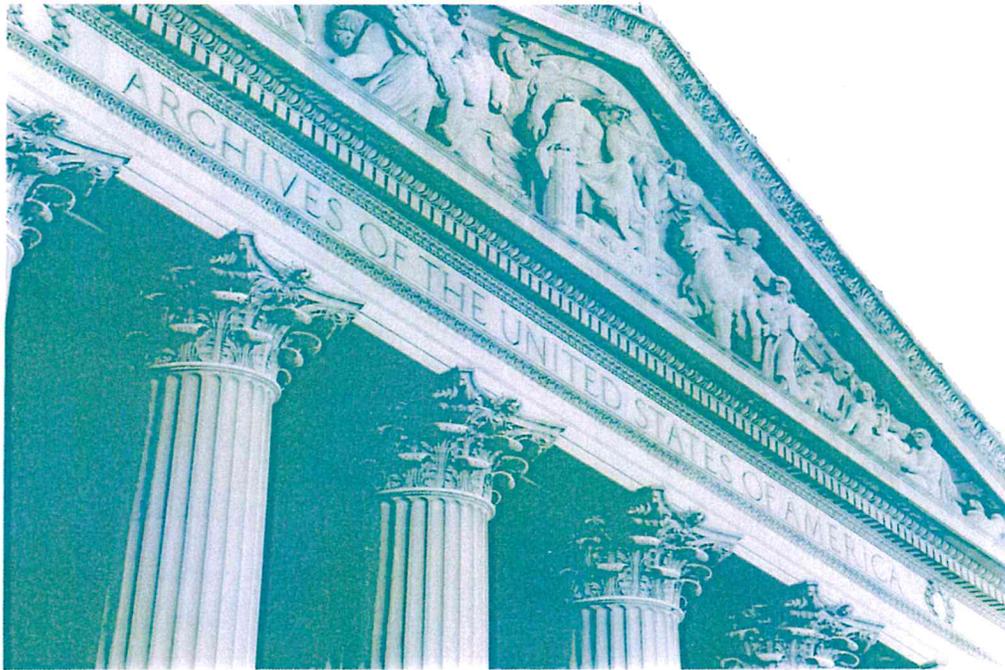




**NATIONAL  
ARCHIVES**

Office of Equal  
Employment  
Opportunity Programs



**EQUAL EMPLOYMENT OPPORTUNITY (EEO) PROGRAM  
STATUS REPORT**

**MANAGEMENT DIRECTIVE (MD) 715  
FISCAL YEAR 2018**

**Report Certified By:**

**David S. Ferriero, Archivist of the United States and  
Erica Pearson, Acting 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)**

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

**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	2693	46	2739

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

Agency Leadership	Name	Title
Head of Agency	David S. Ferriero	Archivist of the United States
Head of Agency Designee	Erica Pearson	Acting EEO Director

**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 (Acting) Director	0260	GS-14	301-837-3411	Erica.pearson@nara.gov
Affirmative Employment Program Manager	Erica Pearson	Affirmative Employment Program Manager	0260	GS-14	301-837-3411	Erica.pearson@nara.gov

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Complaint Processing Program Manager	Tammie Johnson	Complaints Program Manager	0260	GS-14	301-837-1986	Tammie.johnson@nara.gov
Diversity & Inclusion Officer	Erica Pearson	Affirmative Employment Program Manager	0260	GS-14	301-837-3411	Erica.pearson@nara.gov
Hispanic Program Manager (SEPM)	N/A					
Women's Program Manager (SEPM)	N/A					
Disability Program Manager (SEPM)	N/A					
Special Placement Program Coordinator (Individuals with Disabilities)	N/A					
Reasonable Accommodation Program Manager	Amii Limpp	Disability Program Manager	0260	GS-13	301-837-1830	Amii.limpp@nara.gov
Anti-Harassment Program Manager	Tanya Shorter	Anti-Harassment Program Manager	0260	GS-13	301-837-3096	Tanya.shorter@nara.gov
ADR Program Manager	Naheed Khandekar	Assistant General Counsel and	0905	GS-13	301-837-2926	Naheed.khandekar@nara.gov

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		Director of RESOLVE				
Compliance Manager	Erica Pearson	Affirmative Employment Program Manager	0260	GS-14	301-837-3411	Erica.pearson@nara.gov
Principal MD-715 Preparer	Erica Pearson	Affirmative Employment Program Manager	0260	GS-14	301-837-3411	Erica.pearson@nara.gov
Other EEO Staff	Halena Lawson	Equal Employment Opportunity Assistant	0318	GS-7	301-837-3411	Halena.lawson@nara.gov
Other EEO Staff	James Young	Equal Employment Opportunity Specialist	0260	GS-12	301-837-3441	James.young@nara.gov
Other EEO Staff	Sonya Jones	Equal Employment Opportunity Specialist	0260	GS-12	301-837-1902	Sonya.jones@nara.gov

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

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

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

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

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

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

Did the agency submit the following mandatory documents?	Please respond Yes or No	Comments

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Organizational Chart	Yes	Encl (1)
EEO Policy Statement	Yes	Encl (2)
Strategic Plan	Yes	Encl (3)
Anti-Harassment Policy and Procedures	Yes	Encl (4)
Reasonable Accommodation Procedures	Yes	Encl (5)
Personal Assistance Services Procedures	Yes	Will be Included in FY19.
Alternative Dispute Resolution Procedures	Yes	Encl (6)

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

<b>Did the agency submit the following optional documents?</b>	<b>Please respond Yes or No</b>	<b>Comments</b>
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 – Executive Summary**

All agencies must complete Part E.1; however, only agencies with 199 or fewer employees in permanent FT/PT appointments are required to complete Part E.2 to E.5. Agencies with 200 or more employees in permanent FT/PT appointments have the option to Part E.2 to E.5.

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## **Part E.1 - Executive Summary: Mission**

The National Archives and Records Administration (NARA) is an independent agency established in 1934 to identify, protect, preserve, and make publicly available the historically valuable records of all three branches of the Federal government. NARA manages the Federal government's archives, administers a system of Presidential Libraries, operates museums, conducts education and public programs, provides oversight of government-wide records management activities, and provides temporary storage of other agencies' records on their behalf. NARA publishes the Federal Register and makes grants through the National Historical Publications and Records Commission. NARA provides for the appropriate declassification of classified national security information, mediating Freedom of Information Act disputes, and overseeing agency actions regarding classified and controlled, unclassified information. As the nation's records keeper, NARA's mission is to drive openness, cultivate public participation, and to strengthen our nation's democracy through public access to Federal government records of historical value.

CERTIFICATION of ESTABLISHMENT of CONTINUING EQUAL EMPLOYMENT OPPORTUNITY PROGRAMS

I, Erica Pearson Acting Director, NARA EEO/0260/GS-14 am the
(Insert name above) (Insert official title/series/grade above)

Principal EEO Director/Official for National Archives & 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.

[Handwritten signature of Principal EEO Director/Official]

5 July 2019

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

Date

[Handwritten signature of Agency Head or Agency Head Designee]

2 July 2019

Signature of Agency Head or Agency Head Designee

Date

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**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.

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**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>				
 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	<b>Current Part G Questions</b>
<b>A.1.a</b>	<b>A.1 – The agency issues an effective, up-to-date EEO policy statement.</b>	YES	August 15, 2018	A.1.a.2
<b>A.1.b</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		New
<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		New
 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	
<b>A.2.a</b>	<b>A.2 – The agency has communicated EEO policies and procedures to all employees.</b>			
<b>A.2.a</b>	Does the agency disseminate the following policies and procedures to all employees:			
<b>A.2.a.1</b>	Anti-harassment policy? [see MD 715, II(A)]	YES		New
<b>A.2.a.2</b>	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	YES		New

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<b>A.2.b</b>	Does the agency prominently post the following information throughout the workplace and on its public website:			
<b>A.2.b.1</b>	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		New
<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		A.2.c
<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.	NO	In March of FY19, RA procedures were posted here: <a href="https://www.archives.gov/global-pages/accessibility">https://www.archives.gov/global-pages/accessibility</a> Refer to H - 1	A.3.c
<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	New employee orientation (bi-weekly) and Supervisor training (2xs per year)	A.2.a
<b>A.2.c.2</b>	ADR process? [see MD-110, Ch. 3(II)(C)] If "yes", please provide how often.	YES	New employee orientation (bi-weekly) and Supervisor training (2xs per year)	New
<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 (bi-weekly) and Supervisor training (2xs per year)	New
<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 (bi-weekly) and Supervisor training (2xs per year)	New
<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	New employee orientation (bi-weekly) and Supervisor training (2xs per year)	A.3.b

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 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	<b>New Compliance Indicator</b>
	<b>A.3 – The agency assesses and ensures EEO principles are part of its culture.</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.	NO	Refer to H - 2	New
<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		New
<b>Essential Element B: INTEGRATION OF EEO INTO THE AGENCY’S STRATEGIC MISSION</b> <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.</b>				
 <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.1.a
<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	N/A	New
<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.1.d
<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	YES		B.2.a

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	effectiveness, efficiency and legal compliance of the agency's EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]			
<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.	YES	07/2019	B.2.b
<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		New
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.2 – The EEO Director controls all aspects of the EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	<b>New Compliance Indicator</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.3.a
<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		New
<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		New
<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		New
<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		F.3.b
<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		New

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<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)]	YES		New
 <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.2.c & B.2.d
<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 1: Connecting with Customers Goal 2: Build Our Future Through Our People	New
 <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.3.b
<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.4.a

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<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		E.5.b
<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		B.4.f & B.4.g
<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)]	NO	Refer to H - 2	E.1.c
<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.4.c
<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	No automated system for complaints for collection nor tracking. Refer to H - 2.	New
<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]	NO	Refer to H - 2	B.3.c, B.3.c.1, B.3.c.2, & B.3.c.3
<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		New
<b>B.4.a.10</b>	to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]	YES		B.4.d
<b>B.4.a.11</b>	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	YES		New
<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		New
<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.1.b

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<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		E.2.d
<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		E.2.e
<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)]	YES		New
<b>B.5.a.2</b>	Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]	YES		A.3.d
<b>B.5.a.3</b>	Anti-Harassment Policy? [see MD-715(II)(B)]	YES		New
<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		New
<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		E.4.b
<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</b> <b>New Indicator</b>	

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<b>B.6.a</b>	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	NO	Refer to H - 2	New
<b>B.6.b</b>	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	NO	Refer to H - 2	D.1.a
<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	Refer to H - 2	D.1.b
<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	Refer to H - 2	D.1.c
<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	Refer to H - 2	New
<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	Refer to H - 2	New
<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	N/A	New

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 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments  New Indicator</b>	
	<b>C.2 – The agency has established procedures to prevent all forms of EEO discrimination.</b>			
<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		New
<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		New
<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		New
<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		New
<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		New
<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 <u>Complainant v. Dep't of Veterans Affairs</u> , EEOC Appeal No. 0120123232 (May 21, 2015); <u>Complainant v. Dep't of Defense (Defense Commissary Agency)</u> , EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.	YES		New
<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		New

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<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	Refer to H - 1	New
<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		E.1.d
<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		New
<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		New
<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)]	YES		New
<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	73% Refer to H - 1	E.1.e
<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	Refer to H - 1	New
<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.	NO	Refer to H - 1	New
 <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>	

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<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		New
<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		A.3.a.1
<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		A.3.a.4
<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		A.3.a.5
<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		A.3.a.6
<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		A.3.a.7
<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		A.3.a.8
<b>C.3.b.7</b>	Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]	YES		New
<b>C.3.b.8</b>	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]	YES		A.3.a.2
<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		New
<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		New
<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		New

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➔ Compliance Indicator ↓ Measures	<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		New
<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	Refer to H - 2	C.2.a, C.2.b, & C.2.c
<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		New
<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		New
<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)]	NO	Refer to H - 1	New
<b>C.4.e.2</b>	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	NO	Refer to H - 2	New
<b>C.4.e.3</b>	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	YES		New
<b>C.4.e.4</b>	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	NO	Refer to H - 2	New
<b>C.4.e.5</b>	Assist in preparing the MD-715 report? [see MD-715, II(C)]	YES		New

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 <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 <i>Douglas v. Veterans Administration</i> , 5 MSPR 280 (1981)]	YES		C.3.a.
<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.	YES	0	C.3.c
<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)]	YES		New
 <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 with the Archivist and Deputy Archivist-Adhoc updates for management/supervisory officials.	C.1.a
<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		New

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<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>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	
<b>D.1.a</b>	D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.	YES		New
<b>D.1.b</b>	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	NO	Refer to H - 2	New
<b>D.1.c</b>	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I]	NO	Refer to H - 1	New
<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	Refer to H - 1	New
 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>  <b>New Indicator</b>	
<b>D.2.a</b>	D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)	NO	Refer to H - 2	New
<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)]	NO	Refer to H - 2	New
<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)]	NO	Refer to H - 2	B.2.c.2
<b>D.2.c</b>	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human	YES		B.2.c.1

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	resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]			
<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	Refer to H - 2	New
 <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</b> <b>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	Refer to H - 2	New
<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	Refer to H - 2	New
<b>D.3.c</b>	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	NO	Refer to H - 2	New
 <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</b> <b>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.	NO	Refer to H - 1	New
<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)]	NO	Refer to H - 1	New

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<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		New
<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)]	NO	Refer to H - 1	New
<b>Essential Element E: EFFICIENCY</b>				
<b>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>				
 <b>Compliance Indicator</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>Measures</b>				
<b>E.1.a</b>	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	YES		E.3.a.1
<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		E.3.a.2
<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		New
<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 so, please provide the average processing time in the comments.	NO	Refer to H - 3	New
<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		New
<b>E.1.f</b>	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	YES		E.3.a.3

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<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)?	YES		New
<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	Refer to H - 3	E.3.a.4
<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		E.3.a.7
<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 Agency requests that the contractor not use the specific individual who prepared the work product anymore.	E.2.c
<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		New
<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		New
 <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	The EEO program operates as a sole entity and uses the General Counsel in an advisory capacity.	New
<b>E.2.b</b>	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency		Attorney works in College Park, MD but	E.6.a

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	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	does not defend the Agency in regards to EEO complaints.	
<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		New
<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		E.6.b
<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		E.6.c
<b>➔</b> <b>Compliance Indicator</b> <b>↓</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		E.4.a
<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		E.4.c
<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		D.2.a
<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		New
<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		E.4.d
<b>E.3.f</b>	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	YES		New

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 <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 involved management official? [see MD-715, II(E)]	NO	Refer to H - 3	E.5.a
<b>E.4.a.2</b>	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	YES		E.5.c
<b>E.4.a.3</b>	Recruitment activities? [see MD-715, II(E)]	NO	Refer to H - 2	E.5.f
<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)]	NO	Refer to H - 2	New
<b>E.4.a.5</b>	The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]	NO	Refer to H - 1	New
<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]	NO	Refer to H - 4	New
<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		New
 <b>Compliance Indicator</b>  <b>Measures</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>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	E.5.e
<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	E.5.g

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<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		E.3.a
<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>Measures</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>F.1.a</b>	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	YES		F.1.a
<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		E.3.a.6
<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		F.2.a.1
<b>F.1.d</b>	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	YES		F.2.a.2
<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)]	N/A	N/A	F.3.a.
 <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>	
<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	Indicator moved from E-III Revised	C.3.d

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<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		E.3.a.5
<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	N/A	E.3.a.7
<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		New
<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		F.3.d (1 to 9)
 <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		New
<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		New

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## 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.

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element A: Efficiency	<p><b>A.2: The Agency has communicated EEO Policies and Procedures to all employees.</b></p> <p>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. No.</p>

### 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)
01/31/2018	Publish RA procedures on public website. Prominently display (post) RA procedures throughout workplace.	06/30/2018	09/30/2019	

### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Disability Program Manager, NARA EEO	Amii Limpp	No
Acting Director, NARA EEO	Erica Pearson	No

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**Planned Activities Toward Completion of Objective**

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing? (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
01/31/2018	Draft RA Policy finalized.	Yes	01/31/2019	
01/31/2018	Leadership review.	Yes	07/31/2019	
01/31/2018	Policy review.	Yes	07/31/2019	
01/31/2018	Publish.	Yes	09/30/2019	
01/31/2018	Send electronic copies of RA procedures to NARA facilities and request M&S to put them up on organizational bulletin boards (similar to where worker's rights information is posted) Print paper copies of the RA procedures.	Yes	09/30/2019	
01/31/2018	Print copies of RA procedures and place on organizational bulletin boards.	Yes	09/30/2019	

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## 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.

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element C: Efficiency	<p><b>C.2: The agency has established procedures to prevent all forms of EEO discrimination.</b>  C.2.b: Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR 1614.203(d)(3)] No.  C.2.b.5: Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed request in the comment column. No.  C.2.c: Has the agency established procedures for processing requests for Personal Assistance Services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? No.  C.2.c.1: Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column. No.</p> <p><b>C.4: The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.</b>  C.4.e.1: Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR § 1614.203(d); MD-715, II(C)] No.</p>

### 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	C.2.b: Finalize RA Policy to include compliance requirements for RA policies (ex: PAS).	10/31/2017	09/30/2019	
01/31/2018	C.2.b.5: (Refer to EEOC Letter, pg. 5, bottom). Create improved RA tracking log.	04/30/2019	09/30/2019	

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05/31/2017	C.2.c: Create PAS procedures.	10/31/2017	07/31/2019	
05/31/2017	C.2.c.1: Post PAS procedures on public website.	10/31/2018	09/30/2019	
05/31/2017	C.4.e.1: Implement Affirmative Action Plan.	04/30/2018	09/30/2020	

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
Disability Program Manager, NARA EEO	Amii Limpp	Yes
Acting Director, NARA EEO	Erica Pearson	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)
01/31/2018	C.2.b: Complete revisions to draft RA Policy.	Yes	09/30/2019	
07/31/2018	C.2.b.5: Create revised RA tracking log (Refer to EEOC Letter, pg. 5, bottom).	Yes (Excel only).	09/30/2019	
01/31/2018	C.2.c: Include PAS procedures in draft RA Policy. <ul style="list-style-type: none"> <li>• Leadership review</li> <li>• Policy Review</li> <li>• Publish</li> </ul>	Yes	01/31/2019	01/31/2018
01/31/2018	C.2.c.1: Post RA Policy (including PAS procedures) on website.	Yes	09/30/2019	
01/31/2018	C.4.e.1: Review and edit Affirmative Action. <ul style="list-style-type: none"> <li>• Plan for PWDs</li> <li>• Finalize AA Plan</li> <li>• Leadership review</li> <li>• Policy Review</li> </ul>	Yes	09/30/2019	

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	<ul style="list-style-type: none"><li>• Publish (including on website).</li></ul>			
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## 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.

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element D: Efficiency	<p><b>D.1: The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.</b>  D.1.c: Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR § 1614.203.(d)(1)(iii)(C)] No.</p> <p><b>D.4: The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.</b>  D.4.a: Does the agency post its affirmative action plan on its public website? [see 29 CFR § 1614.203.(d)(4)] No.  D.4.b: Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR § 1614.203.(d)(1)(i)] No.  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)] No.</p>

### 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)
07/31/2018	D.1.c: Implement exit interview tool related to disability. (Refer to EEOC letter July 2018, pg. 6, top).	01/31/2019	09/30/2020	
05/31/2017	D.4.a: Finalize Affirmative Action plan.	09/30/2019		
07/31/2018	D.4.b: (Refer to EEOC letter page 6, bottom) Targeted outreach to PW(T)Ds.	05/31/2020		

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07/31/2018	<p>D.4.d: (Refer to EEOC letter page 4, bottom and page 6, middle) Targeted outreach to PW(T)Ds.          Increase Schedule A Hiring Authority usage (proactive feature).          Convert all eligible Schedule A employees to competitive service after two years. (Refer to EEOC letter page 5, bottom).          Improve efforts to ensure accessibility of technology and facilities.</p>	09/30/2021		
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**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
Disability Program Manager, NARA EEO	Amii Limpp	Yes
Acting Director, NARA EEO	Erica Pearson	No
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)
05/31/2020	<p>D.1.c: (Refer to: EEOC letter July 2018, pg. 6, top).</p> <ol style="list-style-type: none"> <li>1. Partner with Human Capital to review previously made exit interview tool for questions relating to disability.</li> <li>2. Amend tool as necessary to include disability questions.</li> <li>3. Review and finalize tool.</li> <li>4. Partner with Human Capital to integrate tool into exit process.</li> </ol>	<p>1.-3. Yes</p> <p>4. Yes (survey is already part of the exit process).</p>		

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09/30/2019	D.4.a: Finalize AA/Disability Strategic plan Review and edit Affirmative Action Plan for PWDs Finalize AA Plan Leadership review Policy Review Publish (including on website).	Yes		
09/30/2019	D.4.b: (Refer to EEOC letter page 4, bottom). Create list of agencies and orgs who work with PW(T)Ds for targeted outreach (Refer to EEOC letter pages 4 & 6, bottom).	Yes		
01/31/2020	Create Schedule A Fact Sheet/job aid, partner with Human Capital for feedback. Partner with Human Capital to analyze recruitment efforts.	Yes		
02/28/2020	(Refer to EEOC letter, pg. 7, bottom): Partner with Human Capital to analyze vacancy advertisements (including brochures, flyers, agency's website, recruiters, USAJobs, specific professional societies and associations, or specific colleges).			
03/31/2020	Partner with Human Capital to examine Policies, Practices, or Procedures limiting its recruitment and/or selection of qualified PW(T)Ds (ie advertising, selection, hiring officials). Partner with Human Capital to participate in job fairs (at Universities-Gallaudet for example, other sponsored job fairs and events focused on disability employment).			

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## 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.

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element E: Efficiency	<p><b>E.4: The agency has effective and accurate data collection systems in place to evaluate its EEO program.</b></p> <p>E.4.a.5: The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)] No.</p>

### 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)
01/31/2018	(Refer to EEOC Letter, pg. 5 bottom) Utilize updated tracking log to track RA cases for timeliness.	09/30/2019		

### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Disability Program Manager, NARA EEO	Amii Limpp	Yes
Acting Director, NARA EEO	Erica Pearson	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)
03/31/2019	(Refer to EEOC Letter, pg. 5, bottom). Create updated RA tracking log.	Yes (Excel only).	09/30/2019	

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## 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.

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element A: Efficiency	<p><b>A.3: The agency assesses and ensures EEO principles are part of its culture.</b></p> <p>A.3.a: Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [See 29 CFR § 1614.102(a) (9)] If "yes", provide one or two examples in the comments section. No.</p>

### 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	A.3.a: Recognize employees, supervisors and managers for superior EEO accomplishments.	9/30/2020		

### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Acting Director, NARA EEO	Erica Pearson	No
Human Resource Working Group	Human Resource Working Group Staff	No

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**Planned Activities Toward Completion of Objective**

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing? (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
12/31/2019	A.3.a: Partner with a representative from HR, NGC and the Workplace Culture Program to develop a proposal for recognition.	Yes		
2/28/2020	Submit proposal to agency leadership for approval.	Yes		
9/30/2020	Implement recognition process.	Yes		

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## 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.

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element B: Efficiency	<p><b>B.4: The agency has sufficient budget and staffing to support the success of its EEO program.</b></p> <p>B.4.a.5: To conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [See 29 CFR § 1614.102(c)(2)] No.</p> <p>B.4.a.7: To maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [See MD-715, II(E)] If not, please identify the systems with insufficient funding in the comments section. No.</p> <p>B.4.a.8: To effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709] No.</p> <p><b>B.6: The agency involves managers in the implementation of its EEO program.</b></p> <p>B.6.a: Are senior managers involved in the implementation of Special Emphasis Programs? [See MD-715 Instructions, Sec. I] No.</p> <p>B.6.b: Do senior managers participate in the barrier analysis process? [See MD-715 Instructions, Sec. I] No.</p> <p>B.6.c: When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [See MD-715 Instructions, Sec. I] No.</p> <p>B.6.d: Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR § 1614.102(a)(5)] No.</p>

### 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	B.4.a.5: Conduct Internal and Field Audits once a year.	9/30/2021		

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04/30/2017	B.4.a.7: See H-3. Refer to E.4.a.1	09/30/2017	09/30/2020	
10/31/2018	B.4.a.8: Develop agency wide special emphasis program.	09/30/2020		
10/31/2018	B.6.a: Refer to B.4.a.8.	09/30/2020		
10/31/2018	B.6.b: Refer to B.4.a.8.	09/30/2020		
10/31/2018	B.6.c: Refer to B.4.a.8.	09/30/2020		
10/31/2018	B.6.d: Refer to B.4.a.8.	09/30/2020		

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
Acting Director, NARA EEO	Erica Pearson	Yes
EEO Staff	EEO Staff	No
Senior Leaders	Senior Leaders	No
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)
9/30/2021	B.4.a.5: 1. Partner with Field Offices to develop a schedule and assessment criteria for field audits. 2. Develop a schedule / plan to conduct Field Audits.	Yes		
9/30/2020	B.4.a.8: 1. Submit SEP proposal to senior leadership. 2. Select SEPMS to align with EAGs. 3. Train SEPMS on barrier analysis. 4. Engage senior leadership and stakeholders such as Human Capital for barrier analysis.	Yes		

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	5. Develop action plans with stakeholders and senior leaders. 6. Monitor and assess plan, implementation and completion.			
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## 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.

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element C: Efficiency	<p><b>C.1: The agency conducts regular internal audits of its component and field offices.</b>            C.1.a: 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.            C.1.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.</p> <p><b>C.4: The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.</b>            C.4.b: Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [See MD-715 Instructions, Sec. I] No.            C.4.e.2: Develop and/or conduct outreach and recruiting initiatives? [See MD-715, II(C)] No.            C.4.e.4: Identify and remove barriers to equal opportunity in the workplace? [See MD-715, II(C)] No.</p>

### 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	C.1.a: Refer to B.4.a.5.	09/30/2021		
10/31/2018	C.1.b: Refer to B.4.a.5 and B.4.a.8.	09/30/2021		
10/31/2019	C.4.b: Partner with the Human Capital Office to schedule time frames to review policies, programs and procedures.	09/30/2020		

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10/31/2019	C.4.e.2: Partner with the Human Capital Office to develop recruiting and outreach initiatives.	09/30/2020		
10/31/2018	C.4.e.4: Refer to B.4.a.8.	09/30/2020		

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
Acting Director, NARA EEO	Erica Pearson	No
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	C.4.b, C.4.e.2: During FY18, Human Capital prepared for a transition to shared services. All staffing and classification services, employee benefits, and other Human Resource functions were migrated to the Administrative Resource Center. Once the transition is complete the Agency will establish timetables and schedules to review policies and practices that may impede participation by all EEO group.	Yes		

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## 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.

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element D: Efficiency	<p><b>D.1: The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.</b></p> <p>D.1.b: Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [See MD-715 Instructions, Sec. I] No.</p> <p><b>D.2: The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)</b></p> <p>D.2.a: Does the agency have a process for analyzing the identified triggers to find possible barriers? [See MD715, (II)(B)] No.</p> <p>D.2.b: Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [See 29 CFR § 1614.102(a)(3)] No.</p> <p>D.2.d: Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable accommodation program; anti-harassment program; and/or external special interest groups? [See MD-715 Instructions, Sec. I] If "yes" please identify the data sources in the comments column. No.</p> <p><b>D.3: The agency establishes appropriate action plans to remove identified barriers.</b></p> <p>D.3.a: Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [See 29 CFR § 1614.102(a)(3)] No.</p> <p>D.3.b: If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [See MD715, II (D). No.</p> <p>D.3.c: Does the agency periodically review the effectiveness of the plans? [See MD-715, II(D)] No.</p>

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

<b>Date Initiated (mm/dd/yyyy)</b>	<b>Objective</b>	<b>Target Date (mm/dd/yyyy)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Date Completed (mm/dd/yyyy)</b>
10/31/2019	D.1.b: Review multiple information sources to identify triggers.	09/30/2020		
10/31/2018	D.2.a: Analyze triggers to identify barriers.	09/30/2020		
10/31/2019	D.2.b: Examine impact of personnel policies, procedures and practices by race, national origin, sex and disability.	09/30/2020		
10/31/2019	D.2.d: Review multiple information sources to find barriers.	09/30/2020		
10/31/2019	D.3.a: Develop and tailor action plans to address barriers.	09/30/2020		
10/31/2019	D.3.b: Part I implementation and planned activities.	09/30/2020		
10/31/2019	D.3.c: Review effectiveness of Part I plan.	09/30/2020		

**Responsible Official(s)**

<b>Title</b>	<b>Name</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>
Acting Director, NARA EEO	Erica Pearson	Yes
EEO Staff	EEO Staff	No
Human Capital Staff	Human Capital Staff	No

**Planned Activities Toward Completion of Objective**

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing? (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
9/30/2020	D.1.b: During FY18, we lost one EEO Specialist and one EEO Supervisor, who both support EEO Inclusion and SEP Program. In FY19, we hired one Diversity and inclusion supervisor to support both roles. During FY18, Human Capital prepared for a transition to shared services. All staffing and classification	Yes		

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	services, employee benefits, and other Human Resource functions were migrated to the Administrative Resource Center. At this time not all data is collected nor available for review. Pending review FY19/20, once the transition is completed.			
	D.2.a: Refer to B.4.a.8.			
	D.2.b: Refer to C.4.b and B.4.a.8.			
	D.2.d: Refer to D.1.b.			
	D.3.a: Refer to B.4.a.8.			
9/30/2020	D.3.b: FY18, Part I will be implemented and monitored over FY19 and FY20.	Yes		
9/30/2020	D.3.c: Part I plans will be reviewed twice per year by the EEO staff for effectiveness.	Yes		

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Fiscal Year	Accomplishments

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## 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.

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element E: Efficiency	<p><b>E.4: The agency has effective and accurate data collection systems in place to evaluate its EEO programs.</b></p> <p>E.4.a.3: Recruitment activities? [See MD-715, II(E)] No.</p> <p>E.4.a.4: External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [See MD-715, II(E)] No.</p>

### 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	E.4.a.3: Evaluate recruitment activities.	2/28/2021		
09/30/2020	E.4.a.4: Evaluate applicant flow data.	2/28/2021		

### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Acting Director, NARA EEO	Erica Pearson	No
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	E.4.a.3, E.4.a.4: The EEO Director will partner with senior leadership and the Chief Human Capital Officer. During FY18 Human Capital prepared for a transition to shared services. All staffing and classification services, employee benefits, and other Human Resource functions were migrated to the Administrative Resource Center (ARC). Once the transition is complete the agency will work with ARC to collect applicant flow data and build reports. Based on the data collected, we will then establish timetables and schedules to review policies and practices that may impede participation by all EEO groups.	Yes		

**Report of Accomplishments**

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## 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.

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element E: Efficiency	<p><b>E.1: The agency maintains an efficient, fair, and impartial complaint resolution process.</b>  E.1.d: Does the agency issue acceptance/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor's report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments. No.  E.1.h: When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 10 29 CFR §1614.110(b)? No.</p> <p><b>E.4: The agency has effective and accurate data collection systems in place to evaluate its EEO program.</b>  E.4.a.1: Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [See MD-715, II( E)] No.</p>

### 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)
11/30/2018	E.1.d: Change the current in-house complaints processing timelines in place to enable effective monitoring and alert staff of due dates for complaints activity.	11/30/2019		
9/30/2018	E.1.h: Issue timely Final Agency Decisions.	9/30/2020		
4/01/2015	E.4.a.1: Procure a new EEO tracking system that will enable effective monitoring and reporting of EEO Informal and Formal Complaints in accordance with EEO regulations and guidelines.	09/30/2017	09/30/2020	

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**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
Acting Director, NARA EEO	Erica Pearson	No
Complaints Program Manager	Tammie Johnson	No
Supervisory Attorney-Adviser (General)	Jeanette Wise	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)
11/30/2018	E.1.d: Get approval to hire an additional EEO Specialist to assist with processing EEO complaints.	Yes		10/29/2018
11/30/2019	E.1.d: Regularly scheduled complaints meetings.	Yes		
11/30/2019	E.1.d: Readjusting in-house processing time-frames.	Yes		
11/30/2019	E.1.d: Training staff.	Yes		
9/30/2019	E.1.h: Host regularly scheduled meetings with NGC to discuss FAD status and completion	Yes		
04/01/2015	E.4.a.1: Develop EEO Management System Business Case Analysis.	Yes		2015
04/01/2015	E.4.a.1: Submit EEO Business Case Analysis to Information Services' Review Board.	Yes		2015
09/30/2015	E.4.a.1: Develop market analysis for available EEO management-tracking systems. (Information Services).	Yes		2015
09/30/2018	E.4.a.1: Select best option to meet EEO management-tracking system's need. (Information Services).	No		(Pending-Purchase of new system)

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09/30/2018	E.4.a.1: Allocate funding to conduct Fit/Gap analysis. (Information Services).	No		(Pending-Purchase of new system)
09/30/2019	E.4.a.1: Establish specific requirements to develop EEO management-tracking system. (Information Services).	No		(Pending-Purchase of new system)
09/30/2020	E.4.a.1: Install EEO management-tracking system. (Information Services).	No		(Pending-Purchase of new system)
09/30/2020	E.4.a.1: Ensure EEO management-tracking system is operating properly. (EEO).	No		(Pending-Purchase of new system)

**Report of Accomplishments**

Fiscal Year	Accomplishments

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## 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.

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element E: Efficiency	<p><b>E.4: The agency has effective and accurate data collection systems in place to evaluate its EEO program.</b></p> <p>E.4.a.6: The processing of complaints for the anti-harassment program? (See EEO Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), V.C.2). No.</p>

### 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)
04/01/2015	E.4.a.6: Procure a new EEO/Anti-Harassment tracking system that will enable effective monitoring and reporting of EEO Informal and Formal Complaints and Harassment Complaints in accordance with EEO regulations and guidelines.	09/30/2020		

### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Acting Director, NARA EEO	Erica Pearson	No
Anti-Harassment Program Manager	Tanya Shorter	No

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**Planned Activities Toward Completion of Objective**

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing? (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
04/01/2015	E.4.a.6: Develop EEO Management System Business Case Analysis.	Yes		2015
04/01/2015	E.4.a.6: Submit EEO Business Case Analysis to Information Services' Review Board.	Yes		2015
09/30/2015	E.4.a.6: Develop market analysis for available EEO management-tracking systems. (Information Services).	Yes		2015
09/30/2018	E.4.a.6: Select best option to meet EEO/Anti-Harassment management-tracking system's need. (Information Services).	No		(Pending-Purchase of new system)
09/30/2018	E.4.a.6: Allocate funding to conduct Fit/Gap analysis. (Information Services).	No		(Pending-Purchase of new system)
09/30/2019	E.4.a.6: Establish specific requirements to develop EEO/Anti-Harassment management-tracking system. (Information Services).	No		(Pending-Purchase of new system)
09/30/2020	E.4.a.6: Install EEO/Anti-Harassment management-tracking system. (Information Services).	No		(Pending-Purchase of new system)
09/30/2020	E.4.a.6: Ensure EEO/Anti-Harassment management-tracking system is operating properly. (EEO).	No		(Pending-Purchase of new system)

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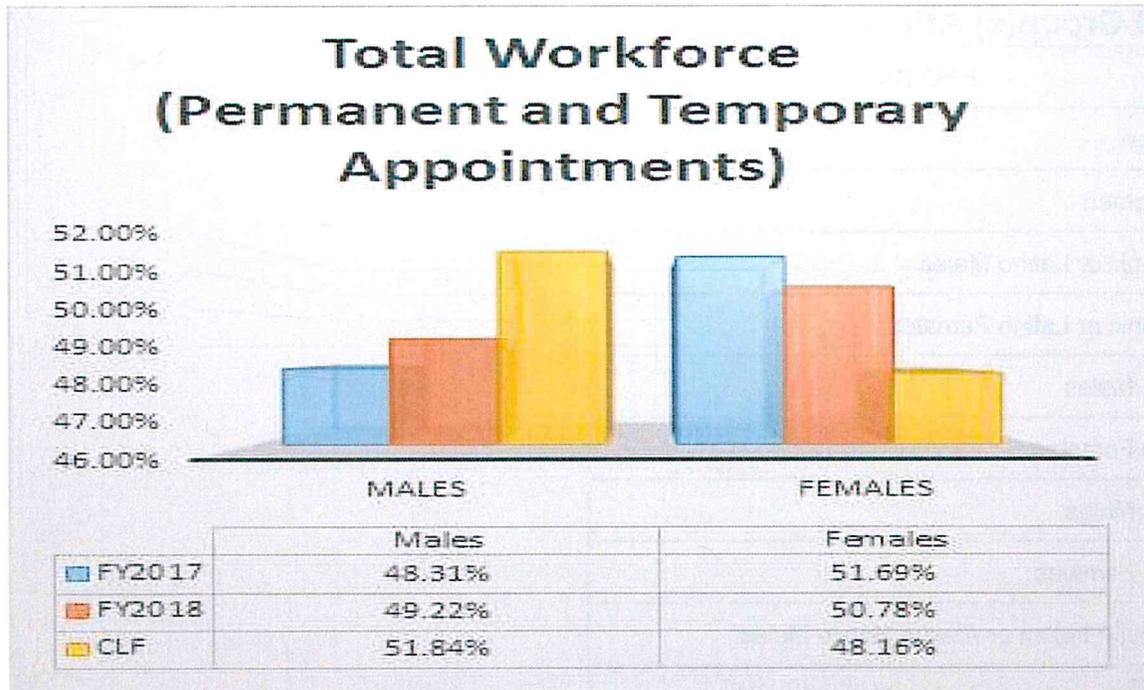
**IMD-715 – Part I**  
**Agency EEO Plan to Eliminate Identified Barrier**

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.

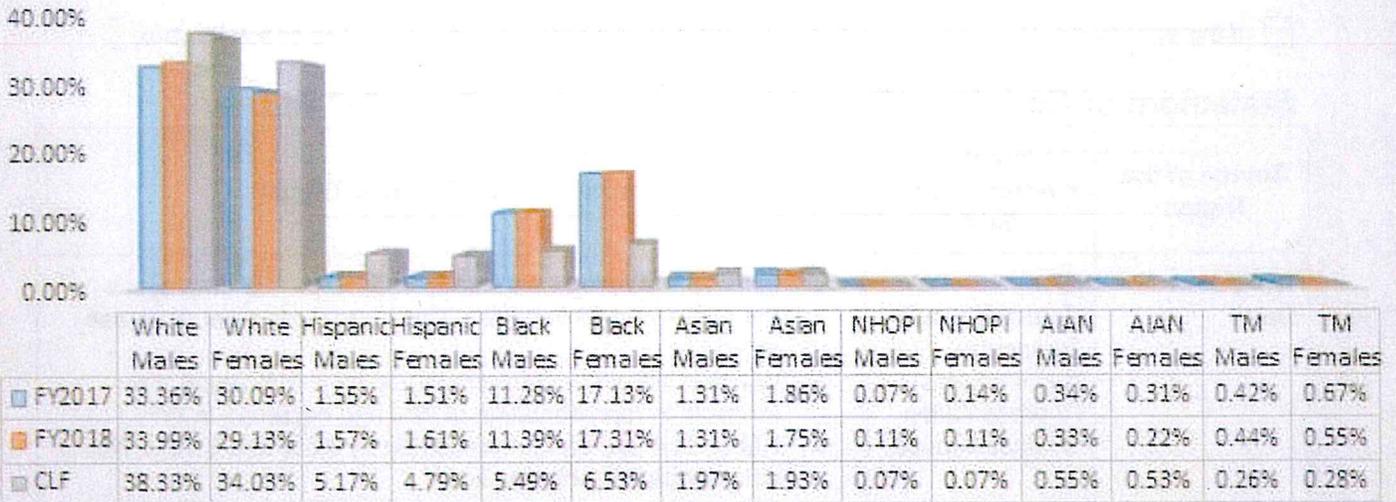
**Statement of Condition That Was a Trigger for a Potential Barrier:**

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce Data	A-1 Permanent and Temporary Appointments, Representation of Class Groups	<ul style="list-style-type: none"> <li>In FY18, NARA's workforce decreased by 102 employees (34 males and 68 females). This represents a net decrease of 3.59%.</li> <li>WM and WF are underrepresented by 4.34% and 4.9%. Increase in representation of WM and decrease in WF.</li> <li>HM and HF are underrepresented by 3.6% and 3.18%. No net change in representation.</li> <li>AM and AF are underrepresented by .66% and .18%. AM remained the same and AF decreased in representation.</li> <li>AIANM and AIANF are underrepresented by .22% and .31%.</li> <li>AIANM and AIANF decreased in representation.</li> </ul>



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## Representation of Class Groups (Total Workforce)



### EEO Group(s) Affected by Trigger

EEO Group
All Men
All Women
Hispanic or Latino Males
Hispanic or Latino Females
White Males
White Females
Asian Males
Asian Females
American Indian or Alaska Native Males
American Indian or Alaska Native Females

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**Barrier Analysis Process**

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	See above

**Status of Barrier Analysis Process**

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

**Statement of Identified Barrier(s)**

Description of Policy, Procedure, or Practice
No barriers were identified during FY18. The EEO Office lost one EEO Specialist and one EEO Supervisor, who both support Diversity and Inclusion and SEP Program. All SEPM activities were placed on hold. In FY19, we hired one EEO supervisor to support both roles. During FY18, Human Capital prepared for a transition to shared services. All staffing and classification services, employee benefits, and other Human Resource functions were migrated to the Administrative Resource Center. Once the transition is complete the Agency will establish timetables and schedules to review policies and practices that may impede participation by all EEO groups.

**Objective(s) and Dates 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)
Review all appointments and representation of class groups with senior leadership, EAGs, SEPMs and Human Capital to determine if barrier(s) exists.	10/01//2019	09/30/2021	Yes		

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**Responsible Official(s)**

<b>Title</b>	<b>Name</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>
Acting Director, NARA EEO	Erica Pearson	Yes
Human Capital Staff	Human Capital Staff	No
Senior Leadership	Senior Leadership	No

**Planned Activities Toward Completion of Objective**

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
9/30/2021	<ol style="list-style-type: none"> <li>1. Submit SEP proposal to senior leadership.</li> <li>2. Select SEPMs to align with EAGs.</li> <li>3. Train SEPMs on barrier analysis.</li> <li>4. Engage senior leadership and stakeholders such as Human Capital for barrier analysis.</li> <li>5. Develop action plans with stakeholders and senior leaders.</li> <li>6. Monitor and assess plan, implementation and completion.</li> </ol>		

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>

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**MD-715 – Part I**

**Agency EEO Plan to Eliminate Identified Barrier**

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.

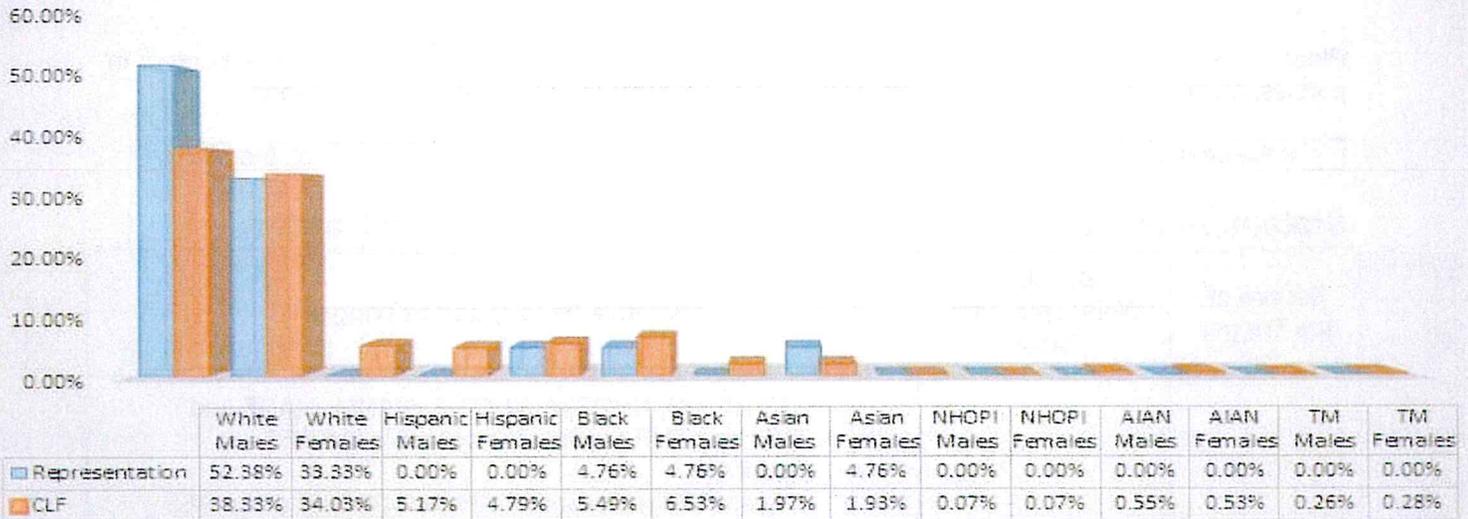
If the agency did not conduct barrier analysis during the reporting period, please check the box.

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

<b>Source of the Trigger</b>	<b>Specific Workforce Data Table</b>	<b>Narrative Description of Trigger</b>
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 52.38% and 33.33% of the SES population in comparison to their respective participation in the workforce at 38.33% and 34.03%.</li><li>• NARA has one each BM and BF SES, who each represent 4.76% and 4.76% of the SES population in comparison to their respective participation in the workforce at 5.49% and 6.53%.</li><li>• NARA also has one AF SES, who represents 4.76% of the SES population. Their participation in the workforce is 1.93%.</li></ul>

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**Participation Rates for SES**



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

EEO Group
Hispanic or Latino Males
Hispanic or Latino Females
Black or African American Males
Black or African American Females
Asian Males
Native Hawaiian or Other Pacific Islander Males
Native Hawaiian or Other Pacific Islander Females
American Indian or Alaska Native Males
American Indian or Alaska Native Females
Two or More Races Males
Two or More Races Females

**Barrier Analysis Process**

Sources of Data	Source Reviewed?	Identify Information Collected

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	(Yes or No)	
Workforce Data Tables	Yes	See above

**Status of Barrier Analysis Process**

<b>Barrier 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>
No barriers were identified during FY18. The EEO Office lost one EEO Specialist and one EEO Supervisor, who both support Diversity and Inclusion and SEP Program. All SEPM activities were placed on hold. In FY19, we hired one EEO supervisor to support both roles. During FY18, Human Capital prepared for a transition to shared services. All staffing and classification services, employee benefits, and other Human Resource functions were migrated to the Administrative Resource Center. Once the transition is complete the Agency will establish timetables and schedules to review policies and practices that may impede participation by all EEO groups.

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

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Consult with external third parties for recruitment and retention strategies for those groups that are not represented in the SES population to identify potential barriers.	10/01/2019	10/31/2021	Yes		

**Responsible Official(s)**

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

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**Planned Activities Toward Completion of Objective**

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
9/30/2020	1. Review and analyze the GS-14 and GS-15 SES applicant pool to determine if any barriers exist.		

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>

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

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.

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

<b>Source of the Trigger</b>	<b>Specific Workforce Data Table</b>	<b>Narrative Description of Trigger</b>
Workforce Data	A-6 Participation Rates for Major Occupations	<ul style="list-style-type: none"> <li>● Major Occupation 0301 Program Management               <ul style="list-style-type: none"> <li>○ In comparison to the Occupational Civilian Labor Force (OCLF), the following groups are underrepresented. HM, HF, WF, BF, AM, NHOPIM, AIANM, AIANF, TMM and TMF.</li> </ul> </li> <li>● Major Occupation 0343 Management Program Analyst               <ul style="list-style-type: none"> <li>○ In comparison to the OCLF, the following groups are underrepresented. HM, HF, WM, WF, AM, NHOPIM and AIANM.</li> </ul> </li> <li>● Major Occupation 1001 General Arts and Information               <ul style="list-style-type: none"> <li>○ In comparison to the OCLF, the following groups are underrepresented. HM, HF, WM, AM, NHOPIM, NHOPIF, AIANM and AIANF.</li> </ul> </li> <li>● Major Occupation 1420 Archivist               <ul style="list-style-type: none"> <li>○ In comparison to the OCLF, the following groups are underrepresented. HM, HF, WF, AM, NHOPIM, NHOPIF, AIANF and TMF.</li> </ul> </li> <li>● Major Occupation 1421 Archives Technician               <ul style="list-style-type: none"> <li>○ In comparison to the OCLF, the following groups are underrepresented. HF, WM, WF, AM, AF and AIANF.</li> </ul> </li> <li>● Major Occupation 2210 IT Management               <ul style="list-style-type: none"> <li>○ In comparison to the OCLF, the following groups are underrepresented. HM, HF, WM, WF, NHOPIF, AIANM and AIANF.</li> </ul> </li> </ul>

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ERIG	0301 Program Management - NARA Representation	OCLF
HM	2.56%	2.86%
HF	3.85%	5.87%
WM	41.03%	27.06%
WF	34.62%	43.84%
BM	5.13%	3.60%
BF	7.69%	8.89%
AM	0.00%	2.57%
AF	3.85%	3.64%
NHOPIM	0.00%	0.03%
NHOPIF	1.28%	0.05%
AIANM	0.00%	0.33%
AIANF	0.00%	0.62%
TMM	0.00%	0.26%
TMF	0.00%	0.39%

ERIG	0343 Management Program Analyst- NARA Representation	OCLF
HM	2.40%	2.46%
HF	0.80%	2.14%
WM	31.20%	49.01%
WF	28.80%	32.56%
BM	8.00%	3.03%
BF	19.20%	3.80%
AM	2.40%	3.33%
AF	4.00%	2.46%
NHOPIM	0.00%	0.02%
NHOPIF	0.00%	0.04%
AIANM	0.00%	0.31%
AIANF	0.80%	0.32%
TMM	1.60%	0.27%
TMF	0.80%	0.24%

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ERIG	1001 General Arts and Information - NARA Representation	OCLF
HM	0.76%	3.93%
HF	1.52%	2.02%
WM	32.58%	45.16%
WF	43.94%	39.26%
BM	6.06%	2.17%
BF	11.36%	1.14%
AM	0.00%	2.59%
AF	2.27%	1.72%
NHOPIM	0.00%	0.05%
NHOPIF	0.00%	0.03%
AIANM	0.00%	0.87%
AIANF	0.00%	0.57%
TMM	0.76%	0.24%
TMF	0.76%	0.23%

ERIG	1420 Archivist - NARA Representation	OCLF
HM	1.15%	1.44%
HF	1.44%	2.20%
WM	42.53%	35.01%
WF	44.83%	51.17%
BM	2.59%	2.28%
BF	4.02%	3.57%
AM	0.29%	1.09%
AF	1.72%	1.60%
NHOPIM	0.00%	0.00%
NHOPIF	0.00%	0.00%
AIANM	0.57%	0.28%
AIANF	0.29%	0.71%
TMM	0.29%	0.22%
TMF	0.29%	0.43%

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ERIG	1421 Archives Technician - NARA Representation	OCLF
HM	1.53%	1.44%
HF	1.45%	2.20%
WM	31.52%	35.01%
WF	23.89%	51.17%
BM	16.12%	2.28%
BF	22.08%	3.57%
AM	0.80%	1.09%
AF	0.94%	1.60%
NHOPIM	0.15%	0.00%
NHOPIF	0.15%	0.00%
AIANM	0.36%	0.28%
AIANF	0.07%	0.71%
TMM	0.44%	0.22%
TMF	0.51%	0.43%

ERIG	2210 IT Management - NARA Representation	OCLF
HM	1.79%	5.39%
HF	0.00%	2.17%
WM	35.71%	52.21%
WF	13.39%	20.89%
BM	18.75%	6.61%
BF	9.82%	4.50%
AM	11.61%	5.14%
AF	5.36%	1.55%
NHOPIM	0.89%	0.10%
NHOPIF	0.00%	0.05%
AIANM	0.00%	0.53%
AIANF	0.00%	0.29%
TMM	0.89%	0.38%
TMF	1.79%	0.18%

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

EEO Group
Hispanic or Latino Males
Hispanic or Latino Females
White Males
White Females
Black or African American Males
Black or African American Females
Asian Males
Asian Females
Native Hawaiian or Other Pacific Islander Males
Native Hawaiian or Other Pacific Islander Females
American Indian or Alaska Native Males
American Indian or Alaska Native Females
Two or More Races Males
Two or More Races Females

**Barrier Analysis Process**

Sources of Data	Source Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	See above

**Status of Barrier Analysis Process**

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

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**Statement of Identified Barrier(s)**

Description of Policy, Procedure, or Practice
No barriers were identified during FY18. The EEO Office lost one EEO Specialist and one EEO Supervisor, who both support Diversity and Inclusion and SEP Program. All SEPM activities were placed on hold. In FY19, we hired one EEO supervisor to support both roles. During FY18, Human Capital prepared for a transition to shared services. All staffing and classification services, employee benefits, and other Human Resource functions were migrated to the Administrative Resource Center. Once the transition is complete the Agency will establish timetables and schedules to review policies and practices that may impede participation by all EEO groups.

**Objective(s) and Dates 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)
Review the applicant flow data, hires and career paths for those groups that are not represented in the SES population to identify potential barriers.	10/01/2019	10/31/2021	Yes		

**Responsible Official(s)**

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

**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
9/30/2020	<ol style="list-style-type: none"> <li>1. Submit SEP proposal to senior leadership.</li> <li>2. Select SEPMs to align with EAGs.</li> <li>3. Train SEPMs on barrier analysis.</li> </ol>		

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	<ol style="list-style-type: none"><li>4. Engage senior leadership and stakeholders such as Human Capital for barrier analysis.</li><li>5. Develop action plans with stakeholders and senior leaders.</li><li>6. Monitor and assess plan, implementation and completion.</li></ol>		
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**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>

## 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)) require 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 <input checked="" type="checkbox"/> |
| b. Cluster GS-11 to SES (PWD)  | Yes <input checked="" type="checkbox"/> | No                                     |

**CLUSTER GS1-10**  
 PWDs 15.67%

**CLUSTER GS11-SES**  
 PWDs 9.76% \*Trigger

NARA has no representation of PWD at the GS-10 level, however, we only have 3 GS-10s in the workforce.

NARA is well represented (at least 14% and above) in GS-2-9

NARA GS-11 to SES PWDs is below the 12% federal goal at 9.76%

GS-11-14 is represented at 10.67% (GS-11), 10.42% (GS-12), 9.48% (GS-13), and 11.56% (GS-14) which are all below the Federal participation rate goal of 12%.

GS-15 is represented at 3.33% (NARA only has 3 PWDs of 90 employees total at this level.)

NARA has only 1 SES w/ a Disability out of 21 total SES.

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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 X | No   |

**CLUSTER GS1-10**

PWTDs= 2.31 %

**CLUSTER GS11-SES**

PWTDs=1.18 %

NARA has no representation of PWTD at the GS-10 level, however, we only have 3 GS-10s in the workforce.

NARA is well represented in the GS-3-8 levels all reaching over the 2% federal goal.

NARA is below the benchmark in the GS-9 level at 1.32%

NARA has no representation of PWTD at the SES level.

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

The Agency did not formally communicate the goals last year. The DPM position was vacant for 4 months of the year. The disAbility EAG initiated an SF256 campaign in late FY 17, with the results listed in early FY 18.

The disAbility EAG plans to communicate these goals during FY19, through various formats (Notices/Communications, monitors, trainings, and posting on the ICN (intranet), etc.) as one of the goals for the year.

## Section II: Model Disability Program

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

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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 0

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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 PWTB	5 + contractor staff			Frances Sandbothe, Chief, Staffing and Recruitment Branch (HTS) Human Resources <a href="mailto:Frances.Sandbothe@nara.gov">Frances.Sandbothe@nara.gov</a>
Answering questions from the public about hiring authorities that take disability into account	2		1	Collateral Duty: Frances Sandbothe  Full time: Allison Wise, D&I Program Director, NEEO <a href="mailto:allison.wise@nara.gov">allison.wise@nara.gov</a>  Full time: Amii Limpp, Disability Program Manager, NEEO <a href="mailto:Amii.Limpp@nara.gov">Amii.Limpp@nara.gov</a>
Processing reasonable accommodation requests from applicants and employees	2			Allison Wise  Amii Limpp
Section 508 Compliance	1			Marjorie Bennett, IT Specialist, Office of Information Services <a href="mailto:Marjorie.Bennett@nara.gov">Marjorie.Bennett@nara.gov</a>
Architectural Barriers Act Compliance	1			Mark Sprouse, Facilities and Materials Management Officer, <a href="mailto:Mark.Sprouse@nara.gov">Mark.Sprouse@nara.gov</a>
Special Emphasis Program for PWD and PWTB	2			Allison Wise  Amii Limpp

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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.

Yes  No

Yes, this year the DPM participated in Absence, Leave Abuse and Medical Issues week long training in September of 2018.

**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.

The Agency currently does not have a program specifically geared towards targeted outreach for PW(T)Ds. Our Human Capital office is able to identify these applicants solely based on Schedule A status. The Agency plans to identify internal and external stakeholders regarding targeted outreach for upcoming positions in order to increase the pipeline of qualified PW(T)Ds, during FY19.

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- 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 all vacancy announcements which include instructions for PW(T)Ds applying under Schedule A.

- 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.

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

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

Yes x            No            N/A

Human Capital Specialists provide training to all new managers and supervisors during quarterly New Supervisor training course. Additionally, Human Capital Specialists conduct a Strategic Recruitment Discussion (SRD) with hiring official prior to any recruitment action. The SRD includes the use of Schedule A hiring authorities.

**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.

During FY18, there was minimal effort to establish contacts. Contact was made to participate in the Gallaudet University Job Fair. The DPM left the Agency before participating.

In FY19, the DPM along with help from the disAbility EAG, plan to gather information for targeted outreach to increase hiring of PWD and PWTD in FY20. The first step is to identify external stakeholders such as Centers for Independent Living (CILs), local and state vocational rehabilitation

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centers, Disability Employment Centers, and other orgs and Agencies who work with PW(T)Ds, and also identify whether they serve the general disability population or specific types of 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)                      Yes                      No X
- b. New Hires for Permanent Workforce (PWTD)                      Yes                      No X

Total permanent new hires: 227 hires. PWDs = 18.50%, and PWTD = 2.20%.  
No triggers.

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.

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

The qualified applicant pool (for PWDs and PWTDs) is the benchmark. The chart below reflects each MCO's QAP benchmark in comparison to the % of New Hires in each MCO. The final column is the difference between the QAP benchmark and the New Hires. If the final column's number is negative, that means NARA is below the benchmark and it is a trigger.

PWDs:

	QAP benchmark	Subtract New Hires	Difference
301	5.01%	0.00%	-5.01%
343	9.92%	0.00%	-9.92%
1001	5.57%	7.69%	2.12%
1420	3.75%	12.50%	8.75%
1421	6.62%	4.50%	-2.12%
2210	7.91%	0.00%	-7.91%

Trigger: We are below the benchmark in 4 of 6 MCOS for PWDs (301, 343, 1421, and 2210).

PWTDs:

	QAP benchmark	Subtract New Hires	Difference
301	2.70%	0.00%	-2.70%
343	5.34%	0.00%	-5.34%
1001	2.78%	0.00%	-2.78%
1420	1.25%	6.25%	5.00%

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**Planned Activities Toward Completion of Objective**

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing? (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
12/31/2019	A.3.a: Partner with a representative from HR, NGC and the Workplace Culture Program to develop a proposal for recognition.	Yes		
2/28/2020	Submit proposal to agency leadership for approval.	Yes		
9/30/2020	Implement recognition process.	Yes		

**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>

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## 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.

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element B: Efficiency	<p><b>B.4: The agency has sufficient budget and staffing to support the success of its EEO program.</b>  B.4.a.5: To conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [See 29 CFR § 1614.102(c)(2)] No.  B.4.a.7: To maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [See MD-715, II(E)] If not, please identify the systems with insufficient funding in the comments section. No.  B.4.a.8: To effectively administer its special emphasis programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709] No.</p> <p><b>B.6: The agency involves managers in the implementation of its EEO program.</b>  B.6.a: Are senior managers involved in the implementation of Special Emphasis Programs? [See MD-715 Instructions, Sec. I] No.  B.6.b: Do senior managers participate in the barrier analysis process? [See MD-715 Instructions, Sec. I] No.  B.6.c: When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [See MD-715 Instructions, Sec. I] No.  B.6.d: Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR § 1614.102(a)(5)] No.</p>

### 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	B.4.a.5: Conduct Internal and Field Audits once a year.	9/30/2021		

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04/30/2017	B.4.a.7: See H-3. Refer to E.4.a.1	09/30/2017	09/30/2020	
10/31/2018	B.4.a.8: Develop agency wide special emphasis program.	09/30/2020		
10/31/2018	B.6.a: Refer to B.4.a.8.	09/30/2020		
10/31/2018	B.6.b: Refer to B.4.a.8.	09/30/2020		
10/31/2018	B.6.c: Refer to B.4.a.8.	09/30/2020		
10/31/2018	B.6.d: Refer to B.4.a.8.	09/30/2020		

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
Acting Director, NARA EEO	Erica Pearson	Yes
EEO Staff	EEO Staff	No
Senior Leaders	Senior Leaders	No
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)
9/30/2021	B.4.a.5: <ol style="list-style-type: none"> <li>1. Partner with Field Offices to develop a schedule and assessment criteria for field audits.</li> <li>2. Develop a schedule / plan to conduct Field Audits.</li> </ol>	Yes		
9/30/2020	B.4.a.8: <ol style="list-style-type: none"> <li>1. Submit SEP proposal to senior leadership.</li> <li>2. Select SEPMs to align with EAGs.</li> <li>3. Train SEPMs on barrier analysis.</li> <li>4. Engage senior leadership and stakeholders such as Human Capital for barrier analysis.</li> </ol>	Yes		

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	5. Develop action plans with stakeholders and senior leaders. 6. Monitor and assess plan, implementation and completion.			
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**Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>

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## 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.

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element C: Efficiency	<p><b>C.1: The agency conducts regular internal audits of its component and field offices.</b>            C.1.a: 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.            C.1.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.</p> <p><b>C.4: The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.</b>            C.4.b: Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [See MD-715 Instructions, Sec. I] No.            C.4.e.2: Develop and/or conduct outreach and recruiting initiatives? [See MD-715, II(C)] No.            C.4.e.4: Identify and remove barriers to equal opportunity in the workplace? [See MD-715, II(C)] No.</p>

### 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	C.1.a: Refer to B.4.a.5.	09/30/2021		
10/31/2018	C.1.b: Refer to B.4.a.5 and B.4.a.8.	09/30/2021		
10/31/2019	C.4.b: Partner with the Human Capital Office to schedule time frames to review policies, programs and procedures.	09/30/2020		

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10/31/2019	C.4.e.2: Partner with the Human Capital Office to develop recruiting and outreach initiatives.	09/30/2020		
10/31/2018	C.4.e.4: Refer to B.4.a.8.	09/30/2020		

**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
Acting Director, NARA EEO	Erica Pearson	No
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	C.4.b, C.4.e.2: During FY18, Human Capital prepared for a transition to shared services. All staffing and classification services, employee benefits, and other Human Resource functions were migrated to the Administrative Resource Center. Once the transition is complete the Agency will establish timetables and schedules to review policies and practices that may impede participation by all EEO group.	Yes		

**Report of Accomplishments**

Fiscal Year	Accomplishments

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## 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.

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element D: Efficiency	<p><b>D.1: The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.</b>  D.1.b: Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [See MD-715 Instructions, Sec. I] No.</p> <p><b>D.2: The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)</b>  D.2.a: Does the agency have a process for analyzing the identified triggers to find possible barriers? [See MD715, II(B)] No.  D.2.b: Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [See 29 CFR § 1614.102(a)(3)] No.  D.2.d: Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable accommodation program; anti-harassment program; and/or external special interest groups? [See MD-715 Instructions, Sec. I] If "yes" please identify the data sources in the comments column. No.</p> <p><b>D.3: The agency establishes appropriate action plans to remove identified barriers.</b>  D.3.a: Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [See 29 CFR § 1614.102(a)(3)] No.  D.3.b: If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [See MD715, II (D)]. No.  D.3.c: Does the agency periodically review the effectiveness of the plans? [See MD-715, II(D)] No.</p>

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**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)
10/31/2019	D.1.b: Review multiple information sources to identify triggers.	09/30/2020		
10/31/2018	D.2.a: Analyze triggers to identify barriers.	09/30/2020		
10/31/2019	D.2.b: Examine impact of personnel policies, procedures and practices by race, national origin, sex and disability.	09/30/2020		
10/31/2019	D.2.d: Review multiple information sources to find barriers.	09/30/2020		
10/31/2019	D.3.a: Develop and tailor action plans to address barriers.	09/30/2020		
10/31/2019	D.3.b: Part I implementation and planned activities.	09/30/2020		
10/31/2019	D.3.c: Review effectiveness of Part I plan.	09/30/2020		

**Responsible Official(s)**

<b>Title</b>	<b>Name</b>	<b>Performance Standards Address the Plan?</b> (Yes or No)
Acting Director, NARA EEO	Erica Pearson	Yes
EEO Staff	EEO Staff	No
Human Capital Staff	Human Capital Staff	No

**Planned Activities Toward Completion of Objective**

<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)
9/30/2020	D.1.b: During FY18, we lost one EEO Specialist and one EEO Supervisor, who both support EEO Inclusion and SEP Program. In FY19, we hired one Diversity and inclusion	Yes		

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	supervisor to support both roles. During FY18, Human Capital prepared for a transition to shared services. All staffing and classification services, employee benefits, and other Human Resource functions were migrated to the Administrative Resource Center. At this time not all data is collected nor available for review. Pending review FY19/20, once the transition is completed.			
	D.2.a: Refer to B.4.a.8.			
	D.2.b: Refer to C.4.b and B.4.a.8.			
	D.2.d: Refer to D.1.b.			
	D.3.a: Refer to B.4.a.8.			
9/30/2020	D.3.b: FY18, Part I will be implemented and monitored over FY19 and FY20.	Yes		
9/30/2020	D.3.c: Part I plans will be reviewed twice per year by the EEO staff for effectiveness.	Yes		

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## 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.

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element E: Efficiency	<p><b>E.4: The agency has effective and accurate data collection systems in place to evaluate its EEO programs.</b></p> <p>E.4.a.3: Recruitment activities? [See MD-715, II(E)] No.</p> <p>E.4.a.4: External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [See MD-715, II(E)] No.</p>

### 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	E.4.a.3: Evaluate recruitment activities.	2/28/2021		
09/30/2020	E.4.a.4: Evaluate applicant flow data.	2/28/2021		

### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Acting Director, NARA EEO	Erica Pearson	No
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	E.4.a.3, E.4.a.4: The EEO Director will partner with senior leadership and the Chief Human Capital Officer. During FY18 Human Capital prepared for a transition to shared services. All staffing and classification services, employee benefits, and other Human Resource functions were migrated to the Administrative Resource Center (ARC). Once the transition is complete the agency will work with ARC to collect applicant flow data and build reports. Based on the data collected, we will then establish timetables and schedules to review policies and practices that may impede participation by all EEO groups.	Yes		

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## 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.

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element E: Efficiency	<p><b>E.1: The agency maintains an efficient, fair, and impartial complaint resolution process.</b>  E.1.d: Does the agency issue acceptance/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor's report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments. No.  E.1.h: When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 10 29 CFR §1614.110(b)? No.</p> <p><b>E.4: The agency has effective and accurate data collection systems in place to evaluate its EEO program.</b>  E.4.a.1: Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [See MD-715, II( E)] No.</p>

### 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)
11/30/2018	E.1.d: Change the current in-house complaints processing timelines in place to enable effective monitoring and alert staff of due dates for complaints activity.	11/30/2019		
9/30/2018	E.1.h: Issue timely Final Agency Decisions.	9/30/2020		
4/01/2015	E.4.a.1: Procure a new EEO tracking system that will enable effective monitoring and reporting of EEO Informal and Formal Complaints in accordance with EEO regulations and guidelines.	09/30/2017	09/30/2020	

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**Responsible Official(s)**

Title	Name	Performance Standards Address the Plan? (Yes or No)
Acting Director, NARA EEO	Erica Pearson	No
Complaints Program Manager	Tammie Johnson	No
Supervisory Attorney-Adviser (General)	Jeanette Wise	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)
11/30/2018	E.1.d: Get approval to hire an additional EEO Specialist to assist with processing EEO complaints.	Yes		10/29/2018
11/30/2019	E.1.d: Regularly scheduled complaints meetings.	Yes		
11/30/2019	E.1.d: Readjusting in-house processing time-frames.	Yes		
11/30/2019	E.1.d: Training staff.	Yes		
9/30/2019	E.1.h: Host regularly scheduled meetings with NGC to discuss FAD status and completion	Yes		
04/01/2015	E.4.a.1: Develop EEO Management System Business Case Analysis.	Yes		2015
04/01/2015	E.4.a.1: Submit EEO Business Case Analysis to Information Services' Review Board.	Yes		2015
09/30/2015	E.4.a.1: Develop market analysis for available EEO management-tracking systems. (Information Services).	Yes		2015
09/30/2018	E.4.a.1: Select best option to meet EEO management-tracking system's need. (Information Services).	No		(Pending-Purchase of new system)

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09/30/2018	E.4.a.1: Allocate funding to conduct Fit/Gap analysis. (Information Services).	No		(Pending-Purchase of new system)
09/30/2019	E.4.a.1: Establish specific requirements to develop EEO management-tracking system. (Information Services).	No		(Pending-Purchase of new system)
09/30/2020	E.4.a.1: Install EEO management-tracking system. (Information Services).	No		(Pending-Purchase of new system)
09/30/2020	E.4.a.1: Ensure EEO management-tracking system is operating properly. (EEO).	No		(Pending-Purchase of new system)

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## 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.

### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element E: Efficiency	<p><b>E.4: The agency has effective and accurate data collection systems in place to evaluate its EEO program.</b></p> <p>E.4.a.6: The processing of complaints for the anti-harassment program? (See EEO Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), V.C.2). No.</p>

### 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)
04/01/2015	E.4.a.6: Procure a new EEO/Anti-Harassment tracking system that will enable effective monitoring and reporting of EEO Informal and Formal Complaints and Harassment Complaints in accordance with EEO regulations and guidelines.	09/30/2020		

### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Acting Director, NARA EEO	Erica Pearson	No
Anti-Harassment Program Manager	Tanya Shorter	No

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**Planned Activities Toward Completion of Objective**

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing? (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
04/01/2015	E.4.a.6: Develop EEO Management System Business Case Analysis.	Yes		2015
04/01/2015	E.4.a.6: Submit EEO Business Case Analysis to Information Services' Review Board.	Yes		2015
09/30/2015	E.4.a.6: Develop market analysis for available EEO management-tracking systems. (Information Services).	Yes		2015
09/30/2018	E.4.a.6: Select best option to meet EEO/Anti-Harassment management-tracking system's need. (Information Services).	No		(Pending-Purchase of new system)
09/30/2018	E.4.a.6: Allocate funding to conduct Fit/Gap analysis. (Information Services).	No		(Pending-Purchase of new system)
09/30/2019	E.4.a.6: Establish specific requirements to develop EEO/Anti-Harassment management-tracking system. (Information Services).	No		(Pending-Purchase of new system)
09/30/2020	E.4.a.6: Install EEO/Anti-Harassment management-tracking system. (Information Services).	No		(Pending-Purchase of new system)
09/30/2020	E.4.a.6: Ensure EEO/Anti-Harassment management-tracking system is operating properly. (EEO).	No		(Pending-Purchase of new system)

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1421	3.54%	3.15%	-0.39%
2210	2.82%	0.00%	-2.82%

Trigger: We are below the benchmark in 5 of 6 MCOs for PWTDs (301, 343, 1001, 1421, and 2210).

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

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

The Relevant Applicant Pool (for PWDs and PWTBs) is the benchmark. The chart below reflects each MCO's RAP benchmark in comparison to the % of qualified internal applicants in each MCO. The final column is the difference between the RAP benchmark and the qualified internal applicants. If the final column's number is positive, that means NARA is below the benchmark and it is a trigger.

Ex: In MCO 1420, PWDs make up 3.76% of the applicant pool, however only 2.75% were qualified, therefore the Agency has a trigger at .1.01% (we need to make up at least 1.01% to equal our applicant pool).

PWDs:

	Relevant Applicant Pool PWD	Subtract Qualified Internal Applicants PWD	Difference PWD
301	14.81%	14.06%	0.75%
343	6.99%	9.92%	-2.93%
1001	10.00%	17.24%	-7.24%
1420	3.76%	2.75%	1.01%
1421	7.69%	7.89%	-0.20%
2210	8.36%	8.40%	-4.00%

Trigger: We are below the benchmark in 2 of 6 MCOs for PWDs (301 and 1420).

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PWTDs:

Ex: In MCO 1001, PWTDs makeup 6.25% of the Relevant applicant pool, however only 2% were qualified, therefore the Agency has a trigger at 4.25% (we need to make up at least 4.25% to equal our applicant pool).

	Relevant QAP PWTD%	Subtract QAP PWTD%	Difference PWTD%
301	7.40%	3.12%	4.28%
343	3.62%	5.34%	-1.72%
1001	6.25%	3.44%	2.81%
1420	2.51%	1.83%	0.68 %
1421	4.75%	4.54%	0.21 %
2210	5.91%	3.60%	2.31%

Trigger: We are below the benchmark in 5 of 6 MCOs for PWTDs (301, 1001,1420,1421, and 2210)

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.

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

The qualified applicant pool (for PWDs) is the benchmark. The chart below reflects each MCO's QAP benchmark in comparison to the % of Promotions in each MCO. The final column is the difference between the QAP benchmark and the Promotions. If the final column's number is positive, that means NARA is below the benchmark and it is a trigger.

Ex: In MCO 343, PWDs make up 9.92% of the qualified promotions, however 0% were selected, therefore the Agency has a trigger at 9.92% (we need to make up at least 9.92% to equal our qualified applicant pool).

	Qualified Internal Promotions PWD	Subtract Selected Promotions	Difference PWD
301	14.06%	4.68%	9.38%
343	9.92%	0%	9.92%
1001	14.24%	0%	14.24%
1420	2.75%	12.50%	-9.75%
1421	7.89%	3.70%	4.19%
2210	8.40%	0%	8.40%

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Trigger: We are below the benchmark in 5 of 6 MCOs for PWDs (301, 343, 1001, 1421, and 2210). The qualified applicant pool (for PWTDS) is the benchmark. The chart below reflects each MCO's QAP benchmark in comparison to the % of Promotions in each MCO. The final column is the difference between the QAP benchmark and the Promotions. If the final column's number is positive, that means NARA is below the benchmark and it is a trigger.

Ex: In MCO 343, PWDs make up 50% of the qualified promotions, however 0% were selected, therefore the Agency has a trigger at 50% (we need to make up at least 50% to equal our qualified applicant pool). PWTDS:

	Qualified Internal Promotions PWT D	Subtract Selected Promotions PWT D	Difference PWT D
301	100%	0%	100.00%
343	50.00%	0%	50.00%
1001	2%	0%	2.00%
1420	33.33%	50%	-16.67%
1421	40.42%	0%	40.42%
2210	21.95%	5.26%	16.69%

Trigger: We are below the benchmark in 5 of 6 MCOs for PWDs (301, 343, 1001, 1421, and 2210). No PWTDS were selected in MCO 301, 343, 1001, and 1421.

### 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 PWT D, have sufficient opportunities for advancement.

The Agency currently does not have a plan in place specifically for PW(T)Ds. The programs offered by the Learning & Development Division are for all employees, and many of the programs have a selection criterion. The Supervisor Development Program is role based (managers and supervisors).

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**B. CAREER DEVELOPMENT OPPORTUNITIES**

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

The Agency currently offers a number of “details” for a specific amount of time (90-120 days) for employees to receive cross-training to boost their careers. These details are offered to any employee regardless of disability. All are welcome to apply.

The following **leadership and development** programs are **competed** for and offered to all employees based on grade level:

- Emerging Leaders (GS5-12)
- Excellence in Government (GS13-14)
- Cross Training (all grade levels)
- Preparing to Lead (GS7-11)

Training Programs: Supervisor Development Program.

2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/approval to participate. [Collection begins with the FY 2018 MD-715 report, which is due on February 28, 2019.]

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs No internship Programs						
Fellowship Programs Excellence in Gov.	36	6	2 5.55%	1 16.66%	0	0
Mentoring Programs No mentoring Prog.						
Coaching Programs Preparing to Lead	11	2	1 9.09%	0	0	0



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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 trigger(s) in the text box.

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

<b>Comparison of inclusion rates between PWD and PWOD (people without disabilities).</b>		
Inclusion rate:	PWD	PWOD
Time off 1-9 hrs	39.19%	37.36%
Time off 9+ hrs	3.45%	6.19%
Cash Awards \$100-500	67.14%	77.60%
Cash Awards \$500+	66.57%	86.43%
<b>Comparison of inclusion rates between PWTD and PWOD</b>		
Inclusion rate:	PWTD	PWOD
Time off 1-9 hrs	29.16%	42.92%
Time off 9+ hrs	8.33%	6.55%
Cash Awards \$100-500	54.16%	87.02%
Cash Awards \$500+	6.25%	95.58%
<b>Triggers PWD</b> There are triggers in 2 award level categories (Time off 9+, and Cash Awards \$500+), where the inclusion rate of PWDs receiving awards is lower than the inclusion rate of PWODs receiving awards.		
<b>Triggers PWTD</b> There are triggers in 3 award level categories (Time off 1-9, Cash Awards \$100-500, and \$500+) where the inclusion rate of PWTDs receiving awards is lower than the inclusion rate of PWODs 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

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	PWD	PWTD
Quality Step Increases	0%	0%
Trigger: There are no PWDs or PWTDs who received QSIs to compare benchmarks.		

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 0      No 0      N/A 0
- b. Other Types of Recognition (PWTD)    Yes 0      No 0      N/A 0

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 0      No 0

ii. Internal Selections (PWD)                      Yes 0      No 0

b. Grade GS-15

i. Qualified Internal Applicants (PWD)      Yes 0      No 0

ii. Internal Selections (PWD)                      Yes 0      No 0

c. Grade GS-14

i. Qualified Internal Applicants (PWD)      Yes 0      No 0

ii. Internal Selections (PWD)                      Yes 0      No 0

d. Grade GS-13

i. Qualified Internal Applicants (PWD)      Yes 0      No 0

ii. Internal Selections (PWD)                      Yes 0      No 0

We are unable to obtain this information.
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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 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0

b. Grade GS-15

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0

c. Grade GS-14

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0

d. Grade GS-13

i. Qualified Internal Applicants (PWTD)	Yes 0	No 0
ii. Internal Selections (PWTD)	Yes 0	No 0

We are unable to obtain this information.

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 0	No 0
b. New Hires to GS-15 (PWD)	Yes 0	No 0
c. New Hires to GS-14 (PWD)	Yes 0	No 0
d. New Hires to GS-13 (PWD)	Yes 0	No 0

We are unable to obtain this information.

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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 0	No 0
b. New Hires to GS-15 (PWTD)	Yes 0	No 0
c. New Hires to GS-14 (PWTD)	Yes 0	No 0
d. New Hires to GS-13 (PWTD)	Yes 0	No 0

We are unable to obtain this information.

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.

a. Executives		
i. Qualified Internal Applicants (PWD)	Yes 0	No 0
ii. Internal Selections (PWD)	Yes 0	No 0
b. Managers		
i. Qualified Internal Applicants (PWD)	Yes 0	No 0
ii. Internal Selections (PWD)	Yes 0	No 0
c. Supervisors		
i. Qualified Internal Applicants (PWD)	Yes 0	No 0
ii. Internal Selections (PWD)	Yes 0	No 0

We are unable to obtain this information.

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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 0      No 0

ii. Internal Selections (PWTD)              Yes 0      No 0

b. Managers

i. Qualified Internal Applicants (PWTD)      Yes 0      No 0

ii. Internal Selections (PWTD)              Yes 0      No 0

c. Supervisors

i. Qualified Internal Applicants (PWTD)      Yes 0      No 0

ii. Internal Selections (PWTD)              Yes 0      No 0

We are unable to obtain this information.

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 0      No 0

b. New Hires for Managers (PWD)              Yes 0      No 0

c. New Hires for Supervisors (PWD)              Yes 0      No 0

We are unable to obtain this information.

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 0      No 0

b. New Hires for Managers (PWTD)              Yes 0      No 0

c. New Hires for Supervisors (PWTD)              Yes 0      No 0





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<https://www.archives.gov/global-pages/accessibility> This webpage provides a telephone number, a mailing address, and an email for "feedback". NARA plans to post a description of how to file a complaint in FY19.

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.archives.gov/global-pages/accessibility> This page has individual contact information for each NARA facility if there is a question regarding accessibility. The DPM plans to work with Tools and Development to post information on rights and complaints filing process in FY19.

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.

The DPM updated the NARA intranet and public website with information regarding accessibility and accessible services.

The DPM monitors the assistive technology needs of its deaf employees and has replaced outdated TTYs, and provided a new video phone for one employee.

The DPM and disAbility Employee Affinity Group (EAG) placed 30 new "Service Animal Welcome" signs in all NARA facilities and Libraries.

### **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.)

FY18 Average processing time is 13.97 days.

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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.

RA trainings were provided throughout the year at the request of supervisors and managers, as well as Deaf etiquette and Service Animal policy and etiquette trainings which were presented to the entire Agency.

The DPM noticed an uptick of RA cases requesting ergonomic equipment and in particular sit/stand desks, as well as outside requests for oral descriptor tours for blind persons, and sign language interpreting & Deaf/Blind interpreting at our Presidential Libraries.

**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 services during FY18. The DPM completed the addition of information on PAS services and processing to the NARA 303 Policy on RA procedures in FY18, and plans to publish the revised policy in FY19. PAS information to be published on the public website in FY19.

Section VI: EEO Complaint and Findings Data

**A. EEO COMPLAINT DATA INVOLVING HARASSMENT**

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

Yes X      No      N/A 0

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During FY 2018, NARA had 11 (7 mental and 4 physical disability) complaints alleging harassment of 60 total complaints = 18.33 %, which is slightly above government wide average of 18.05%.

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                   N/A 0

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

There were no findings of discrimination.

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

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

Yes                   No                  N/A

During FY 18, NARA had 5 complaints alleging failure to accommodate of 20 total complaints = 20.83%, which is above the government average of 12.50%.

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                  N/A

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.

One case was awarded a settlement.

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## 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.

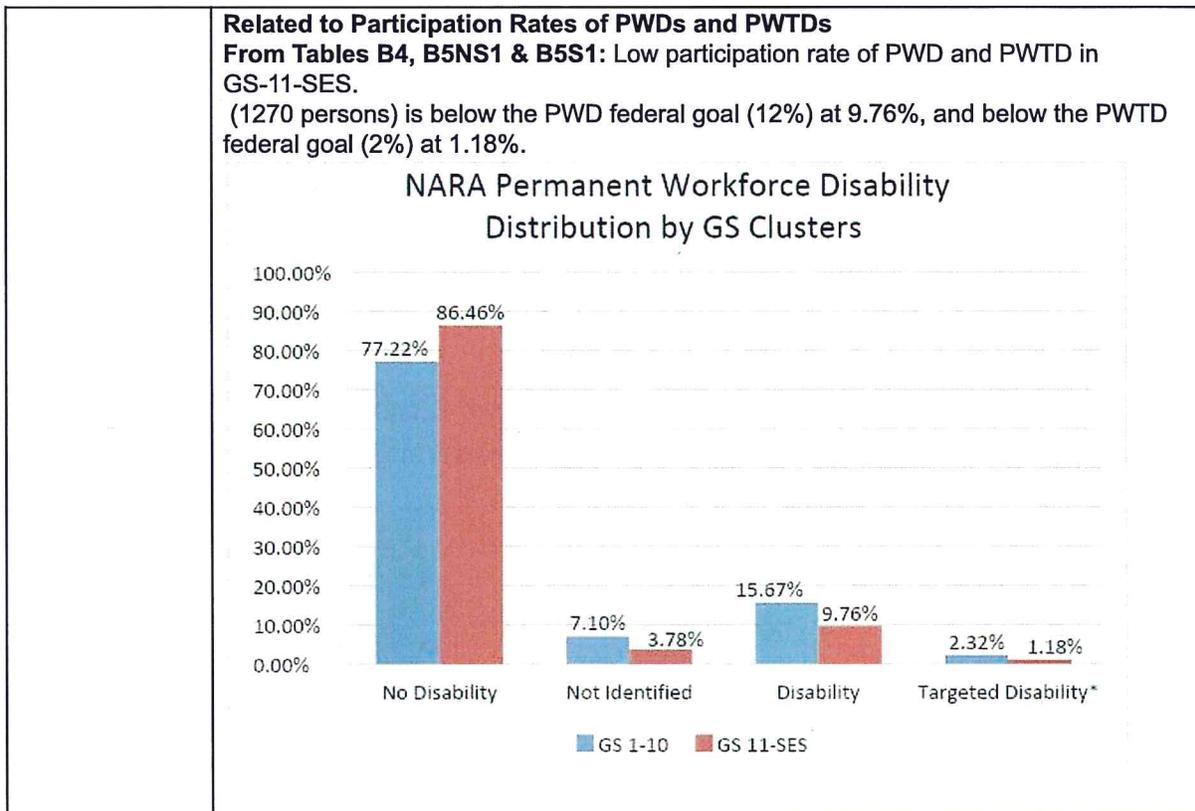
1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Yes  No

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

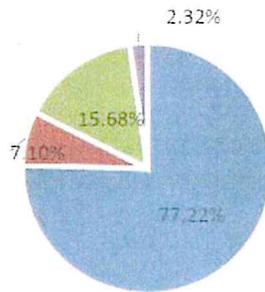
Yes  No  N/A

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



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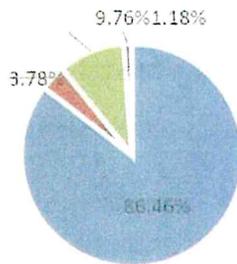
**GS 1-10**



■ No Disability ■ Not Identified ■ Disability ■ Targeted Disability\*

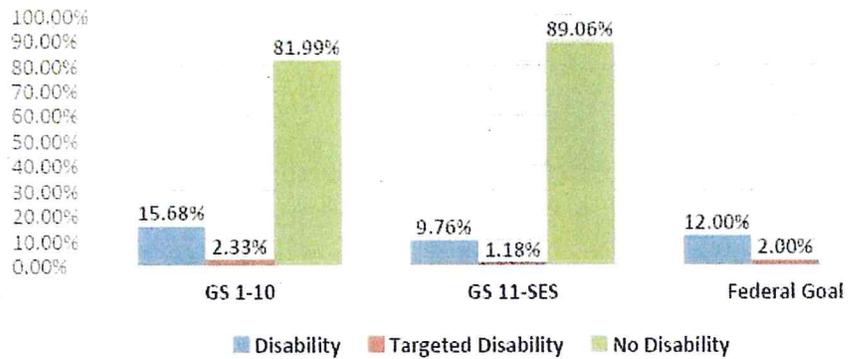
For the purposes of these charts, \*Targeted Disability is included in the total count of Disability.  
 $77.22 + 7.10 + 15.68 = 100\%$

**GS 11-SES**



■ No Disability ■ Not Identified ■ Disability ■ Targeted Disability\*

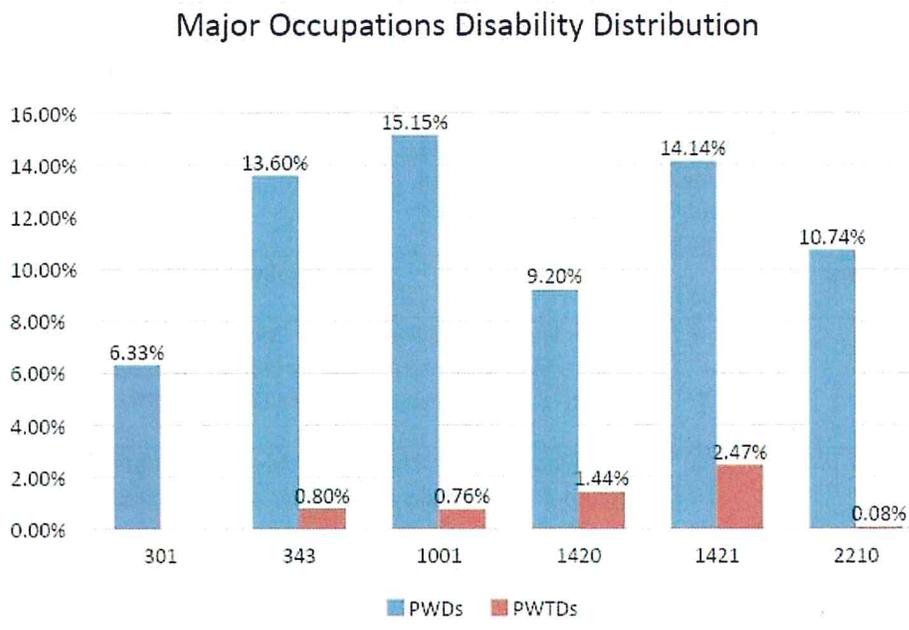
**NARA Permanent Workforce Disability Distribution compared to Federal Goals**



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<p><b>From Table B6: Participation Rate for Major Occupations</b>                  PWDs is below the federal goal (12%) in the 301 (6.33%), 1420 (9.20%), and 2210 (10.74%) Series (three of six).                  PWTDs is below the federal goal (2%) in the 301, 343, 1001, 1420, and 2210 categories (five of six series).</p> <p style="text-align: center;"><b>Major Occupations Disability Distribution</b></p>  <table border="1" style="margin-left: auto; margin-right: auto;"> <caption>Major Occupations Disability Distribution Data</caption> <thead> <tr> <th>Occupation Category</th> <th>PWDs (%)</th> <th>PWTDs (%)</th> </tr> </thead> <tbody> <tr> <td>301</td> <td>6.33%</td> <td>0.00%</td> </tr> <tr> <td>343</td> <td>13.60%</td> <td>0.80%</td> </tr> <tr> <td>1001</td> <td>15.15%</td> <td>0.76%</td> </tr> <tr> <td>1420</td> <td>9.20%</td> <td>1.44%</td> </tr> <tr> <td>1421</td> <td>14.14%</td> <td>2.47%</td> </tr> <tr> <td>2210</td> <td>10.74%</td> <td>0.08%</td> </tr> </tbody> </table>					Occupation Category	PWDs (%)	PWTDs (%)	301	6.33%	0.00%	343	13.60%	0.80%	1001	15.15%	0.76%	1420	9.20%	1.44%	1421	14.14%	2.47%	2210	10.74%	0.08%
Occupation Category	PWDs (%)	PWTDs (%)																							
301	6.33%	0.00%																							
343	13.60%	0.80%																							
1001	15.15%	0.76%																							
1420	9.20%	1.44%																							
1421	14.14%	2.47%																							
2210	10.74%	0.08%																							
<b>Barrier(s)</b>		Possible barriers: Limited applicant pool, limited to no proactive use of Schedule A Hiring Authority, limited information on finding recruits in specific MCOs, limited recruiting efforts conducted FY18.																							
<b>Objective(s)</b>		Partner with Human Capital/ARC (the new shared services) and other organizations for Targeted Outreach to improve applicant pool.																							
<b>Responsible Official(s)</b>		<b>Performance Standards Address the Plan? (Yes or No)</b>																							
Erica Pearson, Acting, Director, Equal Employment Opportunity Amii Limpp, Disability Program Manager, NEEO Valorie Findlater, Acting, Chief Human Capital Officer		No																							
<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>																					

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02/2018	Publish the updated Disability Strategic Plan.	Yes	09/2019	
01/2018	Publication of the revised RA Policy.	Yes	09/2019	
09/2019	Create list of resources for Targeted Outreach.	Yes		
09/2020	Create Schedule A fact sheet/job aid for hiring officials and partner with Human Capital for feedback.	Yes		
09/2021	Collaborate with Human Capital/ARC to create a Pilot Program for Schedule A hiring.	Yes		
09/2021	Collaborate with Human Capital/ARC to create tickler system to inform supervisors it's time to convert Schedule As.	Yes		
<b>Fiscal Year 2018</b>	<b>Accomplishments</b>			
	<ul style="list-style-type: none"> <li>Self-Identification of Disability SF 256 campaign: the DPM lead the disability EAG in a bi-annual resurvey of its workforce to self-identity disability status, resulting in a .78% increase for PWDs, and .21% increase PWTDS.</li> </ul>			
	<ul style="list-style-type: none"> <li>The "Welcome to the National Archives Museum" video in American Sign Language was officially announced and published on the public website in early FY18.</li> </ul>			
	<ul style="list-style-type: none"> <li>The DPM connected an employee to be featured in <i>Careers for the Disabled</i> magazine.</li> </ul>			
	<ul style="list-style-type: none"> <li>One (1) Deaf Etiquette training and webinar was held, and included a lesson with some basic American Sign Language (ASL) to provide support, information, and awareness for their on-boarding deaf employee.</li> </ul>			
	<ul style="list-style-type: none"> <li>The DPM and members of the General Counsel participated in an interagency work group on service animals hosted by DOJ. NARA used lessons learned and best practices shared by other agencies help to finalize its NARA 231, Service Animals in NARA Facilities, policy directive.</li> </ul>			
	<ul style="list-style-type: none"> <li>The DPM assisted with the creation of signage for Research rooms which reserves seating for PWDs, and coordinated the acquisition of new disability accessibility stickers for the Research room doors.</li> </ul>			
	<ul style="list-style-type: none"> <li>Trending outside accommodation requests revealed specific needs such as such as tactile interpreting for DeafBlind customers, and Oral descriptor tours for persons who are blind. The DPM assisted Nixon and Reagan Presidential Library staff to devise a tactile experience for a DeafBlind customer, and also found an oral descriptor service provider.</li> </ul>			
	<ul style="list-style-type: none"> <li>Via collaboration with security and legal staff, the DPM led the initiative to complete revisions to the old Service Animal policy, and also worked on a</li> </ul>			

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	<p>Service Animal Initiative roll-out. This roll out consisted of completion of Policy revisions (released in February 2018), service animal signage, and Policy Briefing for Presidential Libraries, and security employees.</p> <ul style="list-style-type: none"> <li>All NARA facilities and Presidential Libraries have 2 visible signs in their lobbies and front windows displaying NARA's posture on welcoming service animals.</li> </ul>
--	--

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

<p>The DPM position was vacant for 4 months during FY18. The Agency was going through a realignment process, and a transition to a shared services provider, which pulled resources, creating shifting priorities.</p>
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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).

<p>The recertification of the SF256 found there was a slight increase in the number of persons with disabilities who identified. While the increase was not substantial it shows that the campaign efforts had impact, and employees actually did update their status.</p>
--

6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve **Trigger 1** the plan for the next fiscal year.

<p>The Agency is transitioning its staffing services to a shared services provider, ARC. With the completed transition, Human Capital will be better equipped to partner with the DPM and examine issues related to targeted outreach, and the Schedule A hiring process, for example.</p>
--

<b>Trigger 2</b>	<p><b>Triggers related to Applicant Flow Data</b></p> <p><b>Table B7 Hires for Major Occupations –Applicant Flow Data</b>                  All MCOs had lower than the PWD federal goal (12%) for <i>identified/applied</i>, all had under benchmark for <i>qualified</i>, and all were below federal goal for <i>selected</i>, except Archives Tech (1421), which was 12.50%.</p> <p>MCOs 301, 343, and 2210 have no PWDs or PWTDs selected.</p> <p>MCOs 1001, 1420, and 1421 are all below federal goal in PWDs and PWTDs.</p>
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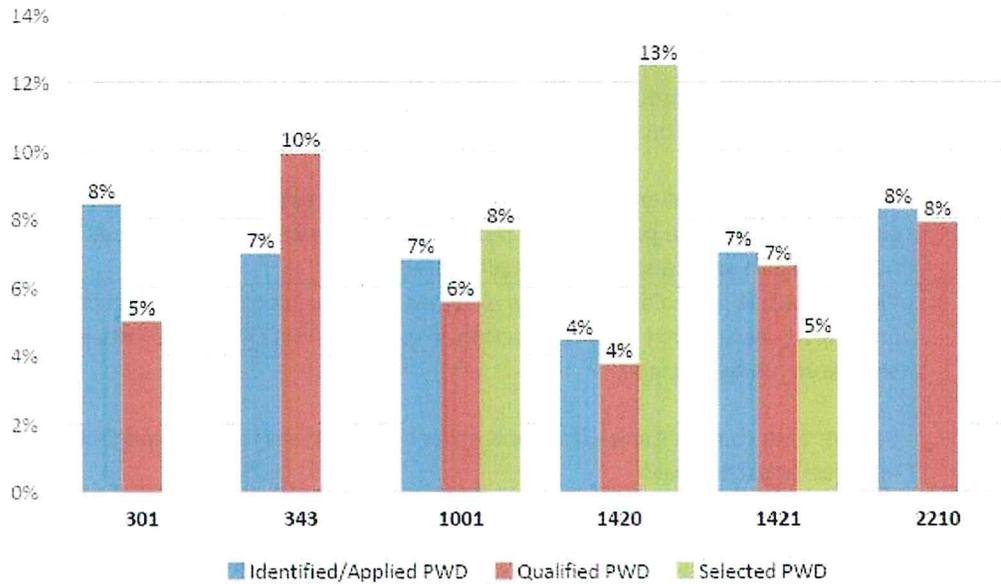
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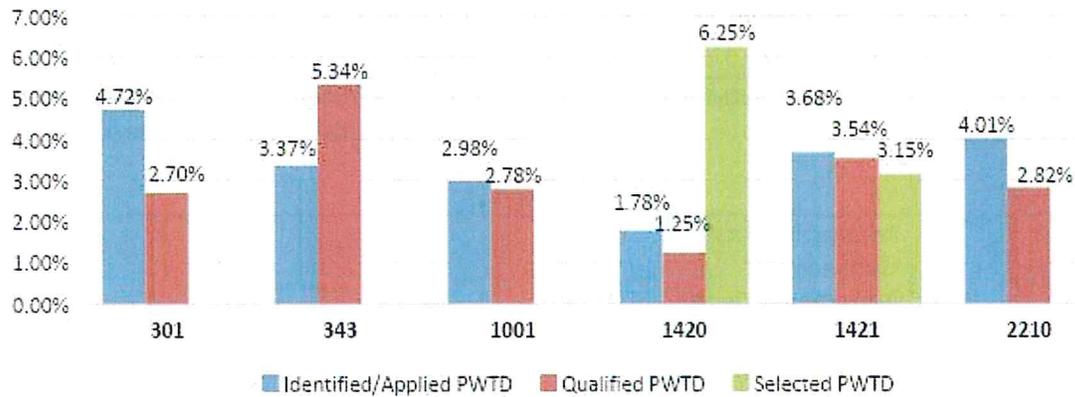
	<p>Comparing applicants to hires for each MCO applicant who voluntarily identified.</p> <p>PWTDs applicants are at or above federal goal of 2%, but those hired are 0% in 4 MCOs.</p> <p>PWDs applicant numbers are below federal goal of 12%, and hired at 0% in 3 MCOs.</p> <p>301 MCO total applicants 889, Total Hired 5 Applicants PWD = 8.44% Hired 0% Applicants PWTD = 4.72% Hired 0%</p> <p>343 MCO total applicants 386, Total Hired 9 Applicants PWD = 6.99% Hired =0% Applicants PWTD = 3.37 % Hired 0%</p> <p>1001 MCO total applicants 705, Total Hired 13 Applicants PWD = 6.81% Hired 7.69% Applicants PWTD = 2.98% Hired 0%</p> <p>1420 MCO total applicants 337, Total Hired 16 Applicants PWD = 4.45% Hired 12.50% Applicants PWTD = 1.78% Hired 6.25%</p> <p>1421 MCO total applicants 4369, Total Hired 222 Applicants PWD = 7.02% Hired 4.50% Applicants PWTD = 3.68% Hired 3.15%</p> <p>2210 MCO total applicants 1171, Total Hired 10 Applicants PWD = 8.28% Hired 0% Applicants PWTD =4.01% Hired 0%</p>
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**APPLICANT FLOW DATA DISABILITY DISTRIBUTION**



**APPLICANT FLOW DATA TARGETED DISABILITY DISTRIBUTION**



▪ Total Hires = 275  
 PWD =  $13/275 = .472 = 4.72\%$   
 PWD =  $8/275 = .029 = 2.90\%$  above Federal Goal

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<ul style="list-style-type: none"> <li>▪ Related to total hires: Even though overall total hires for PWTs (2.90%, which is over the 2% federal goal), a closer look informs us that only one MCO (1421- Archives Tech) is above the benchmark for total hires.</li> </ul>				
<b>Barrier(s)</b>		<p>Potential Barrier: Limited places to focus recruitment, limited applicant pool, and limited proactive use of Schedule A Hiring Authority.</p> <p>Potential Selection process Barrier: Hiring officials may need disability sensitivity training/ or training on how best to interview PWTs.</p> <p>Potential barrier: not enough cross training or detail opportunities to learn new skills to be able to be promoted or move to a higher position? Employees do not have the skills and education to be promoted?</p>		
<b>Objective(s)</b>		<p>Partner with Human Capital/ARC to examine Policies, Practices, or Procedures limiting its recruitment and/or selection of qualified PW(T)s (ie advertising, selection, hiring officials).</p> <p>Partner with Human Capital/ARC and other organizations for Targeted Outreach to improve applicant pool.</p>		
<b>Responsible Official(s)</b>		<b>Performance Standards Address the Plan? (Yes or No)</b>		
Erica Pearson, Acting, Director, Equal Employment Opportunity  Amii Limpp, Disability Program Manager, NEEO  Valorie Findlater, Acting, Chief Human Capital Officer		No		
<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
10/2019	Re-establish Strategic Outreach and Recruitment Tiger Team.	Yes		
05/2020	Partner with Human Capital to review potential problem areas in Policies, Practices, or Procedures limiting recruitment and/or selection of qualified PW(T)s (ie advertising,	Yes		

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	selection, hiring officials).			
09/2019	Create list of resources for Targeted Outreach.	Yes		
06/2020	Create relevant questions to guide focus group discussions on PWD hiring experience. Partner with Human Capital.	Yes		
07/2020	Find PWDs willing to participate.	Yes		
08/2020	Conduct focus groups on PWDs hiring experience. Partner with Human Capital.	Yes		
05/2020	Create Schedule A fact sheet/job aid.	Yes		
05/2020	Partner with Human Capital to participate in job fairs (Federal, University, disability related, etc).	Yes		
06/2020	Provide disability sensitivity training to hiring officials. Partner with Human Capital.	Yes		
<b>Fiscal Year</b>	<b>Accomplishments</b>			

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

The activities have yet to be initiated.

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

The activities have yet to be initiated.

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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 disAbility EAG is working on creating a targeted outreach list in FY19.

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

No activities have been initiated yet.

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

No activities have been initiated yet.

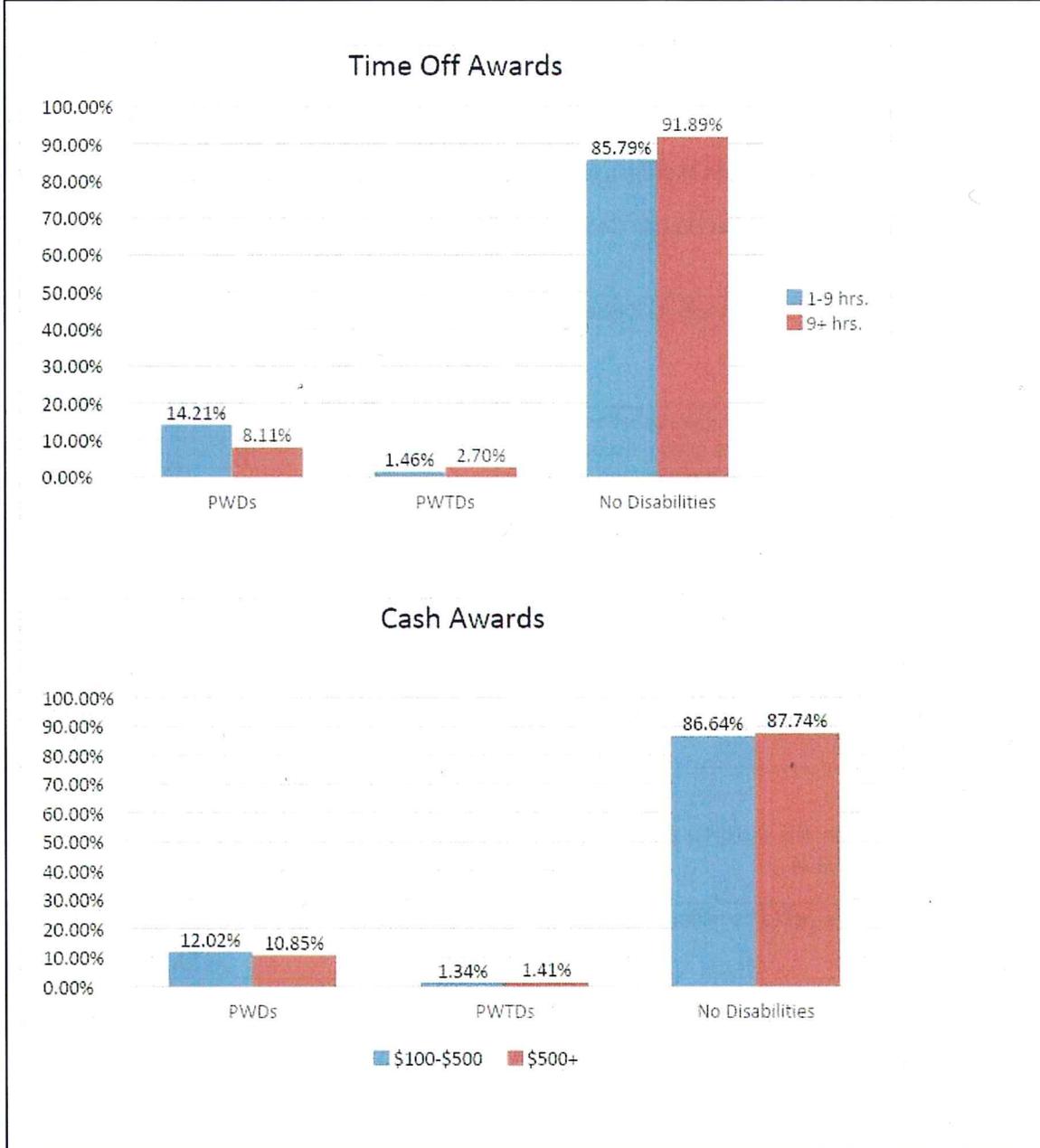
6. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

The DPM and Human Capital could partner on conducting focus groups on the needs of PWDs and PWTDs throughout the employment life cycle. NARA plans to restart our Strategic Outreach and Recruitment Team to approach solutions to outreach and recruitment in a holistic manner. Regular meetings and products will help keep the focus on this work, which has lagged in the past two years due to lack of resources and other priorities.

<b>Trigger 3</b>	<p><b>Table B13 Employee Recognition and Awards</b></p> <p><b>*=below Federal Goal</b></p> <p><b>Time off Awards of 1-9 hours total 957 Employees</b></p> <p>PWTDs (78) received 1.46% (Below federal goal 2%)* ---- Trigger</p> <p><b>Time off Awards of 9+ hours of a total 148 Employees</b></p> <p>PWDs (12) received 8.11% (Below federal goal)* ----Trigger</p> <p><b>Cash Awards of \$100-\$500 to a total 1938 Employees</b></p> <p>PWTDs (26) received 1.34 % (below federal goal)*---- Trigger</p>
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	<p><b>Cash Awards of \$500+ to a total 2130 Employees</b></p> <p>PWDs (231) received 10.85% (below federal goal)*----Trigger</p> <p>PWTDs (30) received 1.41% (below federal goal)*---Trigger</p>
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<b>Barrier(s)</b>	<p>Potential Barrier: Do Managers and Supervisors have biases when providing awards? Are Managers and Supervisors fully aware of the accomplishments of</p>
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	PWD(T)s on their staff? Are PW(T)Ds able to participate on the teams that receive awards?			
<b>Objective(s)</b>	Conduct focus groups to find out how M&S create their criteria by which awards are given and to see whether unconscious bias, or lack of knowledge about PWDs is a reason behind lack of awards.			
<b>Responsible Official(s)</b>		<b>Performance Standards Address the Plan? (Yes or No)</b>		
Erica Pearson, Acting Director, NARA Equal Employment Opportunity  Amii Limpp, Disability Program Manager, NEEO  Valorie Findlater, Acting, Chief Human Capital Officer		No		
<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
06/2020	Create relevant questions to guide focus group discussions on awards process/and PWDs. Partner with Human Capital.	Yes		
07/2020	Find Managers and Supervisors willing to participate. Partner with Human Capital.	Yes		
08/2020	Conduct focus groups. Partner with Human Capital.	Yes		
<b>Fiscal Year</b>	<b>Accomplishments</b>			

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

The activities have yet to be initiated.

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

The activities have yet to be initiated.

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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 planned activities did not correct the trigger because they had not been created yet. The DPM plans to set in motion this plan during FY19.