Employee Development	
<b>Responsible Official(s)</b>	<b>Performance Standards Address the Plan?</b> (Yes or No)	



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Valorie Findlater, Chief Human Capital Officer		Yes
Erica Pearson, Equal Employment Opportunity Director		Yes
Tanya Shorter, Anti-Harassment/Disability Program Manager Supervisor, NEEEO		Yes
Kimberly Meyer Disability Program Manager, NEEEO		Yes
<b>Barrier(s) Analysis Process Completed?</b> (Yes or No)		<b>Barrier(s) Identified?</b> (Yes or No)
No		No
<b>Sources of Data</b>	<b>Sources Reviewed ?</b> (Yes or No)	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	Table B3: Occupational Categories by Disability, Table B4: General Schedule (GS) Grades by Disability, Table B6: Mission-Critical Occupations by Disability
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	No	
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	

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Other (Please Describe)				
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
02/28/2018	Publish the updated Disability Strategic Plan.	Yes	09/30/2026	
01/31/2020	Develop Schedule A fact sheet for supervisors.	Yes	06/30/2021	02/24/2022
09/30/2020	Collaborate with Human Capital and ARC to create a Pilot Program for Schedule A hiring.	Yes	09/30/2022	03/08/2022
09/30/2021	Collaborate with Human Capital and ARC to create a tickler system for conversions.	Yes		09/30/2021
Fiscal Year	Accomplishments			
FY20	NARA's Human Capital appointed a new SPPC after the departure of the previous SPPC. Officially designated 9/28/2020.			
FY21	NARA's Human Capital began development of a resume repository for Schedule A and 30% Disabled Veterans. NARA's Human Capital continued work on strategic recruitment proposals in partnership with NEEO for increasing diversity including Schedule A. NARA's Human Capital advertised job vacancy announcements on LinkedIn and Twitter to try to access a more diverse audience for our job postings. Hired a new DPM who will partner with NARA's Human Capital Office on the promotion of PWD and PWTD.			

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

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

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

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

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

NARA will continue to show improvements in FY22. The DPM plans to collaborate with Human Capital in implementing the strategies for improving recruitment of people with disabilities and Schedule A hiring efforts. Additionally, the DPM will engage with the disABILITY EAG to seek assistance in accomplishing the plan activities.

<b>Trigger 2</b>	<p><b>Advancement of PWD and PWTD</b></p> <p><u>MCO New Hires:</u></p> <p>Trigger(s): Out of the five of six Mission Critical Occupational categories, all are below the federal benchmark of 12% for PWD in the 1420, 1421, 0343, 2210, and 1001 series.</p> <p>Trigger(s): Out of the six Mission Critical Occupational categories, five are below the federal benchmark of 2% for PWTD in the 0301 1420, 0343, 1001 and 2210 series.</p> <p><u>MCO Internal Promotions:</u></p> <p>Trigger(s): Out of the six Mission Critical Occupational categories, three are below the federal benchmark of 12% for PWD in the 0301, 1420, and 2210 series.</p> <p>Trigger(s): Out of the six Mission Critical Occupational categories, five are below the federal benchmark of 2% for PWTD in the 0301, 1420, 0343, 1001, and 2210 series.</p>
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<b>Barrier(s)</b>	None identified	
<b>Objective(s)</b>	Increase advancement for PWD and PWTD in MCOs	
<b>Responsible Official(s)</b>	<b>Performance Standards Address the Plan?</b> (Yes or No)	
Valorie Findlater, Chief Human Capital Officer	Yes	
Erica Pearson, Equal Employment Opportunity Director	Yes	
Tanya Shorter, Anti-Harassment/Disability Program Manager Supervisor, NEEEO	Yes	
Kimberly Meyer, Disability Program Manager, NEEEO	Yes	
<b>Barrier(s) Analysis Process Completed?</b> (Yes or No)	<b>Barrier(s) Identified?</b> (Yes or No)	
No	No	
<b>Sources of Data</b>	<b>Sources Reviewed ?</b> (Yes or No)	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	Table B1: Total Workforce by Disability, Table B6: Mission Critical Occupations by Disability, Table B7: Applicant flow for internal competitive promotions by disability
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	
Exit Interview Data	No	

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Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	No			
<b>Target Date</b> (mm/dd/yyyy)	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding</b> (Yes or No)	<b>Modified Date</b> (mm/dd/yyyy)	<b>Completion Date</b> (mm/dd/yyyy)
03/31/2020	Review potential problem areas in policies, practices, or procedures limiting recruitment and/or selection of qualified PWD and PWTD (i.e. advertising, selection, hiring officials).	Yes	09/30/2023	
08/31/2020	Conduct focus groups on PWD hiring experience.	Yes	09/22/2023	
03/31/2020	Partner with DPM, disABILITY EAG and Human Capital staff to participate in Job Fairs and to more effectively market career development programs.	Yes	09/22/2023	
06/30/2020	Provide disability sensitivity training to the hiring officials. Partner with Human Capital.	Yes	09/30/2023	
10/01/2020	Train all staff on the RA process.	Yes	11/30/2022	
<b>Fiscal Year</b>	<b>Accomplishments</b>			
FY21	At the initiation of recruitment actions, the full range of hiring authorities available to hiring managers including Schedule A, is discussed. Job opportunity announcements solicited Schedule A applicants and are referred amongst all qualified non-competitive applicants.			

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	Requested OMB approval to collect resumes from Schedule A applicants for new Schedule A and 30% Disabled Veterans resume repository. New policies and procedures were created for the RA process.
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7. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

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

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

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

9. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

NARA will continue to show improvements in FY22. The DPM plans to collaborate with Human Capital in implementing the strategies for improving recruitment of people with disabilities and Schedule A hiring efforts, including officially rolling out the Schedule A and 30% Disabled Veterans resume repository. Additionally, the DPM will engage with the disABILITY EAG to seek assistance in accomplishing the plan activities.

<b>Trigger 3</b>	<p>Table B9: Employee Recognition and Awards by Disability</p> <p><u>Table B9-1</u></p> <p>Trigger(s):</p> <p>There are trigger(s) in seven award categories Time off 11-20, 31-40, and 41 and above also Cash Awards \$2000-\$2999, \$3000-\$3999, \$4000-\$4999, and \$5000</p>
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	and above. PWD and PWTD received a lower percentage overall of cash awards as compared to those employees without disabilities in all cash award categories.  <u>Table B9-2</u>  Trigger(s):  There are trigger(s) in seven award categories Time off 11-20, 21-30 31-40 and 41 and above Cash Awards \$3000-\$3999, and \$4000-\$4999, and \$5000 or more. PWD and PWTD received a lower percentage overall of cash awards as compared to those employees without disabilities in all cash award categories.	
<b>Barrier(s)</b>	None identified	
<b>Objective(s)</b>	Increase award distribution to PWD and PWTD	
<b>Responsible Official(s)</b>		<b>Performance Standards Address the Plan?</b> (Yes or No)
Valorie Findlater, Chief Human Capital Officer		Yes
Erica Pearson, Equal Employment Opportunity Director		Yes
Tanya Shorter, Anti-Harassment/Disability Program Manager Supervisor, NEEEO		Yes
Kimberly Meyer, Disability Program Manager, NEEEO		Yes
<b>Barrier Analysis Process Completed?</b> (Yes or No)		<b>Barrier(s) Identified?</b> (Yes or No)
No		No
<b>Sources of Data</b>	<b>Sources Reviewed?</b> (Yes or No)	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	Table B9: Employee Recognition and Awards by Disability
Complaint Data (Trends)	No	

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Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	No			
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	No			
<b>Target Date</b> (mm/dd/yyyy)	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding</b> (Yes or No)	<b>Modified Date</b> (mm/dd/yyyy)	<b>Completion Date</b> (mm/dd/yyyy)
10/01/2021	Promote awards and recognition opportunities to Senior Leaders	Yes	10/01/2023	
<b>Fiscal Year</b>	<b>Accomplishments</b>			
FY21	None			

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

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

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



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

12. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

NARA will continue to show improvements in FY22. The DPM plans to collaborate with Human Capital and the disABILITY EAG to develop strategies for improving award distribution recruitment for people with disabilities.