

DWR Inclusive Excellence Plan Report

2022-2023



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Introduction

In 2022, the Department of Wildlife Resources (“DWR”) embarked on a journey towards Inclusive Excellence with the establishment of the 2022-2026 Inclusive Excellence Strategic Plan (the Plan). The Plan is a product of the “business case” for diversity, opportunity, and inclusion, which is based on measurable, sustainable outcomes that benefit the agency’s overall goals. The Plan was segmented into four “core principles:”



These areas are where DWR must demonstrate excellence to best serve all Virginians and become a workplace where all can reach their full occupational potential.

Each core principle has goals that are accomplished by executing specific *Strategic Initiatives*. To be intentional in producing results, the Plan features *Targeted Outcomes* which will ultimately determine success. While creating a diverse and inclusive workplace is the responsibility of every employee, some divisions are more responsible for the execution of specific initiatives than others. The Plan includes *Accountable Divisions* charts that assign responsibility for each initiative.

Division leaders have been surveyed on their perceptions of the agency’s progress toward inclusive excellence. In this report, we will assess DWR’s progress towards the desired outcomes highlighted in the Plan and recommend the next steps to ensure sustainable progress towards those outcomes.

For each core principle, we will review the definition and goals and offer narratives based on analysis of both qualitative and quantitative data. Included are quotes from both the 2022 Climate Survey and a leadership survey conducted for this report. Also, the report will gauge the progress for each strategic initiative using red (less than 25% accomplished or progressing), yellow (26-75% accomplished or progressing), and green (over 75% accomplished or progressing).



Recruiting

Using a broad spectrum of talent acquisition best practices to attract a diverse and highly skilled applicant pool.

To manage a process free from artificial barriers that would discourage the hiring of underrepresented candidates.

GOALS

- Complete transparency of the recruitment and selection process allowed within federal and state law and Department of Human Resource Management (DHRM) policy.
- Elimination of all artificial barriers to hiring.

The recruitment process at DWR follows the Department of Human Resources Management's requirements. Positions are posted, and applicants are first screened by DWR Human Resources staff and then interviewed by a panel of DWR employees who make a recommendation to the hiring manager. To reach the widest talent pool possible, the recruitment manager, with the assistance of the Law Enforcement Division, has increased the number of Historically Black Colleges and Universities recruiting events attended since 2021. In 2022-2023, DWR participated in several events that targeted underrepresented populations. While we do not have the direct data to measure how those visits were converted to applications, we can surmise that knowledge of the agency, its mission, and employment needs are generally beneficial to future talent acquisition efforts.

Unlike other state agencies, DWR endures several challenges in recruiting non-sworn employees. The Wildlife and Aquatics divisions, specifically, face challenges in recruiting people of color as most positions typically require education and experience in specific biological areas in which minorities are underrepresented in higher education institutions. Additionally, many of the positions available are stationed outside of

Virginia’s major population centers, where there is more diversity. Currently, several non-governmental organizations work diligently to diversify conservation careers by widening the pipeline from college to state agencies. The lack of entry-level positions in conservation jobs at DWR presents another challenge that is being met, in small part, by the agency’s paid internship program. The most consistent source of entry-level positions at the agency is the Law Enforcement Division (Conservation Police Officers).

Below is the demographic breakdown of the agency at the conclusion of 2021 (prior to the implementation of the Plan) and 2023.

	DEC. 31, 2021	DEC. 31, 2023	DELTA
Total	472	503	31 (6.5%)
Male	344 (72.9%)	351 (69.8%)	7 (2.0%)
Female	128 (27.1%)	152 (30.2%)	24 (18.8%)
White	402 (85.2%)	436 (86.7%)	34 (8.5%)
Black/Afr. Am.	30 (6.4%)	29 (5.8%)	(1)(-3.3%)
Hispanic/Latino	9 (1.9%)	11 (2.2%)	2 (2.2%)
Asian/Pac. Isl.	2 (0.4%)	4 (0.8%)	2 (50.0%)
Alaskan Native/ American Indian	6 (1.3%)	7 (1.4%)	1 (16.7%)
Two or more race	3 (0.6%)	4 (0.8%)	1 (33.3%)
Not applicable/ No response	20 (4.2%)	12 (2.4%)	(-8) (-40%)

Since the implementation of the Plan, DWR has experienced an increase in the representation of women and all minority groups except Black/African American. Specifically, the number of women and Asian/Pacific Islanders have outpaced the agency’s growth. The stagnation in the Black/African American population is primarily a result of retention. For example, four (4) Black/African American members of the Law Enforcement Division left the agency in 2023. Three (3) of the four (4) departing employees participated in exit interviews or surveys and noted valid career advancement reasons to leave the agency. Each shared opinions on improving DWR, but non represented them as major factors in their departures.

LEADERSHIP

Below is the demographic makeup of the Director’s Working Group (the agency’s senior leadership team) at the conclusion of 2021 and 2023. Since the Plan was put into place, there have been three (3) DWR employees promoted into the agency’s leadership team and three (3) external hires. A Black male was promoted to Director of the Planning and Finance Division, replacing a White male (who was promoted to Deputy Director), and a White female was promoted to Director of the Boating Division, replacing a White male. External hires for the Outreach and Wildlife Division Directors were both White males replacing White males. A White female was hired to replace the Public Information Officer who was previously a White female.

The results were an incremental advancement in the diversity of the agency’s leadership which is not reflected on the chart below because the last three hires were made in the first quarter of 2024. It can be noted that the internal hire of a person of color and a woman demonstrate the agency’s recognition of the value of its diverse talent.

	DEC. 31, 2021	DEC. 31, 2023
Total	13	11
Male	9	7
Female	4	3
White	12	9
Black/Afr. Am.	1	2

LAW ENFORCEMENT DIVISION

In 2019, the Office of the State Inspector General issued an audit of the natural resources law enforcement agencies targeting the lack of gender and racial diversity in each agency's division. The Department of Wildlife Resources proposed several corrective actions that would result in diversifying the number of sworn officers in the Law Enforcement Division. Since that time, the agency has had some success in hiring and promoting female officers. However, the number of persons of color being selected for and completing the CPO Academy has remained disproportionately low. Challenges to recruiting applicants to the CPO Academy include competition from urban and suburban police departments and limited placement opportunities near Virginian's high population centers.

Key diverse personnel actions included hiring two lateral Black officers at the Captain and Major level, and promoting the only Black captain to major. Unfortunately, the two lateral hires have departed the agency for other positive opportunities.

Based on applicant flow data that suggest some barriers in the Academy applicant vetting process and the sharp drop-off in women candidates in the 2024 CPO Academy cohort, there is a need to act.

Recommendation #1:

The agency conducts a barrier analysis of the CPO recruiting and vetting process.

Recommendation #2:

Establish an Exit Interview/Survey process where the data are analyzed and shared with the Director's Working Group annually.

One leader noted:

"We are doing a much better job at hiring candidates who better reflect the demographics of Virginia. And we're doing it, in a lot of cases, through internal promotion of staff who joined several years ago and who are now stepping into leadership roles. This is great."

However:

"... transparency leaves a bit to be desired. Hiring practices vary widely depending on position and division. Candidate pools are also a confusing mix - some pools have plenty of well-qualified candidates and others contain candidates who are not even minimally qualified."

RECRUITING STRATEGIC INITIATIVES SCORECARD

	2023 STATUS
1. Create a college and university recruitment plan featuring internships and mock interviews that is inclusive of historically Black colleges and universities in the Commonwealth and contiguous states.	Yellow
2. Develop enhanced relationships with college administrators and proficiency with HANDSHAKE[1] technology to assist in recruitment.	Green
3. Track applicant flow data for various demographics. Provide a semi-annual report to leadership for action and accountability consideration.	Yellow
4. Engage diverse recruiting venues, websites, magazines, business publications, and professional and college outdoors-oriented affinity organizations.	Green
5. Provide clear applicant preferred education qualifications and certification requirements to all colleges and universities.	Green
6. Engage subject matter expert(s) to review interview processes to ensure objectivity in candidate selections.	Red
7. Establish an employer branding strategy which includes images of underrepresented and underserved populations.	Green
8. Develop a centralized Internship Program for all divisions with one point of contact, a start-to-finish participation plan, and a way to capture participant and division feedback with the goal of full-time employment.	Green
9. Foster an environment in which interns are paid a wage that will allow them to live independent of other income during the internship.	Green
10. Review the LawFit measurables and water swimming requirements to ensure that they are appropriate and/or can be obtained at the conclusion of a CPO academy.	Green
11. Offer training to ensure that individuals conducting background investigations are doing so equitably and the process is free from bias.	Green
12. Expand advertisements through all avenues that will attract a diverse population such as radio, billboards, social media sites, LinkedIn, Indeed, etc.	Green
13. Communicate and follow hiring timelines including the requirements for completing the Conservation Police Officers academy.	Green
14. Standardize the sharing of information regarding perquisites and conditions of positions to all interviewing candidates.	Yellow
15. Perform salary studies to ensure equity in all offers of employment.	Green
16. Avoid including minimal requirements in a position description that can be obtained after employment.	Red



Culture

To promote and sustain a workplace that is inclusive of all people, talents, and ideas so that members of the workplace may achieve their highest level of engagement and full occupational potential.

GOALS

- Develop a workforce that resembles the diverse racial, gender, and cultural differences of the Commonwealth.
- Value non-traditional approaches and skill sets that can further DWR’s mission.
- Adopt a “best idea wins” approach to decision-making.
- Treat others as THEY wish to be treated and not as YOU wish to be treated.

Workplace Culture is the cornerstone of employee engagement. An organization can excel at acquiring talent, but possessing a toxic workplace culture would only result in high employee turnover and all the costs associated with it. It is imperative that DWR leadership remain knowledgeable of the concerns of the workforce while developing policies and initiatives that send a clear message as to what behaviors are valued, encouraged, and prohibited.

In September 2022, DWR put in place its initial Employee Climate Survey; a study of employees’ perceptions and perspectives of DWR. The survey addressed attitudes and concerns that could help leadership instill positive changes.

Survey participation was high, with 83% (354) of the workforce participating. Conservation Police Officers comprised 32% of the respondents. Below are some other demographic characteristics of respondents:

Male	61%
Female	26%
Non-binary	1%

White	74%
Black	5%
Hispanic	4%

Native American	2%
Asian/Pacific Islander	1%
Bachelor’s Degree or more	79%

Below are some key takeaways from the survey.

EMPLOYMENT AT DWR

- 80% of respondents are “satisfied with DWR as a place to work”
- 70% of respondents are “satisfied with how my contribution to DWR’s is valued”
- Responses regarding supervision, work assignments, workload, co-workers, and job satisfaction range from 50-77% positive scores with a plurality or majority believing it is adequate

While most responses are positive, there is a perception that promotions are not decided by merit.

“Promotions don’t feel that they are based on merit due to the promotion of very poor individuals with terrible work ethic and horrible supervision skills. Promotions feel that they are being based on who you know or just for being employed long enough.”

“Promotions are based more on proximity to Henrico. Those who live in that area are much more likely to get promoted because folks in other parts of the state prefer not to relocate.”

LEADERSHIP AT DWR

- 41% believe DWR leadership proactively identifies and addresses agency challenges versus 25% who disagreed
- 41% responded that DWR leadership works to foster a culture of efficiency and effectiveness versus 31% who disagreed
- 61% responded that DWR leadership works to foster a culture of inclusion and mutual respect versus 13% who disagreed
- 62% stated that DWR leadership places a priority on workforce diversity versus less than 5% who disagreed

PRIORITIES

Another disconnect is the perception that the agency is embracing new priorities and change while emphasizing traditional constituencies.

- Conserving wildlife populations and habitat 45.45% vs. Connecting people to Virginia's outdoors 54.55%
- Protecting endangered species 30.72% vs. Protecting game species 69.28%
- Protecting people and property by managing human-wildlife conflicts 40.82% vs. Educating and promoting safe outdoor experiences and behaviors to the public 59.18%
- Retaining existing stakeholder populations 34.81% vs. Recruiting and engaging new and diverse stakeholder populations 65.19%
- Promoting and recruiting for current outdoor programs 64.65% vs. Shifting programs to meet public motivations 35.35%
- Tradition 59.74% vs. Innovation 40.26%
- Remaining true to our roots 39.05% vs. Adapting to changing social conditions 60.95%
- Diversity, Equity, and Inclusion efforts and advancements 72.47% vs. Minimizing interpersonal conflict 27.53%
- 72% agree with the goals and objectives DWR prioritizes
- 37% believe DWR adapts well to change
- 81% believe DWR collectively disapproves of inappropriate behavior
- 64% believe DWR is highly transparent with the public
- 70% believe the agency's decisions reflect a proper balance between science and public policy

DIVERSITY, OPPORTUNITY, INCLUSION, AND BELONGING

Diversity and inclusion at DWR reveal another disconnect between the Plan's goals and employee perceptions. While an overwhelming majority of the employees recognize DWR's emphasis on inclusion in the workplace, comments reveal that some refer to an "over-emphasis" on diversifying the workforce and others see an agency with little diversity that is merely "checking the boxes." While there is a perception of diversity leading to the hiring of unqualified individuals, there are also shared instances of harassment, bullying, and intolerance that must be addressed. Though the statistics show less than 20% of the workforce don't feel a sense of belonging at the agency, that number is disproportionately made up of women and people of color.

- Over 74% of respondents feel that colleagues make them feel that they belong at DWR.
- Only 10-19% of respondents expressed not feeling connected to the agency and their colleagues.
- A majority expressed that they feel safe, and the agency holds employees accountable for harassment and other discriminatory behaviors.
- 80% of respondents are aware of the process to report harassment and other discriminatory behavior.

Below are some comments from the survey on diversity and inclusion.

“We now place such an emphasis we are bypassing qualified applicants to hire unqualified unsafe individuals because they meet the need for diversity.”

“I have had verbal discriminatory comments made to me by members of the public while other DWR staff were around. Often, they were subtle and related to my gender. For example, being called honey or sweetie, or being talked over or referring primarily to the male DWR employee even if I was the subject matter expert. Sometimes my coworkers would say something in the moment, and other times, they would say something to me later, about how they thought the comment was inappropriate. I really appreciated the support of my coworkers. When something happens like this I think the best thing to do is to say something to the member of the public right away.”

“People using inappropriate comments; men calling women ‘girls’ or just general foul language from folks who are supposed to be professionals.”

“Don’t touch my hair!! That’s what I told the coworker, yet she touched it twice. I then told her I am not a petting zoo and look online about touching coworkers’ hair.”

“In terms of diversity and inclusion in the workplace, I don’t think pictures of minorities on the website or a few opportunities for underrepresented outside of Richmond is going to cut it. We need to do a better job across all of the state. People don’t want to work for an agency where they don’t see anyone, or very few people, that look like them. Furthermore, underrepresented groups when hired won’t want to stay if the culture is that of the good old boy mentality, where they are subtly treated as inferior either by other staff members or the public. We also need to do better than an online diversity and inclusion video training that no one takes seriously.”

“There comes a point when the priority of workforce diversity can affect the quality of your candidate pool. Given that we have recently turned a massive shift into diversity and inclusion, which is a very good thing, we have to continue to focus on the mission. As it sits now, I believe we are doing great. However, we need to be cognizant that the inclusion and diversity push does not lead to favoritism.”

“Over the years, all forms of inappropriate behaviors and correspondence were from various individuals in the Law Division. This goes back beyond 3 years. Things have greatly improved over the last years.”

The Employee Climate Survey will be administered on an 18-month cycle; each March and September on even number years. The next iteration of this report will show a comparison of the 2022 and 2024 surveys.

“We’ve made a lot of progress in the time I’ve been with the Agency. I’ve observed the culture shift significantly towards embracing people of different and non-traditional backgrounds. We still have a way to go, but we’re heading in the right direction. I’m impressed with the courage I’ve seen demonstrated.”

CULTURE STRATEGIC INITIATIVES SCORECARD

	2023 STATUS
1. Challenge and ensure accountability for unacceptable cultural behaviors by both employees and customers.	
2. Conduct an annual climate survey of the workforce. Track progress and course correct towards a more inclusive work environment.	
3. Move beyond the “rites of passage” approach to starting a career in conservation to one which does not present barriers based on means.	
4. Allow employee work profiles and screening criteria to include bonafide and relevant non-career activities when measuring an applicant's qualifications and interests.	
5. In the employment process, when not in contradiction with any state, federal or local law or regulations, consider how an applicant's views and past actions align with the vision, mission and values of DWR.	
6. Develop an Ombudsman Program that provides a safe space for those who have difficulty in the workplace.	
7. Develop an Employee Appreciation Program and demonstrate authentic appreciation that is communicated to entire staff. Ensure that recognition awards are given annually.	
8. Establish a standardized on-boarding process that includes a presentation on "Inclusive Excellence at DWR" and agency-wide introduction of new staff.	
9. Challenge seemingly innocuous office practices that could ultimately exclude certain members of the workforce.	
10. Conduct a standardized exit interview/survey of all departing staff members with data reported annually to leadership for future action.	
11. Emphasize non-traditional/practical experience as a proxy for academic credentials whenever possible.	
12. Require specialized cultural awareness education for all customer-facing personnel.	
13. Encourage participation and transparency in career development practices for all DWR employees.	
14. Conduct a review of all policies, practices, and procedures to ensure alignment with Inclusive Excellence goals.	
15. Create a framework for the development of employee resource groups where employees with similar background and interest may network, mentor, and create a safe space consistent with DWR's policies.	

Several items among the Culture Strategic Initiatives remain to be initiated. Some, like the development of Employee Resource Groups, may not prove to be ideal for an organization that lacks centralization. However, the need for employee mentoring and support is evident from the Climate Survey.

Recommendation #3:
Establish a mentoring pilot program to invest in the success of newer hires, assist in the transfer of institutional knowledge, and further engage our more experienced employees.



Awareness

To develop learning opportunities to equip members of the workforce with the ability to promote inclusive excellence and be active and accountable in building an inclusive work environment.

GOALS

- Initiate Agency-wide, mandatory Inclusive Excellence training.
- Integrate Inclusive Excellence principles in all policies, practices, and procedures going forward.
- Build training to accommodate diverse learning styles.

Since the inception of the Plan, the agency has been very intentional in providing training that would advance inclusion in the workplace. Below is a list of training that has been provided to the workforce:

Diversity and Inclusion training for the following divisions and teams:

- Boating (including the DWR's customer service unit)
- Finance and Planning
- Human Resources
- Law (CPOs)
- Law (Dispatch)
- Outreach
- Agency-wide Workplace Conduct Training by attorney Karen Michaels
- Windmills: Disability Awareness & Inclusion Training

Additionally, in 2023, the agency reinstated the annual Leadership Development Program (LDP) where a cohort of employees would gain the skills necessary to be effective managers and leaders in the organization. An entire day of the LDP is devoted to Inclusive Excellence. The cohort is oriented on the Plan and the agency's inclusive excellence goals, hears from a panel of employees on agency culture, and receives training on how to be an inclusive leader.

“While we in law are required every two years to have at least two hours of diversity training to maintain our sworn status by DCJS standards, the more recent training has been more in-depth and has allowed for more open frank discussions. This provides additional insight into barriers that many do not perceive as well as a better understanding as to why it is so important to the growth and development of our agency. This needs to continue and it cannot simply be a matter of checking boxes and must be about meaningful training to be effective.”

“Training seems to be offered to the same group of individuals on a routine basis. If you are not in these groups then you typically do not get the opportunity.”

“As for professional development - it seems that people are picked and chosen for specific opportunities rather than having an open process for employees to request to attend certain trainings.”

“Denial of professional development opportunities relates to lack of time for training opportunities or lack of proper or state-approved up-to-date technology for developmental opportunities.”

AWARENESS STRATEGIC INITIATIVES SCORECARD

	2023 STATUS
1. Offer regular training on Inclusive Excellence, cultural competency and awareness.	
2. Regularly communicate information that raises awareness and promotes civility in the workplace.	
3. Hold agency leadership accountable, via 360 reviews, for creating an environment within their divisions that promotes inclusive excellence.	
4. Develop training courses that are tailored appropriately for employee's roles and responsibilities.	
5. Bring broader perspectives with the use of third-party trainers with experiences beyond DWR.	
6. Offer training specifically for hiring managers that emphasizes development of job descriptions, bias recognition and elimination, panel selection, etc.	
7. Focus training and awareness opportunities on integrating Inclusive Excellence concepts into all aspects of the agency.	
8. Educate outreach personnel, conservation police officers, and other public facing personnel, on cultural competency and building relationships across cultures.	
9. Require management training of all new managers within one (1) year of hiring/promotion.	
10. Produce annual report on advancement of Inclusive Excellence by Chief Diversity and Inclusion Officer.	
11. Maintain an engaged Inclusive Excellence Council composed of members of each division who will champion Inclusive Excellence throughout the agency.	

Recommendation #4:

Future training should consider a "live" component in the regions. Connectivity limitations in some parts of Virginia make virtual meetings a challenge and the cost of bringing participants to Richmond could prove prohibitive.



Connecting

Utilizing resources and strategies to make the outdoors available, accessible, and safe for all Virginians.

GOALS

- Increase education about and access to, Virginia’s wild spaces and the fish and wildlife that live in them.
- Provide targeted, direct outreach to underrepresented and underserved populations.
- Expand partnerships with outdoor-oriented affinity organizations.

The “Connecting” core principle has had a very successful start due in large part to the Outreach Division’s focus on expanding DWR’s constituencies. Some of the activities since the inception of the Plan include collaboration with:

- The Upper Mattaponi Nation – participated in listening sessions and attended the Pow Wows in 2022 and 2023.
- The Humble Hustle Company – partnered with this innovative youth-empowering non-profit to raise funds via an apparel sponsorship
- Black participation in shooting sports – DWR partnered with the Recreational Shooting Sports Foundation, the National African American Gun Association, Responsive Management research firm, and Johnson Marketing Inc. to win a grant from the U.S. Fish and Wildlife Service. The goal is to learn more about gun ownership among African-Americans and create a campaign to market the shooting sports to underrepresented communities.
- Outdoor Afro DMV – Worked with this chapter of a national group dedicated to promoting the outdoors to African Americans in completing our Relevancy Road map. The relationship led to a Field Day at Lake Frederick on July 8, 2023. DWR staff from Outreach, Wildlife, Aquatics, Law, and volunteers joined over 30 members of the DWV chapter of Outdoor. The day featured archery, fishing, hikes, wildlife viewing, and fish demonstrations.
- Blue Sky Fund – sponsored local non-profit’s “Hikes for Kids” fundraiser
- Rivah Sistah (Patricia Clement) – contracted with a Black female social media influencer to deliver content promoting the outdoors to underrepresented people

To emphasize that the outdoors is for everyone, the Outreach Division has developed more inclusive visual imagery on the DWR website, hunting and fishing regulations digests, and other public communications. Additionally, Outreach has traditionally

attended several events that promote outdoor activity throughout the Commonwealth. Since 2022, the agency has been more intentional about participating in activities that serve non-traditional populations. Several programs in urban areas such as Dominion Energy RiverRock in Richmond, VA have been added to the schedule and expose DWR to new audiences.

Finally, the agency has added a community engagement coordinator whose role will include developing partnerships with both for-profit and non-profit entities.

CONNECTING STRATEGIC INITIATIVES SCORECARD

	2023 STATUS
1. Create DWR branded content that highlights DWR’s mission and ways to get involved to be distributed at parks, schools and colleges.	
2. Create branded content for the Project WILD educational program.	
3. Establish strategic relationships with outdoor affinity organizations to better understand their views on outdoor activities and conservation.	
4. Include more diverse images in both print and electronic media.	
5. Implement a language access strategy for multi-lingual speakers and individuals with disabilities.	
6. Update website with images and languages that are inclusive of those in the Commonwealth.	
7. Partner with other Virginia outdoor organizations to create synergy in messages to diverse audiences.	
8. Seek opportunities to acquire and develop lands and waters that will assist in promoting high-quality outdoor wildlife experiences closer to our urban communities.	
9. Seek to convert or expand the usage of DWR’s current lands and waters to accommodate activities in which underrepresented groups participate.	
10. Host events that target underrepresented populations.	
11. Seek sponsorships and participation in outdoor programs and events that are held by, or target, underrepresented populations.	
12. Develop a Community Engagement Plan and dedicate an employee to its execution.	
13. Share Inclusive Excellence awareness content on website and social media	

Recommendation #5:
The Outreach Division should publish a comprehensive calendar of all events that chronicle DWR participation and allow the public to know of DWR presence.

Conclusion

This initial, two-year review of DWR's progress in achieving the goals of the Inclusive Excellence Strategic Plan highlights the agency's advancement and the many, unique challenges associated with a wildlife agency. Long-term, sustainable change is cellular and incremental. The final recommendation is to continue to enact the initiatives of the Plan, course-correct when necessary, and work to turn red to yellow and yellow to green.

RESPECTFULLY SUBMITTED BY:

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