

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

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

Section I: Efforts to Reach Regulatory Goals

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

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

a. Cluster GS-1 to GS-10 (PWD)

Answer Yes

b. Cluster GS-11 to SES (PWD)

Answer Yes

Cluster GS-1 to GS-10 contains 301 PWD (3.8%). Cluster GS-11 to SES contains 166 PWD (3.79%). Both below the goal of 12%

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

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

a. Cluster GS-1 to GS-10 (PWTD)

Answer Yes

b. Cluster GS-11 to SES (PWTD)

Answer Yes

Cluster GS-1 to GS-10 contains 74 PWTD (.94%). Cluster GS-11 to SES contains 41 PWTD (.92%). Both below the goal of 2%.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	7670	284	3.70	25	0.33
Grades GS-11 to SES	3494	141	4.04	13	0.37

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

Agency EEO Managers have communicated hiring goals to managers and supervisors through regularly scheduled meetings with Area IHS senior leadership. The Indian Preference Act provides absolute preference to qualified American Indian and Alaska Natives who are enrolled in federally recognized Indian tribes as defined by the Secretary of the Department of the Interior. Indian Preference presents challenges to recruitment actions, however, EEO Managers are encouraged to identify qualified Native Americans with disabilities or targeted disabilities

Section II: Model Disability Program

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

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

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

Answer No

The agency has not designated sufficient qualified personnel to implement its disability program. During FY2022, the agency will increase its staff dedicated to the disability program.

- 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	
Architectural Barriers Act Compliance	0	1	0	Located in the Office of Environmental Health and Engineering, Facilities Condition Assessment, the OEHE Facilities Coordinator is responsible for compliance with the Architectural Barriers Act.
Section 508 Compliance	0	1	0	Located in the Office of Technology, the 508 Coordinator is responsible for all aspects of 508 compliance.
Processing reasonable accommodation requests from applicants and employees	0	0	0	Each IHS Manager is responsible for processing their own RA requests
Answering questions from the public about hiring authorities that take disability into account	0	7	0	Each IHS Human Resources Office has an administrative assistant that fields all inquiries about the federal hiring process.
Special Emphasis Program for PWD and PWTD	0	7	0	Each Area EEO Manager (and HQ) is responsible for Special Emphasis Program Activities.

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	0	7	0	Each IHS Human Resources Office has a Specialist that processes all employment applications through USAJobs

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

Answer Yes

Disability program staff have been provided training on Reasonable Accommodation, Personal Assistance Services through the EEOC, and in the case of field staff, other contract vendors on a case by case basis, as time permits.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer No

Through its 2020 reorganization and restructuring effort, Agency will work with senior leadership to identify funding sources and work to obtain other resources to fund the agency disability program. In FY 2021 the EEO restructuring efforts have continued. In FY 2022, DMEEEO will hire an EEO Specialist who will have responsibilities for implementing the Reasonable Accommodation Program as well as PWD Special Emphasis activities. Also in FY2022, the Agency RA Plan will be finalized, disseminated and published on the Agency web page.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)]		
Objective	Ensure IHS has a Reasonable Accommodation Plan that is communicated to all employees.		
Target Date	Jan 1, 2023		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jan 1, 2022		Revise RA policy and procedures for dissemination to the IHS workforce and new employees. Once approved by IHS senior leadership, the policy and procedures will be posted on the EEO website and will be communicated to new employees at orientation.
	Jan 1, 2022		Request 1 FTE's dedicated to coordinating the processing of RA requests (depending on approval of resources.)
	May 31, 2022		Make additional RA program materials available across all IHS facilities and offices.
	Jan 1, 2023		Ensure that all managers and supervisors receive training on their responsibilities with regard to IHS's RA procedures. Develop a database warehouse for an RA system of records, thereby improving the timeframes to handle the RA request.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2020	DMEEEO is currently working to revise RA policy. Due to Covid-19, training for managers and supervisors, employees in Navajo, Portland, Great Plains, and Headquarters on Reasonable Accommodation procedures was not conducted. As Covid-19 activities are adjusted, Area Offices began to plan for a return to training using online resources.	
	2021	DMEEEO continued to move toward completing its RA policy, sending it through IHS policy office for review. HHS efforts to resurvey the workforce also moved forward with expected rollout of the new survey expected in January 2022.	

Brief Description of Program Deficiency	A.2.b.3. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.		
Objective	Ensure IHS has a Reasonable Accommodation Plan that is communicated to all employees.		
Target Date	Sep 30, 2022		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2022		Upload digital version of the RA Policy to the IHS Policy website where all other policies can be found.
	Sep 30, 2022		Make additional RA program materials available across all IHS facilities and offices.
	Dec 31, 2022		Ensure that all managers and supervisors receive training on their responsibilities with regard to IHS's RA procedures.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2020	Continued to provide training and support for all area offices and service units. Conducted audits of PHX, OKC, and GP offices to evaluate adherence to RA policies and procedures. Currently working with OHR to revise RA policy.	

Brief Description of Program Deficiency	B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)]		
Objective	Ensure the IHS has sufficient staff and funding to effectively manage the reasonable accommodation program of the agency.		
Target Date	Sep 30, 2022		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2021		Develop plan to assess needed staff and other resources to effectively administer the reasonable accommodation program.
	Jan 31, 2022		Obtain necessary funding for additional positions to support all reasonable accommodation activities.
	Sep 30, 2022		Fill any vacancies and obtain any necessary data collection and tracking systems to support a model reasonable accommodation program.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2020	No additional accomplishments	
	2019	DMEEEO Director and EEO Restructuring Team spent FY 2019 working to address the resource needs of the IHS's EEO program including the reasonable accommodation program. Reasonable Accommodation (RA) tracking products and services developed to meet the specific needs of the IHS and maintain confidentiality of employee's medical information were identified. In FY 2020, DMEEEO and EEO Restructuring Team developed a plan to allocate sufficient budgetary resources for annual training of DMEEEO Area and Headquarters staff to ensure the IHS is able to administer and evaluate all aspects of its reasonable accommodation program.	

Brief Description of Program Deficiency	B.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]		
Objective	Obtain sufficient resources to support the Special Emphasis Programs		
Target Date	Jan 1, 2023		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jan 31, 2023		Secure additional FTE to provide leadership and oversight for SEP
	Jun 30, 2023		Include additional fund in the budget of DMEEEO to support the SEPM efforts through contract services, purchases of materials.
	Jun 30, 2023		Initiate Employee Resource Groups (ERGs) to support agency SEP activities
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2020	Area EEO Managers disseminated (via email) the HHS/White House Proclamations marking all Special Emphasis Months. HQ DMEEEO partnered with HRSA to deliver a program celebrating Women's History Month.	

Brief Description of Program Deficiency	C.4.e.1. Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]		
Objective	Work with OHR to develop and implement AAP for Individuals with Disabilities		
Target Date	Sep 30, 2022		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2022		Benchmark other operating divisions to identify best practices and incorporate into IHS policies and procedures.
	Sep 30, 2022		Clarify roles and responsibilities of HR and EEO staff
	Dec 31, 2022		Form a senior level working group of HR and EEO professionals to develop AAP, develop and administer training on AAP for all employees.
	Sep 30, 2023		Develop and maintain a quarterly reporting system to evaluate the success of initiatives and make adjustments as a result of any deficiencies.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2021	No progress has been made to date in this area.	

Brief Description of Program Deficiency	D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]		
Objective	Initiate exit interviews to include questions on inclusion, recruitment, hiring, retention and advancement of PWD.		
Target Date	Sep 30, 2021		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Feb 28, 2021	February 28, 2021	Recruit Action in process for Program Specialist to be charged with HR survey activity.
	Jul 31, 2021	July 31, 2021	OPM Demo of their survey system being coordinated with onboarding of Program Specialist an exit survey will be developed or chosen within 9 months.
	Sep 30, 2022		Conduct regular meetings with HR in order to maintain open communication regarding the possibility of using exit interviews.
	Sep 30, 2022		Draft proposed DEIA-related Exit Survey questions and provide to OHR for inclusion in the Agency Exit/Clearance process.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2018	No accomplishments on this item to date.	
	2021	DMEEEO has been supporting the efforts of HHS and the IHS Office of Human Resources in their efforts to reorganize and realign. In FY 2020, these efforts continued and DMEEEO provided assistance and encourage HR to utilize software applications that enable the agency to take advantage of the use of exit interviews. In FY 2021, funding was secured and a Program Specialist was hired within OHR. Program Specialist will oversee HR surveys as well as other activities.	

Brief Description of Program Deficiency	D.4.d. Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR §1614.203(d)(7)(ii)]		
Objective	Take specific steps designed to increase the number of persons with disabilities employed by the agency		
Target Date	Feb 28, 2022		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Dec 31, 2022		Work with leadership to update and publish RA Policy
	Dec 31, 2022		DMEEEO will request resources for a full time RA Specialist.
	Feb 28, 2023		Work with OHR to increase level and visibility of recruitment for PWD/PWTD
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2021	No accomplishments to date	

Brief Description of Program Deficiency	E.4.b. Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]		
Objective	Develop an effective data collection system to survey the workforce		
Target Date	Sep 30, 2023		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Oct 31, 2021		Work collaboratively with HHS to administer Workforce Demographic Survey
	Sep 30, 2023		Work with HHS to develop or procure computer systems to survey the workforce
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	
	2021	No accomplishments to date.	

Section IV: Plan to Recruit and Hire Individuals with Disabilities

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

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

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

USA Staffing allows for the staffing specialists to filter applicants by those requesting consideration under Schedule A, individuals with disabilities and targeted disabilities. EEO will work in collaboration with Human Resources to encourage managers and supervisors to utilize Schedule A hiring authority, to partner with Veteran's organizations to identify potential candidates for employment, and to work with colleges and universities to identify qualified persons with disabilities for intern and/or externships through the IHS Scholarship Program. FY2021 MD-715 Executive Summary includes analysis of Agency activities with respect to Schedule A applicants and hires. There were no conversions in FY2021. This is due to Indian Preference. IP candidates are given priority consideration over non-Indian candidates. A selecting official may not select a non-Indian preference candidate where at least one Indian preference candidate from any source was considered qualified. Section 7-2.10 Selection of Candidates from the IHS Manual Merit Promotion.

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

After applying Indian Preference, the remaining eligible and qualified candidate names are placed on the certificates of eligibles depending on their requested & eligible hiring authorities. In FY2022, a resurvey of the workforce will take place. It is expected that the number of employees self-identifying as a PWD/PWTD will increase. Additionally, offices will be encouraged to identify applicants (hiring) and candidates (internal promotions) that are PWD/PWTD and eligible for IP.

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

The applicant must submit documentation of eligibility for employment under Schedule A which generally comes from a licensed medical or rehabilitation provider. The applicant's name would be placed on a certificate of eligible for consideration if qualified and eligible. Persons claiming Indian Preference are considered priority

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

Answer Yes

Supervisor training on hiring authorities includes an overview of Schedule A. Schedule A training is provided to new supervisors within 6 months of hire.

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.

Agency must consider Indian Preference first when hiring. This drastically reduces the amount of opportunities for consideration that targets PWD and PWTD applicants. To increase the number of persons with disabilities that identify as American Indian, IHS DMEEEO staff will partner with both veteran and state rehabilitation organizations in FY 2021. Area EEO Managers will encourage qualified persons with disabilities to participate in recruiting activities and identify sources of applicants they may be aware of so that contacts can be established. IHS does utilize mechanisms such as the performance management system and award programs in various Areas, to recognize managers that go above and beyond to assist the agency in attracting and retaining qualified persons with disabilities/targeted disabilities.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

a. New Hires for Permanent Workforce (PWD) Answer Yes

b. New Hires for Permanent Workforce (PWTD) Answer Yes

New hire percentages of PWD and PWTD are 2.95% and .56% respectively. Using the goals of 12% and 2%, triggers exist in the permanent workforce.

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

% of Total Applicants					
% of Qualified Applicants					
% of New Hires					

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

a. New Hires for MCO (PWD) Answer Yes

b. New Hires for MCO (PWTD) Answer Yes

Using the goals of 12% and 2%, triggers exist in the top 4 job titles among new hires in the Mission Critical Occupations. These job titles are: Nurse (0610), Medical Officer (0602), and Pharmacist (O660),

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

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

a. Qualified Applicants for MCO (PWD) Answer Yes

b. Qualified Applicants for MCO (PWTD) Answer Yes

Using the goals of 12% and 2%, triggers exist in the top 5 job titles among promotions in the permanent workforce. These job titles are: Nurse (0610), Medical Support Assistance (0679), Medical Officer (0602), Pharmacist (O660), and Health Aid Technician (0640). Data need further analysis - the possibility of the location of the trigger being somewhere in the hiring process rather than the number of qualified PWD/PWTD applicants entering the system.

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

a. Promotions for MCO (PWD) Answer Yes

b. Promotions for MCO (PWTD) Answer Yes

Internal promotions analyzed for potential triggers. Only potential issues were found in the Nurse (0610) job title. Specifically, PWD and PWTD candidates were qualified and referred at higher rates than non-disabled candidates, but were selected at lower rates. More information needs to be gathered to determine if there is truly a trigger to a barrier.

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

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

A. ADVANCEMENT PROGRAM PLAN

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

Recruitment activities will be initiated with organizations that target American Indians with disabilities and veterans. IHS will work to ensure adequate resources for providing reasonable accommodations and personal assistant services to PWD and PWTD. IHS utilizes Senior Executive Service Candidate Development Program when offered, as well as a Leadership Training Program. This Leadership Training Program includes a shadowing experience covering the IHS-specific administrative and programmatic topics that IHS leadership encounter on a daily basis followed by a practical experience. DMEEEO and Human Resources will encourage managers and supervisors to identify potential candidates for this program that are also qualified persons with disabilities/targeted disabilities.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

The Indian Health Service encourages supervisors to develop an Individual Development Plan with each of their employees.

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

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

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

a. Applicants (PWD)

Answer N/A

b. Selections (PWD)

Answer N/A

The Agency does not currently have formal Career Development Programs in place. There are various IHS Scholarship Programs designed for students. There is also an IHS Leadership Program for employees. Currently, there is no mechanism designed to identify disabled participants participating in these programs. In FY 2021, the IHS DMEEEO and HR will work in collaboration to develop a tracking system for this program in order to enable analysis to take place.

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

a. Applicants (PWTD)

Answer N/A

b. Selections (PWTD)

Answer N/A

The Agency does not currently have formal Career Development Programs in place. There are various IHS Scholarship Programs designed for students. There is also an IHS Leadership Program for employees. Currently, there is no mechanism designed to identify disabled participants participating in these programs. In FY 2021, the IHS DMEEEO and HR will work in collaboration to develop a tracking system for this program in order to enable analysis to take place.

C. AWARDS

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

a. Awards, Bonuses, & Incentives (PWD)

Answer Yes

b. Awards, Bonuses, & Incentives (PWTD)

Answer Yes

PWD and PWTD have triggers for Time Off Awards and Cash Awards participation rates hover around 4% and for PWTD approximately 1%. However, these inclusion rates are fairly consistent with the IHS's overall inclusion rates of 3.87% and 1.01%. While the IHS is underrepresented with respect to PWD/PWTD, those employees are receiving awards at a rate consistent with their representation in the agency. Therefore, the IHS will look to increase the numbers of PWD/PWTD in the agency and maintain equitable distribution of awards.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	769	6.39	5.65	10.20	5.97
Time-Off Awards 1 - 10 Hours: Total Hours	7085	65.47	51.63	102.04	61.50
Time-Off Awards 1 - 10 Hours: Average Hours	9	2.00	0.08	20.41	0.00
Time-Off Awards 11 - 20 hours: Awards Given	696	5.19	4.97	6.12	5.09
Time-Off Awards 11 - 20 Hours: Total Hours	13764	103.79	97.88	122.45	101.77
Time-Off Awards 11 - 20 Hours: Average Hours	19	3.99	0.16	40.82	0.00
Time-Off Awards 21 - 30 hours: Awards Given	1700	11.78	12.65	8.16	12.17
Time-Off Awards 21 - 30 Hours: Total Hours	49441	337.72	368.08	244.90	347.79
Time-Off Awards 21 - 30 Hours: Average Hours	29	5.59	0.24	61.22	-0.44
Time-Off Awards 31 - 40 hours: Awards Given	2898	18.76	22.33	16.33	19.03
Time-Off Awards 31 - 40 Hours: Total Hours	122525	774.45	945.55	653.06	787.61
Time-Off Awards 31 - 40 Hours: Average Hours	42	8.18	0.35	81.63	0.22
Time-Off Awards 41 or more Hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	2383	19.16	18.21	18.37	19.25
Cash Awards: \$501 - \$999: Total Amount	1805772	14799.80	13860.26	14557.14	14826.11
Cash Awards: \$501 - \$999: Average Amount	757	154.09	6.41	1616.33	-4.42
Cash Awards: \$1000 - \$1999: Awards Given	2794	23.55	21.56	22.45	23.67
Cash Awards: \$1000 - \$1999: Total Amount	3753976	32487.23	28903.48	33618.37	32364.60
Cash Awards: \$1000 - \$1999: Average Amount	1343	275.25	11.30	3055.10	-26.11
Cash Awards: \$2000 - \$2999: Awards Given	854	8.38	6.62	8.16	8.41
Cash Awards: \$2000 - \$2999: Total Amount	2036247	20216.97	15771.21	20177.55	20221.24
Cash Awards: \$2000 - \$2999: Average Amount	2384	481.24	20.09	5042.86	-13.27
Cash Awards: \$3000 - \$3999: Awards Given	337	3.39	2.52	2.04	3.54
Cash Awards: \$3000 - \$3999: Total Amount	1157811	11888.62	8658.61	7142.86	12403.10
Cash Awards: \$3000 - \$3999: Average Amount	3435	699.20	28.96	7142.86	0.66
Cash Awards: \$4000 - \$4999: Awards Given	213	0.80	1.67	0.00	0.88
Cash Awards: \$4000 - \$4999: Total Amount	949804	3705.79	7431.66	0.00	4107.52
Cash Awards: \$4000 - \$4999: Average Amount	4459	926.35	37.53	0.00	1026.77
Cash Awards: \$5000 or more: Awards Given	247	1.40	1.96	2.04	1.33
Cash Awards: \$5000 or more: Total Amount	1662773	8577.45	13286.61	11224.49	8290.49
Cash Awards: \$5000 or more: Average Amount	6731	1225.35	57.26	11224.49	141.37

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

a. Pay Increases (PWD)

Answer Yes

b. Pay Increases (PWTD)

Answer Yes

PWD and PWTD have triggers for QSI participation rate is 2.88% and for PWTD approximately .52%. This is a trigger because not only are PWD/PWTD underrepresented in the Agency, but those same individuals are underrepresented based on their relative participation in the workforce.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
--------------	-----------	-------------------------	---------------------------------	-----------------------	-------------------------------

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

a. Other Types of Recognition (PWD)

Answer N/A

b. Other Types of Recognition (PWTD)

Answer N/A

N/A

D. PROMOTIONS

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

a. SES

i. Qualified Internal Applicants (PWD)

Answer No

ii. Internal Selections (PWD)

Answer No

b. Grade GS-15

i. Qualified Internal Applicants (PWD)

Answer No

ii. Internal Selections (PWD)

Answer No

c. Grade GS-14

i. Qualified Internal Applicants (PWD)

Answer No

ii. Internal Selections (PWD)

Answer No

d. Grade GS-13

i. Qualified Internal Applicants (PWD)

Answer No

ii. Internal Selections (PWD)

Answer No

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

a. SES

i. Qualified Internal Applicants (PWTD)

Answer No

ii. Internal Selections (PWTD)

Answer No

b. Grade GS-15

i. Qualified Internal Applicants (PWTD)

Answer No

ii. Internal Selections (PWTD)

Answer No

c. Grade GS-14

i. Qualified Internal Applicants (PWTD)

Answer No

ii. Internal Selections (PWTD)

Answer No

d. Grade GS-13

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

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

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

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

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

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

a. Executives

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

b. Managers

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

c. Supervisors

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

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

a. Executives

i. Qualified Internal Applicants (PWTB) Answer No

ii. Internal Selections (PWTB) Answer No

b. Managers

i. Qualified Internal Applicants (PWTB) Answer No

ii. Internal Selections (PWTB) Answer No

c. Supervisors

i. Qualified Internal Applicants (PWTB) Answer No

ii. Internal Selections (PWTB) Answer No

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

a. New Hires for Executives (PWD) Answer No

b. New Hires for Managers (PWD) Answer No

c. New Hires for Supervisors (PWD) Answer No

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

a. New Hires for Executives (PWTB) Answer No

b. New Hires for Managers (PWTB) Answer No

c. New Hires for Supervisors (PWTB) Answer No

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer N/A

During FY 2021, there were no Schedule A employees converted. This is due to Indian Preference. IP candidates are given priority consideration over non-Indian candidates. A selecting official may not select a non-Indian preference candidate where at least one Indian preference candidate from any source was considered qualified. Section 7-2.10 Selection of Candidates from the IHS Manual Merit Promotion.

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

a. Voluntary Separations (PWD)

Answer Yes

b. Involuntary Separations (PWD)

Answer No

Overall, the separation rate for PWD and PWTD stands at 15.18% and 16.67% respectively. However, looking closer at the numbers, the triggering is occurring at the voluntary separation. Disability retirements are the majority of the voluntary separations. Additional research and data needs to be gathered in an effort to look behind the numbers. Currently, the IHS does not have Employee Resource Groups or Exit Interviews. These items are addressed in Plan H.

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	4	0.19	0.02
Permanent Workforce: Removal	117	1.55	0.81
Permanent Workforce: Resignation	921	4.84	6.65
Permanent Workforce: Retirement	368	6.01	2.50
Permanent Workforce: Other Separations	275	1.74	1.97
Permanent Workforce: Total Separations	1685	14.34	11.96

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

a. Voluntary Separations (PWTD)

Answer Yes

b. Involuntary Separations (PWTD)

Answer No

Overall, the separation rate for PWD and PWTD stands at 15.18% and 16.67% respectively. However, looking closer at the numbers, the triggering is occurring at the voluntary separation. Disability retirements are the majority of the voluntary separations. Additional research and data needs to be gathered in an effort to look behind the numbers. Currently, the IHS does not have Employee Resource Groups or Exit Interviews. These items are addressed in Plan H.

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	4	0.00	0.03
Permanent Workforce: Removal	117	6.12	0.82
Permanent Workforce: Resignation	921	10.20	6.57
Permanent Workforce: Retirement	368	2.04	2.63
Permanent Workforce: Other Separations	275	2.04	1.97
Permanent Workforce: Total Separations	1685	20.41	12.02

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.

This item is an action plan item found in Part H. More data will be collected and analysis completed in FY2022.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

<https://www.ihs.gov/eo/section508/>

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

<https://www.access-board.gov/aba/>

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

No additional programs, policies, or practices that the agency has undertaken designed to improve accessibility of the agency's facilities and/or technology.

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.)

In FY 2021, there were 157 Reasonable Accommodation requests logged. 59.87% of RA requests were processed between 6-10 calendar 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.

In FY 2021, the IHS DMEEEO and Area EEO Managers did not provide formal training on Reasonable Accommodation due to IHS employees being involved in direct patient care for COVID-19. In FY 2021, there were 157 Reasonable Accommodation requests logged. 59.87% of RA requests were processed between 6-10 calendar days.

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

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

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

To date, there have been no requests for Personal Assistance Services in the agency during FY 2021.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer No

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

Answer Yes

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.

The agency had three (3) Settlement Agreements that contained allegations of based on disability. There was no (0) findings of discrimination with allegations of harassment based on disability for FY 2021.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer No

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

Answer Yes

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

IN FY 2021, there was two (2) settlement agreements for complaints alleging failure to provide reasonable accommodation. There was one (1) finding of discrimination based on failure to provide reasonable accommodation in FY 2021.

Section VIII: Identification and Removal of Barriers

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

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

Answer Yes

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

Answer Yes

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

Source of the Trigger:	Workforce Data (if so identify the table)				
Specific Workforce Data Table:	Workforce Data Table - B1				
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	The number of PWD in the IHS is 543 or 3.79% of the current workforce. Similarly, the number of PWTD in the IHS is currently 138 or .96% of the workforce. Both of these percentages fall below the goals of 12% and 2% respectively.				
STATEMENT OF BARRIER GROUPS:	Barrier Group People with Disabilities People with Targeted Disabilities				
Barrier Analysis Process Completed?:	Y				
Barrier(s) Identified?:	Y				
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	Barrier Name Disability		Description of Policy, Procedure, or Practice Agency (recruitment, hiring and retention) policies, procedures, practices and attitudes are a barriers for attracting and retaining qualified persons with disabilities.		
Objective(s) and Dates for EEO Plan					
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
01/01/2012	09/30/2022	Yes	05/01/2020		Increase the representation of persons with disabilities in the agency.
Responsible Official(s)					
Title		Name		Standards Address The Plan?	
Director, DMEEEO		Angela K. Porter		No	
Director, Office of Human Resources		Lisa Gyorda		No	
Planned Activities Toward Completion of Objective					
Target Date	Planned Activities			Sufficient Staffing & Funding?	Modified Date
12/31/2022	DMEEEO, and HR will work together to target/expand recruitment efforts to organizations that serve persons with disabilities.			No	10/01/2020
09/30/2022	Encourage all new employees to self-identify their disability status on form 256. Reissue 256 internally and work with HR to ensure accurate data captured.			Yes	10/01/2020

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2022	Work with senior leadership to revise Reasonable accommodation policy. Disseminate policy and continue to train employees, supervisors and managers on disability issues.	No	06/01/2020	
09/30/2022	Work with HR and managers to encourage the use of Schedule A Hiring Authority for every hiring decision within their respective areas.	Yes	06/01/2020	
Report of Accomplishments				
Fiscal Year	Accomplishment			
2019	DMEEEO staff have met with and collaborated with HR staff to produce reports – FEORP and DVETS. Training DVD for Reasonable Accommodation has been completed and utilized throughout the agency.			
2020	No accomplishments to report.			

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

The main factor preventing the agency from timely completing any of the planned activities was lack of resources. The EEO restructuring initiative is putting the framework in place to obtain the necessary staff, contract services, and products to enable goals to be met for FY 2021.

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

None completed.

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.

The IHS will continue to enforce and publicize the HHS policies on Equal Employment Opportunity including Reasonable Accommodation and Anti-Harassment. Revision of IHS' Reasonable Accommodation, Sexual Harassment Prevention, Anti-Harassment, and Alternative Dispute Resolution Policies and Procedures is planned for FY 2021. The IHS will utilize the FEVS and climate assessment surveys to evaluate employees' awareness of and perceptions about EEO programs and their work environment. This will enable the IHS to increase the visibility of diversity and inclusion programs throughout the Agency, increase the collaboration between EEO and HR, in order to improve the success of recruitment and retention of Hispanics and Persons with Disabilities. The IHS will utilize awards and recognition programs to recognize accomplishments in EEO such as the IHS Director's Awards. In addition to mandatory training, in FY 2021, all new supervisors will receive additional training on EEO, Reasonable Accommodation, Alternative Dispute Resolution, Anti-Harassment, as well as effective communication and interpersonal skills during new supervisors training. Further, IHS will develop and deliver in-person and web-based training modules for employees and supervisors using information gathered from prior year reports such as MD-715, NoFEAR, EEOC 462, and Area Office Compliance Reviews. This training will enhance employees' knowledge of EEO and diversity and inclusiveness and reaffirm the commitment of senior leadership to creating a model EEO program for the IHS. MD-715 will be reviewed, monitored, and implemented on an ongoing basis throughout the year to determine what actions to take to correct or improve in any areas noted. This process is to include review by all stakeholders, especially the IHS Human Resources, the IHS executive officers and Area Directors. In addition, barrier identification and action plans will be researched to address shortcomings. EEO will be included in the IHS deliberations/decisions relative to recruitment, vacancy projections, training and development, and strategic planning. Personnel policies, procedures, and practices will be submitted to EEO on a regular basis; EEO to be involved in reassignments such as 638 discussions with the goal of providing input on EEO law to assist in the reduction of EEO complaints, settlements, and to improve the overall employee engagement as recommended by the EEOC.