

# BONNEVILLE POWER ADMINISTRATION

## FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

### **MANAGEMENT DIRECTIVE 715**

**(MD-715)**

**FISCAL YEAR 2022**



REPORT CERTIFIED BY:  
John L. Hairston  
BPA Administrator & CEO

MD-715 ASSESSMENT CONDUCTED BY:  
Office of Civil Rights & Equal Employment Opportunity

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**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)
US Department of Energy	Bonneville Power Administration	905 NE 11 <sup>th</sup> Ave	Portland	OR	97232	DN03	41051

**Part B - Total Employment**

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	2,876	7	2,883

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

Agency Leadership	Name	Title
Head of Agency	John L. Hairston	Administrator and Chief Executive Officer
Head of Agency Designee	Daniel James	Chief Workforce and Strategy Officer

**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	Shana Kuhn	Deputy Chief Workforce and Strategy Officer and Acting Director of Civil Rights and Equal Employment Opportunity	0340	GS-15	503-230-3836	slkuhn@bpa.gov
Affirmative Employment Program Manager	Ernesto Jaquez	EEO Specialist	0260	GS-13	503-230-3562	ejaquez@bpa.gov

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<b>EEO Program Staff</b>	<b>Name</b>	<b>Title</b>	<b>Occupational Series (xxxx)</b>	<b>Pay Plan and Grade (xx-xx)</b>	<b>Phone Number (xxx-xxx-xxxx)</b>	<b>Email Address</b>
Formal Complaint Processing Program Manager	Lidia Somilleda	EEO Specialist	0260	GS-13	503-230-5587	lrsomilleda@bpa.gov
Diversity & Inclusion Officer	Maria Mondragon-Almy	Manager, Diversity & Inclusion	0301	GS-13	503-230-4986	Mdmondragon-almy@bpa.gov
Hispanic Program Manager (SEPM)	Lidia Somilleda	EEO Specialist	0260	GS-13	503-230-5587	lrsomilleda@bpa.gov
Women's Program Manager (SEPM)	Anna Neuzil	Archeologist	0193	GS-12	503-230-4642	aaneuzil@bpa.gov
Disability Program Manager (SEPM)	Ernesto Jaquez	EEO Specialist	0260	GS-13	503-230-3562	ejaquez@bpa.gov
Special Placement Program Coordinator (Individuals with Disabilities)	Pearl Phadungcharoen	Human Resources Specialist	0201	GS-13	503-230-5320	pkphadungcharoen@bpa.gov
Reasonable Accommodation Program Manager	Madeleine B. Goldfarb	Human Resources Specialist	0201	GS-13	971-335-7606	bmgoldfarb@bpa.gov
Anti-Harassment Program Manager	Philip Stanley	Human Resources Specialist	0201	GS-14	503-230-3643	psstanley@bpa.gov
ADR Program Manager	Max Pangborn	EEO Specialist	0260	GS-13	503-230-3054	mjpangborn@bpa.gov

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<b>EEO Program Staff</b>	<b>Name</b>	<b>Title</b>	<b>Occupational Series (xxxx)</b>	<b>Pay Plan and Grade (xx-xx)</b>	<b>Phone Number (xxx-xxx-xxxx)</b>	<b>Email Address</b>
Compliance Manager	Thomas McDonald	Executive Vice President, Compliance and Risk Management	0301	SES	503-230-3251	tamcdonald@bpa.gov
Principal MD-715 Preparer	Lidia Somilleda	EEO Specialist	0260	GS-13	503-230-5587	lrsomilleda@bpa.gov

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

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

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

<b>Subordinate Component</b>	<b>City</b>	<b>State</b>	<b>Country (Optional)</b>	<b>Agency Code (xxxx)</b>	<b>FIPS Codes (xxxxx)</b>

**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.

<b>Did the agency submit the following mandatory documents?</b>	<b>Please respond Yes or No</b>	<b>Comments</b>
Organizational Chart	Yes	
EEO Policy Statement	Yes	
Strategic Plan	Yes	
Anti-Harassment Policy and Procedures	Yes	
Reasonable Accommodation Procedures	Yes	
Personal Assistance Services Procedures	No	BPA utilizes a DOE contract to obtain these services.
Alternative Dispute Resolution Procedures	Yes	

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

<b>Did the agency submit the following optional documents?</b>	<b>Please respond Yes or No</b>	<b>Comments</b>
Federal Equal Opportunity Recruitment Program (FEORP) Report	No	The FEORP was not submitted for FY 2022
Disabled Veterans Affirmative Action Program (DVAAP) Report	Yes	
Operational Plan for Increasing Employment of Individuals with Disabilities under Executive Order 13548	No	The strategy used in DVAAP are also utilized for increasing employment for individuals with disabilities.
Diversity and Inclusion Plan under Executive Order 13583	Yes	
Diversity Policy Statement	No	There is not a standalone Diversity and Inclusion Policy
Human Capital Strategic Plan	Yes	
EEO Strategic Plan	No	The EEO Office utilizes the MD715 to highlight its goals, as well as its ongoing program of work.
Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey	Yes	

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## **Part E – Executive Summary**

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

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

The Civil Rights and EEO ( CREEO) Office leads BPA's efforts to maintain a model EEO program in accordance with EEOC and DOE laws, rules, regulations, policies, and practices.

#### **Civil Rights and EEO Mission**

Our mission is to create and maintain a positive discrimination, harassment and hostility free work environment, through proactive prevention and education, in which everyone can thrive.

#### **Civil Rights and EEO Principles**

1. We strive to be trustworthy stewards who provide useful information that allows people to make informed decisions about Equal Employment Opportunity and Civil Rights.
2. We will take an empathetic unbiased approach, actively listen to and- as appropriate- seek resolutions to raised concerns at the lowest possible level.
3. As we address concerns, we will be timely in our communication and interactions, as well as adhere to the standards of timeliness as outlined by the Equal Employment Opportunity Commission.
4. We will do business in a manner that is kind to our patrons, exudes honesty, and is equitable and respectful.
5. We will offer a safe place to speak in confidence; we will honor anonymity and uphold our duty to adhere to Agency policies, as well as federal laws, regulation, rules and executive orders.

### **Part E.2 - Executive Summary: Essential Element A - F**

#### **Essential Element A- Demonstrated commitment from agency leadership**

BPA's Administrator and leaders across the organization are continuously demonstrating their commitment to EEO. The BPA Administrator has set a tone through open endorsements of EEO and the CREEO Office's use, proactive engagements with the workforce regarding expectations of equity, diversity and inclusion and holding BPA supervisors to high standards relative to the implementation of EEO policies, standards and practices. On January 18, 2022, BPA Administrator signed three FY 22 Policy statements on Equal Employment Opportunity, Alternative Dispute Resolution, and Harassment and Retaliation.

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## **Essential Element B- Integration of EEO into the Agency's strategic mission**

### **Culture Office**

On September 26, 2022, BPA's executive structure changed. The realignment by Administrator and CEO, John Hairston, brings the agency's people-related and strategy functions into the same executive portfolio and refocuses the deputy administrator role. BPA's Workforce and Strategy Office will include the agency's existing Communications, Human Resources, and Civil Rights and Equal Employment Opportunity organizations.

The agency will also add two new organizations:

- The new Technology Innovation and Strategy Office will bring together strategic planning, technology research and development programs. Staff in this new office will report to the Deputy Chief Workforce and Strategy Officer, Shana Kuhn.
- The new Culture Office will focus on the agency's culture strategy, work environment, outreach, wellness, retention, employee experiences, employee engagement, and diversity and inclusion functions. The new Chief Culture Officer will oversee the new organization.

### **Culture Strategy**

In this dynamic energy industry, the needs of BPA's customers are ever-changing, and so are the demands on our workforce. We know that our customers are relying on us more than ever to anticipate their needs and respond with a sense of urgency so that they can meet the demands of their own customers. BPA needs a vibrant and engaged workforce to meet these high expectations. The agency is developing a three-part People and Culture Strategy that will outline investments in BPA's culture, workforce and capabilities so that we can deliver on our strategic goals. The first part being the Culture Strategy. The Culture Strategy defines four key focus areas designed to enhance the BPA community: developing leaders, building on existing programs, building a resilient culture and measuring progress.

The Workforce Strategy will build on an existing effort to define the optimal composition and size of BPA's workforce. This effort informs the size of BPA's ongoing federal workforce, as well as BPA's strategy and use of supplemental labor. The Capability Strategy will articulate the capabilities that we must cultivate to continue to deliver on BPA's mission into the future. With the release of the Culture Strategy, BPA adopted a fifth strategic goal: Value people and deliver results – Build a safe, positive and inclusive culture where everyone can thrive, and a workforce with the capabilities to deliver on our mission and strategy. This captures both our commitments to the workforce and our constituents.

## **Essential Element C- Management and program accountability**

CREEO has established procedures to prevent all forms of EEO discrimination. The BPA Administrator holds all managers, supervisors, and the EEO Director responsible for the effective implementation of the agency's EEO program and plan. The BPA Administrator issues an annual policy statement on Harassment and Retaliation.

A firewall between the anti-harassment coordinator and the EEO Director was created in FY 22 to comply with MD-715 requirements. BPA has a comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance. Employees have an annual anti-harassment 1-hour training requirement.

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## **Essential Element D- Proactive Prevention**

BPA has intentionally increased efforts to proactively engage the workforce about equal employment opportunity (EEO). Early resolution resources are being utilized, CREEO education and resources are readily available to the workforce and there is constant collaboration, as appropriate, with various entities who have responsibilities to manage work environment issues.

The Office of Personnel Management provides that all federal employees government-wide receive Equal Employment Opportunity training on a frequent basis. Additionally, organizations are required to communicate equal employment opportunity policy and programs.

Preventing employment discrimination from occurring at Bonneville Power Administration is preferable to trying to deal with the consequences of discrimination. The Civil Rights and Equal Employment Opportunity Office is committed to providing training and technical assistance, outreach and educational programs to assist employees and stakeholder groups understand and prevent discrimination. We believe that discrimination can be averted if managers and their employees know their legal rights and responsibilities.

## **Essential Element E- Efficiency**

BPA has done a great job of providing early resolution resources through Shared Neutrals, the DOE and individual mediators. The organization maintains an impartial approach to working with management and non-management employees in an effort to help them resolve workplace conflict, as well as strategize to avoid unhealthy workplace conflicts that have the potential to permanently fracture relationships and impair mission effectiveness.

BPA Administrator, John Hairston, issues an annual notice on Alternative Dispute Resolution Policy.

The Civil Rights and EEO Office prides itself on maintaining a fair and impartial EEO complaints program. CREEO ensures that employees who engage in the informal EEO complaint process are informed of their rights and responsibilities. Information related to the EEO complaint process is also prominently displayed on the CREEO webpage.

Both CREEO and the Office of General Counsel (OGC) ensure that there is a clear separation between the impartial EEO complaint process, managed by CREEO and OGC's general litigation function.

## **Essential Element F- Responsiveness and Legal Compliance**

The CREEO Office at BPA has EEO program oversight. The program is managed in accordance with EEO laws and statutes. The CREEO Office also ensures alignment with the EEOC's six (6) essential elements of a model EEO program. Responsiveness to EEO matters and workplace conflicts and legal compliance addressing, correcting, implementing and monitoring EEO and potential EEO activities are at the core of all programs and functions executed.

### **Part E.3 - Executive Summary: Workforce Analyses**

Workforce tables are included in this report, but a workforce analysis was not conducted due to the vacant MD-715 preparer position.



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## **Part E.4 - Executive Summary: Accomplishments**

While the FY 22 MD 715 contains the four triggers and barriers discovered and reported in FY 2018, achieving and completing the planned activities has been the sole focus of the CREEO and BPA stakeholders. The FY 22 report contains a comprehensive listing of accomplishments towards removing the following barriers identified in 2018:

- **Barrier 1:** Data shows that minorities are not hired at a rate consistent with the rate at which they apply for jobs. These inconsistencies call to question whether there is a hiring bias.
- **Barrier 2:** Inclusion rates for minorities in BPA's mission critical occupations are not congruent with their overall representation in the workforce at large or the NCLF; this result calls to question institutional and/or attitudinal barriers that exist about the abilities and interests of these demographics to conduct mission essential work.
- **Barrier 3:** While PWD comprise 10% of the workforce, 31% of the EEO cases cite a disability as the basis.
- **Barrier 4:** A large segment of the workforce demonstrate a lack of competencies in the principles of diversity and inclusion, as well as equal employment opportunity as evidenced by data such as: EEO complaints; Workforce Concerns Hotline calls; D&I training evaluations; FEVS; exit interviews; and other work environment assessments and data.

### **Barrier 1 Accomplishments**

- The Diversity and Inclusion (D&I) Office facilitated a class on Managing a Diverse Workforce for managers/supervisors, which have components of unconscious bias.
  - Managing a Diverse Workforce – 9/8/2022 with 209 participants.
  - Unconscious Bias Equity Class – 3/9/2022 with 24 participants.
- HR has created a set of classes on conducting virtual interviews and one on MSP and PPP. In FY 22 the D&I office offered the following classes related to unconscious bias: Fostering Belonging in the workforce, bias and trauma, braining diversity, countering bias in practices.
- Elements of Unconscious Bias were added to BPA's Aspiring Managers Program per the request of the Leadership Development Program Manager in 2020. First Aspiring Managers training were provided in 2022 with the new unconscious bias element.
- In FY 22, the D&I office completed one class of Inclusive Leadership training with 18 participants. Inclusive Leadership training will be added to the new supervisors training at BPA for FY23.

### **Barrier 2 Accomplishments**

- BPA hired a Culture and Outreach Specialist in 2022. The specialist will be reviewing and developing an outreach strategy to target underrepresented groups in 2023.
- The D&I Office launched the Inclusion Lens, a tool for increasing equity and inclusion in the workplace. An Inclusion Lens is a tool that can be used daily to:
  - Strengthen everyone's awareness of and ability to incorporate differences.
  - Create teams that are relevant to and representative of the communities that we serve.
  - Create energizing and innovative work environments.
  - Collectively address systemic barriers and inequities.
  - Support respect and dignity in our work environment.

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- Executive Team Members were required to host an Inclusion Lens Action Session with their leadership team in FY 22. One hundred percent (100%) of the Executive Team members completed this requirement.
- HCM has been educating managers/supervisors on the many different hiring authorities through their Strategic Business Partners. This process is ongoing and will continue in FY23.
- In FY 22, the Career Path initiative was completed.
- Managers have the ability to post interest announcements on the Intranet. In FY 22, Recruitment and Placement improved job announcement communication by requiring that all job announcements regardless if they are internal or external are sent to the EEO office, Diversity & Inclusion, Business Partners and the hiring manager. This will better announce our positions with BPA internal and external contacts.

**Barrier 3 Accomplishments**

- BPA hired a Culture and Outreach Specialist in 2022, who will focus on producing a new strategic outreach plan.
- The Local Reasonable Accommodation Coordinator (LRAC) worked with the Information Technology organization to:
  - Approve RCC as a service for BPA post the removal of FedRelay as an option for relay captioning services.
  - Consistently provide Captioning services, to deaf and hard of hearing employees, for remote trainings and event offerings as a result of increased visibility of the option to all employees with disabilities through publicizing the availability of reasonable accommodation on all event media and publicity materials.
  - Continue the development of the software library for adding five (5) products to be available for employees with a disability, total 21.
- In collaboration with the Civil Rights and Equal Employment Opportunity organization, the Local Reasonable Accommodation Coordinator:
  - Provided training on Religious Accommodation and Religious Discrimination.
  - Provided two (2) trainings on COVID and Reasonable Accommodation.
  - Provided the disability harassment portion of four trainings on Anti-Harassment.
  - Coordinated the approval of EEO credit for reasonable accommodation trainings through the BPA system to enhance the visibility and value of receiving RA subject trainings to all employees.
- The LRAC worked with the Safety organization to enable the receipt of required Safety credits for the Psychological Health 4 Safety presentation. The LRAC presented Psychological Health and Safety 12 times to BPA organizations.
- In collaboration with BPA's HR Training group, the LRAC supported the development and efforts toward 508 compliance for all remote training products at BPA by providing trainings (2); consultation sessions (5) and information to the training group (accessed through 508.gov).
- The Recruitment and Placement organization continues to maintain a non-competitive (NC) applicant registry available to both employees and non-employees. All job openings are evaluated for potential qualified NC applicants and corresponding selection certificates provided to managers for consideration. Employees eligible under Schedule A, which may include targeted disabilities, may register for this registry to be considered for positions, including career advancement opportunities.

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- BPA's Human Resources Service Center conducted a review and found there are no occupations at BPA that preclude all targeted disabilities. However, each situation must be reviewed on a case-by-case basis as part of the Reasonable Accommodation program as it is dependent upon the severity of the individual disability.

**Barrier 4 Accomplishments**

- In FY 22, 96.4% of BPA employees completed the EEO training requirement.  
The following Civil Rights and EEO training sessions were offered to employees:

ADR 3rd Party Dispute Resolutn	Mngmt Role-EEO Informal Compl
Anti-Harassment: PM#102 Mngr	Movie 9 to 5:Story of Movement
Being an Upstander & Finding..	Navigating-Formal EEO Process
Benefits of Utilizing OST...	Overview of Retaliation
Chinese Diaspora in Oregon	PPP - Whistleblower
Civil Rights & EEO Overview	Pronoun/Gender Language Wrkplc
Combating a Hostile Work Envir	Reasonable Accommodation Mgrs
Conflict Resolution Techniques	Reasonable Accommodations Mgrs
Confronting Workplace Conflict	Roadmap to Success...
Disability Inclusion Training	Steps to Removing Barriers-EEO
Discrimin Free Wrkplc - Mngrs	Tell Them We Are Rising...
EEO - ADR Program Overview	The EEO Complaint Process
EEO & AH Complaint Differences	Treasures from Aztlan Hispanic
EEO Complaints Process	Unpacking Retaliation
Effctv Communi for Supervisors	Virtual Tour - Jim Crow Museum
Effctv Communi Non-Supervisors	WE Series: Anti-Harassment-EEO
First Foods & Climate Resilien	WE Series: Workplace Bullying
From Coveralls to Zoot Suits..	What Know About Wrkpl Violence
Harassment Prevention	Workplace Harassment Prevention
Hiring and Interviewing - EEO	
History of LGBTQ2SIA + Rights	
Inappropriate Behavior-Harassm	
Landscape of LGBTQ Law/Policy	

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- In FY 22, 99% of BPA employees completed the diversity training requirement, which exceeded the 97% goal that was set. The following diversity training sessions were offered to employees:

A Day of Remembrance/Reflectio	Justice40: Equitable Energy Fu
ABA 21-Day Racial Equity...	Let's Talk: Native Voices BPA
Accessibility & Section 508 Aw	Managing a Diverse Workforce
Accessibility & WCAG Complianc	Mindful Journey of Exploration
Adv AAPI Leadership: Intro...	Moving Beyond Impostor Syndrom
Are you Latinx? Complex-Langua	NW Public Employees Diversity
Be the Bridge:Foster Belonging	Outwitting Your Cognitive Bias
Bias and Trauma	Overcome Uncons Bias in Wrkplc
BPA & Daimler Advance AAPI Ldr	Overcoming Your Own Unconsciou
Braining Diversity...Neuroscie	Pandemic Adapt: How you doing?
Bridging the Diversity Gap	Prep by Cultivating...Mind
Confronting Workplace Conflict	Promoting Respect-Wrkplc Empl
Countering Bias in People/Prac	Promoting Respect-Wrkplc Mngrs
Crucial Conversation multi-day	Psychological Safety at Work
Demystifying Privilege:Think..	Radical Empathy...
Develop a Mindset - Resilience	Reframing Inequities:Analy-Act
Dia de los Muertos	Reparations: Documentary Movie
Envir/Social Justice - Indian	SLMS - E-CHP Diversity
Federal Indian Policy	Tribal Affairs
From Reservations to Homelands	Tribal Affairs Training
Global Diversity	Tribes & The Supreme Court
Holocaust Remembrance - Loeb	Unconscious Bias:Recruiting...
Inclusion Lens Action Session	Understanding Unconscious Bias
Inclusive Ldrshp for Managers	Unfurling Rainbow Flag-LGBTQ
Indian Classical Dance, Histor	Veteran's Day Recognition...
Indigenous Response-Climate...	Women at Work: Impact-Pandemic
Journey to Become a Woman	Worldview Perspectives...

- Respect and Dignity was included in the supervisory element in FY 22.
- Executive Team members were required to host an Inclusion Lens action session with their leadership team in FY 22. Forty-two (42) sessions were completed with over 425 participants.
- One customized manager training “Managing a Diverse Workforce” was developed based on the cultural assessment results with 209 HRMIS completions and 224 BPA WebEx participants.
- Inclusive leaders training for aspiring managers/supervisors and new supervisors.
- Individual coaching to help federal employees and contract personnel address crucial conversations and further build people and leadership skills. Focus areas included:
  - Crucial Conversations coaching
  - Diversity and Inclusion guidance and support
  - Inclusive leadership coaching
  - Mental health and wellbeing coaching
  - Personal development coaching
  - Team dynamics consultation and facilitation

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- The Cultural Assessment was completed in FY 22 and the results were shared with the workforce.
- Developed a job aide for managers on special hiring authorities that is available on the Reasonable accommodation SharePoint and is advertised and utilized in all manger reasonable accommodation trainings.
- The LRAC is a recruiter for the Federal WRP Workplace Recruitment Program conducting interviews of student and recent graduates with disabilities to support their inclusion into BPA and greater federal service ensuring they have an understanding of the special hiring authorities.

## **Part E.5 - Executive Summary: Planned Activities**

In FY 2023, the MD-715 stakeholders will work on the following areas of deficiencies, triggers (disparities), and barriers identified in this year's report:

1. Assess the Triggers and Barriers identified in FY 2018.
2. Hire a MD-715 EEO Specialist.
3. EEO Director will request to meet regularly with the HR Director.
4. EEO Office will establish a schedule to review possible systemic barriers in BPA's merit promotion program, employee recognition, and employee development programs.
5. EEO Office will work with Recruitment and Placement team to ensure that applicant flow data is available in a timely manner.

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

I, **Shana L. Kuhn** **Civil Rights and EEO, Manager (Acting)/0340/GS-15** am the

**Principal EEO Director/  
Official for** **Bonneville Power Administration (BPA)**

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.

**SHANA KUHN**

Digitally signed by SHANA KUHN  
Date: 2023.05.25 22:28:07 -07'00'

05/25/2023

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

Date



05/30/2023

Signature of Agency Head or Agency Head Designee

Date

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

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

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

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

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





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

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

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

<b>Essential Element A: DEMONSTRATED COMMITMENT FROM AGENCY LEADERSHIP</b>				
<b>This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.</b>				
 Compliance Indicator		Measure Met? (Yes/No/NA)	Comments	Current Part G Questions
 Measures				
<b>A.1.a</b>	Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "yes", please provide the annual issuance date in the comments column. [see MD-715, II(A)]	Yes	January 18, 2022	A.1.a.2
<b>A.1.b</b>	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 CFR § 1614.101(a)]	Yes		New
 Compliance Indicator		Measure Met? (Yes/No/NA)	Comments	
 Measures				
<b>A.2.a</b>	Does the agency disseminate the following policies and procedures to all employees:	Yes		
<b>A.2.a.1</b>	Anti-harassment policy? [see MD 715, II(A)]	Yes		New
<b>A.2.a.2</b>	Reasonable accommodation procedures? [see 29 C.F.R § 1614.203(d)(3)]	Yes		New
<b>A.2.b</b>	Does the agency prominently post the following information throughout the workplace and on its public website:	Yes		





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<b>A.2.b.1</b>	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [see 29 C.F.R § 1614.102(b)(7)]	Yes		New
<b>A.2.b.2</b>	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	Yes		A.2.c
<b>A.2.b.3</b>	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	Yes	<a href="https://connection.bud.bpa.gov/employee-center/reasonable-accommodation">https://connection.bud.bpa.gov/employee-center/reasonable-accommodation</a>	A.3.c
<b>A.2.c</b>	Does the agency inform its employees about the following topics:	Yes		
<b>A.2.c.1</b>	EEO complaint process? [see 29 CFR §§ 1614.102(a)(12) and 1614.102(b)(5)] If “yes”, please provide how often.	Yes	Annually	A.2.a
<b>A.2.c.2</b>	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	Yes	Annually	New
<b>A.2.c.3</b>	Reasonable accommodation program? [see 29 CFR § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	Yes	Annually	New
<b>A.2.c.4</b>	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.	Yes	Annually	New
<b>A.2.c.5</b>	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 CFR § 2635.101(b)] If “yes”, please provide how often.	N/A	Disciplinary actions are within Employee and Labor Relations’ jurisdiction.	A.3.b
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>A.3 – The agency assesses and ensures EEO principles are part of its culture.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	<b>New Compliance Indicator</b>
<b>A.3.a</b>	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [see 29 CFR § 1614.102(a) (9)] If “yes”, provide one or two examples in the comments section.	Yes	BPA has an EEO and Diversity category in the Administrator’s Excellence Award.	New
<b>A.3.b</b>	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [see 5 CFR Part 250]	Yes		New



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<b>Essential Element B: INTEGRATION OF EEO INTO THE AGENCY'S STRATEGIC MISSION</b>				
<b>This element requires that the agency's EEO programs are structured to maintain a workplace that is free from discrimination and support the agency's strategic mission.</b>				
 Compliance Indicator		Measure Met? (Yes/No/NA)	Comments	
 Measures				
<b>B.1.a</b>	Is the agency head the immediate supervisor of the person ("EEO Director") who has day-to-day control over the EEO office? [see 29 CFR §1614.102(b)(4)]	No		B.1.a
<b>B.1.a.1</b>	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If "yes," please provide the title of the agency head designee in the comments.	Yes	The EEO Director reports to the Chief Workforce and Strategy Officer	New
<b>B.1.a.2</b>	Does the agency's organizational chart clearly define the reporting structure for the EEO office? [see 29 CFR §1614.102(b)(4)]	Yes		B.1.d
<b>B.1.b</b>	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency and legal compliance of the agency's EEO program? [see 29 CFR §1614.102(c)(1); MD-715 Instructions, Sec. I]	Yes		B.2.a
<b>B.1.c</b>	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [see MD-715 Instructions, Sec. I] If "yes", please provide the date of the briefing in the comments column.	Yes	June 13, 2022	B.2.b



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<b>B.1.d</b>	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [see MD-715, II(B)]	Yes		New
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.2 – The EEO Director controls all aspects of the EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments New Compliance Indicator</b>	
<b>B.2.a</b>	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [see MD-110, Ch. 1(III)(A); 29 CFR §1614.102(c)]	Yes		B.3.a
<b>B.2.b</b>	Is the EEO Director responsible for overseeing the completion of EEO counseling [see 29 CFR §1614.102(c)(4)]	Yes		New
<b>B.2.c</b>	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	Yes		New
<b>B.2.d</b>	Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [see 29 CFR §1614.102(c)(5)] [This question may not be applicable for certain subordinate level components.]	N/A	DOE's EEO Office drafts and issues all Final Agency Decisions. BPA submits requests for Final Agency Decisions in a timely manner.	New
<b>B.2.e</b>	Is the EEO Director responsible for ensuring compliance with EEOC orders? [see 29 CFR §§ 1614.102(e); 1614.502]	Yes		F.3.b
<b>B.2.f</b>	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [see 29 CFR §1614.102(c)(2)]	Yes		New
<b>B.2.g</b>	If the agency has subordinate level components, does the EEO Director provide effective guidance and coordination for the components? [see 29 CFR §§ 1614.102(c)(2) and (c)(3)]	N/A		New



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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	
<b>B.3.a</b>	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [see MD-715, II(B)]	Yes		B.2.c & B.2.d
<b>B.3.b</b>	Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [see MD-715, II(B)] If "yes", please identify the EEO principles in the strategic plan in the comments column.	Yes	With the release of the Culture Strategy, BPA adopted a fifth strategic goal: Value people and deliver results – Build a safe, positive and inclusive culture where everyone can thrive, and a workforce with the capabilities to deliver on our mission and strategy. This captures both our commitments to the workforce and our constituents.	New

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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	
<b>B.4.a</b>	Pursuant to 29 CFR §1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:			
<b>B.4.a.1</b>	to conduct a self-assessment of the agency for possible program deficiencies? [see MD-715, II(D)]	No	The MD715 EEO Specialist Position is adequately funded, but not staffed due to departure of staff member. Work is under way to fill this position now.	B.3.b
<b>B.4.a.2</b>	to enable the agency to conduct a thorough barrier analysis of its workforce? [see MD-715, II(B)]	No	The MD715 EEO Specialist Position is adequately funded but not staffed due to departure of staff member. Work is under way to fill this position now.	B.4.a
<b>B.4.a.3</b>	to timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [see 29 CFR § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	Yes		E.5.b





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<b>B.4.a.4</b>	to provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [see MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.	Yes		B.4.f & B.4.g
<b>B.4.a.5</b>	to conduct thorough, accurate, and effective field audits of the EEO programs in components and the field offices, if applicable? [see 29 CFR §1614.102(c)(2)]	N/A		E.1.c
<b>B.4.a.6</b>	to publish and distribute EEO materials (e.g. harassment policies, EEO posters, reasonable accommodations procedures)? [see MD-715, II(B)]	Yes		B.4.c
<b>B.4.a.7</b>	to maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [see MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section.	Yes	Applicant Flow data is not readily available.	New
<b>B.4.a.8</b>	to effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]	Yes		B.3.c, B.3.c.1, B.3.c.2, & B.3.c.3
<b>B.4.a.9</b>	to effectively manage its anti-harassment program? [see MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes	In FY 22, BPA's anti-harassment program was transferred over to Employee & Labor Relations.	New
<b>B.4.a.10</b>	to effectively manage its reasonable accommodation program? [see 29 CFR § 1614.203(d)(4)(ii)]	Yes	RA is within HCM's jurisdiction.	B.4.d
<b>B.4.a.11</b>	to ensure timely and complete compliance with EEOC orders? [see MD-715, II(E)]	Yes		New
<b>B.4.b</b>	Does the EEO office have a budget that is separate from other offices within the agency? [see 29 CFR § 1614.102(a)(1)]	Yes		New
<b>B.4.c</b>	Are the duties and responsibilities of EEO officials clearly defined? [see MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Yes		B.1.b



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<b>B.4.d</b>	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?	Yes		E.2.d
<b>B.4.e</b>	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	Yes		E.2.e
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b> <b>New Indicator</b>	
<b>B.5.a</b>	Pursuant to 29 CFR § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:			
<b>B.5.a.1</b>	EEO Complaint Process? [see MD-715(II)(B)]	Yes		New
<b>B.5.a.2</b>	Reasonable Accommodation Procedures? [see 29 C.F.R. § 1614.102(d)(3)]	Yes	RA is in the jurisdiction of Employee & Labor Relations	A.3.d
<b>B.5.a.3</b>	Anti-Harassment Policy? [see MD-715(II)(B)]	Yes		New
<b>B.5.a.4</b>	Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [see MD-715, II(B)]	Yes		New
<b>B.5.a.5</b>	ADR, with emphasis on the federal government’s interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [see MD-715(II)(E)]	Yes		E.4.b
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.6 – The agency involves managers in the implementation of its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b> <b>New Indicator</b>	
<b>B.6.a</b>	Are senior managers involved in the implementation of Special Emphasis Programs? [see MD-715 Instructions, Sec. I]	Yes		New
<b>B.6.b</b>	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	Yes		D.1.a

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<b>B.6.c</b>	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [see MD-715 Instructions, Sec. I]	Yes		D.1.b
<b>B.6.d</b>	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 CFR § 1614.102(a)(5)]	Yes		D.1.c
<b>Essential Element C: MANAGEMENT AND PROGRAM ACCOUNTABILITY</b> <b>This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency's EEO Program and Plan.</b>				
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.1 – The agency conducts regular internal audits of its component and field offices.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	
<b>C.1.a</b>	Does the agency regularly assess its component and field offices for possible EEO program deficiencies? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	N/A		New
<b>C.1.b</b>	Does the agency regularly assess its component and field offices on their efforts to remove barriers from the workplace? [see 29 CFR §1614.102(c)(2)] If "yes", please provide the schedule for conducting audits in the comments section.	N/A		New
<b>C.1.c</b>	Do the component and field offices make reasonable efforts to comply with the recommendations of the field audit? [see MD-715, II(C)]	N/A		New



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 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments  New Indicator</b>	
<b>C.2.a</b>	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [see MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	Anti-harassment policy was issued on April 1, 2022. Anti-harassment procedures are listed on BPA's internal webpage.	New
<b>C.2.a.1</b>	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	Yes		New
<b>C.2.a.2</b>	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [see EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	Yes	The Anti-harassment program was moved under Employee & Labor Relations and the PM is an Employee Relations Specialist.	New
<b>C.2.a.3</b>	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [see Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes		New
<b>C.2.a.4</b>	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [see Enforcement Guidance, V.C.]	Yes	EEO and Employee & Labor Relations have a collaborative relationship.	New



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<b>C.2.a.5</b>	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <u>Complainant v. Dep't of Veterans Affairs</u> , EEOC Appeal No. 0120123232 (May 21, 2015); <u>Complainant v. Dep't of Defense (Defense Commissary Agency)</u> , EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.	Yes	Timelines for inquiry are set in the DOE PM # 102 The Prevention and Elimination of Harassing Conduct which is the guidance authority for BPA's Anti-Harassment Program.	New
<b>C.2.a.6</b>	Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR 1614.203(d)(2)]	Yes		New
<b>C.2.b</b>	Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [see 29 CFR 1614.203(d)(3)]	Yes	RA is in the jurisdiction of HCM at BPA. The RA program is managed in alignment with DOE RA processes, procedures and standards.	New
<b>C.2.b.1</b>	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [see 29 CFR 1614.203(d)(3)(D)]	Yes	BPA has a Local Reasonable Accommodation Coordinator.	E.1.d
<b>C.2.b.2</b>	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [see MD-110, Ch. 1(IV)(A)]	Yes	The Reasonable Accommodation Program Manager resides in the Employee Relations program.	New

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<b>C.2.b.3</b>	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [see 29 CFR 1614.203(d)(1)(ii)(B)]	Yes	As set forth in DOE Policy Memorandum #100	New
<b>C.2.b.4</b>	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR 1614.203(d)(3)(i)(M)]	Yes	As set forth in DOE Policy Memorandum #100	New
<b>C.2.b.5</b>	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed requests in the comments column.	Yes	As set forth in DOE Policy Memorandum #100	E.1.e
<b>C.2.c</b>	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR 1614.203(d)(6)]	Yes	As set forth in DOE Policy Memorandum #100	New
<b>C.2.c.1</b>	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR § 1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column.	Yes	<a href="http://www.bpa.gov">Reasonable Accommodation - Bonneville Power Administration (bpa.gov)</a>	New
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	<b>New Indicator</b>
<b>C.3.a</b>	Pursuant to 29 CFR §1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?	Yes		New
<b>C.3.b</b>	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities:			



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<b>C.3.b.1</b>	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [see MD-110, Ch. 3.I]	Yes		A.3.a.1
<b>C.3.b.2</b>	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [see 29 CFR §1614.102(b)(6)]	Yes		A.3.a.4
<b>C.3.b.3</b>	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [see MD-715, II(C)]	Yes		A.3.a.5
<b>C.3.b.4</b>	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [see MD-715 Instructions, Sec. I]	Yes		A.3.a.6
<b>C.3.b.5</b>	Provide religious accommodations when such accommodations do not cause an undue hardship? [see 29 CFR §1614.102(a)(7)]	Yes		A.3.a.7
<b>C.3.b.6</b>	Provide disability accommodations when such accommodations do not cause an undue hardship? [ see 29 CFR §1614.102(a)(8)]	Yes		A.3.a.8
<b>C.3.b.7</b>	Support the EEO program in identifying and removing barriers to equal opportunity. [see MD-715, II(C)]	Yes		New
<b>C.3.b.8</b>	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]	Yes		A.3.a.2
<b>C.3.b.9</b>	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [see MD-715, II(C)]	Yes		New



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<b>C.3.c</b>	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [see 29 CFR §1614.102(c)(2)]	Yes		New
<b>C.3.d</b>	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [see 29 CFR §1614.102(c)(2)]	Yes		New
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	
<b>C.4.a</b>	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [see 29 CFR §1614.102(a)(2)]	No		New
<b>C.4.b</b>	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [see MD-715 Instructions, Sec. I]	No	Civil Rights and EEO Office will work with BPA's HRSC to establish such reviews.	C.2.a, C.2.b, & C.2.c
<b>C.4.c</b>	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [see 29 CFR §1614.601(a)]	Yes	CREEO has access to workforce demographic data, but does not receive applicant flow data in a timely manner.	New





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<b>C.4.d</b>	Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [see MD-715, II(C)]	Yes		New
<b>C.4.e</b>	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:			
<b>C.4.e.1</b>	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 CFR §1614.203(d); MD-715, II(C)]	Yes		New
<b>C.4.e.2</b>	Develop and/or conduct outreach and recruiting initiatives? [see MD-715, II(C)]	Yes		New
<b>C.4.e.3</b>	Develop and/or provide training for managers and employees? [see MD-715, II(C)]	Yes		New
<b>C.4.e.4</b>	Identify and remove barriers to equal opportunity in the workplace? [see MD-715, II(C)]	Yes		New
<b>C.4.e.5</b>	Assist in preparing the MD-715 report? [see MD-715, II(C)]	Yes		New
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	
<b>C.5.a</b>	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [see 29 CFR § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)]	Yes	Disciplinary policies and the table of penalties are in HCM's jurisdiction.	C.3.a.



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<b>C.5.b</b>	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [see 29 CFR §1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Yes	0	C.3.c
<b>C.5.c</b>	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [see MD-715, II(C)]	Yes		New
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.6 – The EEO office advises managers/supervisors on EEO matters.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	
<b>C.6.a</b>	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [see MD-715 Instructions, Sec. I] If “yes”, please identify the frequency of the EEO updates in the comments column.	Yes	Annually	C.1.a
<b>C.6.b</b>	Are EEO officials readily available to answer managers’ and supervisors’ questions or concerns? [see MD-715 Instructions, Sec. I]	Yes		New
<b>Essential Element D: PROACTIVE PREVENTION</b>				
<b>This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.</b>				
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	
<b>D.1.a</b>	Does the agency have a process for identifying triggers in the workplace? [see MD-715 Instructions, Sec. I]	Yes		New

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<b>D.1.b</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		New
<b>D.1.c</b>	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR 1614.203(d)(1)(iii)(C)]	Yes	BPA's Culture Office conducts Exit Interviews as well as stay and onboarding surveys.	New
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b> <b>New Indicator</b>	
<b>D.2.a</b>	Does the agency have a process for analyzing the identified triggers to find possible barriers? [see MD-715, (II)(B)]	Yes		New
<b>D.2.b</b>	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [see 29 CFR §1614.102(a)(3)]	Yes		B.2.c.2
<b>D.2.c</b>	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [see 29 CFR §1614.102(a)(3)]	Yes		B.2.c.1





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<b>D.2.d</b>	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable accommodation program; anti-harassment program; and/or external special interest groups? [see MD-715 Instructions, Sec. I] If “yes”, please identify the data sources in the comments column.	Yes	Complaint data, exit surveys, employee climate surveys, program evaluations, special emphasis programs.	New
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.3 – The agency establishes appropriate action plans to remove identified barriers.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b> <b>New Indicator</b>	
<b>D.3.a.</b>	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [see 29 CFR §1614.102(a)(3)]	Yes		New
<b>D.3.b</b>	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [see MD-715, II(D)]	Yes		New
<b>D.3.c</b>	Does the agency periodically review the effectiveness of the plans? [see MD-715, II(D)]	Yes		New
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b> <b>New Indicator</b>	
<b>D.4.a</b>	Does the agency post its affirmative action plan on its public website? [see 29 CFR 1614.203(d)(4)] Please provide the internet address in the comments.	Yes	<a href="https://www.bpa.gov/about/careers/office-of-civil-rights-eeo">https://www.bpa.gov/about/careers/office-of-civil-rights-eeo</a>	New

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<b>D.4.b</b>	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [see 29 CFR 1614.203(d)(1)(i)]	Yes		New
<b>D.4.c</b>	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [see 29 CFR 1614.203(d)(1)(ii)(A)]	Yes		New
<b>D.4.d</b>	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [see 29 CFR 1614.203(d)(7)(ii)]	Yes		New
<b>Essential Element E: EFFICIENCY</b>				
<b>This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency's EEO programs and an efficient and fair dispute resolution process.</b>				
 <b>Compliance Indicator</b>	<b>E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	
 <b>Measures</b>				
<b>E.1.a</b>	Does the agency timely provide EEO counseling, pursuant to 29 CFR §1614.105?	Yes		E.3.a.1
<b>E.1.b</b>	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 CFR §1614.105(b)(1)?	Yes		E.3.a.2
<b>E.1.c</b>	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?	Yes		New
<b>E.1.d</b>	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments.	Yes	15-30 days	New



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<b>E.1.e</b>	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 CFR §1614.102(b)(6)?	Yes		New
<b>E.1.f</b>	Does the agency timely complete investigations, pursuant to 29 CFR §1614.108?	Yes		E.3.a.3
<b>E.1.g</b>	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 CFR §1614.108(g)?	Yes		New
<b>E.1.h</b>	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 CFR §1614.110(b)?	N/A	Final Agency Decisions are drafted and issued by DOE's EEO Office.	E.3.a.4
<b>E.1.i</b>	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 CFR §1614.110(a)?	N/A	Final actions are drafted and issued by DOE's EEO Office.	E.3.a.7
<b>E.1.j</b>	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes", please describe how in the comments column.	Yes	Contractors are held accountable for delay and EEO counseling and investigative services in accordance with 41 CFR 60-1.1. This is often not an issue.	E.2.c
<b>E.1.k</b>	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes		New
<b>E.1.l</b>	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 CFR § 1614.403(g)]	Yes		New



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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.2 – The agency has a neutral EEO process.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments Revised Indicator</b>	
<b>E.2.a</b>	Has the agency established a clear separation between its EEO complaint program and its defensive function? [see MD-110, Ch. 1(IV)(D)]	Yes	There is a firewall as the CREEO office has an internal legal review process and when required or necessary legal sufficiency reviews are conducted by the legal department which is a separate and independent function from the CREEO office.	New
<b>E.2.b</b>	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency 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	William Garrett, EEO Consulting Services	E.6.a
<b>E.2.c</b>	If the EEO office relies on the agency’s defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [see MD-110, Ch. 1(IV)(D)]	Yes		New
<b>E.2.d</b>	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [see MD-110, Ch. 1(IV)(D)]	Yes		E.6.b
<b>E.2.e</b>	If applicable, are processing time frames incorporated for the legal counsel’s sufficiency review for timely processing of complaints? [see EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)]	Yes		E.6.c



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 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	
<b>E.3.a</b>	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [see 29 CFR §1614.102(b)(2)]	Yes		E.4.a
<b>E.3.b</b>	Does the agency require managers and supervisors to participate in ADR once it has been offered? [see MD-715, II(A)(1)]	Yes	Managers and supervisors are required to participate in ADR when ADR is appropriate in accordance with MD-110 standards.	E.4.c
<b>E.3.c</b>	Does the agency encourage all employees to use ADR, where ADR is appropriate? [see MD-110, Ch. 3(IV)(C)]	Yes		D.2.a
<b>E.3.d</b>	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [see MD-110, Ch. 3(III)(A)(9)]	Yes	While managers may have (monetary) settlement authority, they are not allowed to use their authority to settle disputes in which they are directly involved.	New
<b>E.3.e</b>	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [see MD-110, Ch. 3(I)]	Yes		E.4.d
<b>E.3.f</b>	Does the agency annually evaluate the effectiveness of its ADR program? [see MD-110, Ch. 3(II)(D)]	Yes		New



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 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	
	<b>E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.</b>			
<b>E.4.a</b>	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:	Yes		
<b>E.4.a.1</b>	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [see MD-715, II(E)]	Yes		E.5.a
<b>E.4.a.2</b>	The race, national origin, sex, and disability status of agency employees? [see 29 CFR §1614.601(a)]	Yes		E.5.c
<b>E.4.a.3</b>	Recruitment activities? [see MD-715, II(E)]	N/A	Recruitment is an HCM function. EEO does not have access to the database to be able to determine or measure success. CREEO assist with outreach.	E.5.f
<b>E.4.a.4</b>	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [see MD-715, II(E)]	No	EEO does not have access to the applicant flow database. HCM retrieves applicant flow data, but not in a timely manner.	New
<b>E.4.a.5</b>	The processing of requests for reasonable accommodation? [29 CFR § 1614.203(d)(4)]	Yes		New
<b>E.4.a.6</b>	The processing of complaints for the anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	Yes		New
<b>E.4.b</b>	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Yes		New





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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	
<b>E.5.a</b>	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	CREEO monitors trends in its EEO program on a regular basis to ensure it is meeting its obligations. Reports are run in the iCompliance System. This information is also used in training of managers and employees to identify common trends.	E.5.e
<b>E.5.b</b>	Does the agency review other agencies’ best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [see MD-715, II(E)] If “yes”, provide an example in the comments.	Yes	CREEO reviews other agencies best practices on a regular bases as part of it's continuous improvement efforts.	E.5.g
<b>E.5.c</b>	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [see MD-715, II(E)]	Yes		E.3.a

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<b>Essential Element F: RESPONSIVENESS AND LEGAL COMPLIANCE</b>				
<b>This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.</b>				
 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	
<b>F.1.a</b>	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [see 29 CFR §1614.102(e); MD-715, II(F)]	Yes		F.1.a
<b>F.1.b</b>	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [see MD-715, II(F)]	Yes		E.3.a.6
<b>F.1.c</b>	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [see MD-715, II(F)]	Yes		F.2.a.1
<b>F.1.d</b>	Are procedures in place to process other forms of ordered relief promptly? [see MD-715, II(F)]	Yes		F.2.a.2
<b>F.1.e</b>	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [see MD-110, Ch. 9(IX)(H)]	Yes		F.3.a.
 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	
<b>F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.</b>				
<b>F.2.a</b>	Does the agency timely respond and fully comply with EEOC orders? [see 29 CFR §1614.502; MD-715, II(E)]	Yes		C.3.d
<b>F.2.a.1</b>	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [see 29 CFR §1614.108(g)]	Yes	<b>Indicator moved from E-III Revised</b>	E.3.a.5



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<b>F.2.a.2</b>	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [see 29 CFR §1614.501]	Yes		E.3.a.7
<b>F.2.a.3</b>	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [see 29 CFR §1614.403(e)]	Yes		New
<b>F.2.a.4</b>	Pursuant to 29 CFR §1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes		F.3.d (1 to 9)
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.3 - The agency reports to EEOC its program efforts and accomplishments.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	
<b>F.3.a</b>	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), §203(a)]	Yes		New
<b>F.3.b</b>	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 CFR §1614.703(d)]	Yes		New

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**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.

**Statement of Model Program Essential Element Deficiency**

Type of Program Deficiency	Brief Description of Program Deficiency
<b>Essential Element B:</b> Integration of EEO into the Agency's Strategic Mission	<p><b>(B.1.a)</b> The Civil Rights and EEO Manager does not report to the agency head.</p> <p><b>(B.4.a.1)</b> The MD-715 EEO Specialist position is vacant. This position is crucial for the preparation of the MD-715 report.</p> <p><b>(B.4.a.2)</b> The MD-715 EEO Specialist position is vacant, therefore a thorough barrier analysis of the workforce was not conducted for FY 22.</p>
<b>Essential Element C:</b> Management and Program Accountability	<p><b>(C.4.a)</b> The HR Director and Civil Rights and EEO Manager do not meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions and management directives.</p> <p><b>(C.4.b)</b> The Civil Rights and EEO Office does not have an established schedule to review systemic barriers that may exist in BPA's merit promotion program, employee recognition, and employee development programs.</p>
<b>Essential Element E:</b> Efficiency	<b>(E.4.a.4)</b> External and Internal applicant flow data is not readily available.

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

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
05/2023	<b>(B.1.a)</b> At this time, BPA has determined that the reporting structure for Civil Rights and EEO will remain the same.	N/A		
02/2023	<b>(B.4.a.1 &amp; B.4.a.2):</b> Fill the MD-715 EEO Specialist position.	05/2023		

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<b>Date Initiated</b> (mm/dd/yyyy)	<b>Objective</b>	<b>Target Date</b> (mm/dd/yyyy)	<b>Modified Date</b> (mm/dd/yyyy)	<b>Date Completed</b> (mm/dd/yyyy)
05/2023	<b>(C.4.a):</b> The Civil Rights and EEO Manager will meet regularly with HR Director.	12/31/2023		
05/2023	<b>(C.4.b):</b> The Civil Rights and EEO Office will establish a schedule to review possible systemic barriers in BPA's merit promotion program, employee recognition, and employee development programs.	09/30/2024		
05/2023	<b>(E.4.a.4):</b> Civil Rights and EEO Office will work with Recruitment and Placement office to retrieve applicant flow data in a timely manner.	11/30/2023		

**Responsible Official(s)**

<b>Title</b>	<b>Name</b>	<b>Performance Standards Address the Plan?</b> (Yes or No)
Acting EEO Director	Shana Kuhn	No
HR Director	Liza Rosa	No
Recruitment and Placement Supervisor	Dayna Romancito	No

**Planned Activities Toward Completion of Objective**

<b>Target Date</b> (mm/dd/yyyy)	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing?</b> (Yes or No)	<b>Modified Date</b> (mm/dd/yyyy)	<b>Completion Date</b> (mm/dd/yyyy)
05/2023	<b>(B.4.a.1 &amp; B.4.a.2):</b> Hire MD-715 EEO Specialist.	Yes		
12/31/2023	<b>(C.4.a):</b> Civil Rights and EEO Manager will request to meet regularly with HR Director.	Yes		
09/30/024	<b>(C.4.b):</b> Civil Rights and EEO Office will establish a schedule to review possible systemic barriers in BPA's merit promotion program, employee recognition, and employee development programs.	Yes		
11/30/2023	<b>(E.4.a.4):</b> Civil Rights and EEO Office will work with Recruitment and Placement team to ensure that applicant flow data is available in a timely manner.	Yes		

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## Report of Accomplishments

Fiscal Year	Accomplishments		
<b>2022</b>	<p><b><u>Element A Accomplishments</u></b></p> <p><b>(B.1.a)</b> At this time, BPA has determined that the reporting structure for CREEO will remain the same. The reporting structure for the EEO Program provides the Civil Rights and EEO Manager with appropriate authority and resources to effectively carry out a successful EEO program.</p> <p><b><u>Element B Accomplishments</u></b></p> <ul style="list-style-type: none"> <li>• <b>(B.4.a.1)</b> The MD715 EEO Specialist Position is adequately funded, but not staffed due to departure of staff member. Work is under way to back fill this position now.</li> <li>• <b>(B.4.a.3)</b> CREEO has sufficient budget and staffing to thoroughly process EEO Complaints, including EEO Counseling, investigations, and legal sufficiency reviews.</li> <li>• <b>(B.4.a.4)</b> CREEO has obtained sufficient budget and staffing to provide all supervisors and managers with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR.</li> </ul> <p>The CREEO office provides monthly Civil Rights and EEO training courses. In FY 22, 96.4% of BPA employees completed the EEO training requirement. The following Civil Rights and EEO training sessions were offered to employees:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"> <ul style="list-style-type: none"> <li>ADR 3rd Party Dispute Resolutn</li> <li>Anti-Harassment: PM#102 Mngr</li> <li>Being an Upstander &amp; Finding..</li> <li>Benefits of Utilizing OST...</li> <li>Chinese Diaspora in Oregon</li> <li>Civil Rights &amp; EEO Overview</li> <li>Combating a Hostile Work Envir</li> <li>Conflict Resolution Techniques</li> <li>Confronting Workplace Conflict</li> <li>Disability Inclusion Training</li> <li>Discrimin Free Wrkplc - Mngrs</li> <li>EEO - ADR Program Overview</li> <li>EEO &amp; AH Complaint Differences</li> <li>EEO Complaints Process</li> <li>Effctv Communi for Supervisors</li> <li>Effctv Communi Non-Supervisors</li> <li>First Foods &amp; Climate Resilien</li> <li>From Coveralls to Zoot Suits..</li> <li>Harassment Prevention</li> <li>Hiring and Interviewing - EEO</li> <li>History of LGBTQ2SIA + Rights</li> <li>Inappropriate Behavior-Harassm</li> <li>Landscape of LGBTQ Law/Policy</li> </ul> </td> <td style="width: 50%; vertical-align: top;"> <ul style="list-style-type: none"> <li>Mngmt Role-EEO Informal Compl</li> <li>Movie 9 to 5:Story of Movement</li> <li>Navigating-Formal EEO Process</li> <li>Overview of Retaliation</li> <li>PPP - Whistleblower</li> <li>Pronoun/Gender Language Wrkplc</li> <li>Reasonable Accommodation Mngrs</li> <li>Reasonable Accommodations Mngrs</li> <li>Roadmap to Success...</li> <li>Steps to Removing Barriers-EEO</li> <li>Tell Them We Are Rising...</li> <li>The EEO Complaint Process</li> <li>Treasures from Aztlan Hispanic</li> <li>Unpacking Retaliation</li> <li>Virtual Tour - Jim Crow Museum</li> <li>WE Series: Anti-Harassment-EEO</li> <li>WE Series: Workplace Bullying</li> <li>What Know About Wrkpl Violence</li> <li>Workplace Harassment Prevention</li> </ul> </td> </tr> </table>	<ul style="list-style-type: none"> <li>ADR 3rd Party Dispute Resolutn</li> <li>Anti-Harassment: PM#102 Mngr</li> <li>Being an Upstander &amp; Finding..</li> <li>Benefits of Utilizing OST...</li> <li>Chinese Diaspora in Oregon</li> <li>Civil Rights &amp; EEO Overview</li> <li>Combating a Hostile Work Envir</li> <li>Conflict Resolution Techniques</li> <li>Confronting Workplace Conflict</li> <li>Disability Inclusion Training</li> <li>Discrimin Free Wrkplc - Mngrs</li> <li>EEO - ADR Program Overview</li> <li>EEO &amp; AH Complaint Differences</li> <li>EEO Complaints Process</li> <li>Effctv Communi for Supervisors</li> <li>Effctv Communi Non-Supervisors</li> <li>First Foods &amp; Climate Resilien</li> <li>From Coveralls to Zoot Suits..</li> <li>Harassment Prevention</li> <li>Hiring and Interviewing - EEO</li> <li>History of LGBTQ2SIA + Rights</li> <li>Inappropriate Behavior-Harassm</li> <li>Landscape of LGBTQ Law/Policy</li> </ul>	<ul style="list-style-type: none"> <li>Mngmt Role-EEO Informal Compl</li> <li>Movie 9 to 5:Story of Movement</li> <li>Navigating-Formal EEO Process</li> <li>Overview of Retaliation</li> <li>PPP - Whistleblower</li> <li>Pronoun/Gender Language Wrkplc</li> <li>Reasonable Accommodation Mngrs</li> <li>Reasonable Accommodations Mngrs</li> <li>Roadmap to Success...</li> <li>Steps to Removing Barriers-EEO</li> <li>Tell Them We Are Rising...</li> <li>The EEO Complaint Process</li> <li>Treasures from Aztlan Hispanic</li> <li>Unpacking Retaliation</li> <li>Virtual Tour - Jim Crow Museum</li> <li>WE Series: Anti-Harassment-EEO</li> <li>WE Series: Workplace Bullying</li> <li>What Know About Wrkpl Violence</li> <li>Workplace Harassment Prevention</li> </ul>
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**2022**

- **(B.4.a.8)** The CREEO budget includes sufficient funds to effectively manage the Special Emphasis Programs.
- **(B.4.a.9)** In FY 22, The Anti-harassment program relocated to Employee Relations and the program manager is an Employee Relations Specialist.
- **(B.4.b)** The CREEO office has a budget that is approved and managed at the Tier 2 level (DE). The CREEO Manager has the authority to use these funds in the execution of the work of the program and would only need to request other funding if it is found to be inadequate. Detailed reports are available in the financial system outlining the authorized budget and actual spend at the DE level.

**Element C Accomplishments**

- **(C.2.a.2)** In FY 22, a firewall was established when the Anti-harassment program relocated to Employee Relations and the program manager is an Employee Relations Specialist.
- **(C.2.b – C.2.c1)** This element should not have been listed as a program deficiency. BPA has a well-established Reasonable Accommodations Program.
- **(C.3.a)** Managers and Supervisors are held accountable for their role in the agency's EEO policy.
- **(C.3.b.7, C.3.b.8, C.3.b.9)** The FY 22 supervisory element covers the requirements set forth in these three elements.

**Element D Accomplishments**

In FY 22, the CREEO staff provided virtual training to the Transmission Field Services organization for their District Training.

**Element E Accomplishments**

**(E.1.d)** CREEO issues acceptance letters/ dismissal decisions within 15-30 days of receipt of when a formal complaint of discrimination is received. The Department of Energy requires the CREEO Office to submit all dismissals for Department review.

**(E.1.h)** This element does not apply to BPA because Final Agency Decisions are drafted and issued by DOE's EEO Office.

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**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.

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

<b>Source of the Trigger</b>	<b>Specific Workforce Data Table</b>	<b>Narrative Description of Trigger</b>
<b>Trigger 1:</b> Low minority participation rates within BPA's overall workforce	A1/B1	Internal demographics data reports of workflow overall populations note the existence of low minority participation rates.  *Minority = (White females and non-white males and females)
<b>Trigger 2:</b> Low minority and minority female participation in BPA's critical occupational series	A6/B6 (HRMIS data)	Focusing only on female participation within BPA, minority (white females and non-white males and females) participation rate is about 20%. The participation rate is significantly less when compared to the females in each ethnic group to the participation of the entire population in those occupations. Total participation is only 4% while each individual ethnic group's participation is even lower.  Focusing only on male participation within BPA, the minority (excluding Asian males and females) participation rate is about 15%. The participation rate is less when compared to males in each ethnic group to the participation of the entire population in those occupations. Total participation is only 11%.  *Minority = (Non-Asian males and females and non-white male and females)
<b>Trigger 3:</b> Formal Complaints of Discrimination citing discrimination based on Disability are high	B1	31% of all Formal Complaints of Discrimination are based on disability, but only 10% of the permanent workforce is disabled.
<b>Trigger 4:</b> Lack of competencies in the principles of diversity and	NA	A large segment of the workforce demonstrate a lack of competencies in the principles of diversity and inclusion, as well as equal employment opportunity as evidenced by data such as: EEO complaints; Workforce Concerns Hotline Calls; D&I training evaluations; FEVS; exit interview; and other work environment assessments and data.

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<b>Source of the Trigger</b>	<b>Specific Workforce Data Table</b>	<b>Narrative Description of Trigger</b>
inclusion, as well as equal employment opportunity		

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

<b>EEO Group</b>
All Men
All Women
Hispanic or Latino Males
Hispanic or Latino Females
White Males
White Females
Black or African American Males
Black or African American Females
Asian Males
Asian Females
Native Hawaiian or Other Pacific Islander Males
Native Hawaiian or Other Pacific Islander Females
American Indian or Alaska Native Males
American Indian or Alaska Native Females
Two or More Races Males
Two or More Races Females

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**Barrier Analysis Process**

<b>Sources of Data</b>	<b>Source Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	A review of recent workforce demographics data provided insights into the identified trigger. The BPPER024_Summary HRMIS report, which stems from voluntary demographics data collected from the HRSC, helped to identify the number of applicants who identified as minorities. This data was then compared to the data obtained from the Accessions HRMIS report, which contains the voluntary demographics data collected from individuals who on –boarded during the period October 2017 thru September 2018.
Complaint Data (Trends)	Yes	A review of the informal and formal complaints of discrimination, as a well as the most commonly elected illegal discriminatory bases of the most common and issues raised as a matter of concern for employees.
Grievance Data (Trends)	No	NA
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	In FY 2019, there was a finding made on “adverse inferences” regarding reasonable accommodations for a contract worker. BPA managers are continually educated on the RA process, as well as working with employees and contract workers with disabilities. More recently, managers are being educated more about the rights and responsibilities of contract workers in the EEO process.
Climate Assessment Survey (e.g., FEVS)	Yes	The FEVS compiled results were viewed and provided employee perceptions of their work experiences, the agency, and BPA leadership. The FEVS provided managers data about where improvements within their work units were necessary or already attained.
Exit Interview Data	Yes	BPA has recently assigned a specialist to analyze Exit Interviews. Past data is being analyzed. Moving forward, we hope to increase participation rate and be able to analyze data in real time.
Focus Groups	No	NA
Interviews	No	NA
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	NA
Other (Please Describe)	Yes	Human Resources Management Information System (HRMIS) was utilized. It contains demographic information specific to BPA employees.



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**Status of Barrier Analysis Process**

<b>Barrier Analysis Process Completed?</b> (Yes or No)	<b>Barrier(s) Identified?</b> (Yes or No)
Yes in FY 2018	Yes

**Statement of Identified Barrier(s)**

<b>Description of Policy, Procedure, or Practice</b>
<b>Barrier 1:</b> Data shows that minorities are not hired at a rate consistent with the rate at which they apply for jobs. These inconsistencies call to question whether there is a hiring bias.
<b>Barrier 2:</b> Inclusion rates for minorities in BPA's mission critical occupations are not congruent with their overall representation in the workforce at large or the NCLF; this result calls to question institutional and/or attitudinal barriers that exist about the abilities and interests of these demographics to conduct mission essential work.
<b>Barrier 3:</b> While PWD comprise 10% of the workforce, 31% of the EEO cases cite a disability as the basis.
<b>Barrier 4:</b> A large segment of the workforce demonstrate a lack of competencies in the principles of diversity and inclusion, as well as equal employment opportunity as evidenced by data such as: EEO complaints; Workforce Concerns Hotline calls; D&I training evaluations; FEVS; exit interviews; and other work environment assessments and data.

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

Objective	Date Initiated	Target Date	Sufficient Funding & Staffing? (Yes or No)	Modified Date	Date Completed
<p><b>Trigger 1/Barrier 1:</b> While the Agency's hiring practices and policies are consistent with Office of Personnel Management (OPM) standards, the Agency will continue to implement OPM hiring practices and policies, as well as the principles of EEO, diversity and inclusion to ensure the referral of all qualified minority applicants and ensure selecting officials obtain information to bring awareness to hiring biases in an effort to bring congruency to minority applicant and their selection rates.</p>	December 19, 2018	September 30, 2023	Yes		September 30, 2019 Efforts remain ongoing
<p><b>Trigger 2/Barrier 2:</b> Conduct more targeted outreach in an effort to increase inclusion rates of minorities in BPA's critical occupational series in a manner that brings parity when compared to their representation in the workforce as well as against National Civilian Labor Force (NCLF) data.</p>	December 19, 2018	September 30, 2023	Yes		March 30, 2019 Efforts remain ongoing
<p><b>Trigger 3/Barrier 3:</b> BPA's Disability Employment Program Manager (DEPM) will collaborate with the Local Reasonable Accommodation Coordinator to educate the workforce throughout the year. They will coordinate 6 activities annually to provide education and enlightenment relative to People with Disabilities.</p>	December 19, 2018	September 30, 2023	Yes		June 30, 2019 Efforts remain ongoing
<p><b>Trigger 4/Barrier 4:</b> The workforce is cognizant of and able to interact in ways devoid of personal/professional biases and supports, as well as demonstrates equality, respect and dignity through proactive engagement, education and training.</p>	December 19, 2018	September 30, 2023	Yes		September 30, 2019 Efforts remain ongoing

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**Responsible Official(s)**

<b>Title</b>	<b>Name</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>
Civil Rights and EEO, Manager (Acting)	Shana Kuhn	No
Diversity and Inclusion, Manager	Maria Mondragon-Almy	No
Human Resources Services Center, Director	Liza Rosa	No
Supervisory HR Specialist (Recruitment and Placement)	Dayna Romancito	No

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**Planned Activities Toward Completion of Objective**

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
1) 10/01/2020  2) 10/01/2020  3) 06/30/2019  4) 10/01/2020	<p><b><u>Trigger 1/Barrier 1</u></b></p> <ol style="list-style-type: none"> <li>1) Implement Unconscious Bias (UB) in Hiring Training for managers and go through official channels to explore implementation of UB training as part of managers' performance plans.</li> <li>2) Offer additional UB training to the workforce. Implement first "rollout" January 2020 at BPA All Managers meeting.</li> <li>3) Ensure that UB in Hiring training is incorporated into the various mandatory training for managers for example (the New Supervisor Training, Hiring Authorities, etc.)</li> <li>4) Work with BPA's Human Resources Service Center to explore a process to obscure applicant information in order to reduce potential bias in hiring</li> </ol>	4) Language was modified and now reads: Work with BPA Human Resources Service Center to explore a process to obscure applicant information in order to reduce bias January 30, 2020	<ol style="list-style-type: none"> <li>1) Efforts remain ongoing</li> <li>2) Efforts remain ongoing</li> <li>3) Efforts remain ongoing</li> <li>4) Efforts remain ongoing</li> </ol>
1) 09/30/2023 2) 09/30/2023 3) 09/30/2023 4) 09/30/2023 5) 09/30/2023	<p><b><u>Trigger 2/Barrier 2</u></b></p> <ol style="list-style-type: none"> <li>1) Conduct a review of outreach and recruitment plans and ensure a more targeted approach to females and minorities.</li> <li>2) Provide selecting officials training and development relative to UB suite in an effort to increase competencies around cultural differences.</li> <li>3) Educate managers in an effort to ensure awareness of various hiring options and authorities that are available as a source to onboard efficiently.</li> <li>4) Work with HCM and managers to review positions that are appropriate for developmental grades.</li> <li>5) Discuss and review Agency detail opportunities in an effort to ensure that details are well advertised, that females and minorities are more included in the sharing of information through Employee Resource Groups and other sources, and to ensure that promotional details are made more available to the entire workforce for fair competition and equal employment opportunity.</li> </ol>		<ol style="list-style-type: none"> <li>1) Efforts remain ongoing</li> <li>2) Efforts remain ongoing</li> <li>3) Efforts remain ongoing</li> <li>4) Completed in FY 22</li> <li>5) Completed in FY 22</li> </ol>
1) 09/30/2023	<p><b><u>Trigger 3/Barrier 3</u></b></p> <ol style="list-style-type: none"> <li>1) CREEO monthly workforce engagements: Each month a specialist engages the workforce with a CR/EEO related topic and hosts a coordinating activity to provide education and enlightenment relative to the topic.</li> </ol>		<ol style="list-style-type: none"> <li>1) Efforts remain ongoing</li> </ol>

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<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
2) 09/30/2023 3) 09/30/2023 4) 09/30/2023 5) 09/30/2023 6) 09/30/2023 7) 09/30/2023	2) Improve career development opportunities for Persons with Targeted Disabilities (PWTD) through Assistive Technology training to reduce barriers to provide equal opportunity and access to employment empowering PWTDS to do the job.  3) Conduct focus groups with employees with targeted disabilities to discuss recruitment, hiring and career growth experiences within the agency in an effort to better forge plans to increase employment opportunities and improve/maintain a positive work experience for PWTD.  4) Evaluate the career advancement opportunities for employees with targeted disabilities within mission critical occupations.  5) Review all occupations and identify series having occupations requirements that may preclude employment of PTWD: create Bona fide Occupational Qualifiers (BFOQ) listing.  6) Conduct climate assessment (surveys) to obtain feedback from the workforce.  7) Meet with disability organizations and universities' Disabled Student Services Offices to explore the perceptions of the agency within the disabled community.		2) Efforts remain ongoing 3) Efforts remain ongoing 4) Efforts remain ongoing 5) Completed in FY22 6) Efforts remain ongoing 7) Efforts remain ongoing
1) 09/30/2019 2) 09/30/2021	<u><b>Trigger 4 / Barrier 4</b></u>  1) CREEO will host monthly workforce engagements: Each month the office highlights a CR/EEO program, function or topic and a specialist engages the workforce regarding the selected topic and hosts a coordinating activity to provide education and enlightenment.  2) BPA will reestablish the Special Emphasis Program (SEPs) and recruit SEP Managers in an effort to increase cultural awareness; provide support to and channels of outreach and networking for conspicuously underrepresented groups.		1) Efforts remain ongoing 2) Efforts remain ongoing

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<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
3) 09/30-2023	3) The Office of Diversity and Inclusion will continue to offer diversity training classes in HQ and the field. In a variety of subjects in an effort to improve the workforce's competencies in the principles of diversity and inclusion.		3) Efforts remain ongoing
4) 09/30/2020	4) HCM will offer training and awareness about hiring authority in an effort to bring awareness to managers about the benefits an availability of special authorities to hire People with Disabilities.		4) Efforts remain ongoing
5) 09/30/2023			5) Efforts remain ongoing
6) 09/30/2023			6) Efforts remain ongoing
7) 09/30/2023	5) The Office of Diversity and Inclusion has implemented and leads BPA's Respect & Dignity campaign offered in an effort to increase awareness about professional behaviors and create a safe, positive and inclusive environment where people are valued and enabled to deliver results.		7) Efforts remain ongoing
8) 09/30/2023			8) Efforts remain ongoing
9) 09/30/2022			9) Efforts remain ongoing
10) 09/30/2023	6) The CREEO Manager engages the workforce with CR/EEO related topics in an effort to provide education and enlightenment on various CR/EEO topics and general civil treatment.		10) Efforts remain ongoing
	7) The CREEO will provide new employees information about CREEO during bi-weekly New Employee Orientations to ensure new employees are made aware of their rights immediately upon starting their jobs and to ensure live contact with new employees for a personal touch.		
	8) The Office of Diversity and Inclusion will conduct additional training sessions targeting supervisors in an effort to increase supervisory competencies in the principles of diversity and inclusion.		
	9) The Office of Diversity and Inclusion will conduct a Climate Assessment to gauge employee satisfaction, employees' perception of leadership effectiveness and employees' overall job satisfaction. The information will be shared with management to continuously improve the work environment.		
	10) The CREEO Office will provide anti-bullying training to improve the workforce's competencies in respecting others and ensuring that the agency is a safe environment where people could work devoid of fear.		

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## **Report of Accomplishments**

**Trigger 1/Barrier 1:** While the Agency's hiring practices and policies are consistent with Office of Personnel Management (OPM) standards, the Agency will continue to implement OPM hiring practices and policies, as well as the principles of EEO, diversity and inclusion to ensure the referral of all qualified applicants and ensure the referral of all qualified applicants and ensure selecting officials obtain information to bring awareness to hiring biases in an effort to bring congruency to minority applicant and their selection rates.

### **Item 1**

**Implement Unconscious Bias (UB) in Hiring Training for managers and go through official channels to implement UB training as part of manager's performance plans.**

Facilitated two training sessions that have components of UB:

- Managing a Diverse Workforce – 9/8/2022 with 209 participants.
- UB Equity Class – 3/9/2022 with 24 participants.

### **Item 2**

**Offer additional Unconscious Bias (UB) in Hiring Training to the workforce. Implement first “rollout” January 20 at All Manager meeting.**

HR created a set of classes on conducting virtual interviews and one on Merit System Principles and Prohibited Personnel Practices. In FY 22 the D&I office offered:

- Fostering belonging in the workforce
- Bias and trauma
- Braining diversity
- Countering Bias in People and Practices

### **Item 3**

**Ensure UB in Hiring Training is incorporated into the various training for managers.**

- Elements of Unconscious Bias were added to BPA's Aspiring Managers Program per the request of the Leadership Development Program Manager in 2020. In FY 22, the First Aspiring Managers training included the new UB element.
- In FY22, we completed one class of Inclusive Leadership training with 18 participants.

### **Item 4**

**Work with BPA's Human Resources Service Center to explore a process to obscure applicant information in order to reduce potential bias in hiring.**

No accomplishments were reported on this item.

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**Trigger 2/Barrier 2:** Conduct more targeted outreach in an effort to increase inclusion rates of minorities in BPA's critical occupational series in a manner that brings parity when compared to their representation in the workforce as well as against National Civilian Labor Force data.

**Item 1**

**Conduct a review of outreach and recruitment plans and ensure a more targeted approach to females and minorities.**

BPA hired a new Culture and Outreach Specialist in 2022. This person will be reviewing and developing an outreach strategy to target underrepresented groups in 2023.

**Item 2**

**Provide selecting officials training and development relative to UB suite in an effort to increase competencies around cultural differences.**

- The D&I Office launched the new Inclusion Lens tool that helps managers and employees be more inclusive in their decision-making processes. The Inclusion Lens aims to:
  - Strengthen everyone's awareness of and ability to incorporate differences.
  - Create teams that are relevant to and representative of the communities that we serve.
  - Create energizing and innovative work environments.
  - Collectively address systemic barriers and inequities.
  - Support respect and dignity in our work environment.
  
- One hundred percent (100%) of Executive Team Members hosted an Inclusion Lens Action Session with their leadership team in FY22.

**Item 3**

**Educate managers in an effort to ensure awareness of various hiring options and authorities that are available as a source to onboard efficiently.**

HR has been proactively educating managers/supervisors on the many different hiring authorities through their Strategic Business Partners. This process is ongoing and will continue in FY23.

**Item 4**

**Work with HCM and managers to review positions that are appropriate for developmental grades.**

Classification continues to include discussion on career path applicability when providing classification consultation to managers at BPA. As of FY22, the career path initiative has been completed.



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**Item 5**

**Discuss and review Agency detail opportunities in an effort to ensure that details are well advertised, that females and minorities are more included in the sharing of information through Employee Resource Groups and other sources, and to ensure that promotional details are made more available to the entire workforce for fair competition and equal employment opportunity.**

In FY22, HCM improved job announcement communication by requiring that all job announcements regardless if they are internal or external they are sent to the EEO office, Diversity & Inclusion, Business Partners and the hiring manager. This will better announce our positions to the various groups and connections we have within BPA. In FY23, we will be adding the Recruitment & Outreach office to the announcement notifications to ensure their office is aware of the positions posted. This will help increase BPA's visibility when attending outreach events.

**Trigger 3/Barrier 3:** BPA's Disability Employment Program Manager (DEPM) will collaborate with the Local Reasonable Accommodation Coordinator to educate the workforce throughout the year. They will coordinate 6 activities annually to provide education and enlightenment relative to People with Disabilities.

**Item 1**

**CREEO monthly workforce engagements: Each month a specialist engages the workforce with a CR/EEO related topic and hosts a coordinating activity to provide education and enlightenment relative to the topic.**

In FY 22, 96.4% of BPA employees completed the EEO training requirement.

The following Civil Rights and EEO training sessions were offered to employees:

- ADR 3rd Party Dispute Resolutn
- Anti-Harassment: PM#102 Mngr
- Being an Upstander & Finding..
- Benefits of Utilizing OST...
- Chinese Diaspora in Oregon
- Civil Rights & EEO Overview
- Combating a Hostile Work Envir
- Conflict Resolution Techniques
- Confronting Workplace Conflict
- Disability Inclusion Training
- Discrimin Free Wrkplc - Mngrs
- EEO - ADR Program Overview
- EEO & AH Complaint Differences
- EEO Complaints Process
- Effctv Communi for Supervisors
- Effctv Communi Non-Supervisors
- First Foods & Climate Resilien
- From Coveralls to Zoot Suits..
- Harassment Prevention
- Hiring and Interviewing - EEO
- History of LGBTQ2SIA + Rights
- Inappropriate Behavior-Harassm
- Landscape of LGBTQ Law/Policy
- Mngmt Role-EEO Informal Compl
- Movie 9 to 5:Story of Movement
- Navigating-Formal EEO Process
- Overview of Retaliation
- PPP - Whistleblower
- Pronoun/Gender Language Wrkplc

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- Reasonable Accommodation Mgrs
- Reasonable Accommodations Mgrs
- Roadmap to Success...
- Steps to Removing Barriers-EEO
- Tell Them We Are Rising...
- The EEO Complaint Process
- Treasures from Aztlan Hispanic
- Unpacking Retaliation
- Virtual Tour - Jim Crow Museum
- WE Series: Anti-Harassment-EEO
- WE Series: Workplace Bullying
- What Know About Wrkpl Violence
- Workplace Harassment Prevention

**Item 2**

**Improve career development opportunities for persons with targeted disabilities (PWTD) through assistive technology training to reduce barriers to provide equal opportunity and equal access to employment, empowering PWTD to do the job.**

The Local Reasonable Accommodation Coordinator worked with the Information Technology organization to:

- Worked with Contracting and Security to approve RCC as a service for BPA post the removal of FedRelay as an option for relay captioning services.
- Consistently provided Captioning services, to deaf and hard of hearing employees, for remote trainings and event offerings as a result of increased visibility of the option to all employees with disabilities through publicizing the availability of reasonable accommodation on all event media and publicity materials.
- Continued the development of the software library for adding 5 products to be available for employees with a disability total 21.
- BPA's Training group collaborated with the LRAC to support efforts towards 508 compliance for eLearning courses offered at BPA by providing trainings (2); consultation sessions (5) and information to the training groups (accessed through 508 gov). Note: Course owners are responsible to publish 508 compliant eLearning courses.

**Item 3**

**Conduct focus groups with employees with targeted disabilities to discuss recruitment, hiring and career growth experiences within the agency in an effort to better forge plans to increase employment opportunities and improve/maintain a positive work experience for PWTD.**

No accomplishments were reported on this item.

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**Item 4**

**Evaluate the career advancement opportunities for employees with targeted disabilities within mission critical occupations.**

The Recruitment and Placement organization continues to maintain a non-competitive (NC) applicant registry available to both employees and non-employees. All job openings are evaluated for potential qualified NC applicants and corresponding selection certificates provided to managers for consideration. Employees eligible under Schedule A, which may include targeted disabilities, may register for this registry to be considered for positions, including career advancement opportunities.

**Item 5**

**Review all occupations and identify series having occupational requirements that may preclude employment of PWTD; create Bona fide Occupational Qualifiers (BFOQ) listing.**

BPA's Human Resources Service Center conducted a review and found there are no occupations at BPA that preclude all targeted disabilities. However, each situation must be reviewed on a case by case basis as part of the Reasonable Accommodation program as it is dependent upon the severity of the individual disability.

**Item 6**

**Conduct climate assessment (surveys) to obtain feedback from the workforce.**

No climate assessment was conducted to survey the BPA individuals with disabilities workforce.

**Item 7**

**Meet with disability organizations and universities' Disabled Student Services offices to explore the perceptions of the agency within the disability community.**

No accomplishments were reported on this item.

**Trigger 4/Barrier4:** The workforce is cognizant of and able to interact in ways devoid of personal/professional biases and supports, as well as demonstrates equality, respect and dignity through proactive engagement, education and training.

**Item 1**

**Office of Civil Rights and EEO will host monthly workforce engagements: Each month the office highlights and CR/EEO program, function or topic and a specialist engages the workforce regarding the selected topic and hosts a coordinating activity to provide education and enlightenment.**

In FY 22, 96.4% of BPA employees completed the EEO training requirement.

The following Civil Rights and EEO training sessions were offered to employees:

- ADR 3rd Party Dispute Resolutn
- Anti-Harassment: PM#102 Mngr
- Being an Upstander & Finding..
- Benefits of Utilizing OST...
- Chinese Diaspora in Oregon
- Civil Rights & EEO Overview
- Combating a Hostile Work Envir
- Conflict Resolution Techniques

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- Confronting Workplace Conflict
- Disability Inclusion Training
- Discrimin Free Wrkplc - Mngrs
- EEO - ADR Program Overview
- EEO & AH Complaint Differences
- EEO Complaints Process
- Effctv Communi for Supervisors
- Effctv Communi Non-Supervisors
- First Foods & Climate Resilien
- From Coveralls to Zoot Suits..
- Harassment Prevention
- Hiring and Interviewing - EEO
- History of LGBTQ2SIA + Rights
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- Landscape of LGBTQ Law/Policy
- Mngmt Role-EEO Informal Compl
- Movie 9 to 5:Story of Movement
- Navigating-Formal EEO Process
- Overview of Retaliation
- PPP - Whistleblower
- Pronoun/Gender Language Wrkplc
- Reasonable Accommodation Mngrs
- Reasonable Accommodations Mngrs
- Roadmap to Success...
- Steps to Removing Barriers-EEO
- Tell Them We Are Rising...
- The EEO Complaint Process
- Treasures from Aztlan Hispanic
- Unpacking Retaliation
- Virtual Tour - Jim Crow Museum
- WE Series: Anti-Harassment-EEO
- WE Series: Workplace Bullying
- What Know About Wrkpl Violence
- Workplace Harassment Prevention

**Item 2**

**BPA will reestablish the Special Emphasis Program (SEPs) and recruit SEP Managers in an effort to increase cultural awareness, provide support to and channels of outreach and networking for conspicuously underrepresented groups.**

- The Special Emphasis Program Managers from the Office of Civil Rights and EEO hosted BPA's third annual All Cultures Week, July 11-15, 2022. All Cultures Week events aim to provide education and enlightenment about equity, respect for differences and the unique contributions of groups and individuals from diverse backgrounds. The goal of highlighting every culture is to foster a work environment that maximizes the potential of all employees and create a greater sense of belonging.

During All Cultures Week, Special Emphasis Program Managers hosted the following virtual sessions on various topics related to their focus areas:

- Being an upstander & finding common ground in uncommon times!
- Current and Future Landscape of LGBTQ Law and Policy
- An Afternoon at the Movies! Screening of "9 to 5: The Story of a Movement"

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- First Foods and Climate Resilience
  - Tell Them We are Rising (documentary and discussion)
  - Chinese Diaspora in Oregon
  - Treasures from Aztlan: Hispanic Women's Voices
  - Disability Inclusion Training
- 
- The LGBTQ+ Special Emphasis Program offered the following virtual sessions:
    - **Pronouns and gendered language in the workplace**

The Williams Institute is the leading research center on sexual orientation and gender identity law and public policy. The presentation provided an overview of current laws and policies that support LGBTQ workers and highlighted ways employers and policymakers can create a more equitable workplace for the LGBTQ Community.

The event educated the workforce regarding the state of law and regulation as it relates to the LGBTQ federal workforce. Educating the workforce in general, and hiring managers in particular, assists in eliminating barriers to employment and advancement for the Community.
    - **Creating a More Equitable Workplace: The Current and Future Landscape of LGBTQ Law and Policy**

The Williams Institute is the leading research center on sexual orientation and gender identity law and public policy. The presentation provided an overview of current laws and policies that support LGBTQ workers and highlighted ways employers and policymakers can create a more equitable workplace for the LGBTQ Community.

The event educated the workforce regarding the state of law and regulation as it relates to the LGBTQ federal workforce. Educating the workforce in general, and hiring managers in particular, assists in eliminating barriers to employment and advancement for the Community.
    - **Basic Rights Oregon presents the history of LGBTQ2SIA+ rights in Oregon**

The presentation covered the history of LGBTQ rights in Oregon. Topics covered include Oregon's early gay rights organizers of the 1970s and the anti-gay ballot measures of the 80s and 90s. The goal of the presentation was to give attendees a firm foundation in understanding the long, ongoing fight for LGBTQ rights in Oregon.

The event provided a historical overview of LGBTQ rights in Oregon, which helped to foster understanding, empathy, and inclusion in the general workforce for the Community.

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- The American Indian and Alaska Native Special Emphasis Program Manager accomplished the following:
  - Helped coordinate BPA's participation with EFW, D&I and HCM in the 2022 National American Indian Science and Engineering Society (AISES) Conference and Career Fair to engage students about BPA internship opportunities. National conference was held in Palm Springs, CA in October 2022.
  - Participated in AISES EFW internship student interviews for FY 2022 interns.
- The Asian American/Pacific Islander Special Emphasis Program accomplished the following:
  - The Special Emphasis Program for the Asian American/Pacific Islander Pilot Mentor Program kicked off in April 2022. Twelve participants were accepted into the program for a total of 6 pairs of mentor/mentee partnerships. Surveys were completed and matches were made. A binder of guidance documents that were created by the Advisory Committee were mailed to the participants of the program a month in advance of the start. The kick-off to the program was a successful virtual event. A six-month check-in was scheduled with both groups separately, one with mentees and one with mentors. Feedback was very positive. The one-year pilot mentor program may extend through the remainder of FY 23.
  - The Asian American/Pacific Islander Special Emphasis Program Manager was elected to serve as the Co-Chair of the Awards Committee and the National Leadership Team for the Federal Asian Pacific American Council (FAPAC) annual conference. They were also chosen for the Contribution Awardee for the 2021 FAPAC Career Development Program and was given a certificate and trophy that was announced at the graduation ceremony in May 2022.

**Item 3**

**The Office of Diversity and Inclusion will continue to offer diversity training classes in HQ and the field, in a variety of subjects in an effort to improve the workforce's competencies in the principles of diversity and inclusion.**

In FY22, 99% of BPA employees completed the diversity training requirement, which exceeded the 97% goal that was set. The following D&I training sessions were offered to employees:

- A Day of Remembrance/Reflectio
- ABA 21-Day Racial Equity...
- Accessibility & Section 508 Aw
- Accessibility & WCAG Complianc
- Adv AAPI Leadership: Intro...
- Are you Latinx? Complex-Langua
- Be the Bridge:Foster Belonging
- Bias and Trauma
- BPA & Daimler Advance AAPI Ldr
- Braining Diversity...Neuroscie
- Bridging the Diversity Gap
- Confronting Workplace Conflict
- Countering Bias in People/Prac
- Crucial Conversation multi-day

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- Demystifying Privilege:Think..
- Develop a Mindset - Resilience
- Dia de los Muertos
- Envir/Social Justice - Indian
- Federal Indian Policy
- From Reservations to Homelands
- Global Diversity
- Holocaust Remembrance - Loeb
- Inclusion Lens Action Session
- Inclusive Ldrshp for Managers
- Indian Classical Dance, Histor
- Indigenous Response-Climate...
- Journey to Become a Woman
- Justice40: Equitable Energy Fu
- Let's Talk: Native Voices BPA
- Managing a Diverse Workforce
- Mindful Journey of Exploration
- Moving Beyond Impostor Syndrom
- NW Public Employees Diversity
- Outwitting Your Cognitive Bias
- Overcome Uncons Bias in Wrkplc
- Overcoming Your Own Unconsciou
- Pandemic Adapt: How you doing?
- Prep by Cultivating...Mind
- Promoting Respect-Wrkplc Empl
- Promoting Respect-Wrkplc Mngrs
- Psychological Safety at Work
- Radical Empathy...
- Reframing Inequities:Analy-Act
- Reparations: Documentary Movie
- SLMS - E-CHP Diversity
- Tribal Affairs
- Tribal Affairs Training
- Tribes & The Supreme Court
- Unconscious Bias:Recruiting...
- Understanding Unconscious Bias
- Unfurling Rainbow Flag-LGBTQ
- Veteran's Day Recognition...
- Women at Work: Impact-Pandemic
- Worldview Perspectives...

**Item 4**

**HCM will offer training and awareness about hiring authority in an effort to bring awareness to managers about the benefits and availability of special authorities to hire People with Disabilities.**

To support training and create awareness the BPA Service Center:

- Developed a job aide for managers on special hiring authorities, which is available on the Reasonable accommodation SharePoint and is advertised and utilized in all manger reasonable accommodation trainings.
- The Local Reasonable Accommodation Coordinator is a recruiter for the Federal Workplace Recruitment Program (WRP). This role conducts interviews of student and recent grads with disabilities to support their inclusion into BPA and greater federal service ensuring they have an understanding of the special hiring authorities.

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**Item 5**

**The Office of Diversity and Inclusion has implemented and leads BPA's Respect and Dignity campaign offered in an effort to increase awareness about positive professional behaviors and create a safe, positive and inclusive environment where people are valued and enabled to deliver results.**

Respect and Dignity was included in the supervisory element in 2022.

**Item 6**

**The CREEO Manager engages the workforce with CR/EEO related topics in an effort to provide education and enlightenment on various CR/EEO topics and general civil treatment.**

No accomplishments were reported on this item.

**Item 7**

**The Office of Civil Rights and EEO will provides new employees information about CR/EEO during bi-weekly New Employee Orientations to ensure new employees are made aware of their rights immediately upon starting their jobs and to ensure live contact with new employees for a personable touch.**

New Employee Orientation (NEO): The CREEO Manager or their delegate take the opportunity to engage new employees to provide the base line awareness about the CREEO programs and services. The briefing is 15 minutes and contains segments about CREEO policies at BPA, Alternative Dispute Resolution, the Complaints Process, CREEO Education, Special Emphasis Programs and expectations for creating and operating in an inclusive environment of dignity and respect.

**Item 8**

**The Office of Diversity and Inclusion will conduct additional training sessions targeting supervisors in an effort to increase supervisory competencies in the principles of diversity and inclusion.**

- Executive Team members were required to host an Inclusion Lens action session with their leadership team in FY22. Forty-two (42) sessions were completed with over 425 participants.
- One customized manager training "Managing a Diverse Workforce" was developed based on the cultural assessment results with 209 HRMIS completions and 224 BPA WebEx participants.
- Inclusive leaders training for aspiring managers/supervisors and new supervisors.
- Individual coaching to help federal employees and contract personnel address crucial conversations and further build people and leadership skills. Focus areas included:
  - Crucial Conversations coaching
  - Diversity and Inclusion guidance and support
  - Inclusive leadership coaching
  - Mental health and wellbeing coaching
  - Personal development coaching
  - Team dynamics consultation and facilitation



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**Item 9**

**The Office of Diversity and Inclusion will conduct a Climate Assessment to gauge employee satisfaction, employees' perception of leadership effectiveness and employees' overall job satisfaction. The information will be shared with management to continuously improve the work environment.**

The Cultural Assessment was completed in 2022 and the results were shared with the workforce. The data gathered through the assessment will help guide a more strategic approach to diversity and inclusion, allowing BPA to prioritize areas needing improvement. The insights from the assessment will also inform BPA's People and Culture strategy, leading to the safe, positive and inclusive environment called for in BPA's strategic plan. More than half of the BPA workforce (2,051 BFTE and CFTE) participated in the 2021 online survey. 64 randomly chosen workers also participated in follow-up focus groups.

**Item 10**

**HCM will provide anti-bullying training to improve the workforce's competencies in respecting others and ensuring that the agency is a safe environment where people could work devoid of fear.**

No accomplishments were reported on this item.

## Affirmative Action Plan

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

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

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

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

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

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

Answer: No

b. Cluster GS-11 to SES (PWD)

Answer: Yes

The 12% target was met for the lower grades but not higher grades cluster. Among BPA permanent employees on board at the end of FY22: PWD were more highly represented in the lower grades cluster (21.26%) and less represented in the GS11-SES cluster (10.55%)

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

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

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

Answer: No

b. Cluster GS-11 to SES (PWTD)

Answer: No

The 2% target is met for both grade clusters. Among BPA permanent employees on board at the end of FY22: PWTD were more highly represented in the lower grades cluster (6.30%) and less represented in the GS11-SES cluster (2.60%)

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

The Office of Civil Rights (CREEO) educates managers and or recruiters about the barrier analysis process to reinforce parity goals for women, minorities, persons with disabilities and veterans.

## Section II: Model Disability Program

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

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

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

Answer: Yes

EEO specialist is assigned to manage the Individuals with Disabilities program.

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Answering questions from the public about hiring authorities that take disability into account	1	0	0	Madeleine Goldfarb Human Resources Specialist bmgoldfarb@bpa.gov
Processing reasonable accommodation requests from applicants and employees	1	0	0	Madeleine Goldfarb Human Resources Specialist bmgoldfarb@bpa.gov
Section 508 Compliance	0	0	0	vacant Equal Employment Specialist
Architectural Barriers Act Compliance	0	0	0	vacant Equal Employment Specialist
Special Emphasis Program for PWD and PWTB	1	0	0	Ernesto Jaquez Equal Employment Specialist ejaquez@bpa.gov
Processing applications from PWD and PWTB	1	0	0	Dayna Romancito, Supervisory HR Specialist (Recruitment & Placement), dtromancito@bpa.gov

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

Answer: Yes

The Basic DEPM course covers: Roles and responsibilities of an (Effective) Disability Program Manager, Sections 501 and 508 of the Rehabilitation Act of 1973, The Reasonable Accommodation Process, EEOC Management Directive 715 (MD-715) Disability Data Collection, Why it’s Necessary Emergency Evacuation Planning, Recruiting: Interns, Vets & Schedule A and The Architectural Barriers Act (ABA).

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

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

Answer: Yes

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

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

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

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

Targeted Recruitment – We have designed a process to identify/track candidates from a variety of events and map the outreach efforts to actual hires at BPA to determine our success rate (or lack thereof). This process is underway in our Recruitment & Placement workgroup within Human Capital Management.

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

Information about the Schedule A Hiring Authority is available for managers on BPA’s internal Manager’s Resource page.

BPA EEO office will work with the Public Affairs Sounding Board team to create an external webpage on BPA Jobs website to promote Schedule A Hiring Authority once there is a Person’s with Targeted Disabilities Recruitment plan in place.

BPA’s Civil Rights/ EEO Office and BPA’s Disability Awareness Resource Group will incorporate the following measures for FY 2018 and beyond as suggested by the Equal Employment Opportunity Commission:

1. Collect and review applicant flow data to assess the recruitment of qualified individuals with targeted disabilities. NOTE: Applicant flow data is retrieved via USA Jobs website, but not in a timely manner due to technical/output issues
2. Conduct focus groups with employees and targeted disabilities to discuss their recruitment, hiring and career growth experiences with the agency.
3. Meet with disability organizations and universities’ Disabled Student Services offices to explore the perceptions of the agency within the disability community.
4. Evaluate the career advancement opportunities for employees with targeted disabilities to and through the mission critical occupations.
5. Review all occupations and identify series having occupational requirements that may preclude employment of People with Targeted Disabilities.
6. Conduct climate assessment (surveys) to obtain feedback from the workforce.
7. Resurvey the workforce to ensure accurate disability status information.
8. We will work with the Oregon State Department of Rehabilitation to apply best practices for empowering people with disabilities.

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

Targeted Recruitment – BPA has designed an effective process to identify/track candidates from a variety of Events and map to actual hires at BPA to determine our success rate (or lack thereof) for those under Schedule A or other hiring authority. This process is underway in our Recruitment & Placement workgroup within HR. Our Recruitment Coordinator will be utilizing a program to monitor this activity beginning with second quarter of FY 2018. The Recruitment Coordinator will let the hiring officials know about these relevant individuals.

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

Answer: Yes

HCM offered training sessions in FY21 educating managers on the use of hiring authorities. Course Title: Personnel Basics for Federal Managers Hiring Target Audience: Managers and Supervisors Course Description: This class uses real-life examples to teach the nuts and bolts of federal personnel law and hiring in the federal environment. Managers learn tools and strategies needed to handle employee discipline and performance issues, ranging from informal counseling to formal discipline to removal actions with appeals to the Merit Systems Protection Board (MSPB). Managers will also learn the basic structure of federal hiring procedures that will help navigate the process more efficiently and quickly.

**B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS**

Describe the agency’s efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

BPA Disability Employment Program Manager Ernesto Jaquez continues to partner with Business Director Kathy West Evans, of Northwest Employment Coordinators of The Council of State Administrators of Vocational Rehabilitation (CSAVR) by sharing BPA vacancy announcements with Ms. West- Evans. She not only forwards the vacancy announcements to her Northwest Team but to all the CSAVR employment coordinators throughout the country. This is over 50 points of contacts where BPA vacancy announcements are circulated. CSAVR employment coordinators review the vacancy announcements and compare the job requirements with their clients’ resumes and job skills. The employment coordinators only refer those clients that they believe meet the minimum requirements for the BPA vacancy announcements, and whom they believe would be a good fit for a position. They also interview these clients to find out if they would be interested in applying for a vacancy and then go as far as assisting the clients navigating through the usajobs.gov application process. The employment coordinators also assist their clients with preparing their resume.

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

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

a. New Hires for Permanent Workforce (PWD) Answer: No

b. New Hires for Permanent Workforce (PWTD) Answer: No

Among the 282 new hires to BPA's permanent workforce, 9.93% were PWD and 1.42% were PWTD. These were both below the goals.

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

a. New Hires for MCO (PWD) Answer: No

b. New Hires for MCO (PWTD) Answer: Yes

Data for all five BPA major occupational series (i.e., 0850, 1101, 1130, 2210, 2810, and 5407) were combined to permit statistically appropriate analyses.  
Among the 138 new hires to BPA's permanent workforce in the five major occupational series, 11.59% were PWD (meeting the goal) and 0.72% were PWTD (below the goal)

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

a. Qualified Applicants for MCO (PWD) Answer: Yes

b. Qualified Applicants for MCO (PWTD) Answer: No

Data for all five BPA major occupational series (i.e., 0850, 1101, 1130, 2210, 2810, and 5407) were combined to permit statistically appropriate analyses.  
According to the USA Staffing data, there were 1,681 external qualified applicants to vacancies associated with one of the five major occupational series, 4.51% were PWD (below the goal) and 2.57% were PWTD (above the goal).  
Among the 808 internal qualified applicants for internal competitive promotions within the five major occupational series, 9.03% were PWD (below the goal) and 6.77% were PWTD (above the goal).

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

a. Promotions for MCO (PWD) Answer: Yes

b. Promotions for MCO (PWTD) Answer: Yes

Data for all five BPA major occupational series (i.e., 0850, 1101, 1130, 2210, 2810, and 5407) were combined to permit statistically appropriate analyses.  
BPA computed a selection ratio, which indicates the relative likelihood of a PWD or PWTD obtaining a promotion among those who were qualified and referred compared to the overall pool of internal qualified and referred internal applicants for promotions within the five major occupational series. Overall, 17.84% of qualified and referred internal applicants for internal competitive promotions in the five major occupational series were selected. In contrast, just 1.49% of PWD (a selection ratio of 0.08) and 0% of PWTD (a selection ratio of 0.00) who were qualified and referred were selected for promotions. In contrast, employees without disabilities who applied for internal competitive promotions were much more likely to be selected (selection ratio of 1.39).

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

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

### A. ADVANCEMENT PROGRAM PLAN

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

Career Development opportunities are available to all BPA employees.

### B. CAREER DEVELOPMENT OPPORTUNITES

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

**Aspiring Manager Program**  
 The Aspiring Manager Program at BPA launched with a Pilot Cohort in January 2022. Aspiring Manager is a year-long cohort program consisting of six virtual instructor-led workshops and supplemental work to help participants understand the role of a manager at BPA and in the federal government. The program helps participants make an informed decision about whether to pursue a management career at BPA.

**New Manager Leadership Journey**  
 The New Manager Leadership Journey program (NMLJ) prepares new managers and supervisors for the technical, interpersonal, and leadership skills they'll need to be successful managers at BPA. Pre-pandemic, the program relied on an intense three-day, in-person training experience called Personnel Basics, which HR Subject Matter Experts (SMEs) taught. The course covered technical essentials like performance management, leave and pay, the hiring process, disciplinary actions, and a manager's legal rights and responsibilities. Personnel Basics could not be delivered in person as designed during the pandemic dueto COVID-19 restrictions.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Mentoring Programs						
Fellowship Programs	DATA NOT GATHERED					
Other Career Development Programs						
Coaching Programs						
Training Programs						
Internship Programs						
Detail Programs						

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

a. Applicants (PWD) Answer: N/A

b. Selections (PWD) Answer: N/A

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

a. Applicants (PWTD) Answer: N/A

b. Selections (PWTD) Answer: N/A

C. AWARDS

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

a. Awards, Bonuses, & Incentives (PWD) Answer: No

b. Awards, Bonuses, & Incentives (PWTD) Answer: No

At BPA, 93.02% of permanent employees received at least one cash, time off, quality step increase, or performance-based pay increase in FY 2022. PWTD were more likely to receive at least one award (97.53%), while PWD were as likely as all BPA employees (92.70%) to receive at least one award.

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

c. Pay Increases (PWD) Answer: No

d. Pay Increases (PWTD) Answer: No

There were 145 QSIs at BPA in FY 2022: 4.96% of BPAs permanent employees received a QSI in FY 2022. Among PWD, 4.44% received a QSI and 4.94% of PWTD received a QSI. Both of these inclusion rates are statistically similar to the overall 4.96% rate for BPA employees.

There were 16 performance-based pay increases, representing insufficient data for statistical analysis.



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

- e. Other Types of Recognition (PWD) Answer: N/A
- f. Other Types of Recognition (PWTD) Answer: N/A

**D. PROMOTIONS**

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

- a. SES
  - i. Qualified Internal Applicants (PWD) Answer: N/A
  - ii. Internal Selections (PWD) Answer: N/A
- b. Grade GS-15
  - i. Qualified Internal Applicants (PWD) Answer: No
  - ii. Internal Selections (PWD) Answer: N/A
- c. Grade GS-14
  - i. Qualified Internal Applicants (PWD) Answer: Yes
  - ii. Internal Selections (PWD) Answer: N/A
- d. Grade GS-13
  - i. Qualified Internal Applicants (PWD) Answer: No
  - ii. Internal Selections (PWD) Answer: No

a. SES: There were no internal vacancies for SES positions at BPA.

b. GS-15: 17.65% of internal qualified applicants were PWD none were selected. Since there were only 2 internal selections, this is insufficient data to draw conclusions about a possible trigger for internal selection. However, if inclusion rates are used, whereas 33.3% of internal PWD applicants for promotions were deemed qualified, this was a lower rate than the 48.6% of all BPA applicants for GS-15 positions.

c. GS-14: 3.86% of internal qualified applicants were PWD (below the 12% target) none were selected among the 5 selections made, this is insufficient data to draw conclusions about a possible trigger for internal selection. Using inclusion rates: similar to the situation for the GS15 internal applicants, 44.4% of PWD internal applicants versus 67.2% of internal all BPA applicants for promotions to GS14 were deemed qualified. These lower qualification rates of PWD for those who apply to GS15 and GS14 positions suggest a need to examine career counseling and training opportunities provided to PWD at BPA.

d. GS-13: 30.99% of internal qualified applicants were PWD and three (15%) PWD were among the 20 selections made. Using inclusion rates: in contrast to the situation for the GS14 and GS15 internal applicants, PWD were as likely as all BPA internal applicants for competitive promotions to be qualified.

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

a. SES

i. Qualified Internal Applicants (PWTB) Answer: N/A

ii. Internal Selections (PWTB) Answer: N/A

b. Grade GS-15

i. Qualified Internal Applicants (PWTB) Answer: No

ii. Internal Selections (PWTB) Answer: N/A

c. Grade GS-14

i. Qualified Internal Applicants (PWTB) Answer: No

ii. Internal Selections (PWTB) Answer: Yes

d. Grade GS-13

i. Qualified Internal Applicants (PWTB) Answer: No

ii. Internal Selections (PWTB) Answer: Yes

- a. SES: There were no internal vacancies for SES positions at BPA.
- b. GS-15: 11.76% of internal qualified applicants were PWTB none were selected. Since there were only 2 internal selections, this is insufficient data to draw conclusions about a possible trigger for internal selection. However, if inclusion rates are used, whereas 40.0% of internal PWTB applicants for promotions were deemed qualified, this was a lower rate than the 48.6% of all BPA applicants for GS-15 positions.
- c. GS-14: 1.45% of internal qualified applicants were PWTB (below the 12% target) none were selected among the 5 selections made, this is insufficient data to draw conclusions about a possible trigger for internal selection. Using inclusion rates: similar to the situation for the GS15 internal applicants, 30.0% of PWTB internal applicants versus 67.2% of internal all BPA applicants for promotions to GS14 were deemed qualified. These lower qualification rates of PWTB for those who apply to GS15 and GS14 positions suggest a need to examine career counseling and training opportunities provided to PWTB at BPA.
- d. GS-13: 16.96% of internal qualified applicants were PWTB and none were among the 20 selections made, suggesting a trigger for selection of internal PWTB applicants for promotion to GS13 positions. Using inclusion rates: in contrast to the situation for the GS14 and GS15 internal applicants, PWTB were as likely as all BPA internal applicants for competitive promotions to be qualified.

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

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

SES: There were two vacancy announcements, representing insufficient data for analysis. None of the nine applicants were PWD.

GS15: There were 4 PWD applicants, none of whom were deemed qualified, below the 12% goal. Overall there were 26 applicants, of whom 8 (30.8%) were qualified.

GS14: 8.57% of the 70 qualified external applicants were PWD, below the 12% goal.

GS13: 10.42% of the 470 qualified external applicants were PWD, below the 12% goal.

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

- a. New Hires to SES (PWTD) Answer: N/A
- b. New Hires to GS-15 (PWTD) Answer: Yes
- c. New Hires to GS-14 (PWTD) Answer: No
- d. New Hires to GS-13 (PWTD) Answer: No

SES: There were two vacancy announcements, representing insufficient data for analysis. None of the nine applicants were PWTD.

GS15: There was 1 PWTD applicants, none of whom were deemed qualified, below the 2% goal. Overall, there were 26 applicants, of whom 8 (30.8%) were qualified.

GS14: 7.14% of the 70 qualified external applicants were PWTD, above the 2% goal.

GS13: 10.42% of the 470 qualified external applicants were PWTD, above the 2% goal.

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

a. Executives

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

ii. Internal Selections (PWD) Answer: N/A

b. Managers

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

ii. Internal Selections (PWD) Answer: N/A

c. Supervisors

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

ii. Internal Selections (PWD) Answer: N/A

Insufficient data for appropriate statistical analysis.

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

a. Executives

i. Qualified Internal Applicants (PWTDD) Answer: N/A

ii. Internal Selections (PWTDD) Answer: N/A

b. Managers

i. Qualified Internal Applicants (PWTDD) Answer: N/A

ii. Internal Selections (PWTDD) Answer: N/A

c. Supervisors

i. Qualified Internal Applicants (PWTDD) Answer: N/A

ii. Internal Selections (PWTDD) Answer: N/A

Insufficient data for appropriate statistical analysis.

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

- a. New Hires for Executives (PWD) Answer: N/A
- b. New Hires for Managers (PWD) Answer: N/A
- c. New Hires for Supervisors (PWD) Answer: N/A

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

- a. New Hires for Executives (PWTD) Answer: N/A
- b. New Hires for Managers (PWTD) Answer: N/A
- c. New Hires for Supervisors (PWTD) Answer: N/A

USA Staffing does not have the relevant independent variable to permit this analysis.

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

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

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer: N/A

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

- a. Voluntary Separations (PWD) Answer: No
- b. Involuntary Separations (PWD) Answer: Yes

a. Voluntary separations: A total of 227 BPA employees separated in FY 2022. Of these, 193 either resigned or retired (voluntary separations), representing 6.71% of BPA's FY 2022 permanent workforce. Among PWD, 18 retired or resigned in FY 2022, representing 5.81% of BPA's permanent PWD workforce. This rate of voluntary separation is comparable to that of the overall BPA workforce.

b. Involuntary separations: There was a relatively small number of Removals at BPA in FY 2022 (n=9). Among these, 3 were PWD. In total, 227 BPA employees separated in FY 2022, of which, 3.96% were involuntarily separated (i.e., removed). The 3 PWD who were removed represented 12.5% of PWD who were separated in FY 2022. This inclusion rate for involuntary separation is higher than the overall rate among BPA separations. Although the numbers are small, weak evidence of a trigger suggests a need to look more carefully at PWD separations from BPA.

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

- a. Voluntary Separations (PWTD) Answer: No
- b. Involuntary Separations (PWTD) Answer: No

a. Voluntary separations: A total of 227 BPA employees separated in FY 2022. Of these, 193 either resigned or retired (voluntary separations), representing 6.71% of BPA's FY 2022 permanent workforce. Among PWTD, 2 retired or resigned in FY 2022, representing 2.53% of BPA's permanent PWTD workforce. This rate of voluntary separation is lower than that of the overall BPA workforce.

b. Involuntary separations: There was a relatively small number of Removals at BPA in FY 2022 (n=9). Among these, 1 was a PWTD, which represented 33.3% of the three PWTD separations in FY 2022, which is higher than the 3.96% rate for all BPA separations in FY 2022, but illustrating the general statistical problem of drawing conclusions based on small numbers. No evidence of a trigger.

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

N/A

**B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES**

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

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

<https://www.bpa.gov/about/careers/office-of-civil-rights-eeo>

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

<https://www.bpa.gov/about/careers/office-of-civil-rights-eeo>

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

Section 508 of the Rehabilitation Act (29 USC § 794d) requires that Federal agencies' electronic and information technology is accessible to people with disabilities, including employees and members of the public. Before onboarding the Learning & Workforce Development team's eLearning developers, very few eLearning courses at BPA were Section 508 compliant. During the eLearning course migration to Learning Nucleus, the Learning & Workforce Development team eDevelopers edited all courses under the team's purview to meet the Section 508 requirement. Further, all new courses developed by the Learning & Workforce Development eLearning Developers are Section 508 compliant.

Beyond compliance, the Learning & Workforce Development eLearning Developers have also worked with individuals using assistive technology to improve their eLearning experience. This effort has significantly improved all BPA employees' access to eLearning, in addition to finally meeting the Section 508 requirement.

### C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

- Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

The average time for processing requests was 27 days excluding requests for COVID telework and the vaccine mandate.

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

Over the past year we've provided manager training, created a database for monitoring the program, updated our website based on user feedback, and consolidated many of our files to one system for easy reference.

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

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

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

BPA timely processes individual requests for PAS on an ad-hoc basis.

## Section VI: EEO Complaint and Findings Data

### A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer: N/A

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

Answer: N/A

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

BPA reported 10 formal EEO complaints in its FY 2022 462 report. Of these, one was a complainant that alleged harassment based on mental disability and one was a complainant that alleged harassment based on physical disability, representing 0.32% of BPAs 312 PWD employees (permanent and temporary). In comparison, 0.17% of all BPA employees (n=2,883 permanent and temporary) alleged harassment in five formal EEO complaints filed in FY 2022.

(Note: EEOC has advised that agencies use a 21.98% benchmark for comparisons as the government-wide average. Using the implied computational process. 1/1 of the BPA's EEO complaints filed by PWD alleging a mental basis cited harassment as an issue (100%) and 1/3 of the BPA's EEO complaints alleging a physical disability basis cited harassment as an issue (33.3%). While these rates are higher than the 21.98% rate, they are based on such small numbers that conclusions are not statistically appropriate.)

### B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer: No

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

Answer: No

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

There were no formal EEO complaints alleging failure to provide reasonable accommodation. With no RA-issue complaints, BPA's rate is lower than the government-wide average of 14.03% provided by EEOC for comparison purposes. le



## Section VII: Identification and Removal of Barriers

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

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

Answer: No

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

Answer: No

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

N/A

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

N/A

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

N/A

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

N/A

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

<b>Supporting Documents for Submission</b>	
<b>Submitted</b>	<b>Document</b>
Yes	1. Organizational Chart
Yes	2. EEO Policy Statement
Yes	3. Strategic Plan
Yes	4. Anti-Harassment Policy and Procedures
Yes	5. Reasonable Accommodation Procedures
No	6. Personal Assistance Services Procedures
Yes	7. Alternative Dispute Resolution Procedures
No	8. Federal Equal Opportunity Recruitment Program (FEORP) Report
Yes	9. Disabled Veterans Affirmative Action Program (DVAAP) Report
No	10. Operational Plan for Increasing Employment of Individuals with Disabilities under Executive Order 13548
Yes	11. Diversity and Inclusion Plan under Executive Order 13583
No	12. Diversity Policy Statement
Yes	13. Human Capital Strategic Plan
No	14. EEO Strategic Plan
Yes	15. Results from most recent Federal Employee Viewpoint Survey or Annual Employee Survey (FEVS)