



EQUAL EMPLOYMENT OPPORTUNITY (EEO)

PROGRAM STATUS REPORT MANAGEMENT DIRECTIVE (MD)-715

FISCAL YEAR 2023

REPORT CERTIFIED BY:

Dr. Colleen J. Shogan, *Archivist of the United States*
Erica Pearson, *Director of the Office of Equal Employment
Opportunity Programs*

MD-715 ASSESSMENT CONDUCTED BY:

The Office of Equal Employment Opportunity Programs (NEEO)

REPORT SUBMITTED TO:

The Equal Employment Opportunity Commission (EEOC)

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Federal Agency Annual EEO Program Management Directive (MD) -715 Report Overview

The fiscal year 2023 (FY23) Federal Agency Annual EEO Status Report (MD-715 Report) was compiled in accordance with the Equal Employment Opportunity Commission (EEOC) Instructions to Federal Agencies for EEO MD-715.

The MD-715 Report serves two main purposes:

1. Review the Agency's current EEO performance and identify gaps in Agency's operations.
2. Develop plans and strategies for addressing Agency deficiencies, triggers, and barriers of employment to comply with EEO guidelines.

This report contains 10 Parts (labeled A through J), as well as data tables. Each part contains specific information across the agency and completed by different offices to support the Equal Employment Opportunity Program. The Six Essential Elements of a Model EEO Program are assessed and listed below. To ensure compliance, EEO partners and collaborates with several offices to include the Human Capital Office and the General Counsel Office to ensure compliance and promote awareness of the six elements. The six essential elements are identified by letters A thru F:

- A. Demonstrated commitment from agency leadership
- B. Integration of EEO into the agency's strategic mission
- C. Management and program accountability
- D. Proactive prevention of unlawful discrimination
- E. Efficiency
- F. Responsiveness and legal compliance

Parts A-D provide agency specific information. Part E is an executive summary. Part F is the signature page, which signifies the Agency's certification. Part G is a comprehensive assessment checklist. Part H identifies the deficiencies noted in Part G to include the action plans. Part I identifies any barriers. Part J is the Affirmative Action Plan (AAP).

Demographic data in the workforce tables showcase race, national origin, sex, and disability status and is compiled and compared to designated benchmarks. Significant anomalies (triggers) are reviewed to determine their root causes, and if any are determined to be barriers to EEO, plans are developed and executed to eliminate all barriers.

All Federal agencies are required to establish action plans to meet numerical goals for hiring, advancement, and retention of people with disabilities, and to take specific steps that are reasonably designed to achieve those goals. The current goal for people with disabilities is twelve percent (12%) and for people with targeted disabilities is two percent (2%). Part J, the AAP, of the report covers those efforts in greater detail. The AAP assesses data on people with disabilities (PWD) and people with targeted disabilities (PWTD) in comparison to people without disabilities (PWOD).

This report reflects the results of NARA’s efforts throughout FY23. The structure, format, and content of this report are prescribed by the EEOC, including Parts A thru J, data tables A-1 thru B-9, and all supplemental documents (e.g., Reasonable Accommodations procedures, organizational chart, and EEO policy statement).

Of 156 regulatory requirements assessed in Part G of the report, NARA did not comply with 29 requirements leading to agency deficiencies noted in Part H for FY23. Although we noted 29 deficiencies in FY23, some of the prior year deficiencies were corrected. Some deficiencies identified in FY23 have already been corrected in FY24. Below is a scorecard for FY23:

| Model EEO Program Scorecard for FY 2023 | | | |
|---|------------------|------------|---------------|
| | # Total Measures | # Met | % Met |
| Essential Element A: Demonstrated Commitment from Agency Leadership | 14 | 12 | 85.71% |
| Essential Element B: Integration of EEO into the Agency's Strategic Mission | 39 | 33 | 84.62% |
| Essential Element C: Management and Program Accountability | 44 | 37 | 84.09% |
| Essential Element D: Proactive Prevention | 14 | 11 | 78.57% |
| Essential Element E: Efficiency | 33 | 24 | 72.72% |
| Essential Element F: Responsiveness and Legal Compliance | 12 | 12 | 100.00% |
| Total | 156 | 129 | 82.69% |

**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 Rd. | College Park | MD | 20740 | NQ00 | N/A |

Part B - Total Employment

| Total Employment | Permanent Workforce | Temporary Workforce | Total Workforce |
|----------------------------|----------------------------|----------------------------|------------------------|
| Number of Employees | 2,652 | 27 | 2,679 |

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

| Agency Leadership | Name | Title |
|--------------------------|-----------------------|--------------------------------|
| Head of Agency | Dr. Colleen J. Shogan | Archivist of the United States |

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

| EEO Program Staff | Name | Title | Occupational Series (xxxx) | Pay Plan and Grade (xx-xx) | Phone Number (xxx-xxx-xxxx) | Email Address |
|--|----------------|---|-----------------------------------|-----------------------------------|------------------------------------|-------------------------|
| Principal EEO Director/Official | Erica Pearson | Equal Employment Opportunity Director | 0260 | GS-15 | (301) 837-0939 | Erica.pearson@nara.gov |
| Affirmative Employment Program Manager | Vacant | Affirmative Employment Program Specialist | N/A | N/A | N/A | N/A |
| Complaint Program Manager | Tammie Johnson | Complaints Program Manager | 0260 | GS-14 | (301) 837-0939 | Tammie.johnson@nara.gov |
| Diversity & Inclusion Officer | Erica Pearson | Equal Employment Opportunity Director | 0260 | GS-15 | (301) 837-0939 | Erica.pearson@nara.gov |

| | | | | | | |
|---|------------------|---|------|-------|----------------|---------------------------|
| Hispanic Program Manager | N/A | N/A | N/A | N/A | N/A | N/A |
| Women's Program Manager | N/A | N/A | N/A | N/A | N/A | N/A |
| Disability Program Manager | Kimberly Meyer | Disability Program Manager | 0260 | GS-12 | (301) 837-0939 | N/A |
| Special Placement Program Coordinator (Individuals with Disabilities) | Germeka Harrison | Human Capital Staff | 0201 | GS-13 | (314) 801-0524 | Germeka.harrison@nara.gov |
| Reasonable Accommodation Program Manager | Rudregus Davis | Reasonable Accommodation Coordinator | 0260 | GS-12 | (301) 837-1872 | Rudregus.davis@nara.gov |
| Anti-Harassment Program Manager | Tanya Shorter | Anti-Harassment Program Manager | 0260 | GS-14 | (301) 837-3096 | Tanya.shorter@nara.gov |
| Alternative Dispute Resolution (ADR) Program Manager | Naheed Khandekar | Assistant General Counsel and Director of Resolve | 0905 | GS-13 | (301) 837-2926 | Naheed.khandekar@nara.gov |
| Compliance Manager | Erica Pearson | EEO Director | 0260 | GS-15 | (301) 837-0939 | Erica.pearson@nara.gov |
| Principal MD-715 Preparer | Erica Pearson | EEO Director | 0260 | GS-15 | (301) 837-0939 | Erica.pearson@nara.gov |
| Other EEO Staff | Vacant | EEO Counselor | N/A | N/A | N/A | N/A |
| Other EEO Staff | Duane Tobias | EEO Specialist | 0260 | GS-12 | (301) 837-1902 | Duane.tobias@nara.gov |
| Other EEO Staff | Vacant | EEO Assistant | N/A | N/A | N/A | N/A |

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

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

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

| Subordinate Component | City | State | Country (Optional) | Agency Code (xxxx) | Federal Information Processing Codes (xxxxx) |
|-----------------------|------|-------|--------------------|--------------------|--|
|-----------------------|------|-------|--------------------|--------------------|--|

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

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

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

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

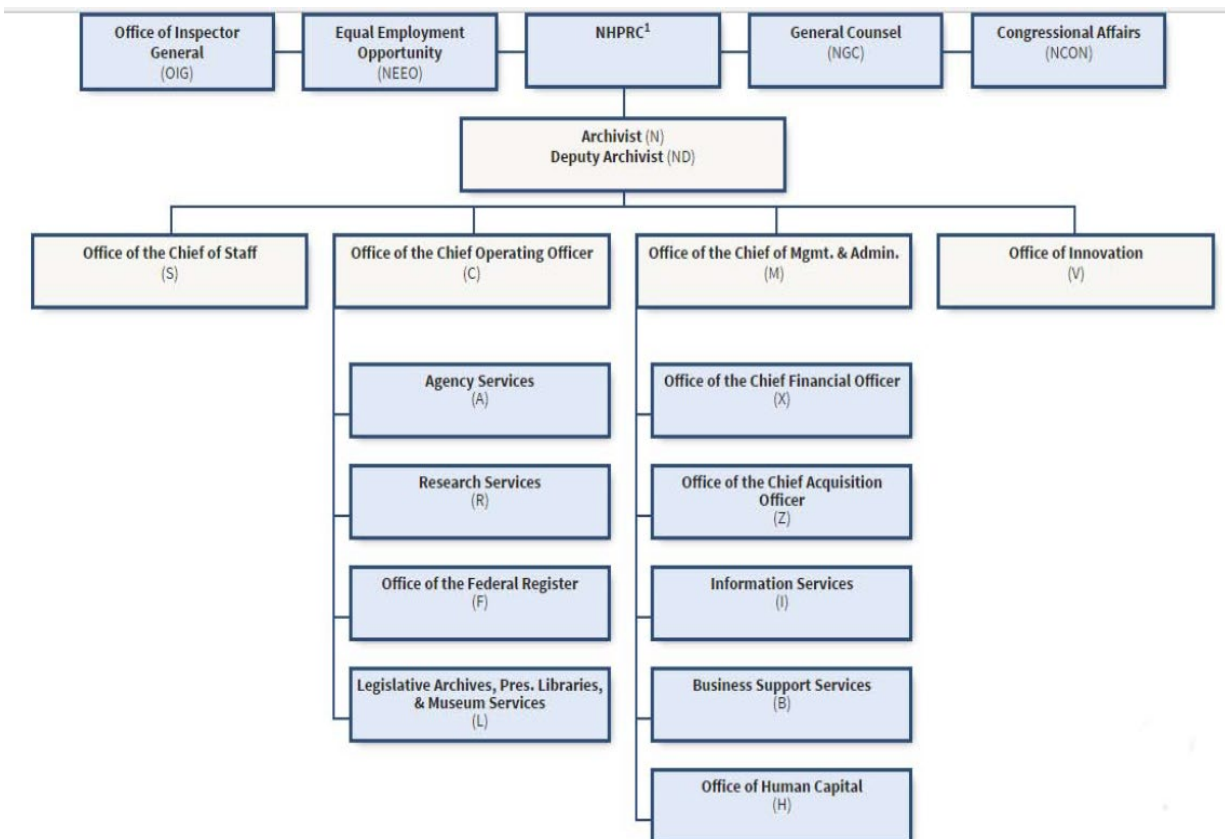
| Did the agency submit the following optional documents? | Please respond Yes or No | Comments |
|---|--------------------------|----------|
| Federal Equal Opportunity Recruitment Program (FEORP) Report | No | |
| Disabled Veterans Affirmative Action Program (DVAAP) Report | No | |
| Operational Plan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

Part E.1 - Executive Summary: Mission

Purpose and Structure of NARA

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

See the organization chart below:



NARA's EEO Program

The Office of Equal Employment Opportunity's mission is to provide leadership, direction, and guidance to carry out NARA's equal employment opportunity responsibilities according to Federal laws, statutes, regulations, and policies. The EEO office reports directly to the agency head and partners with General Counsel, Human Capital, and other NARA Offices to support a Model EEO Program.

The vision is to foster a work environment that is free from discrimination and promotes equal, fair, and inclusive employment opportunities for the best talent available regardless of their differences.

EEO is a neutral program that takes on a range of functions within its four main program offices:

Complaints Management Program

- The Complaints Program is designed to provide an effective and efficient process for addressing EEO discrimination complaints and allegations of harassment.
- It is a neutral program that allows employees and applicants for employment who feel that they have been discriminated against on the basis of race, color, religion, sex, national origin, age, disability, genetic information, or reprisal to file an EEO complaint of discrimination.
- NEEO can enhance the timeliness of complaint tracking with the recently acquired integrated digital platform that centralizes all complaint-related data. This system will allow for real-time updates and tracking, ensuring that complaints are logged immediately upon receipt. Automated notifications and alerts can be set up to inform EEO Specialists of new complaints, impending deadlines, and status changes, thus reducing response time and improving accountability. During FY23 and FY24 NEEO took the proactive step of verifying the accuracy of the electronic files before the system implementation.
- NEEO will continue to improve timeliness by streamlining communication channels between internal stakeholders involved in complaint resolutions, enabling collaboration and information sharing, and eliminating delays caused by fragmented communication.
- NEEO will continue regular training for staff to increase knowledge of the EEO complaint process.

Anti-Harassment Program

- NARA's Anti-Harassment Program is a component designed to address any type of harassment that interferes with, or alters, the condition of an employee's employment and creates a hostile work environment, regardless of the reason.

- The Anti-Harassment Program provides a forum for addressing harassment allegations through an Ad Hoc Committee on Harassment.
- Developed and implemented a follow-up system to ensure timely processing overall.
- Implemented changes to reduce the myriad of allegations. Referring allegations that are conduct-related to the appropriate forum at the onset rather than processing internally.
- Changed committee meeting schedule to streamline the determination process.
- Assisted with development of Anti-Harassment Tracking system to assist in making the overall program more efficient and effective.

Disability Program

- The Disability Program is designed to assist and support the agency with disability employment matters pursuant to the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990, as amended, Executive Order 13548, 29 CFR 1614.102, and 29 CFR 1630
- Reasonable Accommodations are changes or modifications in the workplace, to the way things are customarily done in the work environment, or in the application process that enables a person with a disability to have the benefits and privileges of employment
- Provides Sign Language Interpreting and Communication Access Real Time Translation (CART) Services across the agency internally and externally.

Affirmative Employment Program (AEP)

- AEP was established by statute to help address the long-term effects of historic discrimination impacting women, minorities, and individuals with disabilities.
- The AEP works to improve the employment and advancement opportunities for women, minorities, and individuals with disabilities.
- The AEP also completes the MD-715 report, which assesses the model EEO Program across the agency.

Although the EEO Office experienced turnover in FY23, EEO program Specialists have already made great strides in correcting deficiencies in FY24. The EEO program also looks forward to implementing an EEO Tracking system that will service all EEO programs and provide an accurate picture of processing times, timeliness assessments, and trend/demographic information.

EEOC FORM
715-01
PART F

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

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

I, Erica Pearson, EEO Director GS-0260-15 am the

(Insert name above)

(Insert official
title/series/grade above)

Principal EEO Director/Official for

National Archives and Records Administration

(Insert Agency/Component Name above)

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

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

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

Erica Pearson

8/27/2024

Signature of Principal EEO Director/Official

Date

Certifies that this Federal Agency Annual EEO Program Status Report is in compliance with EEO MD-715.

Loj Shaga

8/23/24

Signature of Agency Head or Agency Head Designee

Date

MD-715 - PART G

Agency Self-Assessment Checklist

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





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

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

For each MD-715 essential element, the Part G checklist provides a series of "compliance indicators." Each compliance indicator, in turn, contains a series of "yes/no" questions, called "measures." To the right of the measures, there are two columns, one for the agency to answer the measure with "Yes", "No", or "N/A;" 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 "N/A" and explain in the comments column that the parent agency drafts all FADs.



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

MD-715 - PART G
Agency Self-Assessment Checklist

| Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP | | | |
|--|---|-------------------------------------|---|
| This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace. | | | |
|  Compliance Indicator  Measures | | Measure Met? (Yes/No/NA) | Comments |
| A.1.a | A.1 – The agency issues an effective, up-to-date EEO policy statement. 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 | The EEO Policy statement was issued on August 24, 2023. |
| A.1.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 The Code of Federal Regulations (C.F.R.) § 1614.101(a)] | Yes | The EEO policy statement covers the additional bases of marital status, political affiliation, and status as a parent. |
| Essential Element B: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP | | | |
|  Compliance Indicator  Measures | | Measure Met? (Yes/No/NA) | Comments |
| A.2.a | A.2 – The agency has communicated EEO policies and procedures to all employees. Does the agency disseminate the following policies and procedures to all employees: | | |
| A.2.a.1 | Anti-harassment policy? [see MD 715, II(A)] | Yes | |
| A.2.a.2 | Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)] | No | See Part H. We experienced a delay in issuing the annual All Staff training due to our decision to update the training materials and replace the videos |

| | | | |
|----------------|--|-----|---|
| | | | recorded by the former Archivist with new ones by the newly appointed Archivist. Consequently, we chose to postpone the training deployment rather than use the old videos. |
| A.2.b | Does the agency prominently post the following information throughout the workplace and on its public website: | | |
| A.2.b.1 | 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 | https://www.archives.gov/eoo/contact |
| A.2.b.2 | 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.b.3 | Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column. | Yes | https://www.archives.gov/eoo/policy/processing-reasonable-accommodation-requests#:~:text=nara%20uses%20the%20definition%20of%20the%20needs%20of%20the%20individual |
| A.2.c | Does the agency inform its employees about the following topics: | | |
| A.2.c.1 | EEO complaint process? [see 29 C.F.R. § 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often. | Yes | Employees are informed of the EEO Process annually via EEO Policy, New Employee Orientation biweekly, Supervisory training, and Ad Hoc training as requested. |



| | | | |
|-----------------------|--|------------|---|
| <p>A.2.c.2</p> | <p>ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.</p> | <p>Yes</p> | <p>NARA distributes ADR policies and procedures in annual EEO training for all employees, the FY23 EEO Policy Statement, new employee orientation materials, supervisor training, and on the intranet. In FY23, NARA developed EEO mediation training and presented ADR information sessions. In October 2022, the agency head issued an agency wide notice promoting ADR and a video on the mediation process.</p> |
| <p>A.2.c.3</p> | <p>Reasonable accommodation program? [see 29 C.F.R. § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.</p> | <p>No</p> | <p>See Part H. We experienced a delay in issuing the annual All Staff training due to our decision to update the training materials and replace the videos recorded by the former Archivist with new ones by the newly appointed Archivist. Consequently, we</p> |



| | | | |
|---|---|---------------------------------|---|
| | | | chose to postpone the training deployment rather than use the old videos. |
| A.2.c.4 | 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 | During biweekly New Employee Orientation, and annually when distributing the Anti-Harassment Policy Statement. |
| A.2.c.5 | Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 C.F.R. § 2635.101(b)] If “yes”, please provide how often. | Yes | NARA informs employees about inappropriate behavior and possible disciplinary actions in numerous policy directives and in annual training. Our Discipline and Adverse Actions policy includes our NARA Penalty Guide and Douglas Factors. Our Use and Monitoring of NARA Office and Information and Technology (IT) Equipment and Resources policy addresses inappropriate use of NARA’s equipment and IT resources. |
|  Compliance Indicator  | A.3 – The agency assesses and ensures EEO principles are part of its culture. | Measure Met? (Yes/No/NA) | Comments |

| Measures | | | New Compliance Indicator |
|----------|--|-----|---|
| A.3.a | Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 C.F.R. § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section. | Yes | Supervisory performance plans have a “Supervision” critical element in which EEO principles are outlined at the fully successful and highly successful levels. All supervisors who receive a fully successful rating or above are granted either cash or time-off awards. |
| A.3.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 C.F.R. Part 250] | Yes | |



Essential Element B: INTEGRATION OF EEO INTO THE AGENCY’S STRATEGIC MISSION



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.

|  Compliance Indicator  Measures | 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. | Measure Met? (Yes/No/NA) | Comments |
|--|--|---------------------------------|---|
| B.1.a | Is the agency head the immediate supervisor of the person (“EEO Director”) who has day-to-day control over the EEO office? [see 29 C.F.R. § 1614.102(b)(4)] | Yes | |
| B.1.a.1 | 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 | The Agency head is the immediate supervisor for the EEO Director. |



| | | | |
|--|--|---------------------------------|---|
| B.1.a.2 | Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 C.F.R. §1614.102(b)(4)] | Yes | |
| B.1.b | Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program? [see 29 C.F.R. §1614.102(c)(1); MD-715 Instructions, Sec. I] | Yes | |
| B.1.c | During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comments column. | No | The State of the Agency Briefing is scheduled for June 26, 2024. A recurring schedule has been set up to ensure this is completed every year. |
| B.1.d | 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 | |
|  Compliance Indicator  Measures | B.2 – The EEO Director controls all aspects of the EEO program. | Measure Met? (Yes/No/NA) | Comments New Compliance Indicator |
| B.2.a | 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 C.F.R. §1614.102(c)] | Yes | |
| B.2.b | Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 C.F.R. §1614.102(c)(4)] | Yes | |
| B.2.c | Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 C.F.R. §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.] | Yes | |
| B.2.d | Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 C.F.R. §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.] | Yes | |



| | | | |
|--------------|--|-----|--|
| B.2.e | Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 C.F.R. § 1614.102(e); 1614.502] | Yes | |
| B.2.f | Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 C.F.R. §1614.102(c)(2)] | Yes | |
| B.2.g | If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 C.F.R. §§ 1614.102(c)(2) and (c)(3)] | N/A | The agency does not have subordinate level components. |

|  Compliance Indicator  Measures | B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions. | Measure Met? (Yes/No/NA) | Comments |
|--|---|---------------------------------|--|
| B.3.a | 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.3.b | Does the agency’s current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If “yes”, please identify the EEO principles in the strategic plan in the comments column. | Yes | Goal 2: Connecting with Customers Goal 4: Build Our Future Through Our People |

|  Compliance Indicator  Measures | B.4 -The agency has sufficient budget and staffing to support the success of its EEO program | Measure Met? (Yes/No/NA) | Comments |
|--|---|---------------------------------|-----------------|
| B.4.a | Pursuant to 29 C.F.R. §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas: | | |
| B.4.a.1 | to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)] | Yes | |
| B.4.a.2 | to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)] | Yes | |





| | | | |
|-----------------|--|-----|--|
| B.4.a.3 | to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 C.F.R. § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)] | Yes | |
| B.4.a.4 | 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.a.5 | to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 C.F.R. §1614.102(c)(2)] | Yes | |
| B.4.a.6 | to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)] | Yes | |
| 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 | See Part H. The EEO office was provided a EEO Complaints, Reasonable Accommodation, and Anti-Harassment tracking system in October of FY24 |
| 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 C.F.R. § 720.204; 5 C.F.R. § 213.3102(t) and (u); 5 C.F.R. § 315.709] | Yes | |
| B.4.a.9 | to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] | Yes | |
| B.4.a.10 | to effectively manage its reasonable accommodation program? [see 29 C.F.R. 1614.203(d)(4)(ii)] | Yes | |
| B.4.a.11 | to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)] | Yes | |
| B.4.b | Does the EEO office have a budget that is separate from other offices within the agency? [see 29 C.F.R. § 1614.102(a)(1)] | Yes | |

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| B.4.c | Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)] | Yes | |
| B.4.d | Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110? | Yes | |
| B.4.e | 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 | |
|  Compliance Indicator  Measures | B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills. | Measure Met? (Yes/No/NA) | Comments New Indicator |
| B.5.a | Pursuant to 29 C.F.R. § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program: | | |
| B.5.a.1 | EEO Complaint Process? [see MD-715(II)(B)] | Yes | |
| B.5.a.2 | Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)] | Yes | |
| B.5.a.3 | Anti-Harassment Policy? [see MD-715(II)(B)] | Yes | |
| B.5.a.4 | Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)] | Yes | |
| B.5.a.5 | ADR, with emphasis on the federal government’s interest in encouraging mutual resolution of disputes and the | Yes | |

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| | benefits associated with utilizing ADR? [see MD-715(II)(E)] | | |
|  Compliance Indicator  Measures | B.6 – The agency involves managers in the implementation of its EEO program. | Measure Met? (Yes/No/NA) | Comments New Indicator |
| B.6.a | Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I] | No | See Part H. Although the budget and staffing were sufficient, we were unable to accomplish all actions due to turnover. |
| B.6.b | Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I] | No | See Part H. Although the budget and staffing were sufficient, we were unable to accomplish all actions due to turnover. |
| 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 | See Part H. Although the budget and staffing were sufficient, we were unable to accomplish all actions due to turnover. |
| B.6.d | Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 C.F.R. § 1614.102(a)(5)] | No | See Part H. Although the budget and staffing were sufficient, we were unable to accomplish all actions due to turnover. |



Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY



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.





|  Compliance Indicator  Measures | C.1 – The agency conducts regular internal audits of its component and field offices. | Measure Met? (Yes/No/NA) | Comments |
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| C.1.a | Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 C.F.R. §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section. | No | See Part H. Although the budget and staffing were sufficient, we were unable to accomplish all actions due to turnover. |
| C.1.b | Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 C.F.R. §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section. | No | See Part H. Although the budget and staffing were sufficient, we were unable to accomplish all actions due to turnover. |
| C.1.c | 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 | The agency is working toward an assessment of field offices. |
|  Compliance Indicator  Measures | C.2 – The agency has established procedures to prevent all forms of EEO discrimination. | Measure Met? (Yes/No/NA) | Comments New Indicator |
| C.2.a | 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)] | No | See Part H. The current policy is being revised to meet the requirement that it complies with the EEOC's enforcement guidance and the |

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| | | | agency has a comprehensive anti-harassment policy. |
| C.2.a.1 | 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 | |
| C.2.a.2 | 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 | |
| C.2.a.3 | 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 | |
| C.2.a.4 | 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 | |
| C.2.a.5 | 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. | No | See Part H. The Anti-Harassment program is diligently working towards meeting this requirement by continually monitoring and revising the Anti-Harassment process to improve efficiency. |
| C.2.a.6 | Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 C.F.R. 1614.203(d)(2)] | Yes | |
| C.2.b | Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 C.F.R. 1614.203(d)(3)] | No | See Part H. The current policy is being revised to meet the |

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| | | | requirement that it complies with the EEOC's enforcement guidance and the agency has a comprehensive Reasonable Accommodation policy. |
| C.2.b.1 | 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 C.F.R. 1614.203(d)(3)(D)] | Yes | |
| C.2.b.2 | Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)] | Yes | |
| C.2.b.3 | Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 C.F.R. 1614.203(d)(1)(ii)(B)] | Yes | |
| C.2.b.4 | 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 C.F.R. 1614.203(d)(3)(i)(M)] | Yes | |
| 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 requests in the comments column. | No | See Part H. Only 50% of requests were processed within the time frame due to an increase in requests for the return to work. |
| 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? [see 29 C.F.R. 1614.203(d)(6)] | Yes | |
| C.2.c.1 | Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 C.F.R. § 1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column. | Yes | https://www.archives.gov/global-pages/accessibility#services |
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|  Compliance Indicator  Measures | C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity. | Measure Met? (Yes/No/NA) | Comments New Indicator |
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| C.3.a | Pursuant to 29 C.F.R. §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 | |
| C.3.b | Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities: | | |
| C.3.b.1 | Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I] | Yes | |
| C.3.b.2 | Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 C.F.R. §1614.102(b)(6)] | Yes | |
| C.3.b.3 | Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)] | Yes | |
| C.3.b.4 | 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 | |
| C.3.b.5 | Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 C.F.R. §1614.102(a)(7)] | Yes | |
| C.3.b.6 | Provide disability accommodations when such accommodations do not cause an undue hardship? [see 29 C.F.R. §1614.102(a)(8)] | Yes | |
| C.3.b.7 | Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)] | Yes | |
| C.3.b.8 | Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2] | Yes | |
| C.3.b.9 | 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 | |
| C.3.c | Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who | Yes | |





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| | have failed in their EEO responsibilities? [see 29 C.F.R. §1614.102(c)(2)] | | |
| C.3.d | When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 C.F.R. §1614.102(c)(2)] | Yes | |
| | | | |
|  Compliance Indicator  Measures | C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program. | Measure Met? (Yes/No/NA) | Comments |
| C.4.a | 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 C.F.R. §1614.102(a)(2)] | Yes | |
| 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] | Yes | |
| C.4.c | 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 C.F.R. §1614.601(a)] | Yes | |
| C.4.d | 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 | |
| C.4.e | Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to: | | |
| C.4.e.1 | Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 C.F.R. §1614.203(d); MD-715, II(C)] | Yes | |
| C.4.e.2 | Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)] | Yes | |
| C.4.e.3 | Develop and/or provide training for managers and employees? [see MD-715, II(C)] | Yes | |



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| C.4.e.4 | Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)] | Yes | |
| C.4.e.5 | Assist in preparing the MD-715 report? [see MD-715, II(C)] | Yes | |
|  Compliance Indicator  Measures | C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action. | Measure Met? (Yes/No/NA) | Comments |
| C.5.a | Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 C.F.R. § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 Merit Systems Protection Board Reporter (MSPR) 280 (1981)] | Yes | |
| C.5.b | When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 C.F.R. §1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments. | N/A | There have been no findings of discriminatory conduct. |
| C.5.c | If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [see MD-715, II(C)] | N/A | There have been no findings of discriminatory conduct. |
|  Compliance Indicator  Measures | C.6 – The EEO office advises managers/supervisors on EEO matters. | Measure Met? (Yes/No/NA) | Comments |
| C.6.a | 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 | The Deputy Archivist of the United States and the Office of General Counsel are advised monthly. Ad Hoc updates are also held at management team meetings and for other offices. |

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| C.6.b | Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [see MD-715 Instructions, Sec. I] | Yes | |
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Essential Element D: PROACTIVE PREVENTION
This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.





| Compliance Indicator ↓ Measures | D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year. | Measure Met? (Yes/No/NA) | Comments |
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| D.1.a | Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I] | Yes | |
| 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] | Yes | |
| 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 C.F.R. 1614.203(d)(1)(iii)(C)] | Yes | |
| | | | |
| Compliance Indicator ← ↓ Measures | D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.) | Measure Met? (Yes/No/NA) | Comments New Indicator |
| D.2.a | Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)] | Yes | |
| 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 C.F.R. §1614.102(a)(3)] | Yes | |
| D.2.c | Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as | Yes | |



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| | re-organizations and realignments? [see 29 C.F.R. §1614.102(a)(3)] | | |
| 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. | Yes | Combined Trends Review and EEO Program Assessment. |
|  Compliance Indicator  Measures | D.3 – The agency establishes appropriate action plans to remove identified barriers. | Measure Met? (Yes/No/NA) | Comments New Indicator |
| D.3.a | Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 C.F.R. §1614.102(a)(3)] | No | See Part H. |
| 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 MD-715, II(D)] | No | See Part H. |
| D.3.c | Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)] | No | See Part H. |
|  Compliance Indicator  Measures | D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities. | Measure Met? (Yes/No/NA) | Comments New Indicator |
| D.4.a | Does the agency post its affirmative action plan on its public website? [see 29 C.F.R. 1614.203(d)(4)] Please provide the internet address in the comments. | Yes | https://work.nara.gov/equal-employment-opportunity/eo-reports.html |
| 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 C.F.R. 1614.203(d)(1)(i)] | Yes | |
| D.4.c | Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 C.F.R. 1614.203(d)(1)(ii)(A)] | Yes | |
| D.4.d | Has the agency taken specific steps that are reasonably designed to increase the number of persons with | Yes | |

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| | disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 C.F.R. 1614.203(d)(7)(ii)] | | |
| Essential Element E: EFFICIENCY | | | |
| This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency’s EEO programs and an efficient and fair dispute resolution process. | | | |
|  Compliance Indicator | E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process. | Measure Met? (Yes/No/NA) | Comments |
|  Measures | | | |
| E.1.a | Does the agency timely provide EEO counseling, pursuant to 29 C.F.R. §1614.105? | No | See Part H. The implementation of a new electronic tracking system will improve the timeliness of issuance of EEO documents. |
| E.1.b | Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 C.F.R. §1614.105(b)(1)? | No | See Part H. The implementation of a new electronic tracking system will improve the timeliness of issuance of EEO documents. |
| E.1.c | Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)? | No | See Part H. The implementation of a new electronic tracking system will improve the timeliness of issuance of EEO documents. |
| E.1.d | 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(I)? If so, please provide the average processing time in the comments. | No | See Part H. The average processing time was 49.4. The implementation of a new electronic |

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| | | | tracking system will improve the timeliness of issuance of EEO documents. |
| E.1.e | 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 C.F.R. §1614.102(b)(6)? | Yes | |
| E.1.f | Does the agency timely complete investigations, pursuant to 29 C.F.R. §1614.108? | No | See Part H. The implementation of a new electronic tracking system will improve the timeliness of issuance of EEO documents. |
| E.1.g | 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 C.F.R. §1614.108(g)? | No | See Part H. The implementation of a new electronic tracking system will improve the timeliness of issuance of EEO documents. |
| E.1.h | When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 C.F.R. §1614.110(b)? | No | See Part H. The implementation of a new electronic tracking system will improve the timeliness of issuance of EEO documents. |
| E.1.i | Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 C.F.R. §1614.110(a)? | No | See Part H. The implementation of a new electronic tracking system will improve the timeliness of issuance of EEO documents. |





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| E.1.j | If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If “yes”, please describe how in the comments column. | Yes | The EEO Office notifies the contractor of any modifications necessary and provides them with a timeframe for corrections. |
| E.1.k | 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 | |
| E.1.l | Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 C.F.R. § 1614.403(g)] | Yes | |
|  Compliance Indicator  Measures | E.2 – The agency has a neutral EEO process. | Measure Met? (Yes/No/NA) | Comments Revised Indicator |
| E.2.a | Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)] | Yes | |
| E.2.b | When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [see MD-110, Ch. 1(IV)(D)] If “yes”, please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column. | Yes | The attorney assigned to conduct the FAD review does not handle any litigation related to the complaint. The attorney is at our facility in College Park, MD and resides in the Office of General Counsel. |
| E.2.c | 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 | |



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| E.2.d | 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.2.e | 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 | |
|  Compliance Indicator  Measures | E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program. | Measure Met? (Yes/No/NA) | Comments |
| E.3.a | Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 C.F.R. §1614.102(b)(2)] | Yes | |
| E.3.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.3.c | Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)] | Yes | |
| E.3.d | 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 | |
| E.3.e | Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)] | Yes | |
| E.3.f | Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)] | Yes | |
|  Compliance Indicator  Measures | E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program. | Measure Met? (Yes/No/NA) | Comments |
| E.4.a | Does the agency have systems in place to accurately collect, monitor, and analyze the following data: | | |
| 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)] | Yes | |

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|--|--|-------------------------------------|---|
| E.4.a.2 | The race, national origin, sex, and disability status of agency employees? [see 29 C.F.R. §1614.601(a)] | Yes | |
| E.4.a.3 | Recruitment activities? [see MD-715, II(E)] | Yes | |
| 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)] | Yes | |
| E.4.a.5 | The processing of requests for reasonable accommodation? [29 C.F.R. § 1614.203(d)(4)] | Yes | |
| E.4.a.6 | The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2] | Yes | |
| E.4.b | Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I] | Yes | |
|  Compliance Indicator  Measures | E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program. | Measure Met? (Yes/No/NA) | Comments |
| E.5.a | Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments. | Yes | Yearly using the MD-715, Ad Hoc meetings, at the end of the year Archivist of the United States briefing, and during recurring meetings with EEO staff. |
| E.5.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 meeting, EEO Directors Meeting, Ad Hoc meetings/surveys with other agencies. |
| E.5.c | Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)] | Yes | |

Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE

This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.

|  Compliance Indicator  Measures | F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements. | Measure Met? (Yes/No/NA) | Comments |
|--|--|---------------------------------|--|
| F.1.a | 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 C.F.R. §1614.102(e); MD-715, II(F)] | Yes | |
| F.1.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 | |
| F.1.c | Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)] | Yes | |
| F.1.d | Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)] | Yes | |
| F.1.e | When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)] | Yes | |
|  Compliance Indicator  Measures | F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions. | Measure Met? (Yes/No/NA) | Comments |
| F.2.a | Does the agency timely respond and fully comply with EEOC orders? [see 29 C.F.R. §1614.502; MD-715, II(E)] | Yes | |
| F.2.a.1 | When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 C.F.R. §1614.108(g)] | Yes | |
| F.2.a.2 | 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 C.F.R. §1614.501] | N/A | There have been no findings of discriminatory conduct. |
| F.2.a.3 | When a complainant files an appeal, does the agency timely forward the investigative file to EEOC’s Office of Federal Operations? [see 29 C.F.R. §1614.403(e)] | Yes | |

| | | | |
|--|--|-------------------------------------|-----------------|
| F.2.a.4 | Pursuant to 29 C.F.R. §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance? | Yes | |
|  Compliance Indicator  Measures | F.3 - The agency reports to EEOC its program efforts and accomplishments. | Measure Met? (Yes/No/NA) | Comments |
| F.3.a | Does the agency timely submit to EEOC an accurate and complete The Notification and Federal Employee Antidiscrimination and Retaliation Act of 2002 (No FEAR Act) report? [Public Law 107-174 (May 15, 2002), §203(a)] | Yes | |
| F.3.b | Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 C.F.R. §1614.703(d)] | Yes | |

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

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

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

1. Statement of Model Program Essential Element Deficiency

| Type of Program Deficiency | Brief Description of Program Deficiency |
|----------------------------|--|
| A.2.a.2 | The agency did not communicate Reasonable Accommodation procedures to all employees. |

Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective | Target Date (mm/dd/yyyy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|--------------------------------|---|-----------------------------|-------------------------------|--------------------------------|
| 09/30/2020 | Communicate Reasonable Accommodation (RA) Procedures. | 09/30/2021 | 11/30/2024 | |

Responsible Official(s)

| Title | Name | Performance Standards Address the Plan? (Yes or No) |
|--|------------------|--|
| EEO Director | Erica Pearson | Yes |
| EEO Anti-Harassment/ Disability Program Supervisor | Sophia Spadacino | Yes |
| Disability Program Manager (DPM) | Vacant | Yes |
| Disability Program Manager | Vacant | Yes |

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Planned Activities Toward Completion of Objective

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|-------------------------------------|----------------------------|---|---|---|
| 09/30/2020 | Communicate RA procedures. | Yes | 11/30/2024 | |

Report of Accomplishments

| Fiscal Year | Accomplishments |
|--------------------|--|
| FY21 | The EEO office is continuing to work with the Strategy and Performance Division to review and publish the RA Policy and Procedures. |
| FY22 | <p>The EEO office is continuing to work with the Strategy and Performance Division to review and publish the RA Policy and Procedures. The next is to forward the policy and procedures to the Deputy Archivist for review. Support return to work activities after Coronavirus Disease (COVID-19) to include processing of RA cases and ensuring approved accommodations are in place.</p> <p>Developed “inclusion language” for position descriptions.</p> <p>Developed guidance for management for Americans with Disabilities (ADA) Act Amendments Act (ADAAA) of 2008 interview questions.</p> <p>Developed a proposed implementation plan for NEEO Disability Program activities</p> |
| FY23 | We experienced a delay in issuing the annual All Staff training due to our decision to update the training materials and replace the videos recorded by the former Archivist with new ones by the newly appointed Archivist. Consequently, we chose to postpone the training deployment rather than use the old videos. The RA Policy and procedures are currently under review and will be released for commenting in FY24. |

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2. Statement of Model Program Essential Element Deficiency

| Type of Program Deficiency | Brief Description of Program Deficiency |
|----------------------------|---|
| A.2.c.3 | The agency did not communicate the Reasonable Accommodation program to all employees. |

Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective | Target Date (mm/dd/yyyy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|--------------------------------|--|-----------------------------|-------------------------------|--------------------------------|
| 9/30/2023 | Communicate the Reasonable Accommodation program to all employees. | 11/30/2024 | | |

Responsible Official(s)

| Title | Name | Performance Standards Address the Plan? (Yes or No) |
|--|------------------|--|
| EEO Director | Erica Pearson | Yes |
| Anti-Harassment/ Disability Program Supervisor | Sophia Spadacino | Yes |
| Disability Program Manager | Vacant | Yes |
| Disability Program Manager | Vacant | Yes |

Planned Activities Toward Completion of Objective

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|-----------------------------|---|---|-------------------------------|---------------------------------|
| 11/30/2024 | Work with NARA Training office to ensure Annual Required Training (including EEO Disability/RA training) is disseminated. | Yes | | |

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Report of Accomplishments

| Fiscal Year | Accomplishments |
|-------------|---|
| FY23 | We experienced a delay in issuing the annual All Staff training due to our decision to update the training materials and replace the videos recorded by the former Archivist with new ones by the newly appointed Archivist. Consequently, we chose to postpone the training deployment rather than use the old videos. The required training has already been released and completed for FY24. |

3. Statement of Model Program Essential Element Deficiency

| Type of Program Deficiency | Brief Description of Program Deficiency |
|----------------------------|---|
| B.1.c | The State of the Agency Briefing was not presented. |

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) |
|--------------------------------|---|-----------------------------|-------------------------------|--------------------------------|
| 9/30/2023 | Present the State of the Agency Briefing. | 6/28/2024 | | |

Responsible Official(s)

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

Planned Activities Toward Completion of Objective

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|-----------------------------|---|---|-------------------------------|---------------------------------|
| 6/28/2024 | State of the Agency Briefing has already been scheduled and will recur on the same date annually. | Yes | | |

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Report of Accomplishments

| Fiscal Year | Accomplishments |
|-------------|--|
| FY23 | The EEO Director and Assistant have already scheduled the briefing dates and prepared the briefings. |

4. Statement of Model Program Essential Element Deficiency

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

Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective | Target Date (mm/dd/yyyy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|--------------------------------|---|-----------------------------|-------------------------------|--------------------------------|
| 04/30/2017 | Identify and fund an EEO Complaint Tracking System. | 09/30/2017 | 09/30/2024 | |

Responsible Official(s)

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

Planned Activities Toward Completion of Objective

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|-----------------------------|---|---|-------------------------------|---------------------------------|
| 09/30/2017 | Secure an EEO Complaint Tracking System for the EEO Office. | No | 09/30/2024 | |

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Report of Accomplishments

| Fiscal Year | Accomplishments |
|-------------|--|
| FY20 | Working closely with Information Services to obtain an EEO Complaint Tracking System. The proposed implementation date is FY23 if funding is approved. |
| FY22 | In FY22, funding was allotted for the tracking system. |
| FY23 | NARA was able to secure and fund a tracking system. Worked closely with the contractor to test the tracking system and implement required updated processes. Tracking system secured in October of FY24, currently working towards implementation. |

5. Statement of Model Program Essential Element Deficiency

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

Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective | Target Date (mm/dd/yyyy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|--------------------------------|--|-----------------------------|-------------------------------|--------------------------------|
| 10/31/2018 | Coordinate Senior Management involvement on the implementation of the SEP. | 09/30/2020 | 09/30/2025 | |

Responsible Official(s)

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

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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 | Market the SEP program to NARA's management and staff. | Yes | 09/30/2025 | |
| 09/30/2020 | Select and Train Special Emphasis Program Managers (SEPM). | Yes | 09/30/2025 | |
| 09/30/2020 | Advance NARA's workforce knowledge about SEPM duties. | Yes | 09/30/2025 | |

Report of Accomplishments

| Fiscal Year | Accomplishments |
|--------------------|---|
| FY20 | Reviewed SEP proposal with the Human Resource Working Group. |
| FY21 | The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness. |
| FY22 | The EEO Office was primarily focused on processing return to work reasonable accommodation requests and EEO complaint program timeliness. |
| FY23 | Recruiting an Affirmative Employment Specialist. |

6. Statement of Model Program Essential Element Deficiency

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

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Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective | Target Date (mm/dd/yyyy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|--|---|-------------------------------------|---------------------------------------|--|
| 10/31/2018 | Develop a barrier analysis process with participation roles for senior leaders. | 09/30/2020 | 09/30/2025 | |

Responsible Official(s)

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

Planned Activities Toward Completion of Objective

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

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Report of Accomplishments

| Fiscal Year | Accomplishments |
|-------------|---|
| FY21 | The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness. |
| FY22 | The EEO Office was primarily focused on processing return to work reasonable accommodation requests and EEO complaint program timeliness. |
| FY23 | Recruiting an Affirmative Employment Specialist. |

7. Statement of Model Program Essential Element Deficiency

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

Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective | Target Date (mm/dd/yyyy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|--------------------------------|--|-----------------------------|-------------------------------|--------------------------------|
| 10/31/2018 | Create roles for senior leaders to assist with developing barrier analysis action plans. | 09/30/2020 | 09/30/2025 | |

Responsible Official(s)

| Title | Name | Performance Standards Address the Plan? (Yes or No) |
|---------------------|---------------------|--|
| EEO Director | Erica Pearson | Yes |
| Human Capital Staff | Human Capital Staff | Yes |
| Senior Leaders | Senior Leaders | 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 | Monitor and assess all plan implementation and for measurable results. | Yes | 09/30/2025 | |
| 09/30/2020 | Develop action plans with stakeholders concurrence. | Yes | 09/30/2025 | |

Report of Accomplishments

| Fiscal Year | Accomplishments |
|--------------------|---|
| FY21 | The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness. |
| FY22 | The EEO Office was primarily focused on processing return to work reasonable accommodation requests and EEO complaint program timeliness. |
| FY23 | Recruiting an Affirmative Employment Specialist. |

8. Statement of Model Program Essential Element Deficiency

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

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Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective | Target Date (mm/dd/yyyy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|--|--|-------------------------------------|---|--|
| 10/13/2018 | Explore opportunities to develop and incorporate EEO action plans into Agency Strategic plans. | 09/30/2020 | 09/30/2025 | |

Responsible Official(s)

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

Planned Activities Toward Completion of Objective

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|-------------------------------------|--|---|---|---|
| 09/30/2022 | Establish partnerships with senior leaders to assist in incorporating EEO action plans into Agency Strategic Plan. | Yes | 09/30/2025 | |

Report of Accomplishments

| Fiscal Year | Accomplishments |
|--------------------|---|
| FY21 | The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness. |
| FY22 | The EEO Office was primarily focused on processing return to work reasonable accommodation requests and EEO complaint program timeliness. |
| FY23 | Recruiting an Affirmative Employment Specialist. |

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9. Statement of Model Program Essential Element Deficiency

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

Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective | Target Date (mm/dd/yyyy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|--------------------------------|------------------------------|-----------------------------|-------------------------------|--------------------------------|
| 10/31/2018 | Conduct field audits yearly. | 09/30/2021 | 09/30/2025 | |

Responsible Official(s)

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

Planned Activities Toward Completion of Objective

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|-----------------------------|---|---|-------------------------------|---------------------------------|
| 09/30/2021 | Develop partnerships with field offices. | Yes | 09/30/2025 | |
| 09/30/2021 | Develop field office assessment criteria. | Yes | 09/30/2025 | |

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Report of Accomplishments

| Fiscal Year | Accomplishments |
|-------------|---|
| FY21 | The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness. |
| FY22 | The EEO Office was primarily focused on processing return to work reasonable accommodation requests and EEO complaint program timeliness. |
| FY23 | The EEO Office focused on building relationships and providing training for field offices and will implement a schedule for assessment in FY24. |

10. Statement of Model Program Essential Element Deficiency

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

Objective(s) and Dates for EEO Plan

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

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Responsible Official(s)

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

Planned Activities Toward Completion of Objective

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

Report of Accomplishments

| Fiscal Year | Accomplishments |
|-------------|---|
| FY21 | The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness. |
| FY22 | The EEO Office was primarily focused on processing return to work reasonable accommodation requests and EEO complaint program timeliness. |
| FY23 | The EEO Office focused on building relationships and providing training for field offices and will implement a schedule for assessment in FY24. |

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11. Statement of Model Program Essential Element Deficiency

| Type of Program Deficiency | Brief Description of Program Deficiency |
|----------------------------|--|
| C.2.a | The agency did not establish a comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance. |

Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective | Target Date (mm/dd/yyyy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|--------------------------------|---|-----------------------------|-------------------------------|--------------------------------|
| 09/30/2022 | Revise, review, and publish an updated comprehensive anti-harassment policy that complies with EEOC requirements. | 12/31/2024 | | |

Responsible Official(s)

| Title | Name | Performance Standards Address the Plan? (Yes or No) |
|--|------------------------|--|
| EEO Director | Erica Pearson | Yes |
| Anti-Harassment/ Disability Program Supervisor | Sophia Spadacino | Yes |
| Anti-Harassment Program Manager | Stephanie Hannah-Agnew | Yes |

Planned Activities Toward Completion of Objective

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|-----------------------------|--|---|-------------------------------|---------------------------------|
| 12/31/2024 | Revise, review, and publish an updated comprehensive anti-harassment policy. | Yes | | |

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Report of Accomplishments

| Fiscal Year | Accomplishments |
|-------------|---|
| FY23 | The anti-harassment program initiated the process of revising the anti-harassment policy to meet this requirement. However, it was not completed due to turnover. |

12. Statement of Model Program Essential Element Deficiency

| Type of Program Deficiency | Brief Description of Program Deficiency |
|----------------------------|--|
| C.2.a.5 | The agency did not conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process. |

Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective | Target Date (mm/dd/yyyy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|--------------------------------|--|-----------------------------|-------------------------------|--------------------------------|
| 10/01/2023 | Conduct a prompt inquiry on all harassment allegations, including those raised in the EEO complaint process within the timeframe set forth in the Anti-Harassment procedures.. | 09/30/2025 | | |

Responsible Official(s)

| Title | Name | Performance Standards Address the Plan? (Yes or No) |
|--|------------------------|--|
| EEO Director | Erica Pearson | Yes |
| Anti-Harassment/ Disability Program Supervisor | Sophia Spadacino | Yes |
| Anti-Harassment Program Manager | Stephanie Hannah-Agnew | Yes |

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Planned Activities Toward Completion of Objective

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|-------------------------------------|--|---|---|---|
| 09/30/2025 | Follow up with all managers and supervisors to ensure timely reporting of harassment allegations. Also ensure managers and supervisors are addressing concerns that do not fall within the scope of the anti-harassment program to reduce the "catch all" of cases that should be addressed in an appropriate forum. | Yes | | |

Report of Accomplishments

| Fiscal Year | Accomplishments |
|--------------------|---|
| FY22 | In August 2022, Administrative Resource Center, Workforce Relations Branch started to conduct the fact-finding and/or investigations when the Ad Hoc Committee on Harassment receives allegations of harassment and/or inappropriate behavior. |
| FY23 | In FY 23 the anti-harassment program looked into 104 allegations of harassment; out of 104 cases reviewed only two (2) inquiries did not meet the 10-day requirement. The Anti-Harassment program is continually reviewing procedures to ensure efficiency; while promptly looking into all harassment allegations. |

13. Statement of Model Program Essential Element Deficiency

| Type of Program Deficiency | Brief Description of Program Deficiency |
|---------------------------------------|--|
| C.2.b | The agency has established but has not published reasonable accommodations procedures that comply with EEOC's regulations and guidance. The reasonable accommodation procedures do not clearly state the agency should process the request within a maximum amount of time (e.g. 30 days). |

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|--|--|-------------------------------------|---|--|
| 05/01/2017 | Establish the RA Policy and Procedures that comply with EEOC's regulations and guidance. | 10/31/2017 | 09/30/2019 | 09/11/2019 |
| 09/11/2019 | EEOC approval of the established RA Policy and Procedures. | 09/11/2020 | 09/30/2021 | 01/05/2021 |
| 01/05/2021 | Revise, review, and publish an updated comprehensive Reasonable Accommodation policy that complies with EEOC requirements. | 02/28/2023 | 12/31/2024 | |

Responsible Official(s)

| Title | Name | Performance Standards Address the Plan? (Yes or No) |
|--|------------------|--|
| EEO Director | Erica Pearson | Yes |
| Anti-Harassment/ Disability Program Supervisor | Sophia Spadacino | Yes |
| Disability Program Manager | Vacant | Yes |
| Disability Program Manager | Vacant | Yes |

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Planned Activities Toward Completion of Objective

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|-------------------------------------|--|---|---|---|
| 01/31/2018 | Complete revisions to draft RA Policy and Procedures. | Yes | 09/30/2019 | 09/11/2019 |
| 09/11/2019 | Provide the established RA Policy and Procedures to the EEOC for approval. | Yes | 09/11/2020 | 01/05/2021 |
| 09/30/2021 | Start the agency policy creation process to get the established RA Policy and Procedures approved for publishing. | Yes | 07/30/2022 | 12/8/2022 |
| 07/30/2022 | Respond to the questions from the Strategy and Performance Division the RA Policy and Procedures. | Yes | 12/31/2022 | 12/8/2022 |
| 09/30/2022 | Collaborate with the Strategy and Performance Division to develop the presentation that must be routed to leadership for feedback. | Yes | 12/31/2022 | 12/8/2022 |
| 02/28/2023 | Route the RA Policy and Procedures for publishing. | Yes | 12/31/2024 | |

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| Fiscal Year | Accomplishments |
|--------------------|--|
| FY21 | <p>The EEO office is continuing to work with the Strategy and Performance Division Office to review and publish the EEOC approved RA Policy and Procedures.</p> <p>Created Standard Operating Procedures (SOPs) for the RA/Reassignment Process.</p> <p>Created Frequently Asked Questions (FAQs) for the Disability Program.</p> <p>Reasonable Accommodations Training was published in FY21.</p> <p>The RA Policy and Procedures were approved by the EEOC on 1/5/2021.</p> <p>Completed four ad hoc training sessions on RA for program offices.</p> |
| FY22 | <p>The EEO office is continuing to work with the Strategy and Performance Division Office to review and publish the EEOC approved RA Policy and Procedures. The next is to forward the policy and procedures to Deputy Archivist review.</p> <p>Created SOPs Conflict of Interest.</p> <p>Developed a Reasonable Accommodations reconsideration template.</p> <p>Developed the language for administrative closure.</p> <p>Research Project of the vision impaired.</p> <p>Research disability inclusion language for position descriptions.</p> <p>Facilitated disability training etiquette.</p> |
| FY23 | <p>The Disability Program initiated the process of revising the Reasonable Accommodation policy to meet this requirement. However, it was not completed due to turnover.</p> |
| FY24 | <p>The Disability Program has revised the policy to include all EEOC's requirements for comprehensive policy. The policy is currently under review. Upon finalization, the revised policy will be published and distributed to all employees.</p> |

14. Statement of Model Program Essential Element Deficiency

| Type of Program Deficiency | Brief Description of Program Deficiency |
|-----------------------------------|--|
| C.2.b.5 | The agency did not process all accommodation requests within the time frame. |

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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) |
|--|---|-------------------------------------|---|--|
| 9/30/2022 | Process case with timeframe set forth in procedures | 09/30/2023 | 09/30/2025 | |

Responsible Official(s)

| Title | Name | Performance Standards Address the Plan? (Yes or No) |
|--|------------------|--|
| EEO Director | Erica Pearson | Yes |
| Anti-Harassment/ Disability Program Supervisor | Sophia Spadacino | Yes |
| Disability Program Manager | Vacant | Yes |
| Disability Program Manager | Vacant | Yes |

Planned Activities Toward Completion of Objective

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|-------------------------------------|--|---|---|---|
| 09/30/2024 | Recruitment for two (2) Disability Program Managers. | Yes | | |

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| Fiscal Year | Accomplishments |
|--------------------|---|
| FY21 | <p>87 percent of RAs were processed timely. Created SOPs for the RA/Reassignment Process. Developed FAQs for the Disability Program. Trained EEO staff on the RA Process in July 2021. The agency hired a DPM and Reasonable Accommodation Coordinator (RAC) in May 2022. The DPM and RAC will be trained on the new RA Procedures by 11/30/ 2022.</p> |
| FY22 | <p>43 percent of RAs were processed timely. Created SOP for RA Conflict of Interest. Hired DPM and RAC in May 2022. The DPM and RAC trained on new RA Procedures. DPM and RAC completed following training's: Next-Level Accommodation and ADA Challenges, What Everyone Should Know about Section 508, Managing Religious Accommodation at Work, and Accommodating Mental Health Conditions.</p> |
| FY23 | <p>Only 50 percent of requests were processed within the time frame due to an increase in requests for the return to work. We are currently implementing an EEO tracking system which will accurately track the timeliness for processing RA requests, and allow employees to submit requests directly into the system.</p> |

15. Statement of Model Program Essential Element Deficiency

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

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Objective(s) and Dates for EEO Plan

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

Responsible Official(s)

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

Planned Activities Toward Completion of Objective

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|-------------------------------------|---|---|---------------------------------------|---|
| 09/30/2020 | Reinvigorate the partnerships with HC Staff to identify barriers to promotion, employee recognition, and employee development programs. | Yes | 09/30/2023 | 09/30/2023 |

Report of Accomplishments

| Fiscal Year | Accomplishments |
|--------------------|---|
| FY20 | We reviewed the Awards and Recognitions policy for barriers. As a result, we changed our award policy to issue performance awards that are now the same for all grades. |

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| | |
|------|--|
| FY21 | While there is not a formal timetable/schedule in place, HC reviews policies on an annual basis and on an ongoing basis, looks at new ways to recognize and award employees. |
| FY22 | Recruit an Affirmative Employment Specialist |
| FY23 | HC collaborates monthly with EEO through the Diversity, Equity, Inclusion, and Accessibility (DEIA) team to identify potential barriers and adopt data evidence based approaches to address challenges that impede participation of all EEO groups in the program. This Part H is completed. |

16. Statement of Model Program Essential Element Deficiency

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

Objective(s) and Dates for EEO Plan

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

Responsible Official(s)

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

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Planned Activities Toward Completion of Objective

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

Report of Accomplishments

| Fiscal Year | Accomplishments |
|--------------------|--|
| FY20 | HC and EEO continue to explore different ways to collaborate on outreach and recruiting initiatives that are aimed at building a diverse pipeline for the next generation of archivists and other mission critical occupations. Initiatives include partnering with professional organizations, enhancing our partnership with Veterans Affairs' (VA) compensated work therapy program, building out our support to managers, supervisors, and work units to better acclimate staff to work underrepresented groups and with persons with targeted disabilities. |
| FY21 | The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness. |
| FY22 | Recruit an Affirmative Employment Specialist |
| FY23 | HC collaborates monthly with EEO through the DEIA team to identify potential barriers and adopt data evidence based approaches to address challenges that impede participation of all EEO groups in the program. This Part H is completed. |

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17. Statement of Model Program Essential Element Deficiency

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

Objective(s) and Dates for EEO Plan

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

Responsible Official(s)

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

Planned Activities Toward Completion of Objective

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

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| Fiscal Year | Accomplishments |
|-------------|--|
| FY20 | As more EEO staff were hired we began collaborating with HC. |
| FY21 | The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness. |
| FY22 | Recruit an Affirmative Employment Specialist |
| FY23 | HC collaborates monthly with EEO through the DEIA team to identify potential barriers and adopt data evidence based approaches to address challenges that impede participation of all EEO groups in the program. |

18. Statement of Model Program Essential Element Deficiency

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

Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective | Target Date (mm/dd/yyyy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|--------------------------------|---|-----------------------------|-------------------------------|--------------------------------|
| 09/30/2020 | Conduct a barrier analysis to establish an agency baseline. | 09/30/2021 | 09/30/2025 | |

Responsible Official(s)

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

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Planned Activities Toward Completion of Objective

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

Report of Accomplishments

| Fiscal Year | Accomplishments |
|--------------------|--|
| FY20 | Hired an Affirmative Employment Supervisor (09/28/2020). |
| FY21 | The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness. |
| FY22 | Recruit an Affirmative Employment Specialist |
| FY23 | HC collaborates monthly with EEO through the DEIA team to identify potential barriers and adopt data evidence based approaches to address challenges that impede participation of all EEO groups in the program. |

19. Statement of Model Program Essential Element Deficiency

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

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Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective | Target Date (mm/dd/yyyy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|--|---------------------------|-------------------------------------|---|--|
| 09/30/2018 | Conduct barrier analysis. | 09/30/2020 | 09/30/2025 | |

Responsible Official(s)

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

Planned Activities Toward Completion of Objective

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|-------------------------------------|---------------------------|---|---|---|
| 09/30/2019 | Conduct barrier analysis. | Yes | 09/30/2025 | |

Report of Accomplishments

| Fiscal Year | Accomplishments |
|--------------------|--|
| FY21 | The EEO Office was primarily focused on processing COVID-19 reasonable and religious accommodation requests and EEO complaint program timeliness. |
| FY22 | Recruit an Affirmative Employment Specialist |
| FY23 | HC collaborates monthly with EEO through the DEIA team to identify potential barriers and adopt data evidence based approaches to address challenges that impede participation of all EEO groups in the program. |

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20. Statement of Model Program Essential Element Deficiency

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

Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective | Target Date (mm/dd/yyyy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|--------------------------------|-------------------------------|-----------------------------|-------------------------------|--------------------------------|
| 10/01/2023 | To provide timely counseling. | 12/31/2025 | | |

Responsible Official(s)

| Title | Name | Performance Standards Address the Plan? (Yes or No) |
|---------------------------|-----------------|---|
| EEO Director | Erica Pearson | Yes |
| EEO Complaints Manager | Vacant | Yes |
| EEO Complaints Specialist | Duane Tobias | Yes |
| EEO Complaints Specialist | Rosalind Meador | Yes |

Planned Activities Toward Completion of Objective

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|-----------------------------|---|---|-------------------------------|---------------------------------|
| 12/31/2025 | Implementation use of a new electronic tracking system to improve timeliness. | Yes | | |

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| Fiscal Year | Accomplishments |
|-------------|--|
| FY23 | <p>The EEO Office hired an EEO Specialist in October 2023 to assist in working toward the timely processing of all EEO complaints at the informal and formal stages.</p> <p>Continuation of monthly timeliness meetings to monitor and track the status of cases.</p> <p>We are currently implementing an EEO tracking system which will accurately track the timeliness for processing EEO Programs, and allow employees to submit requests directly into the system.</p> |

21. Statement of Model Program Essential Element Deficiency

| Type of Program Deficiency | Brief Description of Program Deficiency |
|----------------------------|---|
| E.1.b | The agency did not provide written notification of the rights and responsibilities during the initial counseling. |

Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective | Target Date (mm/dd/yyyy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|--------------------------------|---|-----------------------------|-------------------------------|--------------------------------|
| 10/01/2023 | Issue written notifications of rights and responsibilities during the initial counseling. | 12/31/2025 | | |

Responsible Official(s)

| Title | Name | Performance Standards Address the Plan? (Yes or No) |
|---------------------------|-----------------|---|
| EEO Director | Erica Pearson | Yes |
| EEO Complaints Manager | Vacant | Yes |
| EEO Complaints Specialist | Duane Tobias | Yes |
| EEO Complaints Specialist | Rosalind Meador | Yes |

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Planned Activities Toward Completion of Objective

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|-------------------------------------|---|---|---|---|
| 12/31/2025 | Implementation of a new electronic tracking system will improve the timeliness and accuracy of issuance of EEO documents. | Yes | | |

Report of Accomplishments

| Fiscal Year | Accomplishments |
|--------------------|---|
| FY23 | <p>The EEO Office hired an EEO Specialist in October 2023 to assist in working toward the timely processing of all EEO documents at the formal stage.</p> <p>Continuation of monthly timeliness meetings to monitor and track the status of cases.</p> <p>We are currently implementing an EEO tracking system which will accurately track the timeliness for processing EEO Programs, and allow employees to submit requests directly into the system.</p> |

22. Statement of Model Program Essential Element Deficiency

| Type of Program Deficiency | Brief Description of Program Deficiency |
|---------------------------------------|--|
| E.1.c | Untimely issuance of acknowledgement letters upon receipt of a formal complaint. |

Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective | Target Date (mm/dd/yyyy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|--|--|-------------------------------------|---------------------------------------|--|
| 10/01/2023 | Provide timely acknowledgment letters. | 12/31/2025 | | |

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Responsible Official(s)

| Title | Name | Performance Standards Address the Plan? (Yes or No) |
|---------------------------|-----------------|---|
| EEO Director | Erica Pearson | Yes |
| EEO Complaints Manager | Vacant | Yes |
| EEO Complaints Specialist | Duane Tobias | Yes |
| EEO Complaints Specialist | Rosalind Meador | Yes |

Planned Activities Toward Completion of Objective

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|--------------------------|---|--|----------------------------|------------------------------|
| 12/31/2025 | Implementation of a new electronic tracking system will improve the timeliness and accuracy of issuance of EEO documents. | Yes | | |

Report of Accomplishments

| Fiscal Year | Accomplishments |
|-------------|--|
| FY23 | <p>The EEO Office hired an EEO Specialist in October 2023 to assist in working toward the timely processing of all EEO complaints at the informal and formal stages.</p> <p>Continuation of monthly timeliness meetings to monitor and track the status of cases.</p> <p>We are currently implementing an EEO tracking system which will accurately track the timeliness for processing EEO Programs, and allow employees to submit requests directly into the system.</p> |

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23. Statement of Model Program Essential Element Deficiency

| Type of Program Deficiency | Brief Description of Program Deficiency |
|----------------------------|--|
| E.1.d | Untimely issuance of acceptance/dismissal letters. |

Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective | Target Date (mm/dd/yyyy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|-----------------------------|---|--------------------------|----------------------------|-----------------------------|
| 10/01/2023 | Issue timely acceptance/dismissal letters | 12/31/2025 | | |

Responsible Official(s)

| Title | Name | Performance Standards Address the Plan? (Yes or No) |
|---------------------------|-----------------|---|
| EEO Director | Erica Pearson | Yes |
| EEO Complaints Manager | Vacant | Yes |
| EEO Complaints Specialist | Duane Tobias | Yes |
| EEO Complaints Specialist | Rosalind Meador | Yes |

Planned Activities Toward Completion of Objective

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|--------------------------|---|--|----------------------------|------------------------------|
| 12/31/2025 | Implementation of a new electronic tracking system will improve the timeliness and accuracy of issuance of EEO documents. | Yes | | |

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| Fiscal Year | Accomplishments |
|-------------|--|
| FY23 | <p>The EEO Office hired an EEO Specialist in October 2023 to assist in working toward the timely processing of all EEO complaints at the informal and formal stages.</p> <p>Continuation of monthly timeliness meetings to monitor and track the status of cases.</p> <p>We are currently implementing an EEO tracking system which will accurately track the timeliness for processing EEO Programs, and allow employees to submit requests directly into the system.</p> |

24. Statement of Model Program Essential Element Deficiency

| Type of Program Deficiency | Brief Description of Program Deficiency |
|----------------------------|--|
| E.1.f | Untimely completion of EEO investigations. |

Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective | Target Date (mm/dd/yyyy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|--------------------------------|--|-----------------------------|-------------------------------|--------------------------------|
| 10/01/2023 | To complete all investigations in a timely manner. | 12/31/2025 | | |

Responsible Official(s)

| Title | Name | Performance Standards Address the Plan? (Yes or No) |
|---------------------------|-----------------|--|
| EEO Director | Erica Pearson | Yes |
| EEO Complaints Manager | Vacant | Yes |
| EEO Complaints Specialist | Duane Tobias | Yes |
| EEO Complaints Specialist | Rosalind Meador | Yes |

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Planned Activities Toward Completion of Objective

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|-------------------------------------|--|---|---|---|
| 12/31/2025 | The implementation of a new electronic tracking system will improve with the timeliness of investigations. | Yes | | |

Report of Accomplishments

| Fiscal Year | Accomplishments |
|--------------------|--|
| FY23 | <p>The EEO Office hired an EEO Specialist in October 2023 to assist in working toward the management of the contract investigators and providing timely processing of all EEO documents at the formal stage.</p> <p>Weekly status updates requested from contract investigators with follow-ups as needed.</p> <p>Weekly status updates requested from contract investigators with follow-ups as needed.</p> <p>Continuation of monthly timeliness meetings to monitor and track the status of cases.</p> <p>We are currently implementing an EEO tracking system which will accurately track the timeliness for processing EEO Programs, and allow employees to submit requests directly into the system.</p> |

25. Statement of Model Program Essential Element Deficiency

| Type of Program Deficiency | Brief Description of Program Deficiency |
|-----------------------------------|--|
| E.1.g | Untimely issuance of 108g letters. |

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Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective | Target Date (mm/dd/yyyy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|--|--|-------------------------------------|---|--|
| 10/01/2023 | Issue 108g letters in a timely manner. | 12/31/2025 | | |

Responsible Official(s)

| Title | Name | Performance Standards Address the Plan? (Yes or No) |
|---------------------------|-----------------|--|
| EEO Director | Erica Pearson | Yes |
| EEO Complaints Manager | Vacant | Yes |
| EEO Complaints Specialist | Duane Tobias | Yes |
| EEO Complaints Specialist | Rosalind Meador | Yes |

Planned Activities Toward Completion of Objective

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyy y) | Completion Date (mm/dd/yyyy) |
|-------------------------------------|---|---|--|---|
| 12/31/2025 | The implementation of a new electronic tracking system will improve the issuance of timely documents. | Yes | | |

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Report of Accomplishments

| Fiscal Year | Accomplishments |
|-------------|--|
| FY23 | <p>The EEO Office hired an EEO Specialist in October 2023 to assist in working toward the management of the contract investigators and providing timely processing of all EEO documents at the formal stage.</p> <p>Weekly status updates requested from contract investigators with follow-ups as needed.</p> <p>Continuation of monthly timeliness meetings to monitor and track the status of cases.</p> <p>We are currently implementing an EEO tracking system which will accurately track the timeliness for processing EEO Programs, and allow employees to submit requests directly into the system.</p> |

26. Statement of Model Program Essential Element Deficiency

| Type of Program Deficiency | Brief Description of Program Deficiency |
|----------------------------|--|
| E.1.h | The agency did not issue a timely final agency decision. |

Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective | Target Date (mm/dd/yyyy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|--------------------------------|--------------------------------------|-----------------------------|-------------------------------|--------------------------------|
| 10/01/2023 | Issue timely final agency decisions. | 12/31/2025 | | |

Responsible Official(s)

| Title | Name | Performance Standards Address the Plan? (Yes or No) |
|---------------------------|-----------------|--|
| EEO Director | Erica Pearson | Yes |
| EEO Complaints Manager | Vacant | Yes |
| EEO Complaints Specialist | Duane Tobias | Yes |
| EEO Complaints Specialist | Rosalind Meador | Yes |

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Planned Activities Toward Completion of Objective

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|-------------------------------------|---|---|---|---|
| 09/30/2022 | Monitor Final Agency Decisions (FAD) completion for timeliness. | Yes | 09/30/2023 | |
| 09/30/2023 | Hire an EEO Specialist who will handle cases at the appellant stage of the process including writing FADs. Reexamine internal process/work plan to determine bottleneck and make changes. The implementation of a new electronic tracking system will improve with the timeliness of the EEO program. | No | 12/31/2025 | |

Report of Accomplishments

| Fiscal Year | Accomplishments |
|--------------------|--|
| FY20 | The EEO Office hired an EEO Specialist in July 2020 to assist in working toward the timely processing of FADs. In addition, a work plan was developed to assist in issuing timely FADs. |
| FY21 | The EEO Staff and Office of General Counsel (OGC) Staff meet monthly on a variety of topics including improving the Report of Investigations (ROI) and FADs. On February 24, 2021, the Director and staff met with an EEOC Administrative Judge (AJ) to discuss ROIs and FADs. In May 2021, the EEO Staff and OGC Staff participated in a FAD Writing Training. |
| FY22 | In FY22, funding in the amount of \$110,000 was budgeted for FY23 Improvements were made. One FAD was issued where there was no election. The total number of days was 68 |
| FY23 | The EEO Office hired an EEO Specialist in October 2023 to assist in working toward the timely processing of final actions. Continuation of monthly timeliness meetings to monitor and track the status of cases. We are currently implementing an EEO tracking system which will accurately track the timeliness for processing EEO Programs, and allow employees to submit requests directly into the system. |

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27. Statement of Model Program Essential Element Deficiency

| Type of Program Deficiency | Brief Description of Program Deficiency |
|----------------------------|--|
| E.1.i | The agency did not issue timely final actions. |

Objective(s) and Dates for EEO Plan

| Date Initiated (mm/dd/yyyy) | Objective | Target Date (mm/dd/yyyy) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|-----------------------------|-----------------------------|--------------------------|----------------------------|-----------------------------|
| 10/01/2023 | Issue timely final actions. | 12/31/2025 | | |

Responsible Official(s)

| Title | Name | Performance Standards Address the Plan? (Yes or No) |
|---------------------------|-----------------|---|
| EEO Director | Erica Pearson | Yes |
| EEO Complaints Manager | Vacant | Yes |
| EEO Complaints Specialist | Duane Tobias | Yes |
| EEO Complaints Specialist | Rosalind Meador | Yes |

Planned Activities Toward Completion of Objective

| Target Date (mm/dd/yyyy) | Planned Activities | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|--------------------------|---|--|----------------------------|------------------------------|
| 12/31/2025 | The implementation of a new electronic tracking system will improve with the timeliness of the processing of EEO documents. | Yes | | |

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Report of Accomplishments

| Fiscal Year | Accomplishments |
|--------------------|---|
| FY23 | <p>The EEO Office hired an EEO Specialist in October 2023 to assist in working toward the timely processing of final actions.</p> <p>Continuation of monthly timeliness meetings to monitor and track the status of cases.</p> <p>We are currently implementing an EEO tracking system which will accurately track the timeliness for processing EEO Programs, and allow employees to submit requests directly into the system.</p> |

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

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

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

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

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

| Source of the Trigger | Specific Workforce Data Table | Narrative Description of Trigger |
|---|-------------------------------|--|
| Underrepresentation of HM and HF in the Permanent Workforce | A1 | HM represent 2.15% of the permanent workforce which is below their Civilian Labor Workforce (CLF) benchmark of 6.82%. HF represent 2.34% of the permanent workforce which is below their CLF benchmark of 6.16%. For new hires, HM represents 4.46% and HF represents 3.22%. |

EEO Group(s) Affected by Trigger

| EEO Group(s) |
|--------------|
| HM |
| HF |

Barrier(s) Analysis Process

| Sources of Data | Source Reviewed? (Yes or No) | Identify Information Collected |
|--|-------------------------------------|--|
| Workforce Data Tables | Yes | (Table A1) Total Workforce by Race, Ethnicity, and Sex |
| Complaint Data (Trends) | No | |
| Grievance Data (Trends) | No | |
| Findings from Decisions (e.g., EEO, Grievance, Merit System Protection Board (MSPB), Anti-Harassment Processes) | No | |
| Climate Assessment Survey (e.g., Federal Employee Viewpoint Survey) | No | |
| Exit Interview Data | No | |
| Focus Groups | No | |
| Interviews | No | |
| Reports (e.g., Congress, EEOC, MSPB, Government Accountability Office (GAO), Office of Personnel Management (OPM)) | No | |
| Other (Please Describe) | No | |

Status of Barrier(s) Analysis Process

| Barrier(s) 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 |
|--|
| |

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

| Objective | Date Initiated (mm/dd/yyyy) | Target Date (mm/dd/yyyy) | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|---|------------------------------------|---------------------------------|---|-----------------------------------|------------------------------------|
| Collaborate with Human Capital and hiring officials to determine strategies to enhance the recruitment efforts. | 10/01/2021 | 10/01/2022 | Yes | 09/30/2025 | |

Responsible Official(s)

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

Planned Activities Toward Completion of Objective(s)

| Target Date (mm/dd/yyyy) | Planned Activities | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|---------------------------------|--|-----------------------------------|-------------------------------------|
| 10/01/2021 | Collaborate with Human Capital and hiring officials on recruitment efforts | 09/30/2025 | |

Report of Accomplishment(s)

| Fiscal Year | Accomplishment(s) |
|--------------------|--------------------------|
| | |

2. 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-4 Participation Rates for Senior Executive Service (SES) | HM, HF, BM, AF, NHOPIM, NHOPIF, AIANM, AIANF and TMM and TMF are not represented in the SES population. |

EEO Group(s) Affected by Trigger

| EEO Group |
|------------------|
| HM |
| HF |
| BM |
| AF |
| AIANM |
| AIANF |
| NHOPIM |
| NHOPIF |
| TMM |
| TMF |

Barrier(s) Analysis Process

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

Status of Barrier(s) Analysis Process

| Barrier(s) 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 |
|---|
| |

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

| Objective | Date Initiated (mm/dd/yyyy) | Target Date (mm/dd/yyyy) | Sufficient Funding & Staffing? (Yes or No) | Modified Date (mm/dd/yyyy) | Date Completed (mm/dd/yyyy) |
|---|--------------------------------|-----------------------------|---|-------------------------------|--------------------------------|
| Collaborate with Human Capital to determine career growth and development opportunities | 10/01/2019 | 10/31/2022 | Yes | 09/30/2025 | |

Responsible Official(s)

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

Planned Activities Toward Completion of Objective(s)

| Target Date (mm/dd/yyyy) | Planned Activities | Modified Date (mm/dd/yyyy) | Completion Date (mm/dd/yyyy) |
|---------------------------------|--|-----------------------------------|-------------------------------------|
| 09/30/2020 | Review and analyze the GS-14 and GS- 15 applicant pool to determine if any barriers exist. | 09/30/2025 | |

Report of Accomplishment(s)

| Fiscal Year | Accomplishment(s) |
|--------------------|--------------------------|
| | |