

## U.S. Department of the Interior Equity Action Plan

February 10, 2022 - Submission to OMB

### **(1) Executive Summary**

Executive Order 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, calls on the U.S. Department of the Interior (DOI, the Department) to advance equity so that it is not just an ideal, but a principle that is reflected in how the Department serves the American people and fulfills its mission. By embedding equity in its operations, policies, and decision-making process, the Department is committed to equitable treatment of all individuals, regardless of race, color, national origin, age, sex (including gender identity and sexual orientation), religion, or disability. The Department is proud to put forward this Equity Action Plan, which lays out the foundation to achieve outcomes that remove barriers to equal opportunity and deliver resources and benefits equitably to all.

The Department protects and manages the Nation's natural resources and cultural heritage; provides scientific and other information about those resources; and honors its trust and treaty responsibilities or special commitments to American Indians, Alaska Natives, Native Hawaiians, and affiliated Island Communities. The Department plays a central role in how the United States stewards its public lands and waters, increases environmental protections, pursues environmental justice, and honors our nation-to-nation relationship with Tribes.

The Department is leaning into its moral and legal responsibilities to Tribes by honoring sovereignty and reckoning with DOI's role in the history of injustice and marginalization of Indigenous people. Leaders are learning from past mistakes through nation-to-nation consultation, listening for understanding, ethically co-producing, sharing, using evidence and data for decision-making, and employing analytic tools to advance and promote equity and justice in all that we do for Tribes, Alaska Natives, Native Hawaiians, and the American public.

The Department also recognizes that much of the United States' history is tied to our public lands. Whether it be our national parks, monuments, wildlife refuges, or other historic or culturally significant areas, each of these have played a significant role in shaping America's identity. Public lands enable physical activity, promote mental health and wellness, and foster a sense of community through the preservation of ecosystems and interpretation of a shared heritage. With more than 480 million acres of public land managed by the Department, and more than 400 million people visiting DOI-managed lands annually, opportunities exist to develop and implement new strategies and plans for the advancement of equitable access to public lands for all Americans to connect and recreate.

In executing the Department's diverse mission goals, DOI spends over \$3 billion dollars annually in procurement contracts. These contracts are performed throughout the country across a wide variety of industries, from construction to information technology and beyond. The Department is committed to ensuring a diverse supplier base for these contracts because businesses of all types should realize economic and developmental benefits from DOI's contract dollars, and DOI's programs benefit from diverse experience and expertise.

To date, the Department has focused its initial implementation of Executive Order 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal*

*Government* (EO 13985), on four priority actions that support its mission and have strong potential for equity impact. The four actions are:

- Action 1: Build upon the Department’s data strategies to improve the collection of equity-related data.
- Action 2: Heighten awareness of opportunities and address structural barriers within DOI processes that hinder participation by underserved communities in DOI procurements.
- Action 3: Improve access to and awareness of Tribal discretionary grant funding.
- Action 4: Increase opportunities to access public lands and waters, prioritizing access to recreation areas and services in historically underserved or disadvantaged communities.

The activities in this Equity Action Plan include a combination of actions which are feasible, given current levels of funding and staff resources, as well as actions which will require additional resources to complete. Actions that will require additional resources to complete are indicated with an asterisk (\*) throughout the document. The Department will continue to evaluate its current resource allocations and priorities to determine the best path forward for implementing the activities contained within this Equity Action Plan within an aggressive but reasonable timeframe. This is the Department’s first Equity Action Plan, and the Department intends to expand its assessments and commitments to advance equity. Appendix A contains additional activities under consideration for future plans. The Department will continue to gather and consider feedback from internal and external stakeholders, collect and analyze relevant data and information, and review existing policies and processes to inform both milestone progress and future equity action plans.

## **(2) Summary of Early Accomplishments**

EO 13985 calls on agencies to advance equity through identifying and addressing barriers to equal opportunity that underserved communities may face due to government policies and programs. Early accomplishments related to advancing equity include the following activities, many of which go beyond the scope of the Department’s four priority action areas:

- **Listening Sessions.** The Department hosted 15 listening sessions from October 13 – 29, 2021. Listening sessions were attended by senior leadership in the Department and attracted diverse participation from across the country, with sessions ranging from 30 to 400+ registrants. During the 15 facilitated listening sessions, the Department engaged with over 1,700 registrants about their experiences. Meeting summaries for all sessions as well as a recommendations report from the third-party neutral facilitator have been posted to the DOI’s website to enable stakeholders and partner groups to learn more about the conversations had during the listening sessions.
- **Public Comments.** The Department posted notices in the *Federal Register* inviting public comments on the barriers experienced with respect to the priority action areas, as well as recommendations to address barriers and advance equity in contracting and procurement, recreation, and tribal grants, and received approximately 100 comments that were considered as the Department developed this Equity Action Plan.
- **Procurement/Contracting Crowdsourcing Campaign.** The Department participated in the Office of Federal Procurement Policy and Department of Energy’s government-wide equity crowdsourcing campaign. The Department provided several ideas to the campaign related to use of procurement data for more targeted outreach efforts. The crowdsourcing campaign seeks feedback from historically underserved groups on short-term actions to mitigate barriers in the Federal marketplace that impede qualified historically underserved groups from full and equal access to prime and subcontracting opportunities.

- **DOI Leadership Interviews and Workforce Focus Groups.** From November 9 – 20, 2021, a third-party neutral facilitator conducted a series of leadership interviews and staff-level focus groups to discuss key themes from the listening sessions and potential recommendations for actions to advance equity in the DOI programs. These themes and recommendations were considered as the Department developed this Equity Action Plan.
- **America the Beautiful.** EO 14008, *Tackling the Climate Crisis at Home and Abroad*, created the first-ever national goal for stewardship of nature in America, to conserve at least 30 percent of lands and waters by 2030. On May 6, 2021, the Department released an initial America the Beautiful report in collaboration with CEQ, USDA, and NOAA. One of the key goals of America the Beautiful is addressing inequitable access to the outdoors, and an area identified for early focus is to create more parks and safe outdoor opportunities in nature-deprived communities. As stated in the report, “The Biden-Harris administration has made a historic commitment to ensure that 40 percent of the overall benefits from relevant Federal investments flow to disadvantaged communities. In that spirit, the America the Beautiful campaign should support locally led conservation and park projects in communities that disproportionately lack access to nature and its benefits.”
- **Small Business Participation as an Evaluation Factor.** The Department is developing approaches to reverse the loss of its small business and socio-economically disadvantaged business vendor base by mandating small business participation as an evaluation factor in large procurements. Small business participation as an evaluation factor incentivizes the diversification of supply chains, strengthens subcontract plan performance with small and socio-economically disadvantaged businesses, encourages large firm commitments to small and socio-economically disadvantaged businesses, and ensures enhanced compliance mechanisms to enforce subcontracting commitments.
- **Buy Indian Act Implementation.** The Department is proposing revised regulations to better implement the Buy Indian Act, which provides the Department with authority to set aside procurement contracts for Indian-owned and controlled businesses. These revisions would eliminate barriers that inhibit Indian Economic Enterprises (IEEs) from competing on certain construction contracts, expand IEEs’ ability to subcontract construction work consistent with other socio-economic set-aside programs, and give greater preference to IEEs when a deviation from the Buy Indian Act is necessary, among other updates. The proposed regulations were published in the Federal Register in October 2021, with comments due at the end of December 2021.
- **Law Enforcement Task Force.** In July 2021, the Department established a law enforcement task force to implement the highest standards for protecting the public and providing necessary policy guidance, resources, and training to agency personnel, with a focus on equity and evidence-based decision-making. The Task Force focuses on ways to strengthen public trust and confidence in Interior’s law enforcement programs, ensure appropriate policy and oversight is implemented, and assure supportive resources are available for officer mental health, wellness, and safety. Outcomes are expected to include improving complaint processes to ensure appropriate action is taken for misconduct; ensuring basic training includes and prioritizes skills such as community policing, understanding and reducing implicit bias, communication skills, de-escalation, and procedural justice; and improving processes to recruit, hire, support, and retain a diverse law enforcement workforce that reflects our country and is culturally competent and responsive to underserved communities.

- **Visitor/Visitation Information Collection and Corporate Data.** Several of the Department's bureaus are pursuing efforts and establishing new data collection plans to improve understanding of who is visiting DOI managed lands and waters and pair that information with public interactions, tastes, preferences (such as for different types of programming and delivery media by different demographic groups), trends, values, and behaviors from which we can develop strategic programming related to visitor (including visitors from underserved communities) needs.
- **Land and Water Conservation Fund Project Ranking Criteria.** The Land and Water Conservation Fund (LWCF) supports conservation, recreation, and related projects that enhance management of and public access to existing public land and resources. Some bureaus have already updated their LWCF project ranking criteria to reflect EO 13985 values and other environmental justice considerations.
- **Values Mapping for Planning in Regional Ecosystems.** In addition to the Department's role in supporting development of the government-wide Climate and Environment Justice Screening Tool, the Bureau of Land Management has begun piloting a visualization tool that can be used to identify populations affected by planning efforts at a finer scale (adapted to rural areas). Since underserved communities are more vulnerable to the impacts of climate change, this tool will help the Department pinpoint where to provide assistance.
- **Transportation Innovation in the National Park System.** On November 17, 2021, the Department of the Interior and Department of Transportation entered into a memorandum of understanding to improve transportation within and access to national parks and public lands. Through this partnership, DOI and DOT can advance the intersection of transportation and access to public spaces for people with disabilities, as well as underserved and disadvantaged communities. Innovative technology pilots, shared mobility integration, the electrification of major transit fleets, and additional electric vehicle charging stations will guide the Departments' efforts to build world-class transportation systems that provide enhanced access for car-free trips, interpretation, education, and enjoyment opportunities to all visitors who want to experience public lands.
- **Tribal Consultation.** On August 21, 2021, Secretary Haaland issued a detailed plan to improve tribal consultation. The Plan highlights that tribal consultation offers a means for weaving tribal input into the Department's decision-making processes, and that integration should be second nature for all Interior officials.

### **(3) Additional Strategies to Advance Equity**

The Department continues to assess and add resources for advancing equity, and DOI is establishing a Diversity, Equity, Inclusion and Accessibility (DEIA) Council (Council) which consists of executive leaders who will come together on a recurring basis to operationalize this Plan and other DEIA initiatives and ensure that equity is embedded in the culture of DOI long-term. As for the DEIA initiatives that have already been established such as the Missing and Murdered Indigenous People Initiative, the Indian Boarding School Initiative, and Justice40, senior leaders set ambitious and bold goals and strategies to continue advancing equity so that all communities benefit from DOI programs and initiatives. Major milestones for these initiatives will be tracked and reported in the Department's annual Equity Action Plan progress report.

## **Missing and Murdered Indigenous People Initiative**

American Indian and Alaska Native people are at a disproportionate risk for experiencing violence, murder, or going missing and make up a significant portion of the missing and murdered cases, but for too long, this crisis has been overlooked. On November 15, 2021, President Biden signed EO 14053, *Improving Public Safety and Criminal Justice for Native Americans and Addressing the Crisis of Missing or Murdered Indigenous People*, directing the U.S. Departments of the Interior (DOI), Justice (DOJ), Homeland Security (DHS), and Health and Human Services (HHS) to create a strategy to improve public safety and justice for Native Americans and to address the epidemic of missing and murdered Indigenous peoples so that people can feel safe in their communities.

The Administration established the Missing and Murdered Unit (MMU), within the Bureau of Indian Affairs' Office of Justice Services (BIA-OJS), to investigate cases of missing and murdered people in pursuit of justice for those affected by violence. The MMU is focused on marshaling federal law enforcement resources and agencies to focus attention on solving cases of missing and murdered American Indians and Alaska Natives. The MMU is also working with DOJ to enhance the DOJ's National Missing and Unidentified Persons System and develop working partnerships with the FBI's Behavioral Analysis Units, the FBI Forensic Laboratory, the U.S. Marshals' Missing Child Unit, and the National Center for Missing and Exploited Children.

The MMU is working directly with Tribes through 15 BIA offices located across the nation as it gathers intelligence on missing persons and homicide cases. So far, the MMU has worked with Tribes to solve 40 missing persons cases. Additionally, in December 2021, the MMU launched a website dedicated to solving missing and murdered cases in Indian country. The site provides detailed case information and provides the public an opportunity to submit tips and other case information to help investigators solve missing and murdered persons cases. BIA-OJS anticipates that the website will help with identifying missing persons and solving cases stemming from human trafficking.

In total, the Unit is responsible for:

- Gathering intelligence on active missing and murdered cases;
- Reviewing and prioritizing cases for assignment to investigative teams;
- Developing investigative plans to guide investigators;
- Identifying any outside resources that could benefit their investigative efforts and coordinating those resources with their investigative team;
- Management of the tips submitted to Tip411, the Cold Case email and 1-800 line;
- Assigning and investigating cases;
- Coordinating with other stakeholders; and
- Preparing investigative reports.

The Secretary of the Interior also designated a Coordinator within the BIA-OJS to coordinate prevention efforts, grants, and programs related to the murder of, trafficking of, and missing Indians across federal agencies as part of the Not Invisible Act of 2019 (P.L. 116-166) implementation. Through this important work, the Not Invisible Act Coordinator and team met with other federal agencies to assess prevention efforts, grants, training and technical assistance, and existing collaboration efforts to pursue justice for missing and murdered American Indians and Alaska Natives. The Not Invisible Act Team held four Tribal consultations in Summer 2021 and has been working diligently on preparing a report to Congress on year one activities.

## **Federal Indian Boarding School Initiative**

For more than a century, the Bureau of Indian Affairs was involved in the operation and oversight of Indian boarding schools in the United States. The purpose of Indian boarding schools was to culturally assimilate Indigenous children by forcibly relocating them from their families and communities to distant residential facilities where their American Indian, Alaska Native, and Native Hawaiian identities, languages, and beliefs were to be forcibly suppressed. Hundreds of thousands of Indigenous children were taken from their communities; generations of lost or injured children who are the lost or injured aunts, uncles, parents, and grandparents of those who live today. On June 22, 2021, the Secretary of the Interior announced the Federal Boarding School Initiative (BSI) to recover the histories of these institutions as well as learn of the traumas suffered in the boarding school era to better understand impacts on communities today.

As the first steps in addressing Indian boarding school policies and their effects, the BSI will develop an initial collection and review of DOI documents and records through compilation of existing data within the Department's jurisdiction. DOI staff will develop a BSI Report (Report) due to the Secretary by April 1, 2022, that will highlight strategies for addressing identified next steps. DOI is uniquely positioned to assist in the effort to recover the histories of Federal Indian boarding schools since it had direct authority over the historical implementation of the Federal policies that took Indigenous children from their families and relocated them to boarding schools. In November 2021, DOI, in conjunction with the U.S. Department of Health and Human Services (HHS) held three formal Tribal consultation sessions with approximately 700 registrants from Tribal governments, Alaska Native Corporations, and Native Hawaiian Organizations on key issues for inclusion in the Report. DOI also signed a formal Memorandum of Understanding with the National Native American Boarding School Healing Coalition (NABS) on December 7, 2021, to share records and information in support of the BSI. To build on this work, the initial Report will include preliminary information to lay the foundation for the next steps to expand the boarding school profiles as part of the process to fully investigate the full scope of the flawed policies of the past.

## **Justice40 Initiative**

Historically, disadvantaged communities have borne the burden of our nation's legacy of pollution. The Justice40 Initiative is a whole-of-government effort to ensure that Federal agencies work with states and local communities to advance environmental justice and spur economic opportunity by delivering at least 40 percent of the benefits from Federal investments in climate and clean energy to disadvantaged communities. The Department's implementation of Justice40 closely aligns with the analysis and outreach conducted for EO 13985. Efforts to ensure that 40% of the overall benefits from Federal investments in covered programs go to disadvantaged communities have allowed the Department to holistically evaluate existing and new programs that deliver benefits to disadvantaged communities. As Justice40 also seeks to develop robust outreach plans for meaningful input from EJ communities, the Department has been able to, and will continue to, engage with individuals and organizations interested in advancing equity in low-income communities and communities of color to identify barriers and better ensure benefits flow to these communities in the future.

The Department is currently implementing the Interim Implementation Guidance for the Justice40 Initiative released by the Office of Management and Budget, including the associated Budget Data Request and two associated addendums. The Department developed stepdown

guidance to help identify Justice40 “Covered Programs” across all Department bureaus and offices, and to work towards developing stakeholder engagement plans and benefits methodologies for each covered program. The Department is working with the Office of Management and Budget and Council on Environmental Quality through the White House Environmental Justice Interagency Council to implement interim guidance and help develop the final guidance; this includes supporting work on the Climate and Economic Justice Screening Tool (CEJST). The Department is working on methodologies, policies, tools, and Justice40 Covered Programs towards the goal that a minimum of 40% of the Covered Investment made across all Covered Programs goes to Disadvantaged Communities as defined by EO 14008.

#### **(4) Equity Action Plan**

As part of implementing EO 13985, the Department identified three focus areas that support the agency’s mission and have high potential for equity impact:

- **Contracts for businesses with characteristics that align with the definition of underserved communities.** The Department can use the power of procurement to contract with and support small and disadvantaged businesses, which will help narrow the racial wealth gap. Identifying and addressing barriers in the Department’s procurement process, with a particular emphasis on increasing transparency, small disadvantaged business (SDB) engagement, and ambitious goaling accountability, may improve opportunities for successful engagement of businesses that possess characteristics that align with the definition of underserved communities.
- **Tribal discretionary grants.** Discretionary grant programs administered by the Department can provide funding to support tribal operations, economic development, education, resilience, preservation of historic places, and other key functions. By addressing barriers to applying for and accessing DOI discretionary grants, the Department can better support Tribes in improving long-term sustainable development and quality of life for their members.
- **Recreation on DOI-managed lands and waters and beyond.** Public land visitation data collected from the Department’s bureaus suggests that certain underserved communities are underrepresented as visitors to the more than 480 million acres of public land managed by the Department, relative to their presence in the U.S. population at large. Addressing barriers to recreation on DOI-managed lands and waters will enable more Americans to enjoy these sites and reap the physical and mental health benefits associated with greenspace and outdoor recreation. In addition, the Department, through its programs, can offer technical and financial support to promote and create equitable and close-to-home access to the outdoors beyond DOI-managed land boundaries (and specifically in underserved communities across the nation).

In the evaluation of these three focus areas, the Department proposed four priority actions to address barriers to underserved communities. A definition and description of impacted underserved communities is provided in Appendix C.

#### **ACTION 1 – Build upon the Department’s data strategies to improve the collection of equity-related data.**

The Department recognizes that the lack of demographic and intersectional data hinders its ability to address mission-related equity barriers and that it first must establish targeted strategies to improve the data collected that may inform and influence equity-related priorities. The Department has an agency-wide data strategy and data governance plans that integrate general

equity considerations into data collection and management. In addition to this overarching strategy, targeted strategies should be developed for each of the Department's EO 13985 focus areas, addressing the fact that available data, systems that house the data, and monitoring approaches vary widely between focus areas and have unique characteristics and limitations.

#### **A. Barriers to be Addressed**

- **Lack of Data.** The Department lacks the actionable data needed to truly identify the equity barriers in and across the Department's initial focus areas on contracting, tribal discretionary grants, and recreation. Equity-related data limitations also extend beyond the Department's initial focus areas. The Department recognizes that understanding mission-related equity issues requires data which will enable (1) creation of a baseline from which the agency can track and monitor the impact of initiatives and interventions and (2) identification of emerging areas to prioritize. General summaries of the types of data the Department has access to as well as limitations of existing data are included in Appendix B.

#### **B. Priority Actions and Intended Impact on Barrier**

The Department will coordinate with OMB to strengthen its overarching data strategy and develop more targeted (focus area specific) data strategies to improve the collection and quality of equity-related data. These strategies ensure that the Department develops a coordinated and integrated approach to using data to deliver on mission, increase evidence-based decision making, serve the public, and steward resources while respecting privacy and confidentiality. The Department recognizes fidelity of the data strategies must meet the standards of the Paperwork Reduction and Privacy Acts to reduce the data collection burden on the public while maintaining privacy. Elements the strategies should minimally consider across the three focus areas include, but are not limited to:

##### ***Contracting***

- Modifying the Department's contract writing system to collect quantitative/readily analyzable information on all vendors who submit proposals in addition to vendors who are awarded contracts.\* This data will provide the Department with a more comprehensive picture of the types (such as size, ownership demographic, etc.) of vendors that are responding to solicitations and will enable the Department to identify any patterns regarding which vendors are and are not receiving contract awards. DOI will further determine what, if any, collected data can be made public and evaluate opportunities to do so to increase transparency.
- Supporting the Small Business Administration's ongoing efforts to leverage data in the System for Award Management to measure awards made to additional categories of disadvantaged and underserved businesses, including exploring methods to improve data quality, and report disaggregated contracting data at a more granular (Department) level.

##### ***Recreation***

- Expanding upon several of the bureau efforts of collecting demographic and geographic data on visitors/visitation to better understand who is visiting DOI managed lands and waters and pairing that information with public interactions, tastes, preferences, trends, and values.\*
- Collecting and synthesizing customer feedback and optional customer demographics from visitors to public lands.\*



- Conducting larger scale needs assessments in specific communities to understand how DOI can design programming, services, and access that encourages participation and engagement from members of underserved communities.\*

### ***Tribal Grants***

- Establishing a more consistent data collection protocol across grant programs, including the tracking of data on grant program criteria to better balance DOI grant program purposes.
- Tracking additional information related to applications and rationale for selection/non-selection.\*
- Creating an official database/mapping tool for the multiple variations of Tribe names, to ensure consistent tracking and reporting across Departmental data systems.\*

### **C. Tracking Progress**

The Department recognizes data strategies will not have immediate impacts on improving equity; however, collecting and understanding data will enable the Department to track and monitor the impact of initiatives and interventions.

#### ***Near- to Mid-Term Indicators (1-5 Years)***

- The Department will incorporate additional equity considerations into the existing Department-wide data strategy.
- The Department will develop targeted strategies for improving data related to equity in its three initial focus areas – contracting, tribal discretionary grants, and recreation.
- The Department will hire or contract 2 – 3 equity data strategy resources with the expertise and background in equity analytics and reporting.\*

#### ***Long-Term Indicators (5+ Years)***

- The Department will begin to implement the equity data strategies and commence bi-monthly reporting on the trends and insights gathered to senior leaders across the Department and bureaus.
- The Department will define equity outcomes and measures for the three initial focus areas.
- The Department will catalogue and track identified equity barriers and/or gaps encountered during gathering efforts.
- The Department will document interventions made and report progress and outcomes as part of the bi-monthly reporting to senior leaders across the Department and bureaus.

### **D. Accountability**

*Positions responsible for this action:* The Department’s Chief Diversity Officer, in collaboration with the Department’s Chief Data Officer and the Data Governance Board, will lead the refinement of the overarching data strategy as well as develop the more targeted data strategies for each focus area.

*Accountability for implementing action:* The Data Governance Board will provide progress reports to the DEIA Council on a semi-annual basis. The Department will also hold itself accountable through its agency-wide data strategy and its agency strategic plan. DOI’s draft strategic plan includes Strategic Goal 4: Serve and honor the public trust, which includes

objective statement 4.1: Communities and organizations have the data, science, and information they need. Performance goals and measures for this objective are being finalized. The Department will gather and consider feedback from internal and external stakeholders to inform and update its data strategies.

**ACTION 2 – Heighten awareness of opportunities and address structural barriers within DOI processes that hinder participation by underserved communities in DOI procurements.**

The Department of the Interior has received an “A” or higher grade on the Small Business Administration's annual scorecard for each of the last eleven years. The FY 2021 scorecard hasn't been released as of the date of this report, but preliminary reporting indicates 60% of DOI's contracting dollars were awarded to small businesses, 34% of total dollars going to small disadvantaged businesses. In the most recent published scorecard as of the date of this report, FY 2020, the Department received an A+ rating, having awarded 57% of contract dollars to small businesses, far exceeding the Government-wide goal of 23%. Those dollars include 29% of total dollars going to small disadvantaged businesses, far exceeding the Government-wide goal of 5%, the newly anticipated goal of 11% in FY 2022 and 15% by FY 2025.

While DOI has met and exceeded its annual SDB goals for 14+ years, the Department seeks to maximize opportunities for underserved communities to be involved in the DOI procurement process. Quantitative and qualitative data were analyzed to inform the following barriers, priority actions, proposed tracking mechanisms, and accountability standards. This includes data from the System for Award Management (SAM.gov, the authoritative data source for government contracting data), including disaggregated Federal contracting data reported by SBA, as well as and feedback received from small business owners from underserved communities, the DOI procurement community, public listening sessions, surveys, Federal Register Notice, and a crowd-sourcing campaign.

**A. Barriers Addressed**

- **Difficulty Finding Opportunities.** Learning about contracting opportunities can be challenging, especially for new or inexperienced businesses. While a single government point of entry (SAM.gov) is intended for publicizing solicitations, the prevalence of purchasing through Indefinite Delivery Vehicles, contracts that generally provide for an indefinite quantity of supplies or services in which orders are placed over a period of time, results in complexities that make navigating the process challenging. These include the use of the Federal Supply Schedule, Government-wide Acquisition Contracts (GWACs), and Blanket Purchase Agreements (BPAs). New entrants to the Federal procurement process lack experience and understanding of how to access opportunities and the various methods DOI uses to procure goods and services.
- **Communication.** Several listening session participants indicated frustration with the communication between the Department and vendors. Specifically, vendors indicated they had difficulty identifying the appropriate individuals within Bureaus that could help them, experienced inconsistent response rates, and had encountered challenges obtaining information regarding solicitations (due to proprietary information concerns) and during debriefings of unsuccessful offerors. In addition, outreach (especially in-person outreach) can be limited by geography and established networks, which may also present barriers for some businesses.

- **Process Complexity.** The procurement process is complex, with each step in the process governed by statute and regulations that in many cases differ from commercial contracting, and it can be particularly challenging for new or inexperienced businesses to understand requirements, terms and conditions in solicitations, and other elements of the process. Limited opportunities to gain experience (most vendors learn the process through experience) and/or training on the process may present barriers to some businesses.
- **Departmental Procedures.** Ensuring Departmental processes and policies contribute to an equitable distribution of awards to underserved communities is a critical component to achieving equity in Federal procurement. Based on a preliminary review of DOI policy, feedback from listening sessions, and survey results, the Department has identified the following process and policy as a focus area for additional targeted review and analysis: publicizing procurement actions and communication with vendors throughout the acquisition process, such as communication with vendors who were unsuccessful at securing an award during debriefing.

## **B. Priority Actions and Intended Impact on Barriers**

The following actions are meant to address the barriers identified above. In addition, they complement the five government-wide management actions identified by OMB's memorandum *M-22-03 Advancing Equity in Federal Procurement released on December 2, 2021*. The goal of these actions is to take incremental steps to ensure DOI obligated dollars are equitably distributed to underserved communities. Specific actions under consideration include:

- **Review Departmental Procurement Processes and Policies.** Feedback received during listening sessions and internal reviews indicated that several existing processes and policies may serve as unintentional barriers for businesses with characteristics that align with the EO 13985 definition of underserved communities. The Department will address these issues through activities such as:
  - *Increase Opportunities for Indian-Owned Economic Enterprises.* The Department will develop methods to increase opportunities for IEEs across all the Department's acquisitions, including providing a path for new entrants to Federal procurement. Specific actions may include: (1) creating and implementing policy to set annual IEE and Indian Small Business Economic Enterprise (ISBEE) contracting performance goals for the Department in addition to other small business goals, which would ensure that all DOI bureaus and offices, not just the Bureau of Indian Affairs and Bureau of Indian Education, are incentivized to use Buy Indian set-asides; and (2) creating policy to add a subcontracting goal for ISBEEs for all DOI contracts that require a subcontracting plan, which would provide more opportunities for Indian-owned businesses that do not have previous Government contracting experience to serve as sub-contractors (thereby gaining experience and developing a past performance record).
  - *Create a Team to Develop Innovative Acquisition Strategies.\** Creating a Department-level team of acquisition subject matter experts (modeled after the Department of Homeland Security's Procurement Innovation Lab) to consult with Contracting Officers on individual acquisition actions to develop innovative acquisition strategies that incorporate equity and to educate Contracting Officers on vendor communication and engagement throughout the acquisition process would address the cultural issues with hesitation about sharing information with contractors, as well as hesitation around maximizing use of set-aside tools.

- *Review Departmental Procedures and Practices Related to the Length of Time that Acquisition Actions are Publicized.* During listening sessions and other outreach activities, new entrants and other businesses owned by underserved groups identified a need for adequate time to develop competitive responses to solicitations. DOI will enhance its current policies to ensure that adequate time is provided for all business types to be competitive.
- *Review Departmental Procedures and Practices Related to Communications with Vendors throughout the Procurement Process, Especially with Unsuccessful Offerors After Award.* During listening sessions and other engagement activities, stakeholders from underserved communities identified debriefing practices as an opportunity in the process to improve future engagement. The Department's procurement staff will work with the Department's Office of the Solicitor to develop targeted strategies to improve information conveyed to unsuccessful offerors after award, contributing to a meaningful exchange of information between the government and contractors. New entrants and other businesses could use the information provided during debriefings to learn about government contracting, grow as a business, and be better poised to submit competitive proposals for future acquisitions.
- *Review Departmental Procedures and Practices Related to Contracting Vehicles.* Opportunities for DOI contracting work are often incorporated into contracting vehicles that result in a time and cost savings to the government but are not fully understood by small businesses. The Department will review and update related DOI-operational practices and existing DOI policies to close the gap of understanding by small businesses and how they can participate.
- **Modernize DOI's Small Business Counseling Services.** Feedback received during the listening sessions and internal reviews suggested that many businesses struggle to navigate the procurement process and would benefit from application of the principles of customer experience and service delivery (in accordance with EO 14058, *Transforming Federal Customer Experience and Service Delivery To Rebuild Trust in Government*) to demystify procurement processes, improve DOI-specific and Government-wide procurement literacy, and encourage participation by underserved communities in DOI procurements. The Department will address these issues through activities such as:
  - *Publish Acquisition Data.* DOI will publish a simple to use, public facing, DOI-specific acquisition data visualization in order to provide access to detailed information about DOI's purchasing history. This tool will provide new entrants a simple way to distill extensive DOI contracting data, use the tailored results to target marketing of their products and services, and identify potential networking opportunities, reducing administrative burdens of vendors interested in participating in DOI procurements.
  - *Expand Digital Services.* \* Expanding the use of the DOI's small business-focused digital services— with information, resources, and tools curated based on the journey, experience, and maturity of the business and designed to enhance the customer experience— would improve understanding and awareness of DOI's mission and how vendors can navigate DOI's procurement community for marketing purposes. Examples of curated information, resources, and tools include graphic-based guides, dynamic learning opportunities with DOI programs and procurement staff such as crowd sourcing, and on-demand micro-learnings.

- *Develop a Small Business Toolkit.* \* Developing a small business counseling and education toolkit that is used internally, by Office of Small and Disadvantaged Business Utilization (OSDBU) and bureau procurement offices (with capabilities to apply government-wide), would drive internal cultural changes that ensure the intentional inclusion of underserved communities in planning and preparing for counseling events and educational outreach efforts. The toolkit would be similar to the ‘Community Outreach Toolkit’ developed by the General Services Administration’s Office of Evaluation Sciences for the U.S. Census Bureau.

### **C. Tracking Progress**

Contracting data limitations and lack of standardized definitions and established categories for some underserved community groups affect the ability of the Department to fully understand equity issues in procurement and contracting. In addition, the Department’s contract writing system does not currently collect information on vendors who submit proposals (only on vendors who are awarded contracts). Improving the ability to identify which businesses may be submitting proposals but not receiving contract awards, as well as which businesses have characteristics that align with the definition of underserved communities (per EO 13985) would enable the Department to more meaningfully evaluate the impacts of its priority actions.

The Department will continue to track and monitor contracting data, including the number of contracts awarded to vendors who participate in the Small Business Administration’s Small Business Programs, and will submit a budget request for resources to modify the Department’s contract writing system to collect quantitative/readily analyzable information on all vendors who submit proposals in addition to vendors who are awarded contracts. In the long-term, DOI supports the Small Business Administration’s ongoing efforts to leverage data in the System for Award Management to measure awards made to additional categories of disadvantaged and underserved businesses, including exploring methods to improve data quality and report the disaggregated contracting data at a more granular (Department) level.

#### ***Near- to Mid-Term Indicators*** (1-5 Years)

- DOI will measure the contract workforce’s awareness of the Buy Indian set-aside policy and procedures through pre- and post-implementation surveys (leveraging Acquisition 360 surveys where possible), informing whether the policies increased awareness.
- DOI will inform development of a Department-wide Buy Indian contracting performance goal by baselining the current use of IEE and ISBEE awards.
- DOI will baseline the public’s use of OSDBU’s small business-focused digital services through the observation of website traffic.
- DOI will baseline use of newly established internal resources, such as the small business counseling and education toolkit, through internal digital tracing. This information will inform training needs, additional material development to improve intentional inclusion of underserved communities in planning and preparing for counseling events and educational outreach efforts.

#### ***Long-Term Indicators*** (5+ Years)

- DOI will measure the use of Buy Indian set-asides through tracking of performance against the newly established Buy Indian set-aside goal.

- DOI will measure the use of Indian-owned businesses as subcontractors through tracking of aggregated dollars and percentage of dollars awarded. This will be a lagging indicator of performance due to existing system limitations.
- DOI will measure the impacts and success of developing and deploying procurement communication and equity coaches, if funded, through comparative results of the supported procurements against time to award, cost savings, protests, and Acquisition 360 survey results.
- DOI will implement several changes to acquisition processes and policies, including the length of time that solicitations are advertised, ensuring meaningful communications with offerors post-award, and improving category management practices. To measure progress in these areas, DOI will use the annual, Department-wide processes internal control process of conducting Acquisition Management Reviews in accordance with OMB Circular A-123. Through these reviews, DOI will collect data annually on the adoption of the policy changes.
- DOI will develop and seek approval to use a satisfaction survey to collect data on the small and disadvantaged vendor experience with the DOI OSDBU. If approved, the survey will include a series of indicators (yet to be determined) to evaluate and gain insights on small business awareness, understanding, attitudes, preferences, and experiences about the services, tools, resources, and information provided by DOI OSDBU, measuring success of engagement and informing continued improvement efforts.

#### **D. Accountability**

*Positions responsible for this action:* The Office Acquisition and Property Management (PAM) and the OSDBU will be primarily responsible for carrying out this action, monitoring, and reviewing progress on this work. Depending on capacity available, the DEIA Council will formalize a Contracting Equity Working Group of representatives from PAM, OSDBU, and bureau procurement offices.

*Accountability for implementing action:* The Contracting Equity Working Group will provide progress reports to the Council on a semi-annual basis. The Department will also hold itself accountable through its agency-wide strategic plan. DOI's draft strategic plan includes Strategic Goal 4: Serve and honor the public trust, which includes objective statement 4.2: Access to opportunities, services, and resources is equitable. Performance goals and measures for this objective are being finalized.

#### **ACTION 3 – Improve Access to and Awareness of Tribal Discretionary Grant Funding.**

DOI is the primary Federal agency charged with carrying out the United States' trust responsibility to American Indian and Alaska Native people and the special relationship with Native Hawaiians, maintaining the government-to-government relationship with the federally recognized Indian Tribes, and promoting and supporting tribal self-determination. Through its listening sessions, the Department learned that many Tribes are either unaware of the range of grant opportunities (at DOI and other Federal agencies) available to them and/or lack the technical capacity or time required to apply for grant opportunities. The Department also reviewed its available data for tribal discretionary grant programs and observed the demand for grants nearly always exceeds the funding available. For example, of the total Office of Indian Economic Development Program Grants that were submitted from 2017 to 2020, 29% of applications were funded (337 Applied, 135 Granted, 202 not granted). Additionally, feedback

gathered during recent listening sessions as well as internal DOI focus groups illuminated that Tribes were unsure if applications for grants were properly submitted (given the complexity of the application process and Grants.gov application system) and when grant applications were not funded, Tribes received insufficient feedback from the Department to understand why they did not receive funding. Tribes also acknowledged the challenges associated with post-award reporting requirements via the grants management platform, Grant Solutions.

#### A. Barriers to be Addressed

- **Limited Capacity.** For centuries, Federal government support to Native Americans for infrastructure, self-governance, education, economic development, and other needs, which it promised in exchange for the surrender of Tribal lands, has not been adequate to meet the needs of Tribes. As a result, while Tribal staff capacity and/or technical support is essential for a successful grant application, many Tribes and intertribal organizations lack grant writing expertise. While some Tribes may have grant writers on staff to help draft applications, others with limited capacity may not have staff with time to devote to applying for grants. Additionally, lack of broadband access, limited English proficiency, and education levels can also impact a Tribe's ability to apply for and access grant programs. Tribal organizations, partnerships with consultants, academia, etc. can offer support on developing applications, though not all Tribes have access to these support services.
- **Form Complexity and Redundancy.** Many forms are required when applying for financial assistance through Grants.gov (e.g., applicants must complete an SF424: Application for Federal Assistance for each funding opportunity). Certain questions asked on these forms may not be easily understood by applicants, which sometimes presents a barrier to Tribes. In addition, completing the form multiple times for multiple grant applications may further reinforce the barrier presented by limited capacity for some Tribes. Additional unnecessary forms required by Grants.gov but not required by grant programs have posed confusion and extraneous time spent on applications.
- **Notice of Funding Opportunity Complexity.** Competitive grant announcements include a Notice of Funding Opportunity (available on Grants.gov along with the application package), which is the primary reference document for applicants and describes substantive grant provisions, such as application requirements, evaluation criteria, selection procedures, and acknowledgement of legal requirements. The language, detail, and length of Notice of Funding Opportunity documents may serve as barriers for Tribes, particularly those with capacity or expertise issues.
- **Insufficient DOI Workforce Dedicated to Tribal Grants.** Many tribal grants staff and points of contact operate in a collateral duty capacity and often have competing priorities. Low capacity limits the ability for grant program staff to build relationships through proposal development technical assistance and project implementation support.
- **Grant Solutions.** Tribal discretionary grant programs recently transitioned to Grants.gov and Grant Solutions (applications and updates were previously collected via email). During focus groups and interviews with members of the Department's workforce who manage the grant programs, numerous participants highlighted challenges with Grant Solutions. The learning of a new system has been challenging for DOI staff as well as Tribes already struggling with capacity issues. While these platforms contain extensive information about available grants and streamline many financial assistance management tasks, the systems are not always intuitive and user-friendly.

- **Aversions.** Owing to a history of promises broken by the Federal government and past policies such as termination, some Tribes may be averse to Federal financial assistance and other grants because of the Federal government oversight these award requirements often entail and the historically strained relationship between Tribes and the Federal government.

## **B. Priority Actions and Intended Impact on Barriers**

These actions are intended to result in additional and/or more targeted technical assistance for Tribes navigating the complexities of the current grant application process. These actions also consider the necessary resources and partnerships needed for the Department to further identify and evaluate potential systemic barriers perceived as elements of grant applications process itself. Specific actions under consideration include:

- **Improve Transparency and Technical Assistance.\*** Feedback received during the tribal listening sessions and internal reviews indicated that many applicants feel they do not receive sufficient feedback about why they do not receive grant awards. The Department will improve transparency and technical assistance through activities such as:
  - *Provide Feedback.\** The Department will incorporate additional steps/activities within the grants process to provide (upon request) a debrief and/or feedback to Tribes whose grants were not awarded. Comments by Tribes during recent listening sessions revealed that many believe this information and transparency would enable them to develop more competitive grant applications. The Department may inform its feedback approach through reviewing available information about grant applicants and level of complete-ness of grant applications. The Department can also continue to hold webinars and develop guidance materials on how to address the most common grant submission challenges.
  - *Increase Grants Staff Support to Improve Awareness and Assistance.\** Adding capacity at the regional and program offices will enable more opportunities to build relationships through increased proposal and project implementation support as well as field visits. The additional support would also be beneficial in implementation of “curing” support for grant applicants to be able to receive feedback on whether their applications were incomplete, not competitive, or non-compliant.
  - *Partner with Tribal Colleges and Universities.* The Department has partnered with EPA on the College/Underserved Community Partnership Program (CUPP) to provide technical assistance to underserved communities. Several pilot projects are being coordinated with tribal colleges and universities to reduce barriers, such as classes geared specifically towards the grant writing process. These partnerships are designed to provide additional support to Tribes whose current capacity or experience in the grants process do not support their current needs.
- **Conduct Further Evaluation of Opportunities to Enhance Grants Program Systems and Structural Design.\*** Feedback received during the tribal listening sessions and internal reviews indicated that the current process and supporting technology present challenges for both tribal applicants and the Department’s grant program staff. The themes that emerged from those sessions indicated there may be value in evaluating opportunities to streamline the application process by incorporating common fields and application standards, as well as conducting a review of the Grant Solutions software,



which many indicated has made the process more inefficient than the previous process. To address these findings, the Department will take the following actions:

- *Coordinate Improvements with Other Federal Agencies.* The Department will explore with other grant providing Federal agencies where there are opportunities to adopt common applications standards as part of a government-wide effort to improve efficiency in the grant application process. This may involve participation in a working group tasked with the identification of opportunities to enhance current discretionary grants program processes or systems based on successes found in other Federal grant programs including those within the Department. This would include an evaluation of tribal grant programs that currently provide automatic eligibility to explore how these programs may or may not be addressing some of the challenges faced in discretionary grants.
- *Improve Implementation of Grant Solutions.* \* In addition to advancing efforts to reduce grants application complexity, the Department may further evaluate the challenges DOI staff and Tribes have faced with the rollout and implementation of Grant Solutions. Any evaluation would include collaboration with the broader initiative on data collection and management efforts.

### **C. Tracking Progress**

There are limitations to existing tribal discretionary grants data, including the lack of aggregable data across grant programs, multiple variations of Tribe names used in applications and awards data, and limited demographic and economic statistics specific to Tribes or at a reservation level. Improving data collection across grant programs (e.g., establishing a more consistent data collection protocol, tracking additional information related to applications and rationale for selection/non-selection, etc.) would enable the Department to better understand equity issues and the scale of unmet needs for Federal financial assistance to Tribes, and would also enable tracking of the impacts of policy, program, and/or process changes. Data recommendations are described in Action 1 in this equity action plan, but also referenced here as improved data is essential for effectively tracking progress.

#### ***Near- to Mid-Term Indicators*** (1-5 Years)

- The Department will track the number and associated outcomes of partnerships with tribal colleges and universities that provide technical capacity for underserved communities.
- The Department will determine the additional capacity needed at headquarters and regional offices to adequately support Tribes for grant applications and develop initial recommendations to achieve identified capacity.

#### ***Long-Term Indicators*** (5+ Years)

- As part of Action #1, the Department will improve data collection across grant programs (e.g., establishing a more consistent data collection protocol, tracking additional information related to applications and rationale for selection/non-selection, etc.), which will facilitate a better understanding of equity issues, as well as the type and the scale of unmet needs for Federal financial assistance to Tribes, and would also enable tracking of the impacts of policy, program, and/or process changes.
- The Department will track the unmet needs of Tribes applying for discretionary grants.
- The Department will track the number and amounts of tribal grants awarded.

- The Department will provide an annual report to the DEIA Council on efforts taken to increase capacity at regional and program offices.

#### **D. Accountability**

*Positions responsible for this action:* The DEIA Council will identify a senior leader within the Assistant Secretary for Indian Affairs to lead this effort. Depending on capacity available, the Council will formalize a Tribal Grants Working Group of representatives from programs within the Bureau of Indian Affairs.

*Accountability for implementing action:* The Tribal Grants Working Group will provide progress reports to the Council on a semi-annual basis. The Department will also hold itself accountable through its agency-wide strategic plan. DOI's draft strategic plan includes Strategic Goal 1: Promote well-being, equity, and justice for Tribes, Native Americans, Alaska Natives, Native Hawaiians, and Insular areas, which includes objective statement 1.3: Native American and Insular Areas have economic security and growth to support their communities. Performance goals and measures for this objective are being finalized.

### **ACTION 4 – Increase Opportunities to Access Public Lands, Prioritizing Access to Recreation Areas and Services in Urban Communities.**

Public land visitation data collected from the Department's bureaus suggests that certain underserved communities are underrepresented as public land visitors, relative to their presence in the U.S. population at large. Members of economically disadvantaged urban communities and persons with disabilities may face challenges accessing public lands and recreation services in their vicinity due to limited transportation options and cost prohibitions. Additionally, once on public lands, there may be limitations in the ability to move around easily without additional transportation options while on site or due to accessibility barriers for those with mobility and sensory disabilities. This is exacerbated in economically disadvantaged urban communities and for persons with disabilities, where both getting to and navigating public lands may prove challenging. The Department heard during listening sessions and through its public comment period that access to nature and public lands is challenging for many people.

#### **A. Barriers to Be Addressed**

- **Limited Physical Access.** Individuals may face challenges accessing DOI-managed sites due to the remote nature of many public lands. Accessing public lands often requires a personal vehicle (4-wheel drive or high clearance vehicles are often required) and there are limited alternative transportation options (public transit, alternative access, pedestrian and cycling trails, etc.) for visitors. Also, the character of public lands often poses physical barriers for those with limited mobility or limited sight.
- **Costs.** Not all people have the means to participate in recreational activities on DOI-managed lands. Accessing many sites requires visitors to spend money as well as time. Even when sites do not charge a fee or when a pass for free admission is available (such as the access pass for persons with disabilities), activities within the site generally have a cost implication (equipment can be expensive, access may require a personal vehicle, campsites have a nightly fee, etc.).

#### **B. Priority Actions and Intended Impact on Barriers**

The Department has identified several potential actions to increase opportunities to access public lands, particularly in and around urban areas. Addressing barriers to recreation on public lands

will enable more Americans to enjoy these sites and reap the physical and mental health benefits associated with greenspace and outdoor recreation. In addition to improving access to DOI-managed public lands, the Department, through its programs, can offer technical and financial support to promote and create equitable and close-to-home access to the outdoors beyond DOI-managed land boundaries (and specifically in underserved communities across the nation). The enactment of the Bipartisan Infrastructure Law also provides the Department a unique opportunity to partner with other entities to advance equity, such as the Department of Transportation, on important improvements that will address transportation related barriers to accessing public lands.

- **Expand the current partnership with the Department of Transportation.\*** On November 17, 2021, the Department of the Interior and Department of Transportation entered into a memorandum of understanding with the goal of improving transportation within and access to national parks and public lands. This partnership provides an excellent foundation for improving access to and within public lands, and the Department would like to build on this work to include:
  - *Increasing Bus Routes* and any vehicle additions necessary to supporting fleets that allow for increased options for low to no cost access to public lands in underserved urban communities. This infrastructure improvement must include considerations around the other initiatives in the partnership, including: Advanced Traveler Information Systems to provide visitors with real time transit arrival information; building this capacity through the Electrification of the Transit Fleets to support protection of natural resources using zero-emission vehicles; ensuring that buses are accessible to individuals with disabilities, and an ability to capture relevant program data to monitor and adjust based on communities' needs.
  - *Expanding Shuttle Fleets* or other transportation options, including accessible vehicles for individuals with disabilities, once inside larger public lands in urban or urban-adjacent communities. Upon arrival at many recreation and public land sites, visitors with limited transportation options will need to be able to move around the lands with ease and without fear of creating unsafe situations the more they explore.
- **Strengthen Partnerships.** The Department will work with outfitters, concessions, and other commercial services to expand affordable access and will also continue (and expand) work with a wide range of non-profits (friend groups, cooperative associations, youth programs, and many recreation interest and diversity in the outdoors partners) to provide free or low expense disability-inclusive facilitated experience programs that introduce people to outdoor recreation activities in a safe and supportive environment. Elements of this activity may include:
  - Identify successful existing programs (internal and external to the Department) and evaluate lessons learned from program successes.
  - Establish partnerships and public education campaigns that work to normalize the idea that public lands are for everyone (and how to use them safely).\*
  - Create clear instructions (e.g., how to partner with DOI sites for programs, how to apply for funding for program support, how to make programs disability inclusive etc.) for programs interested in becoming partners with DOI.
  - Offer technical assistance for programs interested in becoming partners.\*
  - Promote partner programs on DOI communication channels, media, and through other partners.
- **Support Close-to-Home Recreation Opportunities.** The Department makes on-the-ground differences in real communities through thoughtful investment in successful and

proven programs that directly provide meaningful technical or financial assistance to communities.

- *Increase Equity Considerations in Land and Water Conservation Fund Implementation.* The LWCF Federal program supports the protection of Federal public lands and waters – including national parks, forests, wildlife refuges, and recreation areas – and voluntary conservation on private land. LWCF state investments secure public access, improve recreational opportunities, and preserve ecosystem benefits for local communities. The Department can improve implementation of LWCF programs through actions such as offering targeted technical assistance to enhance underserved community ability to apply for grants; incorporating additional equity considerations into LWCF projects; and prioritizing acquisitions near urban lands and/or areas with high populations of underserved communities.
- *Increase Investments in Programs and Services with Proven Track Records of Effectiveness.\** Several ongoing programs positively impact equity and access challenges not only in DOI-managed lands access but for communities and places beyond the Department’s units and boundaries. The Department will develop investment strategies to grow and support those programs to do more and better work.

### **C. Tracking Progress**

DOI currently has relatively limited reliable data about visitor characteristics across DOI-managed lands. Including additional information collection elements in visitor monitoring systems already in place would improve the Department’s understanding of who is visiting public lands and who is not visiting. The six Federal agencies on the Interagency Visitor Use Management Council are currently collaborating on visitor demographics data collection and related issues. Improving the ability to capture visitor demographics data would enable the Department to more meaningfully evaluate the impacts of its priority actions. Data recommendations are described in Action #1 in this Equity Action Plan, but also referenced here as improved data is essential for effectively tracking progress.

#### ***Near- to Mid-Term Indicators*** (1-5 Years)

- The Department will track LWCF grant awards and approximate the number and amount of awards to support underserved communities.
- The Department will track the number of partnerships with outfitters, concessions, and other commercial services to expand affordable and disability-inclusive access.
- The Department will track the number of partnerships with non-profits to provide free or low expense and disability-inclusive facilitated experience programs that introduce people to outdoor recreation activities in a safe and supportive environment.
- The Department will use metrics to evaluate the effectiveness of community assistance and other programs for delivering improved access and equity to the outdoors.
- The Department will study the feasibility of developing and implementing a strategic investment plan for expanding and accelerating effective and high-potential community assistance and programmatic work.

#### ***Long-Term Indicators*** (5+ Years)

- The Department will receive transit usage numbers for new transportation infrastructure to determine any equity outcomes.

- The Department will coordinate with commercial service and non-profit partners to track the impacts (# people provided first time experience, # people making repeat visits) of partnership programs to bring underserved communities to public lands.
- As part of Action #1, the Department will improve data collection to more accurately capture visitation numbers as well as visitor demographics, which will facilitate a better understanding of who is visiting public lands and waters and who is not.
- The Department will develop a methodology for tracking its overall spending and investment on partnerships and community assistance programs as an overall percentage of the Department's budget.

#### **D. Accountability**

*Positions responsible for this action:* The DEIA Council will identify a senior leader to lead this effort. Depending on capacity available, the Council will formalize a Recreation Equity Working Group of representatives from the land management bureaus (Bureau of Land Management, Bureau of Reclamation, U.S. Fish and Wildlife Service, National Park Service).

*Accountability for implementing action:* The Recreation Equity Working Group will provide progress reports to the Council on a semi-annual basis. The Department will also hold itself accountable through its agency-wide strategic plan. DOI's draft strategic plan includes Strategic Goal 4: Serve and honor the public trust, which includes objective statement 4.2: Access to opportunities, services, and resources is equitable. Performance goals and measures for this objective are being finalized.

The Department acknowledges that while agency responses to EO 14035: *Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce* and EO 13985 are aligned to separate timelines and deliverables, the interconnected nature of these efforts and identified actions are indisputable. The Department believes it must look internally at its workforce and internal operations to ensure that DEIA are positioned as central to its external operations. The Department heard from various stakeholders throughout its external listening sessions and internal focus groups and interviews that increasing diversity across the workforce— especially in those positions that interface with members of the public— and advancing a culture of DEIA throughout the Department is essential to advancing equity across operations and mission delivery. While activities to improve DEIA across the Department's workforce are not specifically mentioned in the actions of this plan, the Department intends to incorporate feedback from the listening sessions and internal stakeholder engagements into its DEIA Strategy, which is currently under development in accordance with EO 14035 and will be finalized in Spring 2022.

## **Appendix A. Other Actions Under Consideration**

As indicated in the introduction of this report, the actions described in this Equity Action Plan represent only a subset of the full suite of activities currently under consideration by the Department to advance equity and support for underserved communities. The Department seeks to undertake many big and bold activities which will require a closer evaluation of resources and existing staff capacity, as well as additional review and planning and potentially partnerships with other entities. As the Department continues to gather and consider feedback from internal and external stakeholders, collect and analyze relevant data and information, and review existing policies and processes, it is also considering the activities generally summarized here (in no specific order).

- **Improve Access to Tribal Grants Information.** Tribes expressed during the listening sessions that even understanding the types of grants available could be challenging. While grants.gov can be searched for opportunities, many indicated interest in a single “one-stop-shop” site that would present the full range of grant opportunities available (across not only DOI, but also other Federal agencies and state agencies), program points of contact and technical assistance representatives, educational training videos and other materials (such as grant writing webinars), application and award timelines, application templates and examples of successful proposals.
- **Improve Tribal Grants Communication.** Listening session participants indicated that there is limited information about grantmaking opportunities, limited forecasting of opportunities (so Tribes cannot prepare and ensure capacity to apply), and limited DOI points of contact who can assist Tribes with navigating the grantmaking process. The Department could build and deepen relationships with key Tribal leadership and staff, as well as establish improved communication channels by creating clear and consistent points of contacts for questions about program-specific opportunities and feedback on unsuccessful applications.
- **Increase Tribal Grants Flexibility.** Listening session participants described eligibility requirements that were limiting (e.g., requirement for projects to be implemented on tribal lands when many Tribes have diminished land base, data collection requirements, etc.), as well as challenges associated with the limited ability to revise awarded projects. The Department could have programs review their funding and award guidelines to incorporate additional flexibility for in-scope award revisions.
- **Promote Workforce Diversity and Diversity Training for Public Lands Staff.** The Department must look internally at its workforce to ensure that DEIA are central to its external operations. The Department heard from various stakeholders throughout its listening sessions that increasing diversity across the workforce, particularly in those positions that interface with members of the public, is essential to advancing equity across operations. Ensuring the DOI workforce better reflects the demographics of the American public would foster a welcoming feeling for diverse visitors and may encourage additional populations to visit public lands and waters. Offering training regarding cultural competence and equipping front-line staff with the knowledge and skills to keep visitors safe and de-escalate potential visitor conflicts would support positive visitor experiences on public lands and waters.
- **Expand and Update Programming to Make Visitation Inclusive and Accessible.** The Department seeks to provide equitable visitation opportunities for positive experiences recreating on public lands and waters among underrepresented and underserved visitors. Visitors to public lands should feel safe, have an outdoors experience free of

discrimination, and see people like themselves recreating or working on public lands in order to contribute to one's sense of belonging in a public lands setting.

- **Improve Information and Outreach (to Visitors and Non-Visitors).** Non-visitors are diverse, but DOI and its traditional partners (i.e., outdoor recreation partners) are generally not structured to effectively reach these groups. Leveraging relationships with coalitions that focus on equity issues (e.g., Recreate Responsibly) will enable the Department to increase underserved communities' awareness of recreational opportunities on DOI-managed lands and enable the Department to hear more from the public about the experiences they would like to have on DOI-managed lands. Additionally, increasing and improving the information available on DOI websites (i.e., provide enough information that visitors know where sites are and what types of amenities and infrastructure are available) is likely to improve awareness and interest in visitation.
- **Improve Physical and Programmatic Accessibility of Programs, Facilities, and Services.** The Department strives to provide universal accessibility to its programs, facilities, and services, both physical and programmatic. The Architectural Barriers Act of 1968 sets accessibility standards for federal agencies. Section 504 of the Rehabilitation Act of 1973 commits the Department to identifying barriers that limit access to programs, facilities, and services; and to developing transition plans and identifying how these barriers will be removed (where feasible) and when.
- **Hold Continuing Discussions.** The Department seeks to continue engagement with underserved populations to better understand equity issues, barriers to equity, and learn more from the public about experiences they would like to have on DOI-managed lands. The Department is also committed to sharing the information generated (e.g., meeting summaries and final report), subsequent reports on progress and accountability, and seeking feedback to ensure that actions taken by the Department reflect what communities have envisioned.

## **Appendix B. Summary of Available Data and Limitations**

### **Contracting**

- *System for Award Management – All Registered Businesses.* While this data does exist, DOI does not currently have access to this full database.
- *System for Award Management – Businesses Awarded DOI Contracts.* Through the *System for Award Management (SAM)*, the Department has access to data on the SAM-registered businesses that awarded DOI contracts (by fiscal year); this includes the vendor name and type, business address, industry, and award amount, among other fields. Data on business that submit proposals for each DOI contract is not collected through SAM.
- Limitations:
  - No identified dataset to characterize the full “universe” of businesses in the United States. This limits the ability to determine if the set of businesses awarded DOI contracts is reflective of all existing businesses.
  - No identified access to the fields and data associated to SAM-registered businesses. This limits the ability to determine if the construct of DOI awarded contracts is reflective of those businesses registered in SAM.
  - Data about businesses that submit responses to DOI contract solicitations are not maintained in a form that can be readily used in quantitative data analysis.
  - The majority of the “Vendor Business Types” in the Federal Procurement Data System that are being used for analysis do not include published definitions of which types of businesses qualify, and there are no controls for verifying accuracy.
  - Limitations across datasets in measuring underserved community characteristics associated to religion, sexual orientation, and rural location.

### **Tribal Discretionary Grants**

- *FBMS Data.* The Department’s system of record on financial transactions (FBMS) contains information on all grant awards (by fiscal year). This data set includes all grants administered by BIA, as well as grants with “tribal” in the name (CFDA Title) that are administered by other DOI bureaus or by Departmental Offices. However, Tribe/Tribal organization names are not necessarily input in a consistent or uniform manner. The Vendor field contains the name of the entity that the award went to. In some instances, non-Tribal organizations may also be recipients of awards from these grant programs.
- *Federally Recognized Tribes List.* The Department produces the most recent published list of Federally-recognized Tribes (thus eligible to receive tribal discretionary grants). This list does not include Tribal organizations as defined in 25 U.S.C. § 5304 (I), who are also eligible to apply for tribal discretionary grants on behalf of Tribes.
- *Grant Program Data.* Programs track application and award information individually; there is no standard format or automated system for tracking this information, so the level of detail varies across program offices. While all programs report award information, data on applicant requests is not collected consistently or comprehensively across programs.
- *Tribal Demographic and Economic Information.* Reservation-level data is available through the Census Bureau’s American Community Survey (most recent data is for the 2015-2019 time period). This includes some demographic and economic characteristics but represents individuals living within a reservation/off-reservation trust land boundary (which may include members of different Tribes or individuals that are not a member of



any Tribe). However, some tribal-level data (data on characteristics of members of a Tribe, regardless of where they reside) is collected as part of the decennial census.

- Limitations
  - Data on applications and awards may be compiled for each individual grant program, but the data does not exist in a form that is aggregable across all DOI grant programs.
  - While each Tribe has a Federal Register name (as listed in 85 FR 5462), there are issues with multiple variations of Tribe names used in applications and awards data. For example, Tribe names may change over time or Tribe names in some applications may reference the name of a sub-organization within the Tribe (such as the tribal council or a tribal department) rather than the name of the Tribe. A lack of consistent naming standards across datasets creates barriers to linking and aggregating data for analysis within and across DOI grant programs as well as with any potential external data on tribal-level characteristics.
  - Linking the “universe” of eligible Tribes with non-DOI tribal-level statistics (such as Census Bureau data) in order to assign demographic characteristics that will inform on specific patterns and discrepancies requires either a consistency in naming conventions (noted above) or a means of cross-walking between Tribe names and data as presented in other sources (such as reservation-level data). A method or dataset for linking ‘Tribe’ across various datasets has not been identified.
  - Publicly available demographic or economic statistics specific to Tribes or at a reservation-level is extremely limited. Most Federal statistical agencies do not collect or publish data specific to Tribes or for tribal geographic entities.

## Recreation

- *Recreation Information Database.* The Recreation Information Database (RIDB) is a part of the Recreation One Stop (Rec1Stop) project, offering an authoritative source of information and services for millions of visitors to Federal lands, historic sites, museums, and other resources. RIDB contains data on reservations made through Recreation.gov for certain sites managed by DOI, U.S. Department of Agriculture Forest Service, and the U.S. Army Corps of Engineers. Data are publicly available for each year from 2006 through 2020. Initial data analysis included comparing ZIP-code data from reservations to census data to estimate participation rates by various underserved communities.
- *Every Kid Outdoors Vouchers.* As a part of the Every Kid Outdoors (EKO) initiative, U.S. fourth grade students are eligible for a free annual pass. Students, teachers, and park staff can use the EKO website to complete a learning activity and request a paper voucher, which can be printed and exchanged for a plastic pass at select federal recreation sites. There is no demographic data collected when vouchers are requested for the EKO program (so age, gender, race, and ethnicity data are not collected). Voucher requesters are required only to provide their ZIP code (which is not authenticated, so data may include ZIP codes that do not exist or are inaccurate). In addition, these ZIP codes may represent that of the individual/entity requesting the voucher, not the individual who redeemed the voucher. Data on vouchers that are redeemed is not collected. Initial data analysis included comparing ZIP-code data from vouchers generated to census data to estimate participation rates by various underserved communities.

- *National Park Service Comprehensive Survey.* In 2018, the National Park Service (NPS) conducted its third Comprehensive Survey of the American Public, a nationwide telephone survey consisting of 25-minute interviews with more than 2,700 adult respondents across the United States. The survey obtained information on public attitudes and behaviors related to programs and services provided by the NPS, demographic characteristics, and recent visitation behavior.
- *National Survey of Fishing, Hunting, and Wildlife-Associated Recreation.* FWS sponsors the National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, published by the FWS and the U.S. Census Bureau. The survey is undertaken every 5 years, and surveys persons 16 years of age and older about their participation and expenditures in these outdoor activities. The most recent survey (for 2016) was published in 2018.
- Limitations:
  - Not all bureaus (or even individual sites within the same bureau) collect the same types of visitor information or collect information in the same way (some may collect information at entrance stations, others may use self-reported visitor information). NPS manages data collection and analysis at the bureau-level, while BLM, FWS, and Reclamation delegate data collection decisions to individual sites or managing partners. BLM, NPS, and Reclamation count visitor-days, while FWS counts activity-days, so a single person entering a refuge for two different activities (e.g., hunting and fishing) is counted as two visits.
  - Visitation data for remote public lands is often not recorded for a variety of logistical and cost reasons.
  - Paperwork Reduction Act requirements and OMB approval process have been a barrier to gathering timely and relevant information about the public visitors being served.
  - No visitor information is collected when someone purchases an America the Beautiful-the National Parks and Federal Recreation Lands pass (Interagency Pass). Use of passes is also not currently tracked, although NPS plans to implement a barcode-scanning protocol that will allow the Department to access data on where and when passes are used.
  - Data on redemption of Every Kid Outdoors vouchers is currently limited to the site and date of redemption. Implementing the barcode-scanning protocol will provide additional data on who is redeeming vouchers (at NPS sites).
  - Some data on home of record (rural versus urban), race, ethnicity, income, and education are available or can be inferred by current data sources, but data regarding visitors' religion, sexual orientation, gender identity, and disability status is extremely limited or nonexistent.

## **Appendix C. Definition and Description of Impacted Underserved Communities**

### **Contracts for Businesses with Characteristics that Align with the Definition of**

**Underserved Community** - The Department developed its definition of underserved community for this focus area by comparing characteristics identified in the underserved community definition of EO 13985 Section 2 to available data fields in the Federal Procurement Data System, including all “Vendor Business Types,” not just the statutorily-created small business categories. Of the 159 data fields examined, the Department determined that 21 “Vendor Business Type” fields possibly captured business characteristics/descriptions that align with the definition of underserved communities, including Alaskan Native, Black American, Hispanic, Asian-Pacific, tribal, minority owned, and several factors of “disadvantaged.” The scope of the definition assumes that (1) fields that are not exclusive to the EO 13985 Section 2 characteristics of underserved community are considered out of scope, (2) self-certified characteristics are accurate, and (3) fields that include disadvantaged in the description are assumed within scope. The following characteristics could not be identifiable given the available data fields: religious minorities, LGBTQIA+, and persons who live in rural areas.

**Tribal Discretionary Grants** - A federally recognized Tribe is an American Indian or Alaska Native (AIAN) tribal entity that is recognized as having a government-to-government relationship with the United States (with the responsibilities, powers, limitations, and obligations attached to that designation) and is eligible for funding and services from the BIA. At present, there are 574 federally recognized American Indian and Alaska Native Tribes and villages. Many of these federally recognized Tribes are served by Tribal organizations, which may also receive financial assistance on behalf of federally recognized Tribes. While AIAN populations as a whole are considered an “underserved community” within the context of EO 13985, some tribal communities are more resource-constrained than others, face additional challenges due to geography (such as lack of broadband access in rural and remote areas), or experience disproportionate environmental threats (vulnerabilities are particularly high across Alaska where the rate of change has been the highest in the country, however, extreme weather events and other climate impacts are also disruptive for Tribes outside of Alaska), and therefore may have additional challenges accessing the various tribal discretionary grants programs administered by DOI bureaus.

**Recreation Access to DOI-managed Lands for Underserved Communities** - Underserved communities who may face barriers in accessing recreational opportunities include: Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; LGBTQIA+ persons; persons with disabilities; persons who live in rural areas; persons who live in urban areas that are geographically distant from public lands; and persons otherwise adversely affected by persistent poverty or inequality.