



U.S. Department of Homeland Security  
EEOC MANAGEMENT DIRECTIVE 715  
*Equal Employment Opportunity Program Status Report*

Fiscal Year 2021



Homeland  
Security

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

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**MD-715**

**Parts A Through D: Agency Identifying Information**

**Part A - Department or Agency Identifying Information**

Agency	Second Level Component	Address	City	State	Zip Code (xxxxx)	Agency Code (xxxx)	FIPS Code (xxxx)
Department of Homeland Security		2707 Martin Luther King Jr AVE SE Washington, DC 20528-0190	Washington	DC	20528	HS00	7000

**Part B - Total Employment**

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	193,368	20,859	214,227

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

Agency Leadership	Name	Title
Head of Agency	Alejandro N. Mayorkas	Secretary
Head of Agency Designee	Peter Mina	Senior Official Performing the Duties of the Civil Rights and Civil Liberties Officer in the Office for Civil Rights and Civil Liberties (CRCL)

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

EEO Program Staff	Name	Title	Occupational Series (xxxx)	Pay Plan and Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
Principal EEO Director/Official	Veronica Venture	Deputy Officer for CRCL and Director of Equal Employment Opportunity and Diversity	0260	ES-00	202-357-1270	veronica.venture@hq.dhs.gov

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<b>EEO Program Staff</b>	<b>Name</b>	<b>Title</b>	<b>Occupational Series (xxxx)</b>	<b>Pay Plan and Grade (xx-xx)</b>	<b>Phone Number (xxx-xxx-xxxx)</b>	<b>Email Address</b>
Title VII Affirmative EEO Program Official	Vacant	Director, Diversity Management Section (DMS), CRCL	0260	GS-15		
Section 501 Affirmative Action Program Official	Laura Davis	Equal Employment Manager, DMS, CRCL	0260	GS-15	202-357-1264	laura.davis@hq.dhs.gov
Complaint Processing Program Manager	Amelia Demopulos	Director, Complaints Management and Adjudication Section (CMAS), CRCL	0260	GS-15	202-357-1273	amelia.demopulos@hq.dhs.gov
EEO Staff Statistician	Greg Beatty	EEO Staff Statistician, DMS, CRCL	1530	GS-15	202-897-6984	greg.beatty@hq.dhs.gov
Special Emphasis Program Manager (SEPM)	Michelle McGriff	Equal Employment Manager, DMS, CRCL	0260	GS-15	202-357-1261	michelle.mcgriff@hq.dhs.gov
Special Emphasis Program Manager (SEPM)	Conchetta Belgrave	Equal Employment Opportunity Manager, DMS, CRCL	0260	GS-14	202-357-1249	conchetta.belgrave@hq.dhs.gov
Equal Opportunity Employment Specialist	Sara Fernandez	Equal Employment Opportunity Specialist, DMS, CRCL	0260	GS-13	202-357-1268	sara.fernandez@hq.dhs.gov

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

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

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

Subordinate Component	City	State	Country (Optional)	Agency Code (xxxx)	FIPS Codes (xxxxx)
U.S. Customs and Border Protection	Washington	DC		HSBD	7014
U.S. Citizenship and Immigration Services	Camp Springs	MD		HSAB	7003
U.S. Coast Guard	Washington	DC		HSAC	7008
Federal Emergency Management Agency	Washington	DC		HSCB	7022
Federal Law Enforcement Training Centers	Glynco	GA		HSBE	7015
U.S. Immigration and Customs Enforcement	Washington	DC		HSBB	7012
U.S. Secret Service	Washington	DC		HSAD	7009
Transportation Security Administration	Springfield	VA		HSBC	7013
Cybersecurity and Infrastructure Security Agency	Washington	DC		HSCA	
Headquarters - Office of the Secretary	Washington	DC		HSAA	7002
Headquarters - Office of the Inspector General	Washington	DC		HSAA	7004
Headquarters - Management Directorate	Washington	DC		HSAA	7050 & 7051
Headquarters - Science & Technology Directorate	Washington	DC		HSFA	7040 & 7041

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

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

<b>Did the agency submit the following mandatory documents?</b>	<b>Please respond Yes or No</b>	<b>Comments</b>
Organizational Chart	Yes	
EEO Policy Statement	Yes	
Strategic Plan	Yes	
Anti-Harassment Policy and Procedures	Yes	
Reasonable Accommodation Procedures	Yes	
Personal Assistance Services Procedures	Yes	
Alternative Dispute Resolution Procedures	Yes	

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

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

## **Part E: Executive Summary**

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

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

#### **Introduction**

This Equal Employment Opportunity Program Status Report for Fiscal Year 2021 (FY 2021) outlines the status of U.S. Department of Homeland Security (“DHS” or “Department”) Equal Employment Opportunity (EEO) Program activities undertaken pursuant to its EEO program responsibilities under Title VII of the Civil Rights Act of 1964, as amended. This report also describes DHS activities undertaken pursuant to its affirmative action obligations under the Rehabilitation Act of 1973, as amended and as required by the U.S. Equal Employment Opportunity Commission’s (EEOC) Management Directive (MD) 715.

This report highlights DHS’s accomplishments in establishing and maintaining a model program by promoting equal employment opportunity for all employees and applicants for employment. The report also provides the FY 2022 plan to address any programmatic deficiencies that were identified during the year. In addition to this DHS Management Directive 715 report, each DHS Component submits its own report to the EEOC.

#### **The U.S. Department of Homeland Security**

Since its formation, the Department of Homeland Security – the third-largest federal agency – has coordinated the transition of multiple agencies and programs into a single, integrated Department dedicated to protecting the American people and the homeland. Every day, the Department’s extraordinary workforce of more than 250,000 dedicated public servants across our broad mission space demonstrate unwavering commitment to keeping every community across our country safe.

Building on a year of progress in 2021 and seeking to strengthen and enhance capabilities in key areas, the Department has developed twelve priorities to guide DHS’s strategic focus for the balance of the calendar year. These cross-functional priorities cover both organizational and mission-specific advancement and are as follows:

1. increasing our effectiveness through transformational, cross-cutting initiatives;
2. championing our workforce and a culture of excellence;
3. increasing openness and accountability;
4. advancing diversity, equity, inclusion, and accessibility in our workforce and protecting the privacy, civil rights, civil liberties, and human rights of the communities we serve;
5. innovating and harnessing technology to advance mission delivery;
6. maximizing our international impact;
7. combatting all forms of terrorism and targeted violence;



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8. increasing the cybersecurity of our nation's networks and critical infrastructure, including election infrastructure;
9. securing our borders and modernizing ports of entry;
10. building a fair, orderly, and humane immigration system;
11. readying the nation to respond to and recover from disasters and combatting the climate crisis; and
12. combatting human trafficking, labor exploitation, and child exploitation.

### **The Office for Civil Rights and Civil Liberties**

The Office for Civil Rights and Civil Liberties (CRCL) oversees the integration of civil rights and civil liberties into all DHS activities. Among its many responsibilities, CRCL leads DHS's EEO programs and promotes workforce diversity and merit system principles. CRCL's EEO and Diversity (EEOD) Division includes the following organizational units: Diversity Management Section (DMS); EEO Complaints Management and Adjudication Section (CMAS); Alternative Dispute Resolution (ADR) Section; DHS Headquarters EEO Office (HQ EEO); and HQ Anti-Harassment Unit (AHU).

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

### **Program Elements**

According to EEOC Management Directive 715, six essential elements serve as the foundation for a model EEO program:

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

The EEOC has established specific measures for each of these essential elements. Beginning in the FY 2018 reporting cycle, the EEOC increased the cumulative number of measures from 122 to 156. Each DHS Component reports to the EEOC as to whether each measure is *met*, *unmet*, or *not applicable*, in addition to the Department reporting measures for which the Department has responsibility. For this report, the Department issued a data call to all DHS Components to provide a draft list of measures indicating met/unmet/not applicable status. All nine DHS Components that are completing an MD-715 report for FY 2021 responded to the data call in time for inclusion in this report. CISA, a recently created DHS Component, is not completing an MD-715 report for FY 2021. The overall compliance rate with the six essential elements for DHS increased from 94.0 percent in FY 2020 to 95.5 percent in FY 2021.



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The scorecard below shows the percentage of measures met for each of the essential elements by DHS Components during FY 2020 and FY 2021. The percentages also include those measures reported at the Department level.

<b>Model EEO Program Scorecard</b>		
	<b>FY 2020 % Met</b>	<b>FY 2021 % Met</b>
Essential Element A: Demonstrated Commitment from Agency Leadership	96.9%	97.7%
Essential Element B: Integration of EEO into the Agency's Strategic Mission	91.1%	92.8%
Essential Element C: Management and Program Accountability	90.7%	92.5%
Essential Element D: Proactive Prevention of Unlawful Discrimination	89.0%	93.7%
Essential Element E: Efficiency	96.1%	97.2%
Essential Element F: Responsiveness and Legal Compliance	100.0%	99.1%
<b>Total</b>	<b>94.0%</b>	<b>95.5%</b>

Highlights of the Department's FY 2021 accomplishments in each essential element follow.

***Essential Element A – Demonstrated Commitment from Agency Leadership***

- In January 2021, to coincide with National Mentoring Month, the third cohort of the DHS Women in Law Enforcement (WLE) Mentoring Program was deployed. This program was developed and implemented to utilize mentoring as a valuable career development tool and networking opportunity. The program, created for DHS women law enforcement officers (LEOs), remains the only one of its kind in the Federal government. In the third cohort, the 42 mentee participants were located across the country, and worked across DHS Components, including U.S. Customs and Border Protection (CBP), U.S. Immigration and Customs Enforcement (ICE), the Transportation Security Administration (TSA), and the U.S. Secret Service (USSS). The 37 mentors included retired and current law enforcement officers from DHS, the Department of Justice, and the Charleston County Department of Public Safety. Some mentors had more than one mentee. The program included a mentee check-in meeting, mid-cycle program, close-out program, and end of program evaluations.
- The third cohort, like predecessor cohorts, offered presentations on professional development and personal growth. In the mid-cycle program, participants received information on the Department-sponsored Supervisory Leadership Bridges Development Program and Leadership Bridges Self-

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Development Program. In a program segment titled, “*Real Life Strategies for Advancement in Your LEO Career*,” participants received real-time career advice from panelists representing three of the Department’s five components with law enforcement responsibilities namely, U.S. Customs and Border Protection’s U.S. Border Patrol; U.S. Immigration and Customs Enforcement’s Office of Homeland Security Investigations; and the Transportation Security Administration’s Federal Air Marshal Service.

- Feedback received from the mentee participants revealed that a majority had never participated in any career development programs nor had a mentor. They reported that during the program, they felt supported and encouraged to advance in their careers. They stated the coaching and assistance with goal setting was invaluable. The fourth cohort of the WLE Mentoring Program will deploy in January 2022 during National Mentoring Month.
- In July 2021, the second cohort of the DHS Disability Mentoring Program deployed. In the same month, DHS commemorated the 31<sup>st</sup> anniversary of the Americans With Disabilities Act of 1990. The mentoring program provides valuable career development opportunities to both mentor and mentee participants with disabilities. The program matched participants from across the Department and provided a forum to gain insights and perspectives on the various career opportunities DHS has to offer.
- During the FY 2021 second cohort program, CRCL selected 31 participants. Sixteen mentees were paired with 15 mentors. Of the 31 program participants, 61.29 percent self-identified as having a disability, with 29.03 percent self-identifying as having a targeted disability. Specifically, with respect to the 16 mentee participants 87.50 percent self-identified as having a disability while 37.50 percent self-identified as having a targeted disability. The second cohort of the program is scheduled to end in the second quarter of FY 2022.

***Essential Element B – Integration of EEO into the Agency’s Strategic Mission***

- The DHS Strategic Plan for Fiscal Years (FY) 2020-2024 includes DHS’s mission to *Champion the DHS Workforce and Strengthen the Department*.

The Department’s workforce strategy integrates diversity and equal opportunity:

“Maintaining a highly-skilled, diverse, and engaged workforce is critical to accomplishing the homeland security mission, which relies on dedicated personnel who go above and beyond to keep Americans safe from harm.

6.2.7 Promote a culture of transparency, fairness, and equal employment opportunity throughout the DHS workforce,

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providing avenues of redress and leadership support in addressing and resolving workplace conflict via integrated conflict management and Alternative Dispute Resolution systems.”

During FY 2021, CRCL continued its participation in recurring high-level strategic activities, including the Secretary’s Bi-Weekly Component Heads’ meetings; DHS Chiefs of Staff meetings (composed of all DHS Component Chiefs of Staff, or the equivalent ); Human Capital Leadership Council (HCLC) meetings (chaired by the Chief Human Capital Officer and composed of all DHS Component Chief Human Capital Officers); the Human Resources Policy Council; the Workforce Planning Council, which shapes the workforce planning and workforce measurement programs for DHS; and the weekly Reconstitution/Return-to-Workplace Working Group meeting.

*Essential Element C – Management and Program Accountability*

- CRCL continued to collaborate with the Office of the Chief Human Capital Officer (OCHCO) on several initiatives and programs, including the strategic goals identified in the Addendum of the Human Capital Strategic Plan, the DHS Human Capital Annual Operational Plan for FY 2020-2024, and the DHS Inclusive Diversity Strategic Plan.
- DMS conducted technical assistance sessions and training for all DHS Components. Topics included an EEO Reports Update on MD-715 and a review of Affirmative Action Plans for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities.
- DMS provided a briefing on the FY 2021 Mid-Year Review Report based on DHS- wide data provided to DHS Component Special Emphasis Program managers (SEPMs) and MD-715 preparers. This DHS-wide report contained a review of Component self-assessments, program deficiencies, disability employment progress, and actions taken toward creating a model workplace. The mid-year report information was also made available to Components for their use when preparing their annual MD-715 reports.
- In support of DHS’s reasonable accommodation program, CRCL and Component-level subject matter experts (SMEs) continued to collaborate with the Office of Accessible Systems and Technology (OAST) on the development and overall architectural design of an enhanced Accessibility Compliance Management System (ACMS 2.0). ACMS 2.0 is an enterprise-wide system available to all Components to manage, track, and report on all reasonable accommodation requests, including requests for Personal

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Assistance Services<sup>1</sup> (PAS) and requests for exemptions from the vaccination mandate pursuant to Executive Order 14043. The enhanced system now has a built-in capability to produce all reporting and record keeping requirements consistent with Title 29 C.F.R. § 1614.203(d)(5) and Executive Order 13164. In response to Executive Order (EO) 14043 issued in early September 2021 requiring all federal employees be fully vaccinated, CRCL led efforts to provide technical guidance and resources to all DHS Components to include development of DHS Religious and Medical Exemption forms and FAQs designed for Employees and Managers. Until a nationwide preliminary injunction was issued on January 21, 2022, CRCL continued efforts into FY 2022, such as providing several train-the-trainer sessions for Component level board members and other officials as well as training for Disability Program Managers, Reasonable Accommodation Program Managers and Medical Officials. The additional enhancements to ACMS were also underway to include development of the ACMS Vaccine Exemption Process for employees seeking a medical and/or religious exception to the vaccine mandate, along with an ACMS user guide, exemption request dashboards for tracking and reporting, and additional fields for tracking and processing requests for reconsideration.

CRCL also developed and delivered training on COVID-19 and the Rehabilitation Act and other EEO laws. This training provided to the DHS HCLC included unique reasonable accommodation considerations and confidentiality of medical records.

- Initially launched in October 2019, the Strategic Marketing, Outreach, and Recruitment Engagement (SMORE) enterprise system continued to simplify the way OCHCO reports and analyzes recruitment activities. Over 23,000 Master Events are recorded in SMORE, allowing analysis to be performed on current and historical data. The SMORE system is supplemented by two additional SharePoint sites (Recruiters' Portal and Joint Hiring Event Portal), which provide maximum data capture of events across the Department. Within SMORE, there is also an upgraded capability on reporting out on student programs' goals and activities. This enhancement to the SMORE system was made in FY 2021. SMORE Power Business Intelligence (BI) reports provide live results and complex visualizations with the capability to drill down further into the data. There are three dynamic and complex main dashboards which provide 20 unique dashboards that document recruitment and outreach efforts across the Department. Additional dashboards are being designed and developed to the support Pathways and Student Programs additions.
- The DHS Corporate Recruitment Council (CRC) brings together key recruiting personnel from across the Department. The Council annually develops a "Top 25" list of recruiting and outreach

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<sup>1</sup> PAS is assistance with performing activities of daily living that an individual would typically perform if he or she did not have a disability, and that is not otherwise required as reasonable accommodation, including, for example, assistance with putting on or removing clothing, eating, and using the restroom

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events that target diverse populations and specific events. This includes events focused on law enforcement, which represent approximately 40 percent of the positions at DHS. During FY 2021, the CRC focused on collaborating on recruitment strategies for cybersecurity programs. The Secretary's Honors Program for Cyber (SHP-C) recruitment began in FY 2021. The Intelligence and Diversity Fellowship Program recruitment will begin in FY 2022. In addition, the CRC reviewed the results of DHS Equity Assessments for "Learning about and Applying for Jobs at DHS" (initially pursuant to E.O. 13985 and later shifted to E.O. 14035) and discussed potential barriers in the recruitment process and ways to advertise job opportunities to underserved communities. The CRC adjusted recruitment strategies due to the COVID-19 pandemic and discussed how to attract females to the Department's cybersecurity and law enforcement positions.

- CRCL and OCHCO updated and finalized a Memorandum of Understanding (MOU) to expand outreach and recruitment of students and recent graduates at institutions of higher education; higher education associations; and minority-serving institutions for DHS opportunities. These opportunities include but are not limited to internships, externships, fellowships, and temporary and permanent federal positions.
- In FY 2021, the Office of Academic Engagement (OAE) finalized MOUs with nine different colleges, universities, and higher education associations. In the first quarter of FY 2022, OAE and OCHCO will co-sponsor a two-part webinar series for faculty and students within the DHS MOU community. Part I of the series will include information on the mission of DHS and its Components. Part I will also identify available positions within the Secretary's five targeted priority areas: Domestic Violent Extremism; Immigration/ Border; Cybersecurity; Climate Change; and COVID-19. Part II of the webinar series will feature information on resume writing, grant writing, and how to utilize USAJOBS, as well as a moderated panel of current DHS interns.
- DHS continued its use of the Pathways Program (Pathways), the Federal government's primary entry point for students<sup>2</sup> and recent graduates<sup>3</sup>. In FY 2021, DHS hired 169 Pathways student interns, 110 recent graduates, and 16 Presidential Management Fellows, totaling 295 Pathways Program participants. Of these, 30.8 percent identified as members of a racial minority or ethnic group, and 50.2 percent were women.

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<sup>2</sup> Current students in high school, college, trade school, or other qualifying educational institutions may apply to participate in the Pathways Student Internship Program.

<sup>3</sup> The Recent Graduates Program targets recent graduates of trade and vocational schools, community colleges, universities, and other qualifying educational institutions or programs. To be eligible, applicants must apply within two years of degree or certificate completion.

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- CRCL's Director of Equal Employment Opportunity and Diversity:
  - Empowered DMS staff to continue their strategic collaboration efforts with the DHS Human Capital Data Analytics Division to enhance a comprehensive MD-715 Data Table Dashboard in the Analytics Intelligence System (AXIS), the DHS-wide human resources data analytics tool. DMS staff represented CRCL on the OPM Applicant Flow Data Group, a platform for interchange between federal agencies and OPM on the needs of agencies and the evolving capabilities of OPM to provide job applicant flow data. DMS staff used applicant flow data to conduct data analyses and to complete the required MD-715 report data tables.
  - Empowered EEOD staff to co-lead the working groups charged with the implementation of the following E.O.s issued during FY 2021: E.O. 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*; E.O. 13988, *Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation*; and E.O. 14041 White House Initiative on Advancing Educational Equity, Excellence, and Economic Opportunity Through Historically Black Colleges and Universities and E.O. 14020, *Establishment of White House Gender Policy Council*.
  - Empowered EEOD DMS staff to co-lead the implementation of Executive Order 14020 and the Gender Policy Working Group with the CRCL Chief of Staff. Deliverables included the development of the Gender Policy Council DHS Agency Input Template, an Executive Secretary Department-wide data call for gender policy-related policies, programs, and activities, identifying areas of focus for working groups. The working groups assisted in identifying and gathering additional data for inclusion in the DHS input to the Government-wide strategy and the preparation of the final DHS submission to the White House Gender Policy Council.
  - Empowered EEOD DMS staff to lead the development of the Department of Homeland Security's Women, Peace, and Security Report. The Department's baseline report focused on domestic training opportunities for women in law enforcement along with training provided to female foreign national law enforcement officers. It summarized DHS programs created to protect women from gender-based violence, human trafficking, and sex crimes.
  - Encouraged the collaboration of EEOD DMS staff with the Pride in Federal Service Interagency Working Group, a forum for sharing resources and materials in support of lesbian, gay, bisexual,

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transgender, and gender nonconforming inclusion in federal employment.

- Led EEOD DMS staff to represent DHS in the HBCU Emergency Management Workforce Consortium. Its purpose is to increase the participation of HBCUs in DHS-sponsored programs such as FEMA's Emergency Management Institute and the establishment of Community Emergency Response Teams in underserved communities. A primary focus was the reopening and identification of resources for HBCUs closed due to the COVID-19 pandemic.
- Empowered DMS staff to moderate an HBCU Emergency Management Workforce Consortium sponsored inaugural *Disaster Resilience* webinar. The program featured representatives from Howard University College of Medicine, Federal Emergency Management Agency (FEMA), Benedict College, and the DHS Office of Partnership and Engagement (OPE). The OPE Assistant Secretary spoke on the path forward for HBCUs in emergency management. FEMA spoke on grants and other funding opportunities for HBCUs.
- CRCL's DMS co-sponsored with U.S. Customs and Border Protection, a National Women's History Month commemorative program, *Valiant Women of the Vote: Refusing to be Silenced*. The program featured the Deputy CRCL Officer as the keynote speaker. CRCL Officer Katherine Culliton-González provided closing remarks.
- With DHS Pride, the Department's LGBTQ+ Affinity Group sponsored *Not a Straight Line: The Ebbs and Flows of Progress*, featuring a panel of DHS employees who shared their stories of finding balance and navigating the hurdles they faced in the workplace and in their personal lives as members of the LGBTQ+ community. CRCL Officer Katherine Culliton-González delivered remarks and shared information about CRCL's work to support Executive Order 13988, Preventing and Combatting Discrimination on the Basis of Gender Identity or Sexual Orientation, issued by President Biden in January 2021.
- The EEOD Director convened a Sexual Orientation and Gender Identity (SOGI) Working Group comprised of representatives from operating components and Headquarters program offices from across DHS. The SOGI Working Group identified priorities for Department-focused action to prevent and combat discrimination against the members of the LGBTQI+ community in our law enforcement efforts, facilities, human resource efforts and programs.



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- The EEOD Director ensured that the Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals with Disabilities continued as a major initiative within every DHS Component during FY 2021. In its support of these efforts, CRCL provided guidance, technical assistance, and feedback to all DHS Components to ensure their progress in complying with the new obligations outlined in 29 C.F.R. § 1614.203(d)(5). CRCL maintained a tracking mechanism to coordinate activities across the Department, managing and monitoring progress to ensure DHS's compliance with the regulatory requirements of 29 C.F.R. § 1614.203(d)(5).
- The Departmental Disability Employment Program Manager coordinated and led quarterly DHS Disability Employment Advisory Council (DEAC) meetings, providing guidance and resources, including quarterly reports on the DHS Schedule A workforce conversions, to increase coordination and conversion of these employees to career or career conditional appointments. Other resources and information covered throughout the year included updates on COVID-19; the Rehabilitation Act of 1973 as amended and other EEO laws; the Workforce Recruitment Program (WRP); ACMS; service animals; RA and PAS procedural requirements; the MD- 715 and mid-year reporting guidance.
- The EEOD Director encouraged and ensured involvement in various recruiting initiatives targeting persons with disabilities throughout FY 2021.
- The Departmental Disability Employment Program Manager ensured the accuracy and continued Department-wide distribution of the Disability Employment and Schedule A Fact Sheets. These Fact Sheets provide hiring officials with comprehensive information on increasing and retaining the employment of persons with disabilities. The Disability Employment Fact Sheet serves as a guide for all employees on the scope and purpose of the Department's disability employment program. The Fact Sheet was updated to include information on the final rule amending and clarifying federal sector affirmative action obligations under Title 29 C.F.R. § 1614. The information includes, but is not limited to, references to DHS's Annual Affirmative Action Plan, guidance on PAS, DHS's annual disability hiring goals, the selective placement program, and its Schedule A appointment authority. The Schedule A Fact Sheet serves as a resource for hiring officials and prospective applicants in support of outreach and recruitment efforts, providing an overview of the excepted hiring authority, eligibility requirements, and a listing of DHS Component-level Selective Placement Program Coordinators. To provide additional information about the Department's policy and procedures for

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the provision of PAS, a new PAS Fact Sheet was developed and disseminated across the Department.

- CRCL led the effort to revise the Department's reasonable accommodation instruction to incorporate the requirement to provide PAS as an affirmative action obligation. DHS Instruction 259-01-001, Providing Reasonable Accommodations for Employees and Applicants with Disabilities and Personal Assistance Services for Employees with Targeted Disabilities, was issued on March 23, 2021.
- EEOD staff continued engagement by supporting and participating in events and activities sponsored by the Department of Education's White House Initiative on Advancing Educational Equity, Excellence, and Economic Opportunity through Historically Black Colleges and Universities (Initiative). In FY 2021, EEOD DMS staff served as the central point of contact for all Initiative-related programs, activities, and reports as a member of the Federal Interagency Working Group (IWG). DMS ensured full DHS participation in the Initiative's Interagency Competitive Clusters on Federal Contracting; STEM; and Campus Safety and Resilience.
- DHS, along with the Department of Justice, continued to lead the Campus Safety and Resilience Cluster, an HBCU cluster created to identify opportunities and address obstacles impacting the efforts of HBCUs to protect their campuses, students, and communities. The Campus Safety and Resilience Cluster continued its work with the HBCU Campus Law Enforcement Executives and Administrators (HBCU-LEEA) and campus emergency management personnel to improve and increase HBCU campus preparedness and resilience through the provision of grants, resources, emergency management curriculum development, and training to faculty, staff, and students.
- EEOD DMS staff led the Department's participation in the Initiative's 2021 National HBCU Week Conference, CRCL wrote the session proposal *HBCU Resiliency: Better, Stronger, and Prepared*, sponsored, then facilitated a panel focused on the effect of the COVID-19 pandemic on Black communities, the direct correlation between lack of broadband access and higher mortality rates in rural communities, the importance of Community Emergency Response teams in black communities, and developing the talent pipeline for minority emergency managers and federal volunteer opportunities.
- EEOD DMS staff co-sponsored with the Office of Partnership and Engagement and the Office of the Chief Human Capital Officer department-wide recruiter training. The training facilitated by Dr. Travis

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Smith, UNITE, Inc. focused on strategies in recruiting at Historically Black Colleges and Universities. Over 300 recruiters, hiring managers, and EEO professionals attended the training.

- The EEOD Director and staff published and disseminated *Focus on EEO and Diversity*, a DHS EEOD community newsletter. Each edition included summaries of significant U.S. Supreme Court, federal court, and/or administrative decisions affecting the adjudication of EEO complaints; provided relevant and updated guidance on significant case processing issues; and discussed important or cutting-edge diversity issues. The newsletter has received a significant amount of positive feedback for its content and usefulness for the DHS EEOD community, and was frequently disseminated to EEO professionals at other government agencies.
- The EEOD staff continued the compilation and distribution of a DHS-wide listing of Special Emphasis Programs (SEPs) for each commemorative month, including but not limited to, African American History Month, National Women's History Month and National Disability Employment Awareness Month. Throughout the year, three significant areas of the SEPs were promoted: observances, outreach, and barrier analysis.
- EEOD staff represented the Department on the Federal Inter-Agency Holocaust Remembrance Committee Planning Team. The 28<sup>th</sup> Annual Federal Inter-Agency Holocaust Remembrance Program held virtually was titled, *A Chance to Survive*, featured two Holocaust survivors, Alfred Munzer of the Washington, DC area and Max Glauben of Dallas TX. Esther Safran Foer, author of *I Want You to Know We're Still Here: A Post-Holocaust Memoir*, moderated the program.

***Essential Element D – Proactive Prevention***

- DHS again conducted an annual self-assessment to monitor progress of its affirmative employment programs, During the self-assessment, DHS identified areas where barriers may operate to exclude racial, national origin, or gender groups, or qualified individuals with disabilities; and developed strategic plans to mitigate or eliminate these identified barriers.
- CRCL provided basic EEO training to new DHS HQs and CISA employees every two weeks through the OCHCO's and the Cybersecurity and Infrastructure Security Agency's (CISA) New Employee Orientation programs.

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- CRCL provided quarterly EEO training to supervisors participating in OCHCO's HR Essentials Training programs.
- CRCL provided EEO training to supervisors participating in the Office of Intelligence and Analysis' HR Essentials Training programs.
- CRCL's training cadre delivered EEO and Diversity training to HQs and CISA, as requested, at Supervisor Weekly Meetings; All-Staff meetings; and Town Halls for employees.
- CRCL delivered five (5) reasonable accommodation training sessions to DHS HQs and to CISA's supervisors, managers, and employees and three (3) disability etiquette and awareness training sessions to HQ and CISA employees. CRCL also provided a COVID-19 related reasonable accommodation briefing to the OCHCO HCLC.
- The Department's No FEAR Act training was deployed and uploaded on every Component's learning management system in FY 2021 as mandatory training. All DHS employees were required to complete the training by September 30, 2021.
- CRCL conducted three New Mediator Training courses in FY 2021. The DHS Shared Neutrals Roster now has 125 collateral duty mediators.
- CRCL recognized Conflict Resolution Day in FY 2021. CRCL had a banner on the DHS Connect page reminding DHS employees of the option to utilize mediation to resolve workplace disputes. The banner was linked to the ADR program page where employees could find additional information including the point of contact's information for each Component's ADR program.
- In FY 2021, the DHS Headquarters Anti-Harassment Unit (DHS-HQ AHU) closed 101 complaints and eliminated its backlog. The remaining inventory consists of complaints received in FY 2021. The DHS-HQ AHU began FY 2021 with 67 complaints in its inventory. It received 69 new complaints during the fiscal year and closed 101 cases with an average processing time of 253 days.
- CRCL awarded additional funding to the U.S. Office of Personnel Management, USA Learning, for an optional year agreement to replace the existing *Employment of People with Disabilities: A Roadmap to Success* and to allow DHS to expand the newly developed curriculum to further develop the Schedule A section and add learning objectives covering disability equity, inclusion, and accessibility strategies in furtherance of EO 14035, *Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce*. The "Roadmap to Success" is a mandatory training module for all hiring officials (managers/supervisors), and human capital and EEO professionals. The new training is scheduled to be deployed by August 2022.

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- DHS's Disability Employment Program:
  - In FY 2021, CRCL initiated a focused barrier analysis of the DHS disability workforce. The analysis of the disability workforce covers employees at all grade levels. The analysis will focus on the FY 2020 workforce and will include trend comparisons spanning five years (FY 2015 - FY 2020), survey and complaint data, and information on agency policies, procedures, and practices. The goal is to identify and eradicate any barriers to equal employment opportunity for persons with disabilities consistent with merit system principles and applicable personnel laws. Data collection for the analysis included the development and issuance of a Human Resources Policies, Procedures, and Practices Questionnaire through the Executive Secretary to all DHS Components at the end of third quarter in FY 2021. The questionnaire, divided into six sections, focused on policies, procedures and practices related to recruitment, hiring, training and development programs, promotions, separations, and retention. CRCL's goal is to complete the barrier analysis by mid FY 2022.
  - CRCL in partnership with the Headquarters EEO program, developed and delivered two DHS-wide training sessions on disability etiquette and awareness. The training provided tips and best practices supporting disability inclusion and communicating with individuals with disabilities.
  - In support of DHS Operation Vaccinate our Workforce (VOW), CRCL collaborated with the Department of Veterans Affairs, Veterans Health Administration (VHA) to ensure vaccination sites were accessible to DHS employees and reasonable accommodation needs were appropriately addressed. As a result, VHA agreed to modify its MOU to clarify its role and responsibility to provide accessibility and accommodations including, but not limited to, the provision of alternative personal protective equipment i.e., clear face masks; updated signage; and interpreting services.
  - In FY 2021, DHS established Department-wide and Component-specific hiring goals of 12 percent for individuals with disabilities (IWDs) and two percent for individuals with targeted disabilities (IWTDs) in non-law enforcement and non-Transportation Security Officer (TSO) positions. In FY 2021, 15.3 percent of all new hires at DHS were IWDs. Two percent of new hires were IWTDs excluding law enforcement and TSO positions. The new hires included permanent and temporary employees. The Department successfully met its IWD and IWTD new hire goals of 12 and two percent for the second year in a row. DHS ended the fiscal year with IWDs representing 14.22 percent of the total workforce and IWTDs representing 2.4 percent (excluding law enforcement and TSO

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occupations). DHS showed an increase of 0.47 percent for IWDs with no change from 2.4 percent for IWTDs.

- DHS also increased its Schedule A hiring goal, for all new hires in non-law enforcement and non-TSO positions, from 1.5 percent in FY 2020 to two percent in FY 2021. At the end of FY 2021, Schedule A hires comprised 2.5 percent of all new hires in non-law enforcement and non-TSO positions, representing a slight decrease of 0.1 percent compared to the 2.6 percent of Schedule A hires in FY 2020.
- During FY 2021, the overall average time frame for processing initial requests for reasonable accommodations was approximately 27.6 days. This represents a nearly 10-day decrease for processing requests, when compared to 37.30 days in FY 2020. This does not include the average processing time for reasonable accommodation requests at USCIS, as the data system utilized by USCIS does not capture processing times.<sup>4</sup>
- DHS continued its partnership with the Department of Defense's (DoD) Computer/Electronic Accommodation Program (CAP) to provide needs assessments to employees throughout DHS.<sup>5</sup> During FY 2021, CAP conducted eleven needs assessments and filled seven reasonable accommodation requests, before the change in scope took effect. This resulted in a total cost savings during FY 21 of \$33,920.40. DHS' reasonable accommodation program experienced a total cost savings from its 21-year partnership with DoD in the amount of \$2,391,974.71.

*Essential Element E - Efficiency*

During FY 2021, CMAS provided quarterly feedback to DHS Components on the quality of their Reports of Investigation (ROI) using an ROI Feedback Tool (Tool)<sup>6</sup>. Analysts assigned numerical ratings for several criteria related to legal sufficiency and readability and provided narrative information if needed to further explain numerical ratings. Component EEO Offices use the feedback as an additional method to assess the quality of their ROIs. The tool has proven to be an effective way for CMAS to partner with Components to improve the quality of ROIs across DHS. Since the Tool's inception, DHS Component Complaint Managers have welcomed the thorough feedback and detailed comments and offered their own suggestions for

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<sup>4</sup> USCIS did not submit its reasonable accommodation processing time for inclusion in this report due to data limitations. USCIS is exploring switching to an alternate data system that would provide accurate processing time data.

<sup>5</sup> Effective FY 2021, CAP ceased to provide assistive technology or adaptive equipment to non-DOD agencies.

<sup>6</sup> The Tool, developed and launched by CMAS in FY 2016, allowed CMAS's Adjudication Analysts to assess and rate the quality of ROIs reviewed when preparing Final Agency Decisions (FADs) and has been recommended as a best practice for other federal agencies by the EEOC.

improvement. The Complaint Managers share the feedback with their staff members and contractors as an objective improvement mechanism.

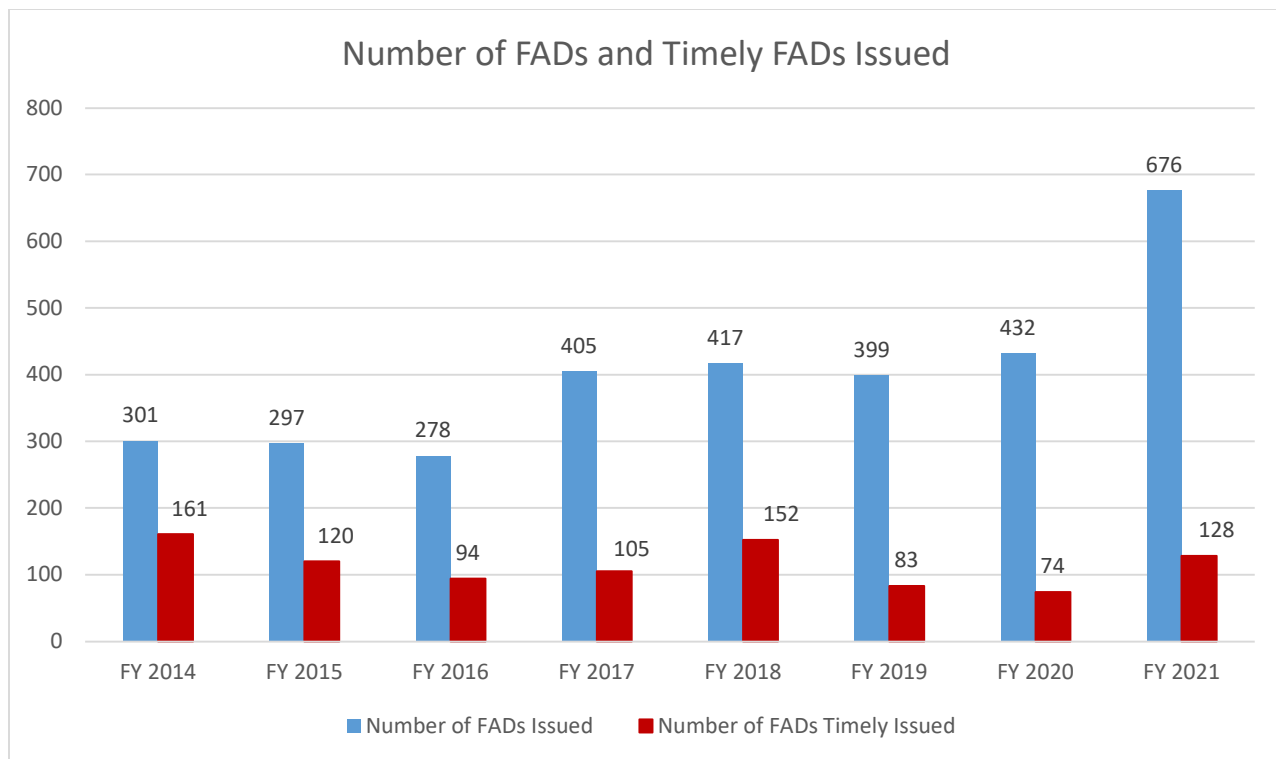
CMAS is required to vet DHS employees nominated to receive certain high-level awards from DHS leadership. The vetting consists of a review of EEO complaint history to ensure there is no disqualifying information on the nominees, including having engaged in any discriminatory conduct. In FY 2021, CMAS processed 13 vetting requests totaling over 200 employees completing 100 percent of vetting requests by their requested due date.

The CMAS Compliance Program monitors Components' progress in the implementation of remedial relief in decisions issued by the EEOC in which unlawful discrimination was found. During FY 2021, CMAS updated its compliance templates in accordance with the Elijah E. Cummings Federal Employee Antidiscrimination Act of 2019 (FEAA), then distributed the templates to all DHS Component Compliance officers. In addition, CMAS continues its collaboration with the EEOC's Compliance Officer, fostering an effective working relationship while focusing on the oldest cases pending full implementation.

During FY 2021, CMAS issued or administratively closed over 1,300 final agency actions, including 1,145 merit final actions. DHS had an internal performance measure goal to issue 49 percent of merit final actions by their regulatory due date. Notably, 52 percent (591 of 1,145) of these merit-based final actions were timely issued. Accordingly, CMAS exceeded its timely issuance goal.

With respect to merit final agency decisions (FADs), CMAS continued to strategically address its inventory. CMAS utilized its in-house adjudication resources primarily for FADs that could have been issued within regulatory timeframes. CMAS assigned many of the older cases to contract vendors to draft FADs. By fiscal year end, of the 369 cases assigned to contractors, 327 drafts had been received. The contract resources were invaluable in helping address the CMAS's FAD inventory. As a result, the backlog inventory decreased from 407 at the end of FY 2020, to 178 at the end of the FY 2021. Addressing backlog inventory will continue as a focus in FY 2022.





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

DHS has a goal of full compliance with EEO statutes, regulations, policy guidance, and other written instructions. Agency personnel are held accountable for timely compliance with orders issued by the EEOC. CMAS has implemented procedures to ensure timely completion of ordered corrective actions and timely submission of compliance reports.

### *Section 508 of the Rehabilitation Act*

OAST is responsible for implementing the requirements of Section 508 of the Rehabilitation Act of 1973, as amended. In addition to implementing Section 508 compliance at DHS, OAST ensures equal access to information and data for employees and customers with disabilities.

The information and data shared include, but are not limited to, several federal shared services, including the DHS Treasury Information Executive Repository, the Financial Systems Modernization project with the Department of the Interior, the Homeland Security Information Network (HSIN) upgrading project, the DHS Chief Human Capital Officer's (CHCO)'s HR Academy Career Path Tool, and the Acquisition Planning Forecast System by the DHS Office of Chief Procurement Officer.

In each case, OAST achieved successful outcomes by using a combination of IT governance to ensure accessibility, certified Trusted Testers to set baselines of Section 508 conformance, and Trusted Tester training to enable federal partners to continue with accessibility responsibilities moving forward.

In FY 2021, OAST shifted its consideration of accessibility shifted from a focus on testing for accessibility (which is normally completed toward the end of the development lifecycle) to considering accessibility during the earlier planning, designing, and development stages.

## **Strategic Guidance**

In FY 2021, OAST served as an instrument of strategic guidance across the Department. Guidance was provided in the form of advisory and resource forms.

The DHS Section 508 Playbook was developed and disseminated. The Playbook is a role-based, accessibility guidance resource designed to support acquisition professionals, IT project managers, developers, testing, quality assurance (QA) resources, and Section 508 program managers and accessibility SMEs. A generic version of the Section 508 Playbook was developed and shared on MAX.gov, allowing other federal agencies to modify their plans to meet their agency-specific acquisition and development requirements.

OAST partnered with CRCL on a dedicated Section 508 module. This module will be included in *A Roadmap to Success: Disability Recruitment, Hiring, Retention, and Advancement*, a mandatory training course designed for managers, supervisors, and human capital and EEO professionals.

OAST is working to create an Accessibility as a Service Delivery Model (ASDM). The ASDM will provide the framework for developing an accessibility consulting service vehicle in the form of a blanket purchase agreement (BPA). With a BPA, organizations can select the accessibility resources such as an accessibility SME, tester, or electronic document remediation specialist to support their project or mission needs.

## **Technical Assistance**

OAST provides technical guidance to the Department on how to navigate and evaluate Information and Communication Technology (ICT) for conformance to Section 508 standards.

ACMS OAST improved the Component Section 508 Program Health assessment process with the goal of providing a repeatable, easy-to-understand health assessment process that supports mandatory reporting requirements and articulates measurable progress against goals, relevant recommendations, and timely guidance.

The General Services Administration (GSA) recognized the OAST-developed DHS Accessibility Requirements Tool (DART) 2.1 as a best practice. GSA requested to rebrand DART as the government-wide Accessibility Requirements Tool (ART), noting its value as a resource for consistently integrating Section 508 requirements into IT acquisitions.

OAST also streamlined the national security request and approval process. This process included the addition of the HQ Chief Information Security Officer in the process.

## **DHS Accessibility Help Desk (AHD)**

The AHD serves DHS as the single point of contact for disability-related issues, especially accommodation needs relating to electronic and information technology accessibility.

## **Training**

Accessibility training is available to anyone in the Department who is interested in learning how to develop and evaluate ICT for conformance to Section 508 standards. Approximately 20,268 individuals used the DHS Accessibility Learning Management System (LMS) to learn about Section 508. Also, approximately 715 people across government and industry obtained their DHS Trusted Tester certification. Trusted Tester certification is a distinguished recognition that demonstrates the tester is equipped to evaluate information and communication technology for conformance to the Revised Section Standards.

OAST offered five additional instructor-led courses<sup>7</sup> to existing on-demand training courses<sup>8</sup> online to increase technical awareness and skills for developing and testing ICT content in popular document media.

OAST collaborated with CRCL and OCHCO's Learning Technology and Innovation Division to integrate Section 508 content into the *A Roadmap to Success: Disability Recruitment, Hiring, Retention, and Advancement*, which is mandatory training for supervisors and managers.

## **Outreach**

In FY 2021, OAST made considerable outreach efforts to promote Section 508 awareness across the Department. OAST hosted the second annual DHS Accessibility Day in May to increase disability and accessibility awareness across the Department, with more than 330 in attendance. OAST represented DHS as the co-chair of the Best Practices Subcommittee on the Federal Chief Information Officers Council Accessibility Community of Practice.

OAST was featured at multiple DCIO Brown Bags, Lunch and Learns, and in August 2021 was highlighted at the OCIO All-Hands in support of the 31<sup>st</sup> anniversary of the Americans with Disabilities Act of 1990. OAST presented multiple automated accessibility tool demonstrations, and is working with CBP, ICE, USCIS, and the DHS HQ MOBIUS team in piloting the integration of automated accessibility testing into their software development lifecycles.

## **Application/Document Testing**

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<sup>7</sup> The transitioned courses are: 1) ANDI Tools video training, 2) Creating Accessible Microsoft Word Electronic Documents, 3) Creating Accessible Microsoft Excel Electronic Documents, 4) Creating Accessible Microsoft Power Point Electronic Documents, and 5) Creating Accessible Adobe PDF Electronic Documents.

<sup>8</sup> Existing courses included: 1) Section 508 What is it and Why it's important, 2) Section 508 testing tools installation, 3) Section 508 Standards for Applications, 4) Trusted Tester Training, 5) Trusted Tester Exam, 6) Section 508 Compliance for COTRs, Program and Project Managers, and 7) Creating Section 508 Compliant Documents (Word, Power Point, Excel, Adobe and Fillable Forms).

Within DHS HQ, OAST is responsible for testing IT applications for compliance based on Section 508 accessibility standards and best practices. OAST provided web application accessibility testing services for 32 major applications. OAST also remediated more than 3,663 document pages to ensure Section 508 conformance.

## **Governance**

OAST's Governance Division provides guidance on policy, acquisitions, and technical assistance. OAST pushed a major revision to the DART 2.1 Section 508 Contract Language Generation tool to improve ease of use, include additional requirements for cloud-based services and enhance tailoring capabilities by adding two new modules for project planning. OAST started an initiative to develop an accessibility services delivery model to improve flexibility and scalability of OAST programs.

Due to the COVID-19 pandemic, almost all work shifted to remote locations. OAST created Department-wide guidance for emergency communications accessibility. OAST also provided guidance emphasizing the inclusive use of various collaborative platforms, such as Microsoft Teams, to ensure accessibility of virtual meetings for employees with and without disabilities.

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

### **Workforce Profile and Trend Analysis**

This section outlines the DHS workforce-trend analysis conducted on the permanent employee workforce. Temporary employees are not included because they are hired for temporary needs, with a predestined separation. The inclusion of the temporary employee population is less relevant to the analysis of employee movements through the human capital lifecycle.

The tables that follow below provide a consolidated view for each gender, race, and ethnic group, and for employees who report a disability or a targeted disability. The tables consolidate statistics to convey how the key human capital activities of hiring, promotion, attrition, and pay compare to established benchmarks (National Civilian Labor Force (NCLF), Relevant CLF (RCLF), or workforce participation rate). One table is provided for each ethnicity, race, and gender (ERI/G) group and disability category.

Workforce trend analysis presumes that parity is the ideal outcome. In a world of parity, all groups are statistically expected to move through the human capital life cycle in proportion to their size. In the tables below, parity would result if each row in the table contained essentially the same number across the board. For example, assuming Black males make up 7.5 percent of the permanent DHS workforce, at parity, they would constitute an equal percentage of workforce attrition, promotions, low pay grades, middle pay grades, and high pay grades. If this is not occurring, it constitutes a trigger, which may suggest a possible EEO barrier. Multiple years of data are provided to allow for an assessment of trends for each race, gender, and ethnic group,

and for employees who report a disability or a targeted disability. Successful human capital strategies can have a minimal effect on the workforce in a particular year. Therefore, analysis of several years of data is often useful in these types of assessments.

The percentages for pay grades listed in the tables encompass all pay plans used across DHS, except wage grade. To facilitate analysis at the Department level, the pay plans across DHS Components were cross walked to the GS scale. The Department has utilized this approach since the DHS FY 2017 MD-715 report. Percentages for earlier years shown in the trend tables were recalculated using the GS crosswalk. Combining the pay plan grade designations allows for one set of ERI/G and disability tables that reflect the majority of the DHS permanent workforce. It also allows for consolidated trend analysis.

Additionally, both NCLF and RCLF statistics are provided as benchmarks. The NCLF consists of all persons over 16 years of age, who are not institutionalized or on active duty in the armed forces, and who either have a job or want a job. The RCLF is a weighted average of demographic statistics pertaining only to occupations seen within DHS. Note that for the FY 2021 MD-715 report, the NCLF and the RCLF were retabulated using data from the 2014-2018 American Community Survey, following EEOC guidance.

The total permanent DHS workforce increased by 322 employees (0.17 percent) from 193,046 in FY 2020 to 193,368 in FY 2021.

DHS Permanent Workforce Trend for Hispanic or Latino Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY21	15.8%	11.3%	12.1%	13.8%	9.4%	13.5%	21.6%	11.1%	6.1%
FY20	15.9%	10.0%	11.3%	14.3%	9.2%	13.5%	21.8%	11.1%	5.4%
FY19	16.0%	11.8%	12.7%	14.7%	9.5%	13.7%	21.9%	11.1%	5.6%
FY18	16.2%	14.4%	12.9%	14.5%	9.3%	14.1%	21.9%	11.2%	5.8%
FY17	16.2%	13.8%	12.0%	14.0%	9.0%	13.7%	21.7%	11.3%	5.4%
FY16	16.1%	13.9%	11.8%	14.8%	7.9%	12.9%	21.9%	11.5%	5.3%
FY15	15.9%	13.6%	11.0%	14.1%	7.5%	11.8%	22.3%	11.4%	4.1%
FY14	15.7%	10.2%	10.9%	13.2%	7.0%	11.8%	21.9%	11.4%	4.1%
FY13	15.7%	11.1%	10.3%	15.9%	6.5%	12.0%	21.8%	11.3%	4.4%
FY12	15.6%	9.9%	10.4%	18.6%	6.0%	12.2%	21.4%	11.4%	4.8%
FY11	15.7%	12.9%	11.0%	21.1%	5.9%	13.2%	21.0%	11.3%	4.1%
FY10	15.6%	9.1%	11.1%	26.2%	6.2%	14.1%	20.5%	11.0%	3.8%
Hispanic Males – 15.8% of DHS, 6.8% of National Civilian Labor Force, 6.0% of Relevant Civilian Labor Force									

The workforce participation rate for Hispanic males at DHS is significantly above the NCLF and RCLF rates. In FY 2021, hires were above the NCLF and RCLF and attrition was below the workforce representation rate. However, the promotion rate for Hispanic males remained below the workforce participation rate. The representation of Hispanic males in Executive/Senior Leader pay grades increased, but still remained significantly below the workforce participation rate.

Hispanics constitute 30 percent of the Customs and Border Protection Officers (CBPOs) and over half of Border Patrol Agents. CBPOs and Border Patrol Agents require fluency in Spanish for initial placements along the southern border, Florida, and Puerto Rico, a requirement that is not present in the standard RCLF comparison. This job requirement, in conjunction with the high percentage of jobs located in the southwest Border States, greatly increases Hispanic male and female representation in these occupations.

DHS Permanent Workforce Trend for Hispanic or Latino Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY21	6.6%	7.7%	6.4%	7.7%	2.2%	10.4%	6.2%	4.0%	2.1%
FY20	6.5%	7.0%	6.7%	8.1%	2.8%	10.0%	6.2%	3.9%	1.8%
FY19	6.5%	8.1%	7.3%	9.0%	2.6%	10.0%	6.1%	3.8%	1.7%
FY18	6.4%	9.8%	7.2%	8.0%	1.6%	10.3%	5.9%	3.7%	1.9%
FY17	6.1%	9.0%	6.7%	7.7%	1.6%	9.7%	5.8%	3.6%	1.8%
FY16	5.9%	8.9%	6.4%	6.7%	1.7%	9.2%	5.7%	3.5%	2.2%
FY15	5.7%	8.7%	6.0%	5.9%	2.0%	8.6%	5.6%	3.4%	2.1%
FY14	5.5%	7.0%	6.3%	6.4%	2.0%	8.0%	5.6%	3.3%	1.9%
FY13	5.5%	7.8%	5.4%	5.4%	1.7%	7.9%	5.6%	3.2%	1.7%
FY12	5.3%	6.1%	5.4%	5.0%	1.5%	7.5%	5.5%	3.2%	1.3%
FY11	5.3%	5.2%	4.5%	5.1%	1.5%	7.3%	5.3%	3.1%	1.4%
FY10	5.2%	3.6%	4.2%	5.3%	2.3%	7.0%	5.4%	3.1%	1.2%
Hispanic Females – 6.6% of DHS, 6.2% of National Civilian Labor Force, 4.6% of Relevant Civilian Labor Force									

The workforce participation rate for Hispanic females at DHS increased slightly in FY 2021 and remains above the NCLF and RCLF participation rates. The hire rate increased and remained above the NCLF and RCLF. The attrition rate decreased in FY 2021 and remains above the participation rate. The promotion rate decreased this past year but continued to exceed the workforce participation rate.

Hispanic females were significantly overrepresented at pay grades GS 5-9 and participated at a lower-than-expected rate at higher pay grades, when compared to their workforce participation rate. The participation rates in the higher grades increased in FY 2021.

DHS Permanent Workforce Trend for White Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY21	37.5%	33.3%	36.5%	36.7%	51.7%	26.5%	37.7%	45.4%	53.8%
FY20	37.8%	37.5%	35.7%	36.2%	49.5%	27.5%	37.7%	46.0%	55.8%
FY19	37.7%	33.3%	34.4%	33.0%	49.9%	26.8%	38.1%	46.5%	55.3%
FY18	37.9%	29.4%	35.1%	34.3%	52.0%	25.7%	38.6%	47.1%	55.7%
FY17	38.6%	30.2%	35.1%	34.3%	53.1%	26.3%	38.9%	47.7%	55.6%
FY16	39.2%	28.3%	36.7%	38.4%	53.4%	27.0%	39.4%	48.3%	55.8%
FY15	40.1%	31.5%	38.2%	42.1%	55.2%	29.1%	39.4%	49.1%	57.0%
FY14	40.6%	36.6%	38.1%	40.0%	55.3%	30.9%	39.4%	49.6%	58.5%
FY13	40.7%	35.1%	39.6%	42.6%	55.9%	31.4%	39.2%	50.2%	57.8%
FY12	40.9%	39.2%	39.8%	43.1%	58.9%	32.2%	39.7%	50.5%	58.6%
FY11	41.1%	40.4%	41.0%	41.6%	56.4%	33.0%	39.8%	50.9%	58.8%
FY10	41.3%	47.5%	41.1%	40.8%	57.2%	33.8%	39.7%	51.6%	59.9%
White Males – 37.5% of DHS, 35.7% of National Civilian Labor Force, 39.6% of Relevant Civilian Labor Force									

The White male workforce participation rate at DHS decreased slightly in FY 2021. It is above the NCLF rate but below the RCLF rate. The hiring rate was below the NCLF and RCLF rates, while the promotion rate continued to be below the workforce participation rate.

White males' participation rate was lower than the expected rate at the GS 5-9 pay grades and at a higher than the expected rate at the GS 13–15 and Executive/Senior Leader grades. The participation rate at grades GS 13–15 has been trending downward for the White male group since FY 2010 and decreased in FY 2021 at the Executive/Senior Leader level.



DHS Permanent Workforce Trend for White Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY21	15.5%	16.4%	17.8%	17.0%	10.6%	17.0%	13.3%	17.5%	21.9%
FY20	15.7%	18.9%	17.5%	17.3%	12.0%	17.4%	13.4%	17.3%	20.8%
FY19	15.6%	17.2%	16.9%	17.0%	12.3%	17.4%	13.2%	17.2%	22.0%
FY18	15.5%	16.2%	17.6%	17.3%	9.2%	17.5%	13.2%	17.1%	21.5%
FY17	15.6%	16.8%	18.8%	17.5%	9.4%	18.2%	13.3%	16.9%	21.6%
FY16	15.8%	16.5%	18.3%	16.8%	9.4%	18.9%	13.3%	16.8%	22.4%
FY15	15.9%	16.7%	19.5%	16.5%	8.8%	19.6%	13.5%	16.5%	21.8%
FY14	16.2%	17.9%	20.4%	17.9%	10.8%	19.7%	13.9%	16.5%	21.5%
FY13	16.4%	18.0%	20.4%	16.2%	11.3%	19.9%	14.2%	16.5%	21.1%
FY12	16.6%	20.5%	20.2%	14.9%	11.4%	20.1%	14.4%	16.6%	20.9%
FY11	16.7%	16.5%	20.6%	14.6%	12.9%	19.5%	14.7%	16.7%	21.7%
FY10	17.0%	18.5%	20.3%	12.4%	12.4%	19.4%	15.3%	16.9%	22.0%
White Females – 15.5% of DHS, 31.8% of National Civilian Labor Force, 31.2% of Relevant Civilian Labor Force									

The White female participation rate at DHS was significantly lower than the NCLF and RCLF rates. The hire rate continues to be above the participation rate, as does the attrition rate, which increased in FY 2021. The White female promotion rate continued to be above the participation rate, with White females represented at higher-than-expected rates in the higher pay grades. Their participation was highest at the Executive/Senior Leader pay grades.

DHS Permanent Workforce Trend for Black or African American Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY21	7.7%	9.7%	8.7%	7.5%	13.8%	9.6%	6.9%	7.0%	6.4%
FY20	7.6%	7.5%	9.3%	7.3%	13.8%	9.3%	6.8%	6.9%	6.5%
FY19	7.7%	8.8%	9.4%	7.9%	15.0%	9.5%	6.8%	6.9%	6.1%
FY18	7.7%	9.1%	9.3%	8.3%	17.7%	9.8%	6.7%	6.8%	5.8%
FY17	7.6%	9.7%	9.5%	8.1%	17.6%	9.9%	6.6%	6.7%	6.4%
FY16	7.5%	10.6%	8.8%	7.6%	18.5%	10.0%	6.4%	6.6%	6.5%
FY15	7.3%	9.7%	8.4%	6.7%	17.2%	9.7%	6.2%	6.5%	7.0%
FY14	7.2%	8.8%	8.2%	6.8%	15.3%	9.3%	6.1%	6.4%	6.6%
FY13	7.1%	8.9%	8.1%	6.1%	14.7%	9.1%	6.1%	6.3%	7.1%
FY12	7.0%	7.1%	8.3%	5.6%	13.2%	8.9%	6.1%	6.1%	6.9%
FY11	7.1%	8.4%	7.9%	5.3%	12.5%	8.7%	6.2%	6.0%	7.0%
FY10	6.9%	7.5%	7.8%	4.8%	12.2%	8.3%	6.2%	5.9%	6.4%
Black Males – 7.7% of DHS, 5.7% of National Civilian Labor Force, 5.0% of Relevant Civilian Labor Force									

In FY 2021, the workforce participation rate and hire rate of Black males at DHS remained above the NCLF and RCLF participation rates with the hire rate increasing for the first time since FY 2016. Representation at grades GS 13-15 has increased since FY 2010, although participation in those grades remained below the overall representation rate. The promotion rate remains just below the participation rate in FY 2021.

DHS Permanent Workforce Trend for Black or African American Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY21	8.6%	11.4%	10.8%	8.4%	6.4%	13.1%	6.5%	7.6%	4.0%
FY20	8.6%	10.2%	11.7%	8.4%	7.1%	12.8%	6.5%	7.5%	4.2%
FY19	8.6%	11.2%	11.3%	9.8%	6.1%	13.1%	6.4%	7.4%	4.2%
FY18	8.6%	12.1%	10.2%	9.4%	5.7%	13.5%	6.2%	7.3%	4.0%
FY17	8.3%	12.0%	10.7%	9.8%	4.9%	13.3%	6.2%	7.1%	4.0%
FY16	8.2%	12.7%	10.5%	8.1%	5.3%	13.2%	6.0%	6.9%	3.9%
FY15	7.9%	10.7%	9.8%	7.4%	5.3%	12.9%	5.8%	6.8%	4.4%
FY14	7.9%	10.6%	9.4%	8.2%	5.3%	12.4%	5.9%	6.6%	3.5%
FY13	7.8%	10.9%	9.8%	7.0%	6.4%	12.1%	6.0%	6.5%	3.9%
FY12	7.8%	9.7%	9.5%	6.2%	5.1%	11.8%	5.9%	6.5%	3.9%
FY11	7.7%	9.6%	9.0%	5.9%	6.1%	11.3%	5.8%	6.4%	3.6%
FY10	7.5%	8.3%	10.0%	4.5%	5.3%	10.6%	6.0%	6.2%	3.4%
Black Females – 8.6% of DHS, 6.6% of National Civilian Labor Force, 5.7% of Relevant Civilian Labor Force									

The workforce participation rate of Black females at DHS has increased since FY 2010 and remained flat since FY 2018, remaining above the NCLF and RCLF participation rates. This group was hired at a rate that was above the NCLF and RCLF since FY 2011. The promotion rate dipped below the representation in the workforce in FY 2020 and is unchanged in FY 2021. Black females continue to have a higher-than-expected attrition rate. This group also had lower than expected participation in higher-graded positions. However, since FY 2010, the rate has trended upward in GS 13-15 positions.

DHS Permanent Workforce Trend for Asian Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY21	3.9%	4.3%	3.3%	4.0%	3.2%	4.4%	3.9%	3.4%	2.0%
FY20	3.8%	3.8%	3.5%	3.9%	3.7%	4.3%	3.9%	3.4%	2.0%
FY19	3.8%	4.3%	3.6%	3.9%	2.8%	4.2%	3.9%	3.3%	1.8%
FY18	3.7%	4.1%	3.7%	3.7%	2.2%	4.1%	3.9%	3.2%	2.0%
FY17	3.6%	3.8%	3.2%	3.8%	2.0%	4.0%	3.9%	3.1%	1.6%
FY16	3.6%	3.9%	3.3%	3.7%	1.7%	4.0%	3.8%	3.0%	1.2%
FY15	3.5%	4.4%	3.0%	3.5%	2.1%	3.9%	3.9%	2.9%	1.2%
FY14	3.4%	3.8%	2.9%	3.5%	1.9%	3.6%	3.8%	2.8%	1.3%
FY13	3.3%	3.7%	2.6%	3.3%	1.7%	3.5%	3.7%	2.8%	1.7%
FY12	3.3%	3.1%	2.6%	3.3%	1.9%	3.3%	3.8%	2.7%	1.4%
FY11	3.2%	3.2%	2.9%	3.2%	2.5%	3.2%	3.7%	2.6%	1.2%
FY10	3.2%	2.5%	2.6%	3.4%	2.1%	3.2%	3.7%	2.5%	1.4%
Asian Males – 3.9% of DHS, 2.2% of National Civilian Labor Force, 2.5% of Relevant Civilian Labor Force									

In FY 2021, Asian males were represented in the DHS permanent workforce at a rate above the NCLF and RCLF rates. The workforce participation rate for Asian males has gradually increased since FY 2010. Attrition was below, while the promotion rate was slightly above, the participation rate.

Asian males are participating at a lower-than-expected rate at the pay grades GS 13 and higher, and their participation in grades GS 13-15 and at the Executive/Senior Leader level was unchanged in FY 2021.

DHS Permanent Workforce Trend for Asian Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY21	2.1%	2.2%	1.8%	2.4%	0.8%	2.5%	1.8%	2.2%	2.2%
FY20	2.1%	2.4%	1.9%	2.4%	0.6%	2.5%	1.7%	2.2%	1.8%
FY19	2.0%	2.6%	1.8%	2.3%	0.4%	2.4%	1.7%	2.1%	1.6%
FY18	1.9%	2.1%	1.6%	2.2%	0.8%	2.2%	1.6%	2.1%	1.7%
FY17	1.9%	2.1%	1.4%	2.3%	0.5%	2.2%	1.6%	2.0%	1.8%
FY16	1.8%	2.1%	1.7%	2.0%	0.6%	2.1%	1.6%	1.9%	1.6%
FY15	1.8%	2.0%	1.7%	1.9%	0.2%	2.1%	1.6%	1.8%	1.3%
FY14	1.7%	2.4%	1.4%	1.9%	0.5%	2.0%	1.6%	1.8%	1.1%
FY13	1.7%	1.8%	1.6%	1.7%	0.4%	1.8%	1.6%	1.7%	1.2%
FY12	1.6%	1.9%	1.5%	1.6%	0.8%	1.8%	1.6%	1.6%	1.2%
FY11	1.6%	1.6%	1.2%	1.4%	1.4%	1.8%	1.6%	1.6%	1.4%
FY10	1.6%	1.3%	1.4%	1.2%	1.2%	1.7%	1.6%	1.5%	1.4%
Asian Females – 2.1% of DHS, 2.2% of National Civilian Labor Force, 2.5% of Relevant Civilian Labor Force									

The participation rate for Asian females was below the NCLF and RCLF rates, and the hire rate matched the NCLF but trailed the RCLF benchmarks. In FY 2021, attrition decreased slightly, remaining below the participation rate.

The rate of promotions of Asian females was higher than their workforce participation rate. The group was spread proportionately throughout the pay grades, with representation close to parity at the higher grades.

DHS Permanent Workforce Trend for Native Hawaiian or Other Pacific Islander Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY21	0.37%	0.48%	0.39%	0.39%	0.22%	0.48%	0.41%	0.21%	0.30%
FY20	0.36%	0.30%	0.39%	0.31%	0.00%	0.48%	0.39%	0.21%	0.31%
FY19	0.37%	0.48%	0.28%	0.40%	0.00%	0.50%	0.37%	0.21%	0.32%
FY18	0.34%	0.41%	0.44%	0.36%	0.00%	0.47%	0.36%	0.20%	0.33%
FY17	0.34%	0.36%	0.42%	0.47%	0.13%	0.49%	0.35%	0.18%	0.33%
FY16	0.34%	0.65%	0.42%	0.34%	0.12%	0.50%	0.35%	0.16%	0.22%
FY15	0.32%	0.43%	0.30%	0.38%	0.21%	0.43%	0.33%	0.17%	0.23%
FY14	0.31%	0.65%	0.33%	0.42%	0.38%	0.43%	0.30%	0.17%	0.35%
FY13	0.29%	0.54%	0.26%	0.36%	0.00%	0.39%	0.31%	0.15%	0.35%
FY12	0.27%	0.46%	0.33%	0.27%	0.11%	0.36%	0.27%	0.14%	0.36%
FY11	0.25%	0.44%	0.18%	0.21%	0.00%	0.31%	0.26%	0.12%	0.37%
FY10	0.21%	0.27%	0.11%	0.20%	0.00%	0.21%	0.26%	0.09%	0.13%
Pacific Islander Males – 0.37% of DHS, 0.1% of National Civilian Labor Force, 0.09% of Relevant Civilian Labor Force									

Since FY 2013, Native Hawaiian/Pacific Islander males at DHS have been represented at over three times the NCLF rate. In FY 2021, the hire rate was above the participation rate, and the attrition rate was just above the participation rate.

Native Hawaiian/Pacific Islander males' promotion rate rose above their participation rate in FY 2021. Representation at grades 13-15 remained below the participation rate. Executive/Senior Leader representation has been trending slightly downward over the past three years.

Caution should be used when drawing inferences from the data for this group due to the relatively small proportion of the total workforce represented by this group.

DHS Permanent Workforce Trend for Native Hawaiian or Other Pacific Islander Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY21	0.26%	0.51%	0.33%	0.30%	0.11%	0.55%	0.18%	0.10%	0.00%
FY20	0.25%	0.26%	0.28%	0.21%	0.00%	0.52%	0.17%	0.09%	0.00%
FY19	0.25%	0.39%	0.35%	0.27%	0.00%	0.50%	0.18%	0.09%	0.00%
FY18	0.23%	0.36%	0.27%	0.24%	0.00%	0.49%	0.18%	0.08%	0.00%
FY17	0.22%	0.37%	0.31%	0.35%	0.00%	0.48%	0.17%	0.08%	0.00%
FY16	0.22%	0.51%	0.31%	0.17%	0.12%	0.47%	0.16%	0.07%	0.00%
FY15	0.20%	0.37%	0.19%	0.16%	0.11%	0.41%	0.16%	0.07%	0.00%
FY14	0.18%	0.22%	0.23%	0.32%	0.09%	0.36%	0.15%	0.06%	0.00%
FY13	0.18%	0.50%	0.32%	0.15%	0.00%	0.35%	0.15%	0.06%	0.00%
FY12	0.17%	0.39%	0.18%	0.11%	0.00%	0.31%	0.14%	0.06%	0.00%
FY11	0.15%	0.29%	0.12%	0.10%	0.00%	0.24%	0.14%	0.05%	0.00%
FY10	0.23%	0.36%	0.27%	0.24%	0.00%	0.49%	0.18%	0.08%	0.00%
Pacific Islander Females – 0.26% of DHS, 0.1% of National Civilian Labor Force, 0.07% of Relevant Civilian Labor Force									

Note: The percentages reported for Pacific Islander Females in the FY 2017 report contained an error. The error is corrected in the table above. The full set of workforce tables included with the FY 2017 report are correct; Only the trend table in the Executive Summary was in error.

Native Hawaiian/Pacific Islander females' participation and hire rates continue to exceed the NCLF and RCLF in FY 2021. The attrition rate remains above the participation rate.

Native Hawaiian/Pacific Islander females were promoted above the participation rate in FY 2021. They continue to participate at a lower-than-expected rate in the higher pay grades.

Caution should be used when drawing inferences from the data for this group due to the relatively small proportion of the total workforce represented by this group.



DHS Permanent Workforce Trend for American Indian or Alaskan Native Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY21	0.63%	0.88%	0.64%	0.57%	0.44%	0.58%	0.62%	0.66%	0.71%
FY20	0.60%	0.65%	0.58%	0.50%	0.48%	0.51%	0.62%	0.63%	0.83%
FY19	0.59%	0.51%	0.67%	0.53%	0.41%	0.51%	0.61%	0.63%	0.76%
FY18	0.61%	0.51%	0.59%	0.54%	0.67%	0.53%	0.62%	0.64%	0.87%
FY17	0.61%	0.55%	0.63%	0.51%	0.75%	0.51%	0.63%	0.64%	1.00%
FY16	0.62%	0.57%	0.65%	0.58%	0.74%	0.50%	0.64%	0.66%	0.56%
FY15	0.62%	0.56%	0.80%	0.50%	0.75%	0.47%	0.68%	0.66%	0.47%
FY14	0.64%	0.44%	0.82%	0.48%	0.75%	0.48%	0.68%	0.69%	0.71%
FY13	0.66%	0.50%	0.74%	0.55%	0.83%	0.51%	0.69%	0.71%	0.59%
FY12	0.66%	0.44%	0.75%	0.66%	0.53%	0.54%	0.69%	0.73%	0.48%
FY11	0.68%	0.54%	0.83%	0.62%	0.64%	0.59%	0.68%	0.75%	0.37%
FY10	0.70%	0.51%	0.66%	0.69%	0.53%	0.66%	0.66%	0.78%	0.26%
American Indian/Alaskan Native Males – 0.63% of DHS, 0.3% of National Civilian Labor Force, 0.3% of Relevant Civilian Labor Force									

The tabulation of the NCLF and RCLF using 2014-2018 American Community Survey data, per EEOC guidance, lowered the NCLF and RCLFs for this group by 50% compared to the 2010 census data. As a result, and in combination with the increase in representation in FY 2021, American Indian/Alaskan Native males are substantially above the NCLF and RCLF participation rates. The hire rate is also well above the NCLF and RCLF. Attrition increased in FY 2021 while the promotion rate remained below the participation rate.

American Indian/Alaskan Native males were represented evenly throughout the range of pay grades, with participation at the higher grades remaining above the participation rate.

Caution should be used when drawing inferences from the data for this group due to the relatively small proportion of the total workforce represented by this group.

DHS Permanent Workforce Trend for Native American Indian or Alaskan Native Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY21	0.32%	0.59%	0.44%	0.32%	0.11%	0.47%	0.27%	0.26%	0.20%
FY20	0.31%	0.63%	0.36%	0.34%	0.12%	0.45%	0.25%	0.25%	0.31%
FY19	0.30%	0.38%	0.36%	0.35%	0.14%	0.43%	0.24%	0.24%	0.11%
FY18	0.29%	0.41%	0.40%	0.32%	0.00%	0.45%	0.23%	0.23%	0.11%
FY17	0.29%	0.42%	0.47%	0.32%	0.25%	0.46%	0.24%	0.22%	0.11%
FY16	0.29%	0.45%	0.43%	0.27%	0.00%	0.47%	0.25%	0.21%	0.00%
FY15	0.29%	0.34%	0.41%	0.30%	0.00%	0.47%	0.25%	0.21%	0.00%
FY14	0.30%	0.41%	0.52%	0.28%	0.00%	0.45%	0.26%	0.22%	0.24%
FY13	0.31%	0.34%	0.46%	0.27%	0.00%	0.47%	0.27%	0.22%	0.12%
FY12	0.32%	0.40%	0.51%	0.23%	0.00%	0.49%	0.28%	0.22%	0.12%
FY11	0.33%	0.27%	0.44%	0.30%	0.00%	0.48%	0.28%	0.23%	0.12%
FY10	0.35%	0.29%	0.43%	0.24%	0.11%	0.50%	0.30%	0.22%	0.00%
American Indian/Alaskan Native Females – 0.32% of DHS, 0.3% of National Civilian Labor Force, 0.25% of Relevant Civilian Labor Force									

The tabulation of the NCLF and RCLF using 2014-2018 American Community Survey data, per EEOC guidance, lowered the NCLF and RCLFs for this group by 50% compared to the 2010 census data. As a result, and in combination with the increase in representation in FY 2021, American Indian/Alaskan Native females are above the NCLF and RCLF participation rates. The hire rate exceeded the NCLF and RCLF in FY 2021 while the attrition rate continued to be higher than the participation rate. The promotion rate was on par with the workforce participation rate. American Indian/Alaskan Native females were overrepresented at grades 5-9 and underrepresented at all other grade levels.

Caution should be used when drawing inferences from the data for this group due to the relatively small proportion of the total workforce represented by this group.

The table that follows summarizes the triggers identified in the preceding workforce trend tables. Each entry indicates a participation rate that is below the relevant benchmark. The text of the entry indicates the trend over the years presented in the relevant trend table. Note that “Trending Up” for attrition means the attrition rate is increasing, which will have a negative impact on the overall participation rate. On the other hand, “Trending Up” for hires and GS 13-Executive/Senior Leader indicates increasing overall workforce participation and participation in the higher pay grades. “No Trend” indicates that there has been no discernible trend over the past several years.

### Summary of Triggers Identified in Workforce Trend Tables (FY 2010 FY 2021)

Group	% of Permanent Workforce (Participation Rate)	% of Hires	% of Attrition	% of Promotions	% of GS 13-Exec/Sr. Lead
Hispanic Male				Below Participation Rate No Trend	Below Participation Rate No Trend
Hispanic Female					Below Participation Rate Trending Up
White Male	Below RCLF Trending Down	Below NCLF/RCLF No Trend		Below Participation Rate No Trend	
White Female	Below NCLF/RCLF No Trend	Below NCLF/RCLF No Trend	Above Participation Rate No Trend		
Black Male			Above Participation Rate No Trend	Below Participation Rate No Trend	Below Participation Rate Trending Up (GS13-15); No Trend (Executive/SL)
Black Female			Above Participation Rate No Trend	Below Participation Rate No Trend	Below Participation Rate Trending Up (GS13-15); No Trend (Executive/SL)
Asian Male					Below Participation Rate No Trend
Asian Female	Below NCLF/RCLF Trending Up	Below RCLF No Trend			
Pacific Islander Male*			Above Participation Rate No Trend		Below Participation Rate No Trend

Pacific Islander Female*			Above Participation Rate No Trend		Below Participation Rate Trending Up
Native American Male*			Above Participation Rate No Trend	Below Participation Rate No Trend	
Native American Female*			Above Participation Rate No Trend		Below Participation Rate Trending Up (GS13-15); No Trend (Executive/SL)

\* Caution should be used when drawing inferences from these data due to the small sample size. Minor changes can produce large percentage swings that may not be statistically significant.

Higher than expected attrition rates, especially for women, and lower than expected participation rates in the higher pay grades for almost all minority groups continued to be significant in FY 2021. Participation in higher grades has increased for several minority groups in recent years.

These findings are addressed in Part I.3 of this report, which notes high separation rates for several minority groups and women. Part I.3 focuses on the findings relating to issues with supervision/management, lack of advancement opportunities, personal/family related reasons, insufficient work/life programs, and lack of alternate work schedules.

Lower than expected representation at the GS 13-15 and higher pay grades is seen in eight of the ten minority groups. Five of the eight groups are trending towards higher representation. Three groups - Black females, Hispanic males, and Hispanic females - are participating at significantly lower rates than their expected rates at the higher pay grades.

DHS expects the upward trend seen in the representation of most minority groups in higher grades to continue. As shown in workforce table A4-1, the feeder pool grades for higher grades are more diverse than the grades they feed, portending a more diverse group of employees at higher grades in the future.

Given the high-graded occupations that are largely Component-specific, the existence of Component Part I's to address the issue, and a persistent upward trend in representation of women and minorities in higher grades, a new Part I at the Department level was not created to address this trigger. DHS will continue its efforts to address barriers related to this trigger through recruiting, as well as the DHS EEO Directors Council's commitment to share promising practices that identify opportunities for cross-Component efforts.

DHS Permanent Workforce Trend for Individuals with Disabilities									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY21	14.22%	16.19%	16.79%	12.98%	5.56%	10.96%	13.78%	17.51%	12.45%
FY20	13.68%	15.69%	16.55%	14.23%	5.74%	10.77%	13.30%	16.71%	11.16%
FY19	13.03%	12.05%	13.79%	14.35%	7.71%	10.31%	12.71%	15.87%	10.61%
FY18	12.55%	12.24%	13.69%	14.46%	8.37%	10.41%	12.08%	14.88%	10.24%
FY17	12.03%	13.62%	11.85%	11.99%	8.25%	10.75%	11.28%	13.92%	9.77%
FY16	11.27%	12.22%	12.32%	11.02%	7.05%	10.06%	10.57%	12.97%	9.07%
FY15	10.76%	11.91%	12.20%	10.84%	5.22%	9.55%	10.24%	12.25%	8.31%
FY14	10.34%	11.91%	11.75%	8.44%	4.42%	9.58%	9.69%	11.67%	8.02%
FY13	9.57%	10.12%	10.66%	8.20%	4.23%	8.64%	9.13%	10.85%	7.31%
FY12	9.05%	11.23%	11.09%	7.38%	5.50%	8.31%	8.69%	10.09%	6.90%
FY11	8.28%	8.78%	10.58%	6.34%	6.43%	7.51%	8.13%	9.08%	6.51%
FY10	7.82%	8.98%	10.21%	5.54%	5.51%	7.13%	7.88%	8.33%	5.90%
Individuals with Disabilities – 14.22% of DHS, 20.50% excluding LEOs and TSA TSOs, 9.49% of the Federal government in 2018 <sup>9</sup> , 12.0% EEOC Goal									

The representation of individuals with disabilities continued to climb in FY 2021, rising to 14.22 percent for the permanent workforce, and 20.50 percent when excluding law enforcement occupations and TSA Transportation Security Officers, who have physical entry requirements. These percentages include employees who have self-identified as having a disability and disabled veterans with a Department of Veterans Affairs (VA) certified disability. Employees appointed under a disability-based Schedule A hiring authority who did not self-identify as having a disability are also included in these percentages.

DHS employees with disabilities in recent years separated at higher rates than their workforce participation rate. This trend continued in FY 2021. Hires increased while the promotion rate decreased. Employees with disabilities are notably above parity in the GS 13-15 grades, with representation in higher pay grades continuing to climb. Employees with disabilities are participating at a lower-than-expected rate at the Executive/Senior Leader level, but with a continuing increasing trend.

<sup>9</sup> EEOC Annual Report on the Federal Workforce Fiscal Year 2018.

DHS Permanent Workforce Trend for Individuals with Targeted Disabilities									
Year	Onboard	Hires	Attrition	Promotions	GS 1 4	GS 5 9	GS 10 12	GS 13 15	Executive/ Senior Leader
FY21	1.25%	1.44%	1.74%	0.88%	1.20%	1.26%	1.09%	1.39%	0.61%
FY20	1.25%	1.19%	1.77%	1.06%	1.56%	1.30%	1.08%	1.38%	0.63%
FY19	1.26%	1.08%	1.59%	1.14%	2.03%	1.31%	1.10%	1.35%	1.08%
FY18	1.28%	1.03%	1.57%	1.20%	2.16%	1.38%	1.11%	1.33%	1.20%
FY17	1.28%	1.14%	1.59%	1.08%	2.38%	1.52%	1.09%	1.26%	1.11%
FY16	1.26%	1.14%	1.72%	0.95%	2.60%	1.57%	1.06%	1.16%	0.90%
FY15	1.25%	1.05%	1.70%	0.86%	2.24%	1.63%	1.04%	1.11%	0.70%
FY14	1.25%	1.39%	1.70%	0.87%	1.97%	1.63%	1.02%	1.10%	0.83%
FY13	1.13%	1.26%	1.78%	0.89%	2.02%	1.50%	0.91%	0.99%	0.83%
FY12	1.13%	1.34%	1.64%	0.70%	2.75%	1.54%	0.91%	0.91%	0.71%
FY11	1.06%	1.19%	1.66%	0.60%	3.22%	1.42%	0.86%	0.81%	0.61%
FY10	1.02%	0.93%	1.29%	0.51%	3.18%	1.33%	0.84%	0.75%	0.79%
Individuals with Targeted Disabilities – 1.25% of DHS, 1.92% excluding LEOs and TSA TSOs, 1.61% of the Federal government in 2018 <sup>10</sup> , 2.0% EEOC Goal									

The percentage of the DHS workforce that self-identifies as having a targeted disability is below the Federal government workforce benchmark and is below the EEOC's goal of 2.0 percent. The participation rate increased between FY 2010 and FY 2018, from 1.02 percent to 1.28 percent, but has dropped in recent years. Excluding law enforcement officers and TSOs, the overall FY 2021 rate is 1.92 percent, .08 percent short of the 2.0 percent EEOC goal. Hires increased in FY 2021 but remained below the 2.0 percent federal goal. The attrition rate of IWTDS is above their participation rate.

Representation of IWTDS is above the overall representation rate for the GS 13-15 grades, but below for the Executive/Senior Leader grades. Representation in promotions is below the representation rate.

### *DHS Exit Survey and Federal Employee Viewpoint Survey Results*

Examination of FY 2021 exit survey data indicates that the top three non-retirement reasons for exiting DHS were: 1) difficulties with management/supervisor, 2) personal or family related reasons, and 3) lack of advancement opportunities. OPM annually administered the Federal Employee Viewpoint Survey (FEVS) to DHS employees between 2005 and 2019. Because of the COVID-19 pandemic, OPM administered the 2020 FEVS later in the year from September

<sup>10</sup> EEOC Annual Report on the Federal Workforce Fiscal Year 2018.

14 through November 5, 2020. The results of the 2020 FEVS became available during FY 2021 and are the most recent FEVS results available.

The 2020 Best Places to Work in Federal Government rankings, which are based on FEVS results, ranked DHS 17<sup>th</sup> out of 17 large agencies.<sup>11</sup> The overall score of 61.1 was based on three FEVS questions chosen for their ability to predict intent to remain in the organization. The method of calculating percent positive was changed in 2020 and the score should not be compared to scores from prior years.

In FY 2016, after six straight years of decline, the employee engagement index increased from 53 percent in FY 2015, to 56 percent. In FY 2017, DHS continued this upward trend, with the employee engagement index increasing to 60 percent. In FY 2018, the index remained at 60 percent, but rose to 61.9 percent in FY 2019 and increased to 66 percent in FY 2020. In FY 2020, DHS remained below the government-wide rate of 72 percent for employee engagement. The overall DHS FEVS score is driven by its larger DHS Components. TSA and CBP account for 58.5 percent of DHS's completed surveys.

Women reported higher scores on the core survey questions (63.5 percent vs. 63.1 percent for males) and on the work-life balance questions (57.0 percent vs. 52.2 percent for males). Hispanic, American Indian/Alaskan Native, Native Hawaiian/Pacific Islander, and individuals with disabilities reported lower average results on the core questions.

### *Women in Law Enforcement*

Notably, DHS has the largest law enforcement population in the Federal government, but the lowest rate of participation by women. In FY 2021, women occupied approximately 9.19 percent of law enforcement positions at DHS. In FY 2020, women occupied approximately 8.93 percent of the law enforcement positions at DHS. Although DHS saw a small increase, the female participation rate remains substantially lower than expected. In comparison, the rate of women in law enforcement positions across the Federal government is 13.7<sup>12</sup> percent.

To help address this, from January 10 to March 31, 2022, DHS – led by the Office of the Chief Human Capital Officer (OCHCO) and with support from the Office of Public Affairs (OPA), the Office of Civil Rights and Civil Liberties (CRCL), and the Office of Public Engagement (OPE) – conducted a highly successful women in law enforcement hiring sprint. The sprint's objective was to jumpstart the WLE 30x23 initiative, which aims to increase the representation of newly hired women as law enforcement officers and in law enforcement-related occupations at DHS to 30% by 2023 and offer 500 temporary job offers for law enforcement positions in the department. DHS far outpaced this goal and extended over 1,200 temporary job offers to women law enforcement candidates.

The participation rate of women in Criminal Investigator (series 1811) law enforcement positions at DHS is also lower than the occupational civilian labor force participation rate for

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<sup>11</sup> DHS's score lowered by 0.8 points from FY 2018 to FY 2019.

<sup>12</sup> See Bureau of Justice Statistics, *Census of Federal Law Enforcement Officers*, 2019.

investigators, which is 23.63 percent<sup>13</sup>. In FY 2019, the percentage of permanent DHS Criminal Investigators who were women was 12.70 percent. The percentage has slowly increased to 13.15 percent in FY 2021. In other law enforcement positions at DHS, women make up 29.18% of the 1801 job series, 19.72% of the 1895 series, and 5.60% of the 1896 job series.

The Women in Law Enforcement Interagency Working Group (WLE IWG) established in August 2021 is an interagency collaboration with the Departments of Justice, Interior, and Treasury. The purpose of the WLE IWG is to review actions to address the advancement of women in nontraditional occupations including but not limited to law enforcement, at DHS and the three partner agencies. Each federal agency will share their intra-agency initiatives that focus on strategies to improve recruitment, retention, and advancement in law enforcement positions in DHS and the federal partner agencies. Additional areas for review include existing policies on workplace flexibilities, family/elder care, job sharing, training opportunities, details, and other areas the WLE IWG members identify. IWG members will also share and review promising and best practices and solicit them from state and local law enforcement agencies. The IWG will develop strategies to broaden best practices across the participating agencies and, if possible, the Federal government as a whole. CRCL will consolidate the findings and recommended action items in a white paper, then submit the cumulative report to Secretary Mayorkas during Q2 in FY 2022.

DHS collaborated with Dr. Helen Yu, Associate Professor, University of Hawai'i at Mānoa, on the administration of a survey of the DHS law enforcement workforce. Dr. Yu will administer a gender and representation survey to the Department's 43,000 law enforcement officers to identify any disparities in pay and issues surrounding workplace environments.

Dr. Yu will survey the workforce in Q1 of FY 2022 using the Qualtrics Survey instrument. She will submit an executive summary with policy recommendations to CRCL in February 2022. CRCL will plan a briefing by Dr. Yu to the CRCL Officer, Deputy CRCL Officer, Secretary Mayorkas, and those Component Heads with law enforcement responsibilities.

DHS submitted its three women-focused initiatives, Women in Law Enforcement Mentoring Program; the WLE IWG; and University of Hawai'i Survey of the DHS LEO workforce in the Department's input to the Government-Wide Strategy for the White House Gender Policy Council.

### *Data Sources*

The workforce numbers used in this report were obtained using DHS's workforce data application, AXIS, and are based on an extraction from National Finance Center (NFC) data for Pay Period 19 at the end of FY 2021. DHS employees voluntarily submitted all race, national

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<sup>13</sup> Occupational Civilian Labor Force participation for series 1811 Criminal Investigators is based on 2010 Census civilian labor force data.



origin, gender, and disability data relied upon in this report. To better capture the number of IWDs, DHS identified employees who are disabled veterans with entitlement of preference of 10 points (as determined by the Veterans Administration) or who were hired under the Schedule A hiring authority and did not report a disability through the self-identification process. These individuals are counted in the workforce tables as having a non-targeted disability. In FY 2021, and in the data tables used for this report, DHS counted Veteran Preference Codes 3 and 4 in addition to Code 6, as was done in recent years. This change brought DHS's tabulation method in line with the procedure used by the EEOC. The trend table for individuals with disabilities included in this report includes updated percentages for all prior years in addition to FY 2021. Statistics on IWDs/IWTDs in the Federal government were obtained from the EEOC Annual Report on the Federal Workforce Fiscal Year 2018.

Applicant flow data presented in this report were extracted from USA Staffing, which is used by four of the nine DHS Components: CBP, ICE, USCIS, and DHS HQ. The remaining five DHS Components use Monster Government Solutions or a proprietary system as their applicant flow management system. The Monster Government Solutions data was not available from a consolidated source and had to be obtained by separate data extract or data call to the relevant Components.

NCLF statistics were compiled using the Census Bureau's American Community Survey data. RCLF statistics were tabulated using American Community Survey data, weighted by representation in each job series in the DHS permanent workforce.

EEO complaint numbers were obtained via complaint data collected by DHS and its Components and stored in DHS's case management database, which can process *ad hoc* queries – the results of which can be used for evaluating all aspects of the EEO case management process. FEVS data pertaining to DHS employees were obtained from OPM, then made available to CRCL for analysis purposes.

## Conclusion

DHS leadership is proud of its accomplishments in the areas of attracting, developing, and retaining an increasingly diverse workforce. DHS's overall increase in the representation of women, minorities, and individuals with disabilities is a significant accomplishment. This report identifies accomplishments, but also identifies several challenges requiring attention, including establishing an effective career development program, improving the retention strategy, correcting significantly high separation rates of women in the DHS workforce, and increasing the participation of individuals with disabilities and individuals with targeted disabilities. The plans in Parts I and J address these issues.

## Part F: Certification and Signatures

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

I, Veronica Venture, Deputy Officer for Civil Rights and Civil Liberties/Director of Equal Employment Opportunity and Diversity, am the principal Equal Employment Opportunity Director/Official for the U.S. Department of Homeland Security.

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

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

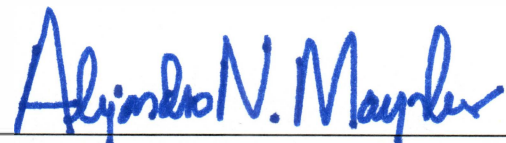
I certify that proper documentation of this assessment is in place and is being maintained for EEOC review upon request.



April 5, 2022

Signature of Principal Equal Employment Opportunity  
Director/Official  
Veronica Venture  
Deputy Officer, Office for Civil Rights and Civil Liberties  
Director, Equal Employment Opportunity and Diversity  
U.S. Department of Homeland Security  
Certifies that this Federal Agency Annual Equal Employment  
Opportunity Program Status Report is in compliance with  
Management Directive 715

Date



June 24, 2022

Signature of Agency Head or Agency Head Designee  
Alejandro N. Mayorkas  
Secretary  
U.S. Department of Homeland Security

Date

## Part G: Agency Self-Assessment Checklist

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

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



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

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



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

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

<b>Essential Element A: Demonstrated Commitment from Agency Leadership</b> <b>This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.</b>				
 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met?</b> <b>(Yes/No/NA)</b>	<b>Comments</b>	<b>Current Part G Questions</b> 12-15-2021
<b>A.1.a</b>	<b>A.1 – The agency issues an effective, up-to-date EEO policy statement.</b>  Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "yes," please provide the annual issuance date in the comments column. [see MD-715, II(A)]	No-CBP, ICE	<b>DHS</b> issued policy statement on 9/30/2021.  CBP No date provided.  <b>FLETC</b> issued Policy statement on 10/01/2021.  <b>FEMA</b> No date provided.  <b>ICE</b> Will issue policy statement upon onboarding of new director.  <b>TSA</b> Current EEO policy was signed on 01/05/2021. <b>USCG</b> issued policy statement on 08/23/2021.  <b>USCIS</b> issued policy statement on 9/30/2021.	<b>A.1.a.2</b>

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			USSS issued policy statement on 9/22/2021 and 9/24/2021.	
<b>A.1.b</b>	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 C.F.R. § 1614.101(a)]	No	CBP issued policy statement on 06/05/2019 and does not include additional bases.	New
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>A.2 – The agency has communicated EEO policies and procedures to all employees.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	<b>Current Part G Questions</b> 12-18-2019
<b>A.2.a</b>	Does the agency disseminate the following policies and procedures to all employees?			
<b>A.2.a.1</b>	Anti-harassment policy? [See MD-715, II(A)]	Yes		New
<b>A.2.a.2</b>	Reasonable accommodation procedures? [See 29 C.F.R § 1614.203(d)(3)]	No HQ		New
<b>A.2.b</b>	Does the agency prominently post the following information throughout the workplace and on its public website?			
<b>A.2.b.1</b>	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [See 29 C.F.R § 1614.102(b)(7)]	Yes		New
<b>A.2.b.2</b>	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	Yes		A.2.c
<b>A.2.b.3</b>	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	Yes	<b>DHS</b> <a href="https://www.dhs.gov/reasonable-accommodations-dhs">https://www.dhs.gov/reasonable-accommodations-dhs</a>  <b>CBP</b> <a href="https://www.cbp.gov/about/eeo-diversity/reasonable-accommodation">https://www.cbp.gov/about/eeo-diversity/reasonable-accommodation</a>	A.3.c

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			<p><b>FLETC</b>  <a href="https://www.fletc.gov/reasonable-accommodation-request-procedures">https://www.fletc.gov/reasonable-accommodation-request-procedures</a></p> <p><b>HQ</b>  <a href="https://www.dhs.gov/reasonable-accommodations-dhs">https://www.dhs.gov/reasonable-accommodations-dhs</a></p> <p><b>ICE</b>  <a href="https://www.ice.gov/leadership/dcr">https://www.ice.gov/leadership/dcr</a>   <a href="https://icegov.sharepoint.com/sites/insight/director/dcr">https://icegov.sharepoint.com/sites/insight/director/dcr</a></p> <p><b>TSA</b>  Internal:  <a href="https://office.ishare.tsa.dhs.gov/sites/WPED/WPED_Info_Center/SitePages/Reasonable_Accommodations.aspx">https://office.ishare.tsa.dhs.gov/sites/WPED/WPED_Info_Center/SitePages/Reasonable_Accommodations.aspx</a>   External:  <a href="https://www.tsa.gov/about/jobs-at-tsa">https://www.tsa.gov/about/jobs-at-tsa</a></p> <p><b>USCG</b>  <a href="#">U.S. COAST GUARD CIVIL RIGHTS MANUAL</a>,  <a href="#">COMDTINST M5350.4E</a>  <a href="https://uscg.mil">uscg.mil</a>) (Pg. 6-5 – 6.23).</p> <p><b>USCIS</b>  <a href="https://www.uscis.gov/sites/default/files/document/legal-docs/Disability-">https://www.uscis.gov/sites/default/files/document/legal-docs/Disability-</a></p>	
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			<a href="#">Accommodations-for-Employees-and-Job-Applicants-MD-256-006.pdf</a>  <b>USSS</b> External website. The EDI is regularly updated via direct POC with Office of the Chief Information Officer and Office of Communication and Media Relations.	
<b>A.2.c</b>	Does the agency inform its employees about the following topics:			
<b>A.2.c.1</b>	EEO complaint process? [See 29 C.F.R. §§ 1614.102(a)(12) and 1614.102(b)(5)] If "yes", please provide how often.	Yes	<b>CBP</b> Provided quarterly in pay stubs, information and FAQs posted prominently on cbp.gov and notice of EEO rights are identified in action letters.  <b>FEMA</b> Posted on the intranet in an ongoing basis. <a href="https://usfema.sharepoint.com/sites/OAI/ooer/Pages/EEO D.aspx">https://usfema.sharepoint.com/sites/OAI/ooer/Pages/EEO D.aspx</a>  <b>FLETC</b> Provided at New Employee Orientation. Annually sent to supervisors, placed on Internet, Intranet and on EEO Posters.  <b>HQ</b> During new employee orientation and when training is requested.  <b>ICE</b> Complaint process is on the Office of Diversity and Civil Rights (ODCR) intranet site and is discussed bi-weekly	A.2.a

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			<p>during new employee orientation, during mandatory training for new managers and supervisors, during site visits and ad hoc requests for training, mandatory PALMS training, and notice of EEO rights are identified in action letters.</p> <p><b>TSA</b> Provided at least once every two weeks/26 times per year during new hires orientation in addition to Biennial No FEAR Act training.</p> <p><b>USCG</b>  New Employee Orientation  Triennially – Civil Rights Awareness Training</p> <p><b>USCIS</b>  Provided during the onboarding process and through an annual EEO policy statement.</p> <p><b>USSS</b></p> <ul style="list-style-type: none"> <li>• Uniformed Division Introductory Course/Special Agent Introductory Course Training (twice per month)</li> <li>• Anti-Harassment Training (every class includes anti-harassment)</li> <li>• New Supervisors Training (Quarterly)</li> </ul>	
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			<ul style="list-style-type: none"> <li>• Uniformed Division Leadership Training (every other month)</li> <li>• Cornerstone Leadership Training (Six times per year)</li> <li>• EEO and You (12 sessions over two weeks)</li> <li>• EEO Intake Process (all training sessions include this)</li> <li>• EEO Posters</li> <li>• Internal and External Websites.</li> </ul>	
<b>A.2.c.2</b>	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	Yes	<p><b>CBP</b> Provided at least annually in pay stubs; information and FAQs posted prominently on cbp.gov; and Complainants are notified during the complaint process.</p> <p><b>FLETC</b> Provided at New Employee Orientation, FLETC New Supervisor Training and provided slide presentation to managers.</p> <p><b>HQ</b> During new employee orientation and when training is requested.</p> <p><b>ICE</b> Policies are disseminated during the bi-weekly new employee orientation, and information is on the Office of Diversity and Civil Rights (ODCR) intranet page. New managers and supervisors are also informed of the process</p>	New

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			<p>during mandatory training sessions, and Complainants are notified during the complaint process.</p> <p><b>TSA</b> Provided at least once every two weeks/26 times per year during new hires orientation in addition to our Biennial No FEAR Act training.</p> <p><b>USCG</b> New Employee Orientation Triennially – Civil Rights Awareness Training</p> <p><b>USCIS</b> Provided bi-annually during Alternate Dispute Resolution training for managers and information is placed on the agency internal website.</p> <p><b>USSS</b>  <ul style="list-style-type: none"> <li>•Uniformed Division Introductory Course/Special Agent Introductory Course Training (twice per month)</li> <li>•Anti-Harassment Training (every class includes anti-harassment)</li> <li>•New Supervisors Training (Quarterly)</li> <li>•Uniformed Division Leadership Training (every other month)</li> <li>•Cornerstone Leadership Training (Six times per year)</li> </ul> </p>	
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			<ul style="list-style-type: none"> <li>•EEO and You (12 sessions over two weeks)</li> <li>•EEO Intake Process (all training sessions include this)</li> <li>•EEO Posters</li> <li>•Internal Website</li> <li>•Early Dispute Resolution Policy (EDR) trainingsessions.</li> </ul>	
<b>A.2.c.3</b>	Reasonable accommodation program? [See 29 C.F.R. § 1614.203(d)(7)(ii)(C)] If “yes”, please provide how often.	Yes	<p><b>CBP</b> Provided at least annually in pay stubs; information and FAQs posted prominently on cbp.gov. and during on-going RA training for managers and supervisors.</p> <p><b>FLETC</b> Provided during New Employee Orientation, FLETC New Supervisor Training, posted on Internet and Intranet, during employee and supervisor training as needed and in PALMS.</p> <p><b>HQ</b> During new employee orientation and when training is requested.</p> <p><b>ICE</b> Policies are disseminated during the bi-weekly new employee orientation, and information is on the ODCR intranet page, and in required PALMS training.</p> <p><b>TSA</b> Presented HR Essentials Module on Reasonable</p>	New

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			<p>Accommodation via Adobe Connect two times per year.</p> <p>Reasonable Accommodation information provided during new hires orientation every two weeks/26 times per year.</p> <p>Reasonable Accommodation awareness training provided to offices upon request.</p> <p><b>USCG</b>  New Employee Orientation  Triennially – Civil Rights Awareness Training</p> <p><b>USCIS</b>  Through quarterly supervisor trainings and semi-annual employee overviews.</p> <p><b>USSS</b>  •Uniformed Division Introductory Course/Special Agent Introductory Course Training (twice per month)  •Anti-Harassment Training (all training sessions include this)  •New Supervisors Training (Quarterly)  •Uniformed Division Leadership Training (every other month)  •Cornerstone Leadership Training (Six times per year)  •EES-06(05) Reasonable Accommodation</p>	
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			<ul style="list-style-type: none"> <li>•Internal Website</li> <li>•Disability Table Topic: Reasonable Accommodations (Once annually)</li> <li>•EEO and You Training (Four times per year)</li> <li>•EES and You Training (Twice per year).</li> </ul>	
<b>A.2.c.4</b>	Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.	Yes	<p><b>CBP</b> Provided annually with issuance of Anti-Discrimination and Anti-Harassment Policy Statement; and ongoing EEO training.</p> <p><b>FLETC</b> Provided during New Employee Orientation, FLETC New Supervisor Training, and posted on Internet and Intranet.</p> <p><b>HQ</b> During new employee orientation and when training is requested.</p> <p><b>ICE</b> AH policy is on ODCR’s intranet site. ICE also provides AH policies and procedures biweekly during new employee orientation and during annual mandatory training for new managers and supervisors, and in required PALS training for employees.</p> <p><b>TSA</b> Annual Mandatory Online Learning Center (OLC) training. Additionally, the AHP partners with CRDI to provide</p>	New



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			<p>virtual and onsite training to management teams upon request.</p> <p><b>USCG</b> New Employee Orientation Triennially – Civil Rights Awareness Training</p> <p><b>USCIS</b> Emailed the annual EEO policy statement to all staff as well as an annual reminder in the agency's electronic newsletter.</p> <p><b>USSS</b> •Uniformed Division Introductory Course/Special Agent Introductory Course Training (twice per month) •Anti-Harassment Training (all training sessions include this) •New Supervisors Training (Quarterly) •Uniformed Division Leadership Training (every other month) •Cornerstone Leadership Training (Six times per year) •RES-(04) Prevention of Harassment in the Workplace •Internal Website.</p>	
<b>A.2.c.5</b>	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 29 C.F.R. § 2635.101(b)] If “yes”, please provide how often.	Yes	<b>CBP</b> Annually with issuance of Anti-Discrimination and Anti-Harassment Policy Statement; and ongoing EEO training.	A.3.b

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			<p><b>FLETC</b> Provided at New Employee Orientation, FLETC New Supervisor Training, and posted on both Internet and Intranet.</p> <p><b>HQ</b> Anti-Harassment Program all forms of harassment. ER/LR handles all other inappropriate investigation within the agency, excluding EEO based complaints.</p> <p><b>ICE</b> The topic is covered in the Anti-Harassment Policy letter that is disseminated and publicized on ICE intranet website.</p> <p><b>TSA</b> Management Directive (MD) 1100.73.3, "Anti-Harassment Program," was signed on August 16, 2017 and sent to all employees via a TSA broadcast message email. In addition, we provide new hire employee training every two weeks.</p> <p><b>USCG</b> Communicated through the agency on a regular basis through several methods.</p> <p><b>USCIS</b> Anti-harassment training is required for all new hires and</p>	
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			<p>annually for all employees. In addition, this language is included in the annual EEO policy statement.</p> <p><b>USSH</b> Information is continuously updated on the agency's website.</p>	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>A.3 – The agency assesses and ensures EEO principles are part of its culture.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>  <b>New Compliance Indicator</b>	<b>Current Part G Questions</b>
<b>A.3.a</b>	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [See 29 C.F.R. § 1614.102(a) (9)] If “yes,” provide one or two examples in the comments section.	Yes	<p><b>CBP</b> Provided recognition with Commissioner's EEO/Diversity Award.</p> <p>Ten (10) members of the Petroleum, Natural Gas, and Minerals Center of Excellence Diversity and Inclusion Program Committee received the Commissioner's EEO/Diversity Award for championing CBP's commitment to a bias-free work environment and exemplifying EEO principles.</p> <p><b>FLETC</b> Provided recognition via the Component Intranet, recognition in staff meetings; management and staff are recognized through performance evaluations.</p>	New





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			<p><b>HQ DHS</b> Secretary has EEO-related categories in annual Secretary's Awards.</p> <p><b>TSA</b> Utilized the agency's Honorary Awards Program that had an award category for Equal Employment Opportunity, Workforce Diversity and Cultural Awareness. Awards granted by the Administrator can be given to both individuals and groups. TSA also participates in the DHS Civil Rights and Civil Liberties (CRCL) Awards Program.</p> <p><b>USCG</b> CG Affinity Groups Awards Partnership in Education (PIE) Civil Rights Service Providers</p> <p><b>USCIS</b> issued the two Directors Awards annually for Equal Employment Opportunity and Diversity Excellence. The award recognizes any USCIS employee, supervisor, manager, or team who has demonstrated superior commitment to further USCIS' goal to advance equality of employment opportunity, promoting a diverse workforce,</p>	
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			<p>and creating a workplace culture of inclusion.</p> <p><b>USSS</b> Utilized the Performance Appraisal process to provide Cash Awards, Time-off Awards, and Quality Step Increases to recognize the achievements and accomplishments of employees. Included in the rating is the employee's support for EEO and Diversity Principles. FEV results are disseminated to all directorates for further analysis.</p> <p><b>ICE</b> offered the Director's Outstanding Achievement in Diversity Management and Core Value Awards. See <a href="https://insight.ice.dhs.gov/director/awards/Pages/index.aspx">https://insight.ice.dhs.gov/director/awards/Pages/index.aspx</a>.</p>	
<b>A.3.b</b>	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [See 5 29 C.F.R. Part 250]	Yes		New

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<b>Essential Element B: Integration of EEO into the Agency's Strategic Mission</b> <b>This element requires that the agency's EEO programs are structured to maintain a workplace that is free from discrimination and support the agency's strategic mission.</b>				
 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met?</b> <b>(Yes/No/NA)</b>	<b>Comments</b>	<b>Current Part G Questions</b> 12-18-2019
<b>B.1.a</b>	<b>B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.</b>  Is the agency head the immediate supervisor of the person ("EEO Director") who has day-to-day control over the EEO office? [See 29 C.F.R. §1614.102(b)(4)]	Yes	<p><b>CBP</b> The EEO Director reports to the Executive Director, Privacy and Diversity Office.</p> <p><b>TSA</b> In FY 2021, the TSA's Executive Resources Council approved two new executive-level positions—an Executive Diversity, Equity, and Inclusion Officer, and an Executive Director of CRL/OTE's Civil Rights, Diversity &amp; Inclusion (CRDI) Division, who will have day-to-day oversight of TSA's EEO Program. The CRDI Executive Director position is located in CRL/OTE and will have an independent reporting line to the TSA Administrator on all EEO matters.</p> <p><b>USSF</b> The EEO Director reports to the Deputy Director who has oversight responsibility for the mission-related programmatic offices.</p>	B.1.a

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<b>B.1.a.1</b>	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If "yes," please provide the title of the agency head designee in the comments.	No CBP	<b>FLETC</b> The EEO Director reports to the Chief of Staff in the Director's Office and has unlimited access to the Director. FLETC has no plans currently to change the organizational structure.  <b>USCIS</b> The EEO Director reports to the Deputy Director.  <b>USSS</b> Deputy Director	New
<b>B.1.a.2</b>	Does the agency's organizational chart clearly define the reporting structure for the EEO office? [See 29 C.F.R. §1614.102(b)(4)]	Yes		B.1.d
<b>B.1.b</b>	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency, and legal compliance of the agency's EEO program? [See 29 C.F.R. §1614.102(c)(1); MD-715 Instructions, Sec. I]	Yes		B.2.a
<b>B.1.c</b>	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [See MD-715 Instructions, Sec. I] If "yes," please provide the date of the briefing in the comments column.		<b>DHS</b> presented on 5/4/2021.  <b>CBP</b> presented on 4/6/2021.  <b>FLETC</b> presented on 4/22/2021 along with the submission of the MD-715 report.  <b>HQ</b> Provided briefings to various HQ Programs, and to Deputy Officer for CRCL during FY 2021.	B.2.b

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			<b>ICE</b> The State of the EEO Briefing was presented to the head of the agency on 1/28/2021.  <b>TSA</b> presented on 9/30/2021.  <b>USCG</b> presented on 7/12/2021.  <b>USCIS</b> presented 08/17/2021.  <b>USSS</b> presented on 04/27/2021.	
<b>B.1.d</b>	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [See MD-715, II(B)]	No CBP		New
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.2 – The EEO Director controls all aspects of the EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments  New Compliance Indicator</b>	<b>Current Part G Questions 12-18-2019</b>
<b>B.2.a</b>	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [See MD-110, Ch. 1(III)(A); 29 29 C.F.R. § 1614.102(c)]	Yes		B.3.a
<b>B.2.b</b>	Is the EEO Director responsible for overseeing the completion of EEO counseling [See 29 29 C.F.R. § 1614.102(c)(4)]	Yes		New
<b>B.2.c</b>	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [See 29 29 C.F.R. §1614.102(c)(5)] [This question may not be applicable for certain subordinate level Components.]	Yes		New
<b>B.2.d</b>	Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [See 29 29 C.F.R. §1614.102(c)(5)] [This question may not be applicable for certain subordinate level Components.]	Yes  N/A	FADS are issued by DHS/CRCL for all Components.	New

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		CBP, FEMA, FLETC, ICE, TSA, USCG, USCIS, USSS		
<b>B.2.e</b>	Is the EEO Director responsible for ensuring compliance with EEOC orders? [See 29 C.F.R. § 1614.102(e); 1614.502]	Yes		F.3.b
<b>B.2.f</b>	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [See 29 C.F.R. § 1614.102(c)(2)]	Yes		New
<b>B.2.g</b>	If the agency has subordinate level Components, does the EEO Director provide effective guidance and coordination for the Components? [See 29 C.F.R. § 1614.102(c)(2) and (c)(3)]	Yes  N/A CBP, FEMA, FLETC, ICE, TSA, USCG, USSS		New
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	<b>Current Part G Questions</b> 12-18-2019
<b>B.3.a</b>	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession planning, and selections for training/career development opportunities? [See MD-715, II(B)]	No CBP		B.2.c & B.2.d
<b>B.3.b</b>	Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [See MD-715, II(B)] If "yes," please identify the EEO principles in the strategic plan in the comments column.	No CBP	<b>FLETC</b> 3.1.2 To develop recruiting strategies to support FLETC's near and long-term staffing goals. 3.01.02.05 To foster a high performing, diverse, and inclusive workforce.  <b>HQ</b> Promote a culture of transparency, fairness, and equal employment opportunity	New

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			<p>throughout the DHS workforce, providing avenues of redress and leadership support in addressing and resolving workplace conflict.</p> <p><b>ICE</b> FY 2021-2025 Strategic Plan Goal 1: Empower the Workforce That Powers the Mission Objective 1.1: Recruit, Hire, and Retain a Diverse and Highly Capable Workforce.</p> <p><b>TSA</b> To commit to our people: TSA's most important assets are the dedicated professionals securing our Nation's transportation system. Component will foster a diverse, inclusive, and transparent work environment, establishing TSA as a federal employer of choice. The Agency will utilize available tools and authorities to cultivate a skilled workforce prepared and equipped to meet the challenges of tomorrow. TSA will transform the organizational culture to promote an entrepreneurial spirit and operational excellence.</p> <p><b>USCIS</b> To recruit, develop, and retain a diverse, highly trained, and</p>	
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			<p>flexible workforce. This is outlined as USCIS Strategic Goal Objective 1.1.</p> <p><b>USCG</b>  Stated in the Coast Guard Strategic Plan 2018-2022:</p> <p>1.1.1. Improve Support Programs for the Mission Ready Total Workforce.</p> <ul style="list-style-type: none"> <li>• Foster positive work environments, embracing and leveraging the differences among us, while ensuring equal opportunity for all (bullet #3).</li> </ul> <p>1.1.3. Recruit and Retain an Inclusive and Diverse Workforce that Reflects the American Public We Serve.</p> <p>Enhance recruiting, hiring, and personnel management policies that advance inclusion and diversity (bullet #1).</p> <p><b>USSS</b>  Goal 2: To grow and support a diverse workforce.  Goal 3: Identify, Develop, and Empower Leaders.  Goal 4: Modernize Business Processes.</p>	
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			Goal 5: Increase Communication and Collaboration.	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	<b>Current Part G Questions</b>
<b>B.4.a</b>	Pursuant to 29 C.F.R. § 1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:			
<b>B.4.a.1</b>	To conduct a self-assessment of the agency for possible program deficiencies? [See MD-715, II(D)]	No CBP, USCIS		B.3.b
<b>B.4.a.2</b>	To enable the agency to conduct a thorough barrier analysis of its workforce? [See MD-715, II(B)]	No CBP, USCIS	<b>USCIS</b> lacks sufficient trained staff to conduct comprehensive barrier analyses on all triggers.	B.4.a
<b>B.4.a.3</b>	To timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [See 29 C.F.R. § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	No CBP, ICE		E.5.b
<b>B.4.a.4</b>	To provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [See MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.	No USCIS	<b>USCIS</b> While USCIS does have training modules on these subjects available to employees through its PALMS web-based learning system, USCIS lacks adequate staff to provide all its supervisors and employees with interactive live training on ADR, the EEO complaint process, religious accommodations and disability accommodations.	B.4.f & B.4.g
<b>B.4.a.5</b>	To conduct thorough, accurate, and effective field audits of the EEO programs in Components and the field offices, if applicable? [See 29 C.F.R. § 1614.102(c)(2)]	N/A TSA, FEMA, USCIS	<b>FEMA, TSA, and USCIS do</b> not have subordinate level components.	E.1.c

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<b>B.4.a.6</b>	To publish and distribute EEO materials (e.g., harassment policies, EEO posters, reasonable accommodations procedures)? [See MD-715, II(B)]	Yes		B.4.c
<b>B.4.a.7</b>	To maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [See MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section.	No USCG	<b>USCG</b> The Coast Guard is exploring solutions to obtain accurate relevant applicant pool data and applicant flow data to meet the MD-715 data reporting requirements.	New
<b>B.4.a.8</b>	To effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 U.S.C. § 7201; 38 U.S.C. § 4214; 5 C.F.R. § 720.204; 5 C.F.R. § 213.3102(t) and (u); 5 C.F.R. § 315.709]	No USCIS	<b>USCIS</b> While USCIS has more than 100 collateral duty SEPMs in offices across the agency who assist in executing many facets of these SEPM programs, the agency lacks sufficient dedicated staff to effectively administer the identified programs on a national level.	B.3.c, B.3.c.1, B.3.c.2, & B.3.c.3
<b>B.4.a.9</b>	To effectively manage its anti-harassment program? [See MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	No USCIS	<b>CBP</b> Harassment complaints are tracked by CBP's Office of Professional Responsibility (OPR), which is outside the EEO Office. However, compliance activities related to harassment complaints made through the EEO process are managed by the EEO office (and referred to CBP's OPR).	New
<b>B.4.a.10</b>	To effectively manage its reasonable accommodation program? [See 29 C.F.R. § 1614.203(d)(4)(ii)]	No USCIS	<b>USCIS</b> allocated \$3.4 million to its centralized disability accommodation funds in FY 2021, but there remains insufficient disability accommodation program staff to timely address the current workload; the program also lacks a data system to fully	B.4.d

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			track and report reasonable accommodations.	
<b>B.4.a.11</b>	To ensure timely and complete compliance with EEOC orders? [See MD-715, II(E)]	Yes		New
<b>B.4.b</b>	Does the EEO office have a budget that is separate from other offices within the agency? [See 29 C.F.R. § 1614.102(a)(1)]	No CBP	<b>CBP</b> The EEO office is a part of the Privacy and Diversity Office (PDO), which is within the Office of the Commissioner. Within the PDO there are five offices (Diversity and EEO; Freedom of Information Act; Privacy; Custody Support and Compliance; and Mission Support) which have a shared budget.	New
<b>B.4.c</b>	Are the duties and responsibilities of EEO officials clearly defined? [See MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Yes		B.1.b
<b>B.4.d</b>	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?	Yes		E.2.d
<b>B.4.e</b>	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	No-USSS	<b>USSS</b> due to transitional leadership collateral duty counselors did not receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110.	E.2.e
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments  New Indicator</b>	<b>Current Part G Questions 12-18-2019</b>
<b>B.5.a</b>	Pursuant to 29 C.F.R. § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:			
<b>B.5.a.1</b>	EEO Complaint Process? [See MD-715(II)(B)]	Yes		New

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<b>B.5.a.2</b>	Reasonable Accommodation Procedures? [See 29 C.F.R. § 1614.102(d)(3)]	No HQ		A.3.d
<b>B.5.a.3</b>	Anti-Harassment Policy? [See MD-715(II)(B)]	Yes		New
<b>B.5.a.4</b>	Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [See MD-715, II(B)]	Yes		New
<b>B.5.a.5</b>	ADR, with emphasis on the Federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [See MD-715(II)(E)]	No ICE		E.4.b
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.6 – The agency involves managers in the implementation of its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments  New Indicator</b>	<b>Current Part G Questions</b> 12-18-2019
<b>B.6.a</b>	Are senior managers involved in the implementation of Special Emphasis Programs? [See MD-715 Instructions, Sec. I]	No HQ		New
<b>B.6.b</b>	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	No CBP	<b>CBP</b> The EEO office is not funded to conduct barrier analysis beyond identifying triggers. Funding has been requested but not approved.	D.1.a

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<b>B.6.c</b>	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [See MD-715 Instructions, Sec. I]	No CBP  N/A FEMA, FLETC, USCIS	<b>CBP</b> The EEO office is not funded to conduct barrier analysis beyond identifying triggers. Funding has been requested but not approved.  <b>FEMA</b> The barrier analysis effort is ongoing.  <b>FLETC</b> Senior managers assist with barrier analysis and actions plans. No barriers have been identified.  <b>USCIS</b> No barriers have been identified.	D.1.b
<b>B.6.d</b>	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 C.F.R. § 1614.102(a)(5)]	No CBP N/A USCIS	<b>CBP</b> The EEO office is not funded to conduct barrier analysis beyond identifying triggers. Funding has been requested but not approved.  <b>USCIS</b> No barriers have been identified. USCIS has been unable to conduct thorough barrier analysis due to inadequate resources.	D.1.c

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<b>Essential Element C: Management and Program Accountability</b> <b>This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency's EEO Program and Plan.</b>				
 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met?</b> <b>(Yes/No/NA)</b>	<b>Comments</b>	<b>Current Part G Questions</b> 12-18-2019
<b>C.1.a</b>	<b>C.1 – The agency conducts regular internal audits of its Component and field offices.</b>  Does the agency regularly assess its Component and field offices for possible EEO program deficiencies? [See 29 C.F.R. § 1614.102(c)(2)] If "yes," please provide the schedule for conducting audits in the comments section.	No CBP, HQ  N/A FEMA, TSA, USCIS	<b>FLETC</b> Annually.  <b>TSA</b> does not have subordinate level components.  <b>USCG</b> Annually. All CG units are required to complete an EEO self-assessment (Command Checklist) of their commands by October 31.  <b>USCIS</b> No action plans have been identified.  <b>USSS</b> continuously assesses and enhances internal management accountability by conducting assessments.	New
<b>C.1.b</b>	Does the agency regularly assess its Component and field offices on their efforts to remove barriers from the workplace? [See 29 C.F.R. § 1614.102(c)(2)] If "yes," please provide the schedule for conducting audits in the comments section.	No CBP, HQ  N/A TSA, USCIS	<b>DHS</b> Annually conducts reviews of Component MD-715 reports including identification of triggers, identification of barriers, and action plans to remove identified barriers.  <b>FEMA</b> The barrier analysis effort is ongoing.	New

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			<p><b>FLETC</b> Annually.</p> <p><b>TSA</b> does not have subordinate level components.</p> <p><b>USCG</b> Commands develop plans to address any identified deficiencies following the assessment.</p> <p><b>USCIS</b> does not have subordinate level field offices.</p>	
<b>C.1.c</b>	Do the Component and field offices make reasonable efforts to comply with the recommendations of the field audit? [See MD-715, II(C)]	<p>Yes</p> <p>N/A CBP, FEMA, TSA, USCIS</p>	<p><b>FEMA</b> has not completed a field audit.</p> <p><b>TSA</b> does not have subordinate level components.</p> <p><b>USCIS</b> does not have subordinate level components.</p> <p><b>USSS</b> continuously assesses and enhances internal management accountability by conducting assessments.</p>	New
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.2 – The agency has established procedures to prevent all forms of EEO discrimination.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b> <b>New Indicator</b>	<b>Current Part G Questions</b> 12-18-2019
<b>C.2.a</b>	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [See MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes		New
<b>C.2.a.1</b>	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment?	Yes		New

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	[See EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]			
<b>C.2.a.2</b>	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [See EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	Yes		New
<b>C.2.a.3</b>	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [See Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	<b>CBP</b> The EEO office has a liaison who refers all harassment allegations received through the EEO process. Individuals can report harassment allegations through their chain of command, CBP's OPR, or the Joint Intake Center. Harassment allegations, not received through the EEO complaint process, are investigated by CBP's OPR.	New



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<b>C.2.a.4</b>	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [See Enforcement Guidance, V.C.]	No FEMA, USCIS	<b>FEMA</b> Employees are advised of their right to contact the Office of Professional Responsibility (OPR), but EEO does not refer nor report any EEO counseling activity alleging harassment to the (OPR).  <b>USCIS</b> does not currently refer allegations of harassment raised in the EEO complaint process to the anti-harassment program but has implemented a plan to do so. All allegations of which the agency becomes aware through the EEO complaint process are communicated to management and information relating to the most concerning allegations is also communicated to either employee relations or the Office of Chief Counsel so appropriate interim steps may be taken as warranted under the circumstances.	New
<b>C.2.a.5</b>	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <u>Complainant v. Dep't of Veterans Affairs</u> , EEOC Appeal No. 0120123232 (May 21, 2015); <u>Complainant v. Dep't of Defense (Defense Commissary Agency)</u> , EEOC Appeal No. 0120130331 (May 29, 2015)] If "no", please provide the percentage of timely-processed inquiries in the comments column.	No CBP, HQ	<b>CBP</b> In FY 2021 81% were timely, with an average of 5.8 calendar days.  <b>HQ</b> 0% compliance.	New
<b>C.2.a.6</b>	Do the agency's training materials on its anti-harassment policy include examples of disability-based harassment? [See 29 C.F.R. 1614.203(d)(2)]	Yes	<b>USSS</b> Covered during Reasonable Accommodation Training/FACT Sheet.	New

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<b>C.2.b</b>	Has the agency established disability reasonable accommodation procedures that comply with EEOC's regulations and guidance? [See 29 C.F.R. 1614.203(d)(3)]	No HQ, USCIS	<b>USCIS</b> Updated reasonable accommodation (RA) procedures were submitted to the EEOC on 09/20/2021 and are pending review.	New
<b>C.2.b.1</b>	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [See 29 C.F.R. 1614.203(d)(3)(D)]	Yes	<b>USCG</b> uses DHS's Accessibility Compliance Management system (ACMS) to assist in processing RA requests.	E.1.d
<b>C.2.b.2</b>	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [See MD-110, Ch. 1(IV)(A)]	Yes	<b>CBP</b> The Reasonable Accommodation Program Manager is not the Decision-makers for reasonable accommodation requests.	New
<b>C.2.b.3</b>	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [See 29 C.F.R. 1614.203(d)(1)(ii)(B)]	Yes		New
<b>C.2.b.4</b>	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [See 29 C.F.R. 1614.203(d)(3)(i)(M)]	No FEMA		New
<b>C.2.b.5</b>	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [See MD-715, II(C)] If "no", please provide the percentage of timely-processed requests in the comments column.	No CBP, FLETC, FEMA, ICE, TSA, USCG, USCIS	<b>CBP</b> 32.7% of reasonable accommodation requests were timely processed within the reasonable accommodation procedures time frame set forth in CBP's reasonable accommodation procedures (currently 15 business days). However, CBP is pending approval of its updated RA Directive which is consistent with DHS's processing requirement of 30 business days.	E.1.e

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			<p><b>FEMA</b> 76% of requests were timely processed within the timeframes outlined in FEMA's RA policy. The average processing was 22.3 days.</p> <p><b>FLETC</b> 85.7% percent reasonable accommodation requests were timely processed within the reasonable accommodation procedures time frame.</p> <p><b>ICE</b> In FY 2021, 60% of reasonable accommodation (RA) requests were processed within 15 business days, although the goal is to process 90% of RA requests within the time frame set forth in the agency standard operating procedures. However, ICE is pending approval of its updated RA Directive which is consistent with DHS's processing requirement of 30 business days.</p> <p><b>TSA</b> 76% of all cases were processed within the time frame set forth in the reasonable accommodation procedures.</p> <p><b>USCG</b> 90% percent of requests for reasonable accommodation were timely</p>	
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			<p>processed within the reasonable accommodation procedures time frame.</p> <p><b>USCIS</b> New Part H. The existing RA system has multiple deficiencies including the inability to calculate processing time frames.</p> <p><b>USSS</b> 100% of accommodation requests for employees have been processed timely. (Average 7 days)</p> <p>100% of accommodation requests for applicants have been processed timely. (Average 2 days)</p> <p>100% of all accommodation requests, for employees and applicants, have been processed successfully within 20 business days.</p>	
<b>C.2.c</b>	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [See 29 C.F.R. 1614.203(d)(6)]	No FEMA, HQ, USCIS	<p><b>FEMA</b> in process of updating RA policy to include PAS procedures. Plans to complete before the end of the FY.</p> <p><b>USCIS</b> New Part H. Personal Assistance Services (PAS) procedures are included in RA procedures that were submitted to the EEOC on</p>	New

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			9/20/2021 and are pending review.	
<b>C.2.c.1</b>	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [See 29 C.F.R. § 1614.203(d)(5)(v)] If "yes," please provide the internet address in the comments column.	No FEMA	<p><b>DHS</b> <a href="https://www.dhs.gov/reasonabl-e-accommodations-dhs">https://www.dhs.gov/reasonabl-e-accommodations-dhs</a></p> <p><b>CBP</b> <a href="https://www.cbp.gov/about/eeo-diversity/reasonable-accommodation">https://www.cbp.gov/about/eeo-diversity/reasonable-accommodation</a>.</p> <p><b>FEMA</b> is in process of updating RA policy, which will include PAS procedures. Plan to complete before the end of the FY.</p> <p><b>FLETC</b> <a href="#">Reasonable Accommodation Request Procedures   Federal Law Enforcement Training Centers (fletc.gov)</a>.</p> <p><b>HQ</b> <a href="http://dhsconnect.dhs.gov/org/offices/crcl/eeo/Documents/DHS%20Disability%20Employment%20Fact%20Sheet%20as%20of%20July%202019">http://dhsconnect.dhs.gov/org/offices/crcl/eeo/Documents/DHS Disability Employment Fact Sheet as of July 2019</a></p> <p><b>ICE</b> <a href="https://www.ice.gov/doclib/about/offices/dcr/icePASP.pdf">https://www.ice.gov/doclib/about/offices/dcr/icePASP.pdf</a></p> <p><b>TSA</b> Information regarding request for PAS is included in the MD-1100.73-4, Appendix A. Information/link is on TSA public website:</p>	New

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			<a href="https://www.tsa.gov/about/jobs-at-tsa">https://www.tsa.gov/about/jobs-at-tsa</a>  <b>USCG</b> <a href="#">U.S. COAST GUARD CIVIL RIGHTS MANUAL</a> , <a href="#">COMDTINST M5350.4E</a> <a href="https://uscg.mil">(uscg.mil)</a> (Pg. 6-5 – 6-23).  <b>USCIS</b> <a href="https://www.uscis.gov/about-us/affirmative-action-plan-recruitment-hiring-advancement-and-retention-persons-disabilities">https://www.uscis.gov/about-us/affirmative-action-plan-recruitment-hiring-advancement-and-retention-persons-disabilities</a> .  <b>USSS</b> External website is updated. The Office of EES regularly updates through our POCs within the Office of the Chief Information Officer (CIO) and Office of Communication and Media Relations (CMR). <a href="https://www.secretservice.gov/diversity/overview">https://www.secretservice.gov/diversity/overview</a> .	
 <b>Compliance Indicator</b>   <b>Measures</b>	<b>C.3 - The agency evaluates managers and supervisors on their efforts to ensure equal employment opportunity.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>  <b>New Indicator</b>	<b>Current Part G Questions</b> 12-18-2019
<b>C.3.a</b>	Pursuant to 29 C.F.R. § 1614.102(a)(5), do all managers and supervisors have an element in their performance appraisal that	Yes		New

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	evaluates their commitment to agency EEO policies and principles and their participation in the EEO program?			
<b>C.3.b</b>	Does the agency require rating officials to evaluate the performance of managers and supervisors based on the following activities?			
<b>C.3.b.1</b>	Resolve EEO problems/disagreements/conflicts, including the participation in ADR proceedings? [See MD-110, Ch. 3.I]	Yes		A.3.a.1
<b>C.3.b.2</b>	Ensure full cooperation of employees under his/her supervision with EEO officials, such as counselors and investigators? [See 29 C.F.R. § 1614.102(b)(6)]	Yes		A.3.a.4
<b>C.3.b.3</b>	Ensure a workplace that is free from all forms of discrimination, including harassment and retaliation? [See MD-715, II(C)]	Yes		A.3.a.5
<b>C.3.b.4</b>	Ensure that subordinate supervisors have effective managerial, communication, and interpersonal skills to supervise in a workplace with diverse employees? [See MD-715 Instructions, Sec. I]	No FEMA	<b>FEMA</b> This deficiency was provided to OCHCO to address.	A.3.a.6
<b>C.3.b.5</b>	Provide religious accommodations when such accommodations do not cause an undue hardship? [See 29 C.F.R. § 1614.102(a)(7)]	Yes		A.3.a.7
<b>C.3.b.6</b>	Provide disability accommodations when such accommodations do not cause an undue hardship? [See 29 C.F.R. § 1614.102(a)(8)]	Yes		A.3.a.8
<b>C.3.b.7</b>	Support the EEO program in identifying and removing barriers to equal opportunity. [See MD-715, II(C)]	Yes		New
<b>C.3.b.8</b>	Support the anti-harassment program in investigating and correcting harassing conduct. [see Enforcement Guidance, V.C.2]	Yes		A.3.a.2
<b>C.3.b.9</b>	Comply with settlement agreements and orders issued by the agency, EEOC, and EEO-related cases from the Merit Systems Protection Board, labor arbitrators, and the Federal Labor Relations Authority? [See MD-715, II(C)]	Yes		New
<b>C.3.c</b>	Does the EEO Director recommend to the agency head improvements or corrections, including remedial or disciplinary actions, for managers and supervisors who have failed in their EEO responsibilities? [See 29 C.F.R. § 1614.102(c)(2)]	No CBP	<b>CBP</b> The EEO Director is not in a decision-making capacity for discipline outside of the EEO office. These decisions are advised by Labor and Employee Relations and made by the relevant program office. There is currently no process in place for the EEO Director to review findings of discrimination and recommend disciplinary action.	New

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			<p><b>ICE</b> ODCR suggests training, facilitated discussions, and works with the Office of Human Capital (OHC) and Office of Professional Responsibility (OPR) for disciplinary actions.</p> <p><b>USSS</b> EEO Director does not provide recommendation on disciplinary actions. All disciplinary actions are covered under ITG-04.</p>	
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<b>C.3.d</b>	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [See 29 C.F.R. § 1614.102(c)(2)]	No CBP  N/A ICE, TSA, USCIS	<p><b>CBP</b> The EEO Director is not in a decision-making capacity for discipline outside of the EEO office. These decisions are advised by Labor and Employee Relations and made by the relevant program office. There is currently no process in place for the EEO Director to review findings of discrimination and recommend disciplinary action.</p> <p><b>FEMA</b> on a case-by-case basis as needed.</p> <p><b>ICE</b> ODCR does not recommend, rather it works with the OHC and OPR for disciplinary actions.</p> <p><b>TSA</b> The program office, with guidance from the Professional Responsibility and/or Chief Counsel program offices, has the final decision.</p> <p><b>USCIS</b> No recommendations for remedial or disciplinary actions have been made to date.</p>	New



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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	<b>Current Part G Questions</b> 12-18-2019
<b>C.4.a</b>	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [See 29 C.F.R. §1614.102(a)(2)]	No CBP		New
<b>C.4.b</b>	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [See MD-715 Instructions, Sec. I]	Yes	<b>FEMA</b> These policies are on a recurring four-year review, renew, revise, or rescind schedule.  <b>USSS</b> Annually during the MD-715 assessment.	C.2.a, C.2.b, & C.2.c
<b>C.4.c</b>	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [See 29 C.F.R. §1614.601(a)]	No USCG	<b>USCG</b> The Coast Guard is exploring solutions to obtain accurate relevant applicant pool data and applicant flow data to meet the MD-715 data reporting requirements.	New
<b>C.4.d</b>	Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [See MD-715, II(C)]	Yes	<b>FEMA</b> has not yet requested such data from the HR Office.	New
<b>C.4.e</b>	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:			
<b>C.4.e.1</b>	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 C.F.R. § 1614.203(d); MD-715, II(C)]	No HQ		New
<b>C.4.e.2</b>	Develop and/or conduct outreach and recruiting initiatives? [See MD-715, II(C)]	Yes		New
<b>C.4.e.3</b>	Develop and/or provide training for managers and employees? [See MD-715, II(C)]	Yes		New
<b>C.4.e.4</b>	Identify and remove barriers to equal opportunity in the workplace? [See MD-715, II(C)]	No FEMA, HQ		New
<b>C.4.e.5</b>	Assist in preparing the MD-715 report? [See MD-715, II(C)]	Yes		New

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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	<b>Current Part G Questions</b> 12-18-2019
<b>C.5.a</b>	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [See 29 C.F.R. § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)]	Yes	<b>USSS</b> Office of Integrity - USSS Table of Penalties (ITG-04).	C.3.a
<b>C.5.b</b>	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [See 29 C.F.R. § 1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Yes	<p><b>FEMA</b> no discipline cases involved findings of discriminatory conduct.</p> <p><b>ICE</b> had 2 individuals that were referred to OPR and OHC for potential disciplinary action based on findings of discrimination. No action rising to the level of discipline was implemented. However, both received a verbal counseling and a cease and desist with respect to contacting the complainant.</p> <p><b>TSA</b> In FY21, ten (10) actions were issued and one (1) resignation prior to the action being issued.</p> <p><b>USCG</b> There were no individuals disciplined/sanctioned during FY21.</p> <p><b>USCIS</b> had one (1) finding of discrimination and one (1) individual was disciplined/sanctioned.</p>	C.3.c

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			<b>USSS</b> Despite no findings of discrimination, any management official found to engage in inappropriate conduct, disciplinary actions are applied in accordance with ITG-04.	
<b>C.5.c</b>	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [See MD-715, II(C)]	Yes	<b>FEMA</b> OER advises offices when there is a finding. OCC provides all settlements to OER for compliance action. Any lessons learned from a settlement are reported to the OCC chain of command. Any misconduct is reported to OPR and to LER.	New
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.6 – The EEO office advises managers/supervisors on EEO matters.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	<b>Current Part G Questions</b> 12-18-2019
<b>C.6.a</b>	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [See MD-715 Instructions, Sec. I] If “yes,” please identify the frequency of the EEO updates in the comments column.	No HQ	<b>CBP</b> Memoranda are issued quarterly with information on EEO complaints, workforce demographics, legal updates, and special emphasis program updates. Component published an Annual Report that went to the workforce with summary information of these programs.  <b>FEMA</b> The EEO Office provides senior leadership updates annually through the	C.1.a

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			<p>agency's 462 Report and MD-715 Report.</p> <p><b>ICE</b> ODCR provides this information annually to managers and supervisors through training, virtual site visits with field managers and supervisors, and routing briefs with headquarters managers and supervisors.</p> <p><b>TSA</b> Civil Rights, Diversity, and Inclusion Division (CRDI) provided reports to Airports that included workforce demographics and complaint data to all visited sites throughout the fiscal year.</p> <p><b>USCG</b> This occurs in various forums, i.e., triennial training, weekly meetings, No Fear act postings, newsletter, etc.</p> <p><b>USCIS</b> The OEIO Chief provides updates through an annual state of EEO briefing to executives, demographic snapshots, and meet and greets between the OEIO Chief and Deputy Chief and program office and directorate senior leadership.</p> <p><b>USSS</b> Annually.</p>	
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<b>C.6.b</b>	Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [See MD-715 Instructions, Sec. I]	Yes		New
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<b>Essential Element D: Proactive Prevention</b> <b>This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.</b>				
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.</b>	<b>Measure Met?</b> <b>(Yes/No/NA)</b>	<b>Comments</b>	<b>Current Part G Questions</b> 12-18-2019
<b>D.1.a</b>	Does the agency have a process for identifying triggers in the workplace? [See MD-715 Instructions, Sec. I]	Yes		New
<b>D.1.b</b>	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [See MD-715 Instructions, Sec. I]	No HQ	<b>CBP</b> The agency has used workforce data; complaint/grievance data; exit surveys; and employee climate surveys to conduct trigger identification. There are continued plans to incorporate additional sources of information to assess human capital programs.	New
<b>D.1.c</b>	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [See 29 C.F.R. 1614.203(d)(1)(iii)(C)]	No CBP	<b>USCG</b> uses the DHS exit survey.	New
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)</b>	<b>Measure Met?</b> <b>(Yes/No/NA)</b>	<b>Comments</b>  <b>New Indicator</b>	<b>Current Part G Questions</b> 12-18-2019
<b>D.2.a</b>	Does the agency have a process for analyzing the identified triggers to find possible barriers? [See MD-715, (II)(B)]	Yes		New
<b>D.2.b</b>	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [See 29 C.F.R. § 1614.102(a)(3)]	No HQ		B.2.c.2



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<b>D.2.c</b>	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource decisions, such as re-organizations and realignments? [See 29 C.F.R. § 1614.102(a)(3)]	No HQ		B.2.c.1
<b>D.2.d</b>	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable accommodation program; anti-harassment program; and/or external special interest groups? [See MD-715 Instructions, Sec. I] If “yes,” please identify the data sources in the comments column.	No HQ	<p><b>CBP</b> Complaint data, exit surveys, program evaluations, and special emphasis programs.</p> <p><b>FLETC</b> Complaints, NFC, Complaint and Grievance data, exit surveys, special emphasis programs, reasonable accommodation program.</p> <p><b>ICE</b> ICE reviews the following: complaint/grievance data; employee climate surveys; focus groups; site visits and evaluative data from the special emphasis programs.</p> <p><b>TSA</b> The data sources are complaint/grievance data, employee climate survey, reasonable accommodation program, workforce demographics, and the Barrier Analysis Recommendation report.</p> <p><b>USCG</b> Complaints/grievance Employee Climate Surveys (DEOCS) Program Evaluation Command Checklist</p>	New





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			USCG Anti-harassment Program USCG Reasonable Accommodation Program.  <b>USCIS</b> Data sources include EEO complaint data, exit survey, FEVS scores, climate survey, special emphasis programs, reasonable accommodation program, and annual program assessment responses from program offices and directorates.  <b>USSS</b> Complaint data Exit survey data Reasonable accommodation data Anti-Harassment data	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.3 – The agency establishes appropriate action plans to remove identified barriers.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments  New Indicator</b>	<b>Current Part G Questions 12-18-2019</b>
<b>D.3.a.</b>	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [See 29 C.F.R. § 1614.102(a)(3)]	No HQ  N/A FLETC, USCIS	<b>FLETC</b> No barriers have been identified.  <b>USCIS</b> No barriers have been identified. The Component has been unable to conduct thorough barrier analysis due to inadequate resources.	New

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<b>D.3.b</b>	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [See MD-715, II(D)]	No HQ  N/A FLETC, USCIS	<b>FLETC</b> No barriers have been identified.  <b>USCIS</b> No barriers have been identified. The Component has been unable to conduct thorough barrier analysis due to inadequate resources.	New
<b>D.3.c</b>	Does the agency periodically review the effectiveness of the plans? [See MD-715, II(D)]	No HQ  N/A FLETC, USCIS	<b>FLETC</b> No barriers have been identified.  <b>USCIS</b> No barriers have been identified. The Component has been unable to conduct thorough barrier analysis due to inadequate resources.	New
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b> <b>New Indicator</b>	<b>Current Part G Questions</b> 12-18-2019
<b>D.4.a</b>	Does the agency post its affirmative action plan on its public website? [See 29 C.F.R. 1614.203(d)(4)] Please provide the internet address in the comments.	Yes	<b>DHS</b> <a href="https://www.dhs.gov/reports-office-civil-rights-and-civil-liberties">https://www.dhs.gov/reports-office-civil-rights-and-civil-liberties</a> .  <b>CBP</b> <a href="https://www.cbp.gov/about/eeo-diversity/diversity-inclusion">https://www.cbp.gov/about/eeo-diversity/diversity-inclusion</a> .  <b>FEMA</b> <a href="https://www.fema.gov/sites/default/files/2020-">https://www.fema.gov/sites/default/files/2020-</a>	New

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			<p>09/fema_affirmative-action-plan.pdf</p> <p><b>FLETC</b>  <a href="#">Affirmative Action Plan   Federal Law Enforcement Training Centers (fletc.gov).</a></p> <p><b>ICE</b>  <a href="https://www.ice.gov/leadership/dcr">https://www.ice.gov/leadership/dcr</a></p> <p><b>TSA</b>  <a href="https://www.tsa.gov/civil-rights-diversity-and-inclusion">https://www.tsa.gov/civil-rights-diversity-and-inclusion</a></p> <p><b>USCG</b>  <a href="https://www.uscg.mil/Resources/Civil-Rights/Reports-and-References/">https://www.uscg.mil/Resources/Civil-Rights/Reports-and-References/</a>.</p> <p><b>USCIS</b>  <a href="https://www.uscis.gov/about-us/affirmative-action-plan-recruitment-hiring-advancement-and-retention-persons-disabilities">https://www.uscis.gov/about-us/affirmative-action-plan-recruitment-hiring-advancement-and-retention-persons-disabilities</a>.</p> <p><b>USSS</b>            External website is updated. Office of EES regularly updates through our POCs within the Office of the Chief Information Officer and Office of Communication and Media Relations.  <a href="https://www.secretservice.gov/diversity/overview">https://www.secretservice.gov/diversity/overview</a></p>	
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<b>D.4.b</b>	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [See 29 C.F.R. 1614.203(d)(1)(i)]	Yes		New
<b>D.4.c</b>	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [See 29 C.F.R. 1614.203(d)(1)(ii)(A)]	Yes		New
<b>D.4.d</b>	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [See 29 C.F.R. 1614.203(d)(7)(ii)]	Yes		New

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<b>Essential Element E: Efficiency</b> <b>This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency's EEO programs and an efficient and fair dispute resolution process.</b>				
 <b>Compliance Indicator</b>	<b>E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.</b>	<b>Measure Met?</b> <b>(Yes/No/NA)</b>	<b>Comments</b>	<b>Current Part G Questions</b> 12-18-2019
 <b>Measures</b>				
<b>E.1.a</b>	Does the agency timely provide EEO counseling, pursuant to 29 C.F.R. § 1614.105?	Yes		E.3.a.1
<b>E.1.b</b>	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 C.F.R. § 1614.105(b)(1)?	Yes		E.3.a.2
<b>E.1.c</b>	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?	Yes		New
<b>E.1.d</b>	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments.	No CBP, HQ	<b>FLETC</b> The average processing time was 13.7 days.  <b>HQ</b> Average processing time is 97 days.  <b>ICE</b> The average processing time is 64 days.  <b>TSA CRDI</b> average processing time was of 24 days.  <b>USCG</b> The average processing time was 27.5 days.  <b>USCIS</b> The average processing time is 29 days.	New



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			<b>USSS</b> The average processing time was 32.88 days.	
<b>E.1.e</b>	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 C.F.R. § 1614.102(b)(6)?	Yes		New
<b>E.1.f</b>	Does the agency timely complete investigations, pursuant to 29 C.F.R. § 1614.108?	No FEMA, ICE, USSS	<b>USSS</b> processed 86% within the time frames.  <b>FEMA</b> processed 48% within the time frames.  <b>ICE</b> processed 54.9% within the time frames.	E.3.a.3
<b>E.1.g</b>	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 C.F.R. § 1614.108(g)?	Yes		New
<b>E.1.h</b>	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 C.F.R. § 1614.110(b)?	No	<b>DHS</b> final agency decisions (FADs) are issued by DHS CRCL for all DHS Components.	E.3.a.4
<b>E.1.i</b>	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 C.F.R. § 1614.110(a)?	Yes  N/A CBP, FLETC, ICE, TSA, USCIS		E.3.a.7
<b>E.1.j</b>	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes," please describe how in the comments column.	Yes	<b>FLETC</b> EEO Complaints Manager, along with Procurement Office, immediately contacts contract investigative company to address deficiency.	E.2.c

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			<p><b>ICE</b> In accordance with the contractor's statement of work, the Agency may demand the removal of a contract investigator where it determines an investigator is ineffective (including untimeliness) or biased.</p> <p><b>TSA</b> Currently has agreements with two outside contractors for conducting investigations. The contracts have a penalty clause for poor work or delays.</p> <p><b>USCG</b> The Performance Work Statement provides specific delivery accountability.</p> <p><b>USCIS</b> Processing timeframes and sufficiency standards are included in the contract statement of work. If processing timelines or sufficiency standards are not met, the issue is first addressed with the contract firm. If the problem continues, the agency may use breach provisions in the contract.</p> <p><b>USSS</b> Works directly with Procurement Division to remove contractors who do not comply with the performance statement of</p>	
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			work. Also, the Formal Complaints Program Manager monitors the work of contractors.	
<b>E.1.k</b>	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes		New
<b>E.1.l</b>	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 C.F.R. § 1614.403(g)]	Yes		New
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.2 – The agency has a neutral EEO process.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments  Revised Indicator</b>	<b>Current Part G Questions 12-18-2019</b>
<b>E.2.a</b>	Has the agency established a clear separation between its EEO complaint program and its defensive function? [See MD-110, Ch. 1(IV)(D)]	Yes		New
<b>E.2.b</b>	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [See MD-110, Ch. 1(IV)(D)] If “yes,” please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.	Yes	<b>DHS CRCL has two</b> dedicated embedded attorneys who have no role in the agency’s defensive function.  <b>HQ</b> Complaints Manager is an attorney, and the EEO Director is also an attorney. Also, the office was staffed with two legal advisors from the Office of General Council (OGC) who are available to assist with legal sufficiency reviews.  <b>ICE</b> ODCR has one full-time embedded attorney from the Office of Principal Legal	E.6.a







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			<p>Advisor that reviews reports of investigation. The attorney provides legal advice to various divisions within ODCR and does not represent the Agency in any other manner.</p> <p><b>TSA</b> Chief Counsel Labor and Employment Advice Section.</p> <p><b>USCG</b> The Attorney Advisor is located in the Solutions and Complaints Division.</p> <p><b>USCIS</b> has an EEO Specialist and Team Lead that do the sufficiency reviews are attorneys. The complaints manager is also an attorney.</p> <p><b>USSS</b> The attorney providing the legal sufficiency reviews is separate and distinct from other attorneys involved in the EEO Process.</p>	
<b>E.2.c</b>	If the EEO office relies on the agency's defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [See MD-110, Ch. 1(IV)(D)]	Yes  N/A USCIS	<b>USCIS</b> The EEO Office does not rely on the agency's defensive function to conduct the legal sufficiency review.	New
<b>E.2.d</b>	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [See MD-110, Ch. 1(IV)(D)]	Yes		E.6.b
<b>E.2.e</b>	If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [See EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)]	N/A CBP, FLETC	<b>FLETC</b> Agency's defense does not conduct legal sufficiency reviews.	E.6.c



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 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	<b>Current Part G Questions</b> 12-18-2019
<b>E.3.a</b>	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [See 29 C.F.R. § 1614.102(b)(2)]	Yes		E.4.a
<b>E.3.b</b>	Does the agency require managers and supervisors to participate in ADR once it has been offered? [See MD-715, II(A)(1)]	Yes		E.4.c
<b>E.3.c</b>	Does the agency encourage all employees to use ADR, where ADR is appropriate? [See MD-110, Ch. 3(IV)(C)]	Yes		D.2.a
<b>E.3.d</b>	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [See MD-110, Ch. 3(III)(A)(9)]	Yes	<b>FEMA</b> OCC does not always involve management officials. OCC has settlement authority.	New OER plans to work with OCC to discuss their processes and offer recommendations.
<b>E.3.e</b>	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [See MD-110, Ch. 3(I)]	Yes		E.4.d
<b>E.3.f</b>	Does the agency annually evaluate the effectiveness of its ADR program? [See MD-110, Ch. 3(II)(D)]	Yes		New
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	<b>Current Part G Questions</b> 12-18-2019
<b>E.4.a</b>	Does the agency have systems in place to accurately collect, monitor, and analyze the following data?			
<b>E.4.a.1</b>	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [See MD-715, II(E)]	Yes		E.5.a
<b>E.4.a.2</b>	The race, national origin, sex, and disability status of agency employees? [See 29 C.F.R. § 1614.601(a)]	Yes		E.5.c
<b>E.4.a.3</b>	Recruitment activities? [See MD-715, II(E)]	Yes		E.5.f

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<b>E.4.a.4</b>	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [See MD-715, II(E)]	No USCG, USCIS	<b>USCG</b> The Coast Guard is exploring solutions to obtain accurate relevant applicant pool data and applicant flow data to meet the MD-715 data reporting requirements.  <b>USCIS</b> lacks complete applicant flow data to include validation of internal competitive promotions, internal/external selections for management/senior positions, interview data, ability to capture and report on merit promotion and career development participation data by race/ethnicity, gender, and disability status efficiently. This is a deficiency reported on the agency FY2021 MD-715 Report.	New
<b>E.4.a.5</b>	The processing of requests for reasonable accommodation? [29 C.F.R. § 1614.203(d)(4)]	Yes		New
<b>E.4.a.6</b>	The processing of complaints for the anti-harassment program? [See EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	Yes		New
<b>E.4.b</b>	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Yes		New
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	<b>Current Part G Questions</b> 12-18-2019
<b>E.5.a</b>	Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC	Yes	<b>DHS</b> Complaint trends, quarterly diversity dashboards.	E.5.e

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	<p>enforces? [See MD-715, II(E)] If “yes”, provide an example in the comments.</p>		<p><b>FLETC</b> Created Trend Analysis Worksheets to start baseline to monitor trends.</p> <p><b>FEMA</b> Director’s Dashboard: data analysis is conducted on a weekly basis.</p> <p><b>HQ</b> Complaints Program tracks trends for programs offices (e.g., FPS, CISA, I&amp;A) by issues and bases over several fiscal years and provide aggregate results with the programs offices.</p> <p><b>ICE</b> The Office of Diversity and Civil Rights Complaints and Resolution Division provides monthly updates to ICE program office leadership regarding complaint activity and areas of concern identified in complaint data. Diversity data is provided to program offices annually.</p> <p><b>TSA</b> Internally, TSA collects program data and it is reviewed on a weekly basis by the EEO Director or a designated representative. It includes complaint, ADR and training/outreach data.</p> <p><b>USCG</b> 462 Report MD-715</p>	
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			<p>USCG Civil Rights Strategic Plan 2020 2025.</p> <p><b>USCIS</b> In FY 2021, USCIS conducted a review of EEO complaints by Ethnicity Race Indicator/Gender and disability status.</p> <p><b>USSS</b> Participated in an annual assessment with DHS's Office for Civil Rights and Civil Liberties (CRCL) by producing a detailed, informational "QUAD Chart" that analyzes our agency's Strengths, Weaknesses, Opportunities and Threats (SWOT) as they relate to inclusive diversity.</p>	
<b>E.5.b</b>	Does the agency review other agencies' best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [See MD-715, II(E)] If "yes," provide an example in the comments.	Yes	<p><b>DHS</b> Leads the DHS EEO Directors meeting, DHS Strategic Recruitment, Diversity, and Inclusion workgroup; and DHS ADR Council.</p> <p><b>FEMA</b> routinely benchmarks with other agencies and attends compliance meetings held at DHS.</p> <p><b>FLETC</b> Participated in DHS Disability Employees Advisory Council; Quarterly DHS Complaints Managers Group;</p>	E.5.g

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			<p>DHS EEO Directors' Meeting; DHS Strategic Diversity Inclusion and Inclusion Workgroup; DHS ADR Council; and Quarterly DHS Component Meetings; reviewed DHS Accommodation Procedures for guidance in drafting FLETC's new Reasonable Accommodation Directive.</p> <p><b>HQ</b> DHS has six component-wide working groups for this purpose.</p> <p><b>ICE</b> reviewed best practices across agencies to streamline processing of reasonable accommodation requests. RA procedures are currently being updated, as a result of the reviews conducted.</p> <p><b>TSA</b> EEO Director or a designated representative meets with other DHS EEO directors monthly to discuss best practices.</p> <p><b>USCG</b> Annually the EEO personnel analyze its 462 elements' performance against DHS components and the federal community. Staff uses this information to interact with components who excel in some areas.</p>	
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			<p><b>USCIS</b> benchmarked other agencies' resurveying practices, reasonable accommodation practices, and means and methods of analysis.</p> <p><b>USSS</b> Participated in quarterly Disability Employment Advisory Council meetings where agencies share best practices of their Disability Programs.</p>	
<b>E.5.c</b>	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [See MD-715, II(E)]	Yes		E.3.a

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<b>Essential Element F: Responsiveness and Legal Compliance</b> <b>This element requires federal agencies to comply with EEO statutes and EEOC regulations, policy guidance, and other written instructions.</b>				
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.1 – The agency has processes in place to ensure timely and full compliance with EEOC Orders and settlement agreements.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	<b>Current Part G Questions</b> 12-18-2019
<b>F.1.a</b>	Does the agency have a system of management controls to ensure that its officials timely comply with EEOC orders/directives and final agency actions? [See 29 C.F.R. § 1614.102(e); MD-715, II(F)]	Yes		F.1.a
<b>F.1.b</b>	Does the agency have a system of management controls to ensure the timely, accurate, and complete compliance with resolutions/settlement agreements? [See MD-715, II(F)]	Yes		E.3.a.6
<b>F.1.c</b>	Are there procedures in place to ensure the timely and predictable processing of ordered monetary relief? [See MD-715, II(F)]	Yes		F.2.a.1
<b>F.1.d</b>	Are procedures in place to process other forms of ordered relief promptly? [See MD-715, II(F)]	Yes		F.2.a.2
<b>F.1.e</b>	When EEOC issues an order requiring compliance by the agency, does the agency hold its compliance officer(s) accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 9(IX)(H)]	Yes		F.3.a.
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.2 – The agency complies with the law, including EEOC regulations, management directives, orders, and other written instructions.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b> <b>Indicator Moved from E-III Revised</b>	<b>Current Part G Questions</b> 12-18-2019
<b>F.2.a</b>	Does the agency timely respond and fully comply with EEOC orders? [See 29 C.F.R. § 1614.502; MD-715, II(E)]	Yes		C.3.d
<b>F.2.a.1</b>	When a complainant requests a hearing, does the agency timely forward the investigative file to the appropriate EEOC hearing office? [See 29 C.F.R. § 1614.108(g)]	Yes		E.3.a.5
<b>F.2.a.2</b>	When there is a finding of discrimination that is not the subject of an appeal by the agency, does the agency ensure timely compliance with the orders of relief? [See 29 C.F.R. § 1614.501]	Yes		E.3.a.7



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<b>F.2.a.3</b>	When a complainant files an appeal, does the agency timely forward the investigative file to EEOC's Office of Federal Operations? [See 29 C.F.R. §1614.403(e)]	Yes		New
<b>F.2.a.4</b>	Pursuant to 29 C.F.R. § 1614.502, does the agency promptly provide EEOC with the required documentation for completing compliance?	Yes		F.3.d (1 to 9)
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>F.3 - The agency reports to EEOC its program efforts and accomplishments.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>	<b>Current Part G Questions</b> 12-18-2019
<b>F.3.a</b>	Does the agency timely submit to EEOC an accurate and complete No FEAR Act report? [Public Law 107-174 (May 15, 2002), § 203(a)]	Yes		New
<b>F.3.b</b>	Does the agency timely post on its public webpage its quarterly No FEAR Act data? [see 29 C.F.R. § 1614.703(d)]	No USSS		New

## Part H: Agency EEO Plan to Attain the Essential Elements of a Model EEO Program

H.1 listed below is new starting in the FY 2018 reporting cycle, which requires all Part G unmet measures to be represented in a Part H. Parts H.2 and H.5 are new in FY 2019; Part H.3 is new in FY 2020; Part H.2 was closed out in prior years.

### Part H.1

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

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

#### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
DHS Component EEO program deficiencies	See Part G for list of DHS Components not meeting specific Part G measures. These include deficiencies in the anti-harassment program, barrier analysis, field audits, state of agency briefing, applicant flow data, disciplinary action recommendations, and EEO principles in strategic plans. See Component Part Hs for objectives, responsible officials, planned activities, and accomplishments related to each DHS Component deficiency.

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

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/1/2017	At the Department level, monitor Component activities and progress in correcting EEO program deficiencies. Take actions, such as sharing best practices, to assist Components in addressing deficiencies.	9/30/2019	9/30/2022	

## Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Deputy Officer & Director of Equal Employment Opportunity and Diversity	Veronica Venture	Yes
Director, Diversity Management Section (DMS), CRCL	Elaine McKinney	Yes

## Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
7/31/2019	Data call to all Components for mid-year update on all Part G measures and progress made on deficiencies	Yes	7/31/2022	
7/31/2019	CRCL/DMS staff meet one-on-one with each Component EEO staff and review program deficiencies, actions, accomplishments, and plans	Yes	7/31/2022	
12/1/2019	Data call to all Components for end-year Parts G, H and J, including progress made on deficiencies (Part H); Consolidate into Department Part G and compare to prior fiscal year Part G	Yes	12/1/2022	

## Report of Accomplishments

Fiscal Year	Accomplishments
FY 2021	<p>Since these are ongoing annual activities, DHS updated the Modified dates to 2022 even though the three activities were completed in the FY 2021 reporting year.</p> <p>The data call for the mid-year update on Part G measures was issued to all Components. The results were compiled by CRCL/DMS staff then shared with DHS Components.</p> <p>CRCL/DMS staff conducted one-on-one meetings with each Component EEO official during which they reviewed program deficiencies, actions, accomplishments, and plans.</p>

	<p>The data call to all Components for end-year Parts G, H, and J was issued. The Component Part G input was consolidated into this Department level MD-715 report (see Executive Summary).</p>
FY 2020	<p>Since these are ongoing annual activities, DHS updated the Modified dates to 2021 even though the three activities were completed for the FY 2020 reporting year.</p> <p>The data call to all Components for the mid-year update on Part G measures was issued on 5/12/2020 then compiled by CRCL/DMS staff.</p> <p>CRCL/DMS staff conducted one-on-one meetings with each Component EEO official during which they reviewed program deficiencies, actions, accomplishments, and plans.</p> <p>The data call to all Components for end-year Parts G, H, and J was issued. The Component Part G input was consolidated into this Department level MD-715 report (see Executive Summary).</p>
FY 2019	<p>Since these are ongoing annual activities, DHS updated the Modified dates to 2020 although all three activities were completed for the FY 2019 reporting year.</p> <p>Issued data call to all Components for mid-year update on all Part G measures; tabulated results; presented results to all Components at CRCL/DMS Component Quarterly Meeting then facilitated discussion of how to address common unmet measures.</p> <p>Conducted one-on-one meetings with Components to review program deficiencies, actions, accomplishments, and plans.</p> <p>Issued data call to all Components for end-year Parts G and H, including progress made on deficiencies (Part H); Consolidated into Department Part G and compared to prior fiscal year Part G.</p>
FY 2018	<p>Issued data call to all Components for mid-year update on all Part G measures; tabulated results; presented results to all Components at CRCL/DMS Component Quarterly Meeting then facilitated discussion of how to address common unmet measures.</p> <p>Conducted one-on-one meetings with Components to review program deficiencies, actions, accomplishments, and plans.</p> <p>Issued data call to all Components for end-year Parts G and H, including progress made on deficiencies (Part H); Consolidated into Department Part G and compared to prior fiscal year Part G.</p>

## MD-715 – Part H.2

### Agency EEO Plan to Attain the Essential Elements of a Model EEO Program

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

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

#### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element A: Demonstrated Commitment from Agency Leadership	A.1.a: During FY 2018 the Department did not issue the signed and dated EEO policy statement on agency letterhead that clearly communicated the agency's commitment to EEO for all employees and applicants.

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

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/01/2018	Release and post the Department-wide EEO Policy Statement to include all bases as identified by EEOC in its Instructions to Federal Agencies for MD-715 (dated September 2017).	09/06/19	10/11/2019	10/11/2019

#### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Officer, CRCL	Katherine Culliton-Gonzalez	Yes
Deputy Officer, CRCL, Director EEO and Diversity	Veronica Venture	Yes

#### Planned Activities Toward Completion of Objective

<b>Target Date</b> (mm/dd/yyyy)	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing?</b> (Yes or No)	<b>Modified Date</b> (mm/dd/yyyy)	<b>Completion Date</b> (mm/dd/yyyy)
05/31/2019	Circulate draft EEO Policy Statement for review.	Yes	10/11/2019	10/22/2019
09/06/2019	Post final signed and dated EEO Policy Statement with written commitment to release yearly.	Yes	10/11/2019	10/11/2019

#### **Report of Accomplishments**

<b>Fiscal Year</b>	<b>Accomplishments</b>
FY 2021	This Part G measure was met and is no longer a program deficiency. This Part H will be discontinued.
FY 2020	Issued policy email statement on 10/11/2019.

## MD-715 – Part H.3

### Agency EEO Plan to Attain the Essential Elements of a Model EEO Program

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

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

#### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element B: Integration of EEO into the Agency's Strategic Mission	B.1.c: During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the Agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [See MD-715 Instructions, Sec. I)] If "yes", please provide the date of the briefing in the comments column.

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

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/01/2020	Prepare and present to the head of the agency the "State of the Agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process.	09/30/21		05/04/21

#### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Officer, CRCL	Katherine Culliton-Gonzalez	Yes
Deputy Officer, CRCL, Director EEO and Diversity	Veronica Venture	Yes

### Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
06/01/2021	Prepare and finalize the State of the Agency briefing.	Yes		05/04/21
09/30/2021	Present the State of the Agency briefing to the agency head or designee.	Yes		05/04/21

### Report of Accomplishments

Fiscal Year	Accomplishments
FY 2021	This Part G measure was met and is no longer a program deficiency. This Part H will be discontinued.
FY 2020	N/A



## MD-715 – Part H.4

### Agency EEO Plan to Attain the Essential Elements of a Model EEO Program

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

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

#### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element E – Efficiency	E.1.h When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 C.F.R. § 1614.110(b)?

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

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
3/30/2008	Expand and clarify the data collection process to allow DHS to perform accurate and comprehensive analyses in the future.	3/30/2019	9/30/2022	
3/30/2008	Issue final agency decisions within 60 days.	3/30/2019	9/30/2022	

#### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Deputy Officer & Director of Equal Employment Opportunity and Diversity	Veronica Venture	Yes
Chief Human Capital Officer	Roland Edwards	Yes

## Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
9/30/2019	1. Develop DHS-wide automated system to capture career development programs. (Table A/B12 - Participation in Career Development).	Yes	9/30/2022	
9/30/2013	2. Coordinate with DHS Components to develop supplemental internal controls regarding timeliness of investigations.	Yes		9/30/2013
9/30/2013	3. Coordinate with DHS Components to develop streamlined review processes to expedite issuance of Reports of Investigation.	Yes		9/30/2013
9/30/2017	4. Coordinate barrier analyses across Components through the EEO Director's Council, which implements the EEOD Strategic plan and activities	Yes		9/30/2017
9/30/2016	5. Provide MD-715 Training to ensure compliance and to ensure the document serves as a useful resource for managers/supervisors.	Yes		9/30/2016
9/30/2018	6. Develop a brochure to promote the use of alternative resolutions to address workplace disputes and issues.	Yes	9/30/2019	7/10/2019
9/30/2019	7. Develop a multi-year plan to issue final agency decisions within 60 days in accordance with EEOC regulations.	Yes	9/30/2022	

## Report of Accomplishments

Fiscal Year	Accomplishments
FY 2021	<p><b>Activity #1</b></p> <p>DHS is implementing a new enterprise data system (Tableau) and the data model for this system includes the capability to extract employee training data from the talent management system (referred to as the Performance and Learning Management System or PALMS) and merge the data with diversity data elements (ERI, gender, disability status). DHS will continue to work on obtaining training data that can be broken down by ERI, gender, and disability as the new system is deployed in FY 2022.</p>

**Activity #7**

During FY 2021, CMAS provided quarterly feedback to DHS Components on the quality of their Reports of Investigation (ROI) using an ROI Feedback Tool (Tool). Analysts assigned numerical ratings for several criteria related to legal sufficiency and readability and provided narrative information if needed to further explain numerical ratings. Component EEO Offices use the feedback as an additional method to assess the quality of their ROIs. The tool has proven to be an effective way for CMAS to partner with Components to improve the quality of ROIs across DHS. Since the Tool's inception, DHS Component Complaint Managers have welcomed the thorough feedback and detailed comments and offered their own suggestions for improvement. The Complaint Managers share the feedback with their staff members and contractors as an objective improvement mechanism.

CMAS is required to vet DHS employees nominated to receive certain high-level awards from DHS leadership. The vetting consists of a review of EEO complaint histories to ensure there is no disqualifying information on the nominees, including having engaged in discriminatory conduct. During FY 2021, CMAS processed 13 vetting requests totaling over 200 employees and timely completed 100 percent of vetting requests by their requested due date.

The CMAS Compliance Program monitors Components' progress in the implementation of remedial relief in decisions issued by the EEOC in which discrimination was found. During FY 2021, CMAS updated its compliance templates in accordance with the Elijah E. Cummings Federal Employee Antidiscrimination Act (FEAA) Addendum and distributed them to all DHS Component Compliance officers. In addition, CMAS continues its collaboration with the EEOC's Compliance Officer, fostering an effective working relationship while focusing on the oldest cases pending full implementation.

During FY 2021, CMAS issued or administratively closed over 1,300 final agency actions, including 1,145 merit final actions. DHS had an internal performance measure goal to issue 49 percent of merit final actions by their regulatory due date. Notably, 52 percent (591 of 1,145) of these merit-based final actions were timely issued. Accordingly, CMAS exceeded its timely issuance goal.

With respect to merit FADs, CMAS continued to strategically address its backlog inventory. CMAS utilized its in-house adjudication resources primarily for FADs that could have been issued within regulatory timeframes. CMAS assigned many of the older cases to contract vendors to draft FADs. By fiscal year end, 369 cases were assigned to the contractor, and 327 drafts had been received. The contract resources were invaluable in helping address the backlog FAD inventory. As a

	<p>result, the backlog inventory decreased from 407 at the end of FY 2020, to 178 at the end of the FY 2021. Addressing backlog inventory will continue as a focus in FY 2022.</p>
FY 2020	<p><b>Activity #1</b> DHS achieved full operational capability for its talent management system (referred to as the Performance and Learning Management System or PALMS) for most Components. DHS will continue to identify qualifying career development programs and related courses, as well as produce a report in compliance with MD-715, using data from our talent management system(s) to identify personnel who participated in those courses and data from the human resources systems to obtain personnel attributes.</p> <p><b>Activity #7</b> During FY 2020, CMAS issued or administratively closed over 1,100 final agency actions in EEO complaints, including 893 merit final actions. DHS had an internal performance measure goal to issue 47 percent of merit final actions by their regulatory due date. Notably, 49 percent (437 of 893) of these merit-based final actions were timely issued. Accordingly, CMAS exceeded its timely issuance goal.</p> <p>With respect to merit FADs, CMAS continued to strategically address its inventory. CMAS utilized its in-house adjudication resources primarily for FADs that could have been issued within regulatory timeframes and assigned many of the older cases to a contract vendor to draft FADs. By fiscal year end, 229 cases were assigned to the contractor and 206 drafts had been received. This contract resource was invaluable in helping address the CMAS FAD inventory. Nonetheless, due to resource shortages within CMAS and continued increased incoming requests for final action, the backlog inventory grew from 311 at the end of FY 2019, to 407 at the end of the FY 2020. Addressing backlog inventory will continue as a focus in FY 2021.</p>
FY 2019	<p><b>Activity #1</b> In FY 2019, DHS reported participation and applicant flow counts and percentages for the SES Career Development Program (CDP), which is the only program managed at the Department level that leads to promotion without further competition. The SES CDP, announced in USAJobs and USAStaffing, was used to track applications, qualifications, referrals, and selections. The Department was able to obtain full applicant flow data for the SES CDP announced in FY 2019. The SES CDP program staff were able to provide data on participants.</p> <p>DHS also reported applicant flow data for the Women in Law Enforcement pilot mentoring program. This program does not lead to promotion without further competition but is managed at the Department level.</p> <p>DHS achieved full operational capability for its talent management system (referred to as the Performance and Learning Management System, or PALMS) at six of the nine DHS Components, in August 2017. OCHCO exempted FEMA, TSA, and USCG from adopting PALMS. In FY 2019, DHS planned to identify the solution set for follow-on capability, including reporting capability, such as that required for MD-715.</p>

	<ul style="list-style-type: none"> <li>DHS completed its collection of training course completion data from all Components in November 2019. In FY 2020, DHS will begin using this data with other data sets to determine our ability to produce the MD-715 report.</li> <li>DHS will continue to identify qualifying career development programs and courses that support those programs. Using data from our talent management system(s) to identify personnel who participated in those courses and data from the human resources systems to obtain personnel attributes. DHS will continue to produce a report in compliance with MD-715.</li> </ul> <p><b>Activity #6</b> The ADR brochure was completed 7/10/2019.</p> <p><b>Activity #7</b> For FY 2019, CRCL issued 954 final agency actions, including 832 decisions that addressed the merits of allegations of discrimination. Notably, 51 percent (421 of 832) of these merit-based final actions were timely issued; accordingly, CMAS surpassed its timely issuance goal by 6 percent. Additionally, CMAS continued to strategically address its backlog of merit-based cases pending final agency decision (FAD). CMAS utilized its in-house adjudication resources primarily for FADs that could be prepared within regulatory timeframes and assigned many of the older cases to a contract vendor to draft FADs. By fiscal year end, 178 cases had been assigned to the contractor and 184 drafts had been received (some having been sent to the contractor the prior fiscal year). This contract resource was invaluable in helping address the CMAS FAD backlog; nonetheless, due to resource shortages within CMAS and increased incoming requests for final action, the backlog grew from 172 at the beginning of FY 2019, to 311 at the end of the fiscal year. Backlog reduction will continue to be a focus in FY 2020.</p>
FY 2018	<p>Activities #2, #3, #4, and #5 completed in prior years.</p> <p><b>Activity #1</b> In FY 2018, DHS reported participation and applicant flow counts and percentages for the SES Career Development Program (CDP), which is the only program managed at the Department level that leads to promotion without further competition. The SES CDP, announced in USAJobs and USAStaffing, was used to track applications, qualifications, referrals, and selections. The Department was able to obtain full applicant flow data for the SES CDP announced in FY 2018. The SES CDP program staff were able to provide data on participants.</p> <p>DHS will identify qualifying career development programs at DHS and courses that support those programs. Using data from our talent management system(s) to identify personnel who participated in those courses and data from the human resources systems to obtain personnel attributes, DHS will produce a report in compliance with MD-715.</p> <p>DHS achieved full operational capability for its talent management system (referred to as the Performance and Learning Management System, or PALMS) at six of the nine DHS Components, in August 2017. OCHCO exempted FEMA, TSA, and USCG from adopting PALMS. DHS plans to</p>

	<p>identify, in FY 2019, the solution set for follow-on capability, including reporting capability, such as that required for MD-715.</p> <p><b>Activity #2, #3: Completed 9/30/2013 – Continues annually</b></p> <p><b>Activity#4: Completed 9/30/2017 – Barrier analysis continues</b></p> <p><b>Activity #5: Completed 9/30/2016</b></p> <p><b>Activity #6</b> The ADR brochure is scheduled to be completed in FY 2019.</p> <p><b>Activity #7</b> During FY 2018, CMAS issued or administratively closed 940 final agency actions, including 417 merit FADs. The EEOC Regulations, at 29 C.F.R. Part 1614, require merit FADs to be issued within 60 days of election of, or failure to elect a FAD. Upon completion of the investigation in a mixed case complaint, a final decision will be issued within 45 days without a hearing. DHS had a performance measure goal to issue 40 percent of merit FADs by the regulatory due date. During FY 2018, CMAS issued or administratively closed 940 final agency actions, including 417 merit FADs. Further, CMAS amassed an inventory of pending merit FADs during the year. CMAS used a triage system, striving for efficiency to address its inventory. To further address the growing inventory, CRCL leadership approved funding for contract support to draft merit FADs. The contract approved in late fourth quarter of FY 2017, had a positive impact on the issuance of merit FADs in FY 2018. At the conclusion of FY 2018, CMAS was sufficiently staffed with analysts and support staff.</p>
FY 2017	<p>Updates below include FY 2017 and prior years.</p> <p>Of the seven planned activities, DHS has completed four, and a fifth is awaiting final approval (Alternate Dispute Resolution Brochure to promote the use of alternative resolutions to address workplace disputes and issues).</p> <p>DHS timely submitted both the annual 462 Report and the annual No FEAR Act report.</p> <p>CRCL launched the Report of Investigation (ROI) Feedback Tool. The purpose of the Feedback Tool is to provide objective assessments regarding the quality of the Components' EEO investigations.</p> <p>DHS conducted basic and advanced barrier analysis training for EEO staff across DHS. Both courses were attended by representatives from all Components, and the feedback regarding the course was positive.</p> <p><b>Activity #1</b></p>

	<p>OCHCO will identify qualifying career development programs at DHS and courses that support those programs. Using data from our talent management system(s) to identify personnel who participated in those courses and data from the human resources systems to obtain personnel attributes, DHS will produce a report in compliance with MD-715.</p> <p>DHS achieved full operational capability for its talent management system (referred to as the Performance and Learning Management System, or PALMS) at six of the nine DHS Components, in August 2017. OCHCO exempted FEMA, TSA and USCG from adopting PALMS. Throughout FY 2018 and FY 2019, DHS is seeking follow-on capability to PALMS and will consider MD-715 requirements in the program's acquisition life cycle.</p> <p><b>Activity #2, #3: Completed 9/30/2013 – Continues annually</b> Regarding Activity #3, CRCL launched the ROI Feedback Tool, the purpose of which is to provide objective assessments regarding the quality of the Components' EEO investigations and reports. CRCL shared its methodology for assessing ROI quality with all Components, including providing a training workshop at the Inaugural EEO and Diversity Conference in September 2016. Feedback was provided to Components on a quarterly basis, with the intent that the feedback be used by Components to improve the quality of their ROIs and sufficiency reviews.</p> <p>CRCL led the development and establishment of a Management Directive on the EEO ADR Program, which was issued on December 12, 2016. DHS EEO Council and DHS leadership reviewed documents and every Component was briefed on the program. The ADR Directive ensures that managers and supervisors participate in the mediation process and do so in good faith.</p> <p><b>Activity#4: Completed 9/30/2017 – Barrier analysis continues</b> To implement the EEO Strategic Plan, DHS's EEO Council formed working groups. CRCL DMS led the group tasked with leveraging EEO data DHS-wide to conduct a comprehensive trigger analysis. The trigger analysis included reviewing workforce statistics for each DHS Component and reviewing all Component Parts I and J from FY 2012-2016 MD-715 reports. The report identified all triggers and tabulated triggers across the Components. Triggers common to DHS Components were: 1) less than expected representation of multiple Ethnicity and Race Indicators (ERI) groups and women at higher pay grades, 2) overall lower than expected rate of participation of women, and 3) lower than expected rate of participation of IWD and IWTD. The group observed that Component Parts I and J included the most significant triggers relevant to each Component. The group is exploring with the full DHS EEO Council the efficacy of establishing cross-Component barrier analysis teams to further explore the common triggers.</p> <p>CRCL conducted a DHS-wide study on women in law enforcement. The report on the study identified perceived barriers to EEO and diversity; provided recommendations and strategies to achieve a model workplace;</p>
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	<p>and highlighted best practices from within DHS and from other federal law enforcement agencies. Because some of the recommendations related to the Federal Women's Program, implementation has occurred via Special Emphasis Programs at the various Components, particularly during National Women's History Month. These programs highlight some of the challenges that women in law enforcement faced, and how women have managed the challenges.</p> <p>In addition, CRCL DMS, in coordination with the DHS EEO Council Strategic Plan Working Group on Department-wide Special Emphasis Program management, conducted Basic and Advanced barrier analysis training for DHS EEO professionals with MD-715 and data management responsibilities.</p> <p><b>Activity #5: Completed 9/30/2016</b></p> <p>DMS completed the EEOC MD-715 FY 2016 Agency Self-Assessment Checklist, which identified areas requiring improvement to achieve a Model EEO Program. DMS held quarterly Component meetings that included reviews and discussions of the MD-715 Model EEO program report; Special Emphasis Programs; Disability Employment Program; statistical reports; and emerging guidance, regulations, and program requirements.</p> <p>Additionally, in September 2016, CRCL convened nearly 280 DHS EEO and Diversity professionals from across the country at the DHS Inaugural EEO and Diversity Training Conference in Washington, D.C. Expert DHS and Federal partner leaders addressed core competencies in the field of EEO and Diversity, via 20 cutting-edge seminars and plenary sessions. EEO and Diversity practitioners from all DHS Components attended workshops on a myriad of topics, including barrier analysis, disability protocols and reasonable accommodation. The EEO and Diversity Training Conference included a track for EEO Counselors and EEO Investigators that allowed them to meet their yearly training requirements.</p> <p>In FY 2016, CRCL partnered with OCHCO Diversity and Inclusion staff and the Office of Human Capital Data Analytics to provide training and guidance to Component level EEO and HR Professionals. The training included the data systems available to support MD-715 reporting requirements specifically DHS's Business Intelligence system powered by AXIS, NFC Insight, and USA Staffing Cognos.</p> <p><b>Activity #6: Revised Completion Date 9/30/2017</b></p> <p>DHS released its EEO ADR Program Directive Number 065-04 on December 12, 2016. The Directive states that full participation by managers and supervisors in ADR is required. A DHS ADR brochure was prepared, is under review, and is expected to be published in FY 2017.</p> <p>CRCL continues to lead the DHS ADR Manager's Council. Each Component, along with the OCHCO, is represented on the Council. The</p>
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	<p>ADR Council oversees the effectiveness of the DHS ADR Shared Neutrals program, establishes certification for mediators on the shared neutrals roster, and provides oversight for the cadre of collateral duty mediators.</p> <p>During FY 2016, the DHS ADR program added 22 mediators to the ADR Shared Neutrals Roster bringing the roster total to 54 collateral duty mediators. Two 90-minute refresher trainings were held via webinar for the mediators on the shared neutrals roster. The DHS ADR Shared Neutrals Program saw a 50 percent increase in the use of the mediators. This increased use of the Shared Neutrals Program resulted in a significant cost savings to the DHS.</p> <p><b>Activity #7</b></p> <p>During FY 2017, CMAS issued or administratively closed 822 final agency actions, including 405 merit FADs. The EEOC Regulations, at 29 C.F.R. Part 1614, requires merit FADs to be issued within 60 days of election of, or failure to elect a FAD. Upon completion of the investigation in a mixed case complaint, a final decision will be issued within 45 days without a hearing. DHS had a performance measure goal to issue 40 percent of merit FADs by the regulatory due date. For reasons directly related to diminished CMAS resources throughout the fiscal year and an increased volume of incoming FAD requests, CRCL did not meet its goal and timely issued 26 percent of merit FADs. Further, CMAS amassed an inventory of pending merit FADs during the year and, as a result, approached the situation strategically, striking a balance between issuing regulatory timely FADs while also not disadvantaging complainants whose cases could not be issued by the regulatory date, either due to late receipt within CRCL or CMAS's temporarily diminished resources. To further address the growing inventory, CRCL leadership approved funding for contract support for the drafting of merit FADs. The contract was approved in late fourth quarter of FY 2017 and is expected to have a positive impact on the issuance of merit FADs in FY 2018. At the conclusion of FY 2017, CMAS was fully resourced with analysts and support staff.</p> <p><b>Component Updates</b></p> <p>Included by reference, per EEOC guidance.</p>
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## MD-715 – Part H.5

### Agency EEO Plan to Attain the Essential Elements of a Model EEO Program

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

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

#### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.	B.4.a.3: To timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [See 29 C.F.R. § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]

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

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
04/01/2020	Ensure sufficient budget and staffing to timely generate and issue final agency decisions in EEO complaints.	09/30/21	09/30/22	

#### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Officer, CRCL	Katherine Culliton-Gonzalez	Yes
Deputy Officer, CRCL, Director EEO and Diversity	Veronica Venture	Yes

#### Planned Activities Toward Completion of Objective

<b>Target Date</b> (mm/dd/yyyy)	<b>Planned Activities</b>	<b>Sufficient Funding &amp; Staffing?</b> (Yes or No)	<b>Modified Date</b> (mm/dd/yyyy)	<b>Completion Date</b> (mm/dd/yyyy)
09/30/2020	Conduct staffing study to identify staffing/budget shortages in the Complaints Management and Adjudication Section (CMAS), which is responsible for issuing all of DHS's final agency decisions.	Yes		9/30/20
12/13/2020	Based on the staffing study, prepare and submit justifications for staffing and related budget increases in CMAS.	Yes	3/31/22	

#### Report of Accomplishments

<b>Fiscal Year</b>	<b>Accomplishments</b>
FY 2021	CMAS submitted requests and justifications for additional staff and was successful in obtaining additional resources. CMAS hired a new CMAS Director, on-boarded one Analyst, and hired two additional analysts (awaiting onboarding) in FY 2021. CMAS also obtained additional contract support that led to significant progress in reducing the backlog from 407 at the beginning of FY 2021 to 178 at the end of FY 2021. DHS is not closing out this Part H at this time and will continue to pursue additional resources.
FY 2020	CRCL partnered with the Program Analysis and Evaluation Office, OCFO, and completed the CRCL staffing model. In addition to activities listed in this Part H, Component staffing models are also in progress. CRCL anticipates having the Component staffing models completed by 6/2021.  CRCL will have an opportunity to request the additional staff indicated as needed by the staffing model by 3/2021.
FY 2019	CRCL formed a partnership with the Program Analysis and Evaluation Office, OCFO, and has initiated a staffing needs study across CRCL, which includes CMAS. The results of the staffing study are expected to be received by CRCL by the end of FY 2020.

## Part I: Agency EEO Plan to Eliminate Identified Barrier

Part I.1 was closed in FY 2017. Part I.2, which addresses participation rates for IWD/IWTD, was closed per EEOC guidance that IWD/IWTD triggers and barriers are to only be addressed in Part J of MD-715 2.0. Part I.3 retains the I.3 identifier for consistency with prior year reporting.

### Part I.3

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

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

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

Source of the Trigger	Specific Workforce Data Table	Narrative Description of Trigger
Workforce data tables	Table A1	<p>The non-retirement separation rate is high and disproportionately affects certain groups, most notably White women. The high separation rate also erodes efforts to create a workforce reflective of the Nation and to maintain target staffing levels.</p> <p>Statistical data on separation rates was reviewed and analyzed.</p>

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

EEO Group
All Men
All Women
Hispanic or Latino Males
Hispanic or Latina Females – Yes, trending up
White Males
White Females – Yes, trending down
Black or African American Males – Yes, trending up
Black or African American Females – Yes, no trend
Asian Males
Asian Females
Native Hawaiian or Other Pacific Islander Males – Yes, trending up

<b>EEO Group</b>
Native Hawaiian or Other Pacific Islander Females – Yes, no trend
American Indian or Alaska Native Males
American Indian or Alaska Native Females
Two or More Races Males
Two or More Races Females – Yes, trending down

## Barrier Analysis Process

<b>Sources of Data</b>	<b>Source Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	Tables AB 1 – 14
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	FEVS multiple years
Exit Interview Data	Yes	DHS exit survey FY 2014 – FY 2021 data
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	No	

## Status of Barrier Analysis Process

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

## Statement of Identified Barrier(s)

Description of Policy, Procedure, or Practice
DHS has identified supervision/management, lack of advancement opportunities, personal/family related reasons, insufficient work/life programs, and lack of alternate work schedules as causes of higher-than-expected non-retirement separations. Low OPM Employee Viewpoint Survey ratings and exit survey data are the primary sources for barrier identification.

## Objective(s) and Dates for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Investigate and identify specific opportunities to improve supervision/management, advancement opportunities, organizational response to personal/family related reasons, work/life programs, and alternate work schedules any trends in resignations and reduce the overall rates by improving employee satisfaction.	10/01/2011	9/30/2019	Yes	9/30/2022	

## Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Deputy Officer & Director of Equal Employment Opportunity and Diversity	Veronica Venture	Yes
Director, Diversity Management Section (DMS), CRCL	Elaine McKinney	Yes
OCHCO	Angela Bailey	Yes
DHS Components	Component EEO Directors (see Component reports for current EEO Directors)	Yes

## Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
3/31/2011	1. Develop and Implement Exit Survey. (DHS Workforce Strategy Objectives 3.1 and 3.5: Use employee feedback to influence workplace policies and practices to improve employee satisfaction; Enhance employee recognition and work-life balance initiatives to improve employee satisfaction and retention.)  1.a. OCHCO will implement exit survey DHS-wide.		3/31/2011
6/30/2011	1.b. OCHCO will conduct preliminary review of results and continue in future years.		9/30/2012
12/30/2011	1.c. OCHCO will conduct first major review of results and continue in future years.		9/30/2012
3/31/2012	1.d. OCHCO will update or augment methods as needed and continue in future years.		3/31/2012
6/30/2012	1.e. OCHCO and CRCL will identify retention interventions and continue in future years.		6/30/2012
12/30/2012	1.f. OCHCO and CRCL will implement these interventions and continue in future years <ul style="list-style-type: none"> <li>• Track interventions through this plan quarterly</li> <li>• Evaluate as yearly data become available</li> <li>• Make any needed corrections</li> <li>• Conduct-in-depth analysis every second year</li> </ul>		12/30/2012
9/30/2013	2. Use Employee Viewpoint survey to identify changes needed to improve employee satisfaction.  2.a. CRCL will provide annual Federal Employee Viewpoint Survey (FEVS) results (and new yearly survey results as they become available) to DHS Components within two months of FEVS results publication annually.	9/30/2022	
9/30/2013	2.b. OCHCO, CRCL and Components will work jointly to develop DHS Component Employment Engagement Action Plans.	9/30/2022	9/30/2013
6/30/2011	3. Review promotion data.		6/30/2011

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
	3.a. CRCL will determine if there are areas or occupations with triggers in promotions annually.		
9/30/2011	3.b. CRCL will determine if these correlate with higher resignation rates annually.		9/30/2011
3/30/2013	3.c. If yes, CRCL will work with OCHCO to identify interventions <ul style="list-style-type: none"> <li>• Track interventions through this plan</li> <li>• Evaluate as yearly data become available</li> <li>• Make any needed corrections</li> </ul>		3/30/2013
9/30/2013	4. Annually, DHS Components will promote participation in their career development programs, academic programs, and learning training programs sponsored by their agency and/or government agencies. In addition, as appropriate, Components will have access to training/career development programs courses through: <ul style="list-style-type: none"> <li>• Performance and Learning Management System (PALMS)</li> <li>• Online Courses</li> <li>• Online Books</li> <li>• (CBP) Leadership Institute</li> <li>• (USCIS) Training Academy</li> <li>• (ICE) Virtual University</li> <li>• (FEMA) Employment Development Division</li> <li>• (FLETC) Learning Management System</li> <li>• (TSA) Online Learning Center</li> <li>• DHS CRCL Institute</li> <li>• Naval Post Graduate School</li> </ul>		9/30/2013
9/30/2013	5. Annually, DHS will continue to promote/advertise DHS-wide the Senior Executive Service Candidate Development and Fellows Program.		9/30/2013
9/30/2013	6. Annually, DHS Components will use their agency's Mentoring Program, if applicable, as another career development tool.		9/30/2013
3/31/2011	7. Annually, DHS Components will assess occupations and grade levels where there is substantial underrepresentation to identify skills, knowledge, and abilities by occupation; employees' training needs; and applicable career development programs.		3/31/2011



## Report of Accomplishments

Fiscal Year	Accomplishments
FY2021	<p><b>Activity #1</b>  The DHS Exit Survey is in the SurveyMonkey tool. Currently TSA, CBP, ICE, USSS, CISA, and USCIS continue to maintain their own exit surveys and the other DHS Components continue to administer the DHS Exit Survey. Datasets are combined to look at overall trends.</p> <p>Aside from retirement, the top reasons separating non-SES employees listed for leaving DHS in FY 2021 were:</p> <ul style="list-style-type: none"> <li>• Supervisor/Management</li> <li>• Personal/Family-Related</li> <li>• End of Temporary Position/Internship</li> </ul> <p>OCHCO is working with all Components to improve survey participation and content. Effective FY 2022, all component POCs will meet quarterly via the Exit Survey Working Group to discuss challenges, updates, and share best practices.</p> <p><b>Activity#2</b>  The 2020 FEVS results were provided to all DHS Components in January 2021. Overall DHS scores improved, with the Employee Engagement Index increasing three percentage points to 66%.</p> <p>In March 2021, OCHCO issued written guidance for the DHS Component employee engagement action planning process that included mechanisms for OCHCO to monitor Component implementation of the OPM action planning cycle. OCHCO met with Component staff to discuss and assess the plans, and final signed plans are due by the end of November 2021.</p> <p><b>Activity #3</b>  Part E covers the FY 2020 trigger analysis and information on Activity #3 b and c actions.</p> <p><b>Activity #4</b>  The Department continues to offer various ways for employees to further their education goals. In FY 2021, 27 employees participated in the Department of Defense Senior Service School master's degree program. Eleven employees attended the National Intelligence University in either a bachelor's or master's degree program. DHS also nominates employees to attend the Center for Homeland Defense and Security Masters, Emergence, and Executive Leaders Programs. DHS promotes the use of OPM's Federal Academic Alliance programs where employees can take advantage of various discounts from more than 15 different colleges/universities.</p> <p>DHS employees have, or will have, access to training/career development courses by means such as:</p>

	<ul style="list-style-type: none"> <li>• DHS's Senior Executive Service Candidate Development Program (SES CDP) advertised both internally and externally to DHS;</li> <li>• DHS, in partnership with SkillSoft, offers nearly 40,000 online learning resources which can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills. These resources are aligned to support competencies, job roles or blended learning offerings; and</li> <li>• The DHS Leader Development Program, which establishes required and optional development activities throughout the year for new and seasoned leaders at all levels across DHS.</li> </ul> <p><b>Activity #5</b> Advertising for the SES CDP occurs via email, the DHS website, and other avenues of communication. DHS will continue its outreach efforts to help ensure a diverse applicant pool for this program. In addition, DHS is developing an SES Outreach Plan that will outline strategies to increase diversity in the SES cadre. In FY 2021 and beyond, DHS advertised and will continue to advertise for the SES CDP through its Employee Associations as well as the Strategic Recruitment, Diversity and Inclusion Council.</p> <p><b>Activity #6</b> The DHS Mentoring Program is a formal program that provides enriching experiences through reciprocal relationships and opportunities for personal and professional growth while sharing knowledge, leveraging skills, and cultivating talent. The DHS Mentoring Program is open to all DHS federal employees. The Under Secretary for Management announces the launch of this flagship mentoring opportunity, and training is provided to mentors. Types of mentoring include: Speed Mentoring, Flash Mentoring, Situational Mentoring, Reverse Mentoring, Group Mentoring, and Peer Mentoring. The program is evaluated, and feedback is provided on its successes, along with areas requiring improvement.</p> <p>In FY 2021, the DHS Mentoring Program consisted of 388 mentors and mentees providing demographic information as follows:</p> <p><b>Gender Indicator (Mentors/Mentees)</b></p> <ul style="list-style-type: none"> <li>• Men = 408 (52.8%)</li> <li>• Women = 343 (44.4%)</li> <li>• Not identified = 21 (2.7%)</li> </ul> <p><b>Ethnicity/Race Indicators (Mentors/Mentees)</b></p> <ul style="list-style-type: none"> <li>• White = 441 (57.1%)</li> <li>• Black or African American = 140 (18.1%)</li> <li>• Asian = 56 (7.2%)</li> <li>• Hispanic or Latino = 98 (12.6%)</li> <li>• Native Hawaiian or Other Pacific Islander = 3 (0.3%)</li> <li>• American Indian or Alaska Native = 10 (1.2%)</li> <li>• Two or More = 3 (0.3%)</li> <li>• Not identified = 22 (2.7%)</li> </ul>
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	<p><b>Disability Indicators (Mentors/Mentees)</b></p> <ul style="list-style-type: none"> <li>• Do not self-identify as having a disability = 665 (86.1%)</li> <li>• Self-identified as IWD = 66 (8.5%)</li> <li>• Self-identified as IWTB = 20 (2.5%)</li> <li>• Not identified = 21 (2.7%)</li> </ul>
FY2020	<p><b>Activity #1</b></p> <p>The DHS Exit Survey transitioned to SurveyMonkey in April 2020. Currently TSA, CBP, ICE, USSS, CISA, and USCIS all maintain their own exit surveys and the other DHS Components continue to administer the DHS Exit Survey. Datasets are combined to look at overall trends. OCHCO is working with all Components to improve survey participation and content.</p> <p>Aside from retirement, the top reasons separating non-SES employees listed for leaving DHS were:</p> <ul style="list-style-type: none"> <li>• Advancement Opportunities.</li> <li>• Management/Supervisor</li> <li>• Personal/Work-Life</li> </ul> <p><b>Activity #2</b></p> <p>The Office of Personnel Management delayed the 2020 FEVS due to the COVID-19 pandemic. Data was not available to DHS in time for this report.</p> <p>In FY 2020, DHS OCHCO met with each of the Components to review their DHS Component Engagement Action Plans and make recommendations for improvement; those plans were then finalized, signed by Component leadership, and sent forward. OCHCO has provided virtual updates to the EESC given the demands of the pandemic response, rather than continuing quarterly meetings, but we hope to begin meeting again in the new FY. In terms of the overall approach, we are in the process of finalizing written action planning guidance and subsequent training, both of which will launch in this FY.</p> <p><b>Activity #3</b></p> <p>Part E covers the FY 2020 trigger analysis and information on Activity #3 b and c actions.</p> <p><b>Activity #4</b></p> <p>The Department continues to offer various ways for employees to further their education goals. In FY 2020, 21 employees participated in the Department of Defense Senior Service School Master's Degree program. DHS also nominates employees to attend the Center for Homeland Defense and Security Masters and Executive Leaders Programs. DHS promotes the use of OPM's Federal Academic Alliance programs where employees can take advantage of various discounts from more than 15 different colleges/universities.</p> <p>DHS employees have, or will have, access to training/career development courses by means such as:</p> <ul style="list-style-type: none"> <li>• DHS's Senior Executive Service Candidate Development Program (SES CDP) advertised both internally and externally to DHS;</li> </ul>

	<ul style="list-style-type: none"> <li>• DHS, in partnership with SkillSoft, offers nearly 40,000 online learning resources which can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills. These resources are aligned to support competencies, job roles or blended learning offerings; and</li> </ul> <p>The DHS Leader Development Program, which establishes required and optional development activities throughout the year for new and seasoned leaders at all levels across DHS.</p> <p><b>Activity #5</b></p> <p>Advertising for the SES CDP occurs via email, the DHS website, and other avenues of communication. DHS will continue its outreach efforts to help ensure a diverse applicant pool for this program. In addition, DHS is developing an SES Outreach Plan that will outline strategies to increase diversity in the SES cadre. In FY 2021 and beyond, DHS will also advertise for the SES CDP through its Employee Associations as well as the Strategic Recruitment, Diversity and Inclusion Council.</p> <p><b>Activity #6</b></p> <p>The DHS Mentoring Program is a formal program that provides enriching experiences through reciprocal relationships and opportunities for personal and professional growth while sharing knowledge, leveraging skills, and cultivating talent. The DHS Mentoring Program is open to all DHS federal employees. The Under Secretary for Management announces the launch of this flagship mentoring opportunity, and training is provided to mentors. Types of mentoring include: Speed Mentoring, Flash Mentoring, Situational Mentoring, Reverse Mentoring, Group Mentoring, and Peer Mentoring. The program is evaluated, and feedback is provided on its successes, along with areas requiring improvement.</p> <p>In FY 2020, the DHS Mentoring Program consisted of 479 mentees; with 431 mentees providing demographic information as follows:</p> <p>Gender Indicator (Mentors/Mentees)</p> <ul style="list-style-type: none"> <li>• Men = 226 (52.4%)</li> <li>• Women = 203 (47.0%)</li> <li>• Missing = 2 (0.6%)</li> </ul> <p>Ethnicity/Race Indicators (Mentors/Mentees)</p> <ul style="list-style-type: none"> <li>• White = 241 (55.9%)</li> <li>• Black or African American = 91 (21.2%)</li> <li>• Asian = 23 (5.3%)</li> <li>• Hispanic or Latino = 49 (11.3%)</li> <li>• Native Hawaiian or Other Pacific Islander = 1 (0.2%)</li> <li>• American Indian or Alaska Native = 7 (1.7%)</li> <li>• Two or More = 3 (0.6%)</li> <li>• Missing = 16 (3.7%)</li> </ul> <p>Disability Indicators (Mentors/Mentees)</p> <ul style="list-style-type: none"> <li>• Do not self-identify as having a disability= 378 (87.8%)</li> <li>• Self-identified as IWD = 27 (6.2%)</li> <li>• Self-identified as IWTD = 10 (2.3%)</li> <li>• Missing = 16 (3.7%)</li> </ul>
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FY 2019	<p><b>Activity #1</b>  The Department Exit Survey program is going through a transition period. Content and administration changes are under consideration. Currently, TSA, CBP, ICE, and USSS all maintain their own exit surveys. CBP made the transition at the beginning of FY 2019. ICE deployed their survey on October 15, 2019. These Components share their results with the Department. Aside from retirement, the top reasons separating non-SES employees listed for leaving DHS were:</p> <ul style="list-style-type: none"> <li>• Personal/Work-Life</li> <li>• Management/Supervisor</li> <li>• Advancement Opportunities.</li> </ul> <p>Results are based on completed exit surveys. USSS, CBP and TSA results are included in the results above.</p> <p><b>Activity #2</b></p> <ul style="list-style-type: none"> <li>• The 2019 FEVS results were overall positive, with the Employee Engagement Index increasing by two percentage points, the New IQ increasing by one percentage point, and Global Satisfaction staying steady. DHS performed preliminary data analysis and shared the results with leadership and Components, along with the data analysis provided by the Office of Personnel Management (OPM). DHS is working with the Employee Engagement Steering Committee to develop Employee Engagement Action Plans that target Component and sub-Component issues.</li> </ul> <p><b>Activity #3</b>  Part E covers the FY 2019 trigger analysis and information on Activity #3 b and c actions.</p> <p><b>Activity #4</b>  The Department continues to offer various ways for employees to further their education goals. In FY 2019, 28 employees participated in the Department of Defense Senior Service School master's degree programs. DHS also nominates employees to attend the Center for Homeland Defense and Security Masters and Executive Leaders Programs. DHS promotes the use of OPM's Federal Academic Alliance programs where employees can take advantage of various discounts from more than 15 different colleges/universities. DHS employees have, or will have, access to training/career development courses by a variety of means:</p> <ul style="list-style-type: none"> <li>• DHS's Senior Executive Service Candidate Development Program (SES CDP), advertised both internally and externally to DHS;</li> <li>• DHS, in partnership with SkillSoft, offers nearly 40,000 online learning resources which can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills. These resources are aligned to support competencies, job roles or blended learning offerings.</li> <li>• The DHS Leader Development Program, which establishes required and optional development activities throughout the year for new and seasoned leaders at all levels across DHS.</li> </ul> <p><b>Activity #5</b></p>

	<p>Advertising for the SES CDP occurs via email, the DHS website, and other avenues of communication. DHS will continue its outreach efforts to help ensure a diverse applicant pool for this program. In addition, DHS is developing an SES Outreach Plan that will outline strategies to increase diversity in the SES cadre. In FY 2020 and beyond, DHS will also advertise for the SES CDP through its Employee Associations as well as the Strategic Recruitment, Diversity and Inclusion Council.</p> <p><b>Activity #6</b></p> <p>The DHS Mentoring Program is a formal program that provides enriching experiences through reciprocal relationships and opportunities for personal and professional growth while sharing knowledge, leveraging skills, and cultivating talent. The DHS Mentoring Program is open to all DHS federal employees. The Under Secretary for Management announces mentoring opportunities and training is provided to mentors. Types of mentoring include: Speed Mentoring, Flash Mentoring, Situational Mentoring, Reverse Mentoring, Group Mentoring, and Peer Mentoring. The program is evaluated, and feedback is provided on its successes, along with areas requiring improvement. In FY 2019, the DHS Mentoring programs consisted of 479 mentees.</p> <p>Total = 479</p> <p>Gender Indicator (Mentors/Mentees)</p> <ul style="list-style-type: none"> <li>• Men = 254 (53.1 percent)</li> <li>• Women = 225 (46.9 percent)</li> </ul> <p>Ethnicity/Race Indicators (Mentors/Mentees)</p> <ul style="list-style-type: none"> <li>• White = 276 (57.6 percent)</li> <li>• Black or African American = 107 (22.3 percent)</li> <li>• Asian = 31 (6.4 percent)</li> <li>• Hispanic or Latino = 50 (10.4 percent)</li> <li>• Native Hawaiian or Other Pacific Islander = 2 (0.4 percent)</li> <li>• American Indian or Alaska Native = 7 (1.4 percent)</li> <li>• Two or More = 5 (1.7 percent)</li> <li>• Missing = 1 (0.2 percent)</li> </ul> <p>Disability Indicators (Mentors/Mentees)</p> <ul style="list-style-type: none"> <li>• Do not self-identify having a disability= 412 (86.0 percent)</li> <li>• Self-identified as IWD = 35 (7.3 percent)</li> <li>• Self-identified as IWTD = 13 (2.7 percent)</li> <li>• Missing = 19 (3.9 percent)</li> </ul> <p><b>Activity #7</b></p> <p>Participant/Selectee Highlights from the DHS SES CDP Cohort I - VIII Analysis:</p> <ul style="list-style-type: none"> <li>• For Black/African American participation, the trend is consistently fluctuating in every other year from Cohort I to Cohort VII; Asian American participation has similar results.</li> <li>• Representation of White Females dropped significantly from Cohort III (25.5 percent) to 8.2 percent in Cohort IV, then back to an</li> </ul>
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	<p>upward trend for the remaining Cohorts, ending in 34.5 percent in Cohort VII.</p> <ul style="list-style-type: none"> <li>• Other ERI groups reflect nominal participation rates.</li> </ul> <p>Note that DHS is developing a SES Diversity Plan to address issues of underrepresentation in the SES cadres. The plan will be released in FY 2019.</p>
FY 2018	<p><b>Activity #1</b></p> <p>In FY 2018, DHS continued its use of the DHS-wide web-based Exit Survey. Aside from retirement, the top reasons separating non-SES employees listed for leaving DHS were:</p> <ul style="list-style-type: none"> <li>• Personal or family related</li> <li>• Supervisor</li> <li>• Advancement opportunities</li> </ul> <p>Results are based on completed exit surveys. USSS and TSA do not participate in the DHS-wide survey.</p> <p><b>Activity #2</b></p> <p>The 2018 FEVS results were overall positive, with the Employee Engagement Index holding steady, and the Global Satisfaction and New IQ Indices increasing by one percentage point. DHS performed preliminary data analysis and shared the results with leadership and Components, along with the data analysis provided by the Office of Personnel Management (OPM). DHS worked intensively with the Employee Engagement Steering Committee (EESC) to develop Employee Engagement Action Plans that target Component and sub-Component issues.</p> <p>As a result of the preliminary data analysis and information gathered through listening tours, DHS leadership over the course of FY 2019 will:</p> <ul style="list-style-type: none"> <li>• Host an all-Executives forum, in conjunction with the Secretary's Awards Ceremony to convey information to SES personnel on themes related to FEVS such as ethics and inclusive diversity.</li> <li>• Work with the major operational Components on implementing the engagement elements of the President's Management Agenda, including identifying and working intensively with the lowest 20 percent performing organizations to increase their employee engagement and morale.</li> <li>• Continue EESC focus on the effective execution of engagement action plans.</li> </ul> <p><b>Activity #3</b></p> <p>Part E covers the FY 2018 trigger analysis and information on Activity #3 b and c actions.</p> <p><b>Activity #4</b></p> <p>The Department continues to offer various ways for employees to further their education goals. In FY 2018, 31 employees participated in the Department of Defense Senior Service School master's degree programs. DHS also nominates employees to attend the Center for Homeland Defense and Security (CHDS) Masters and Executive Leaders Programs.</p>

	<p>DHS promotes the use of the OPM's Federal Academic Alliance programs where employees can take advantage of various discounts from more than 15 different colleges/universities.</p> <p>DHS employees have, or will have, access to training/career development courses by a variety of means:</p> <ul style="list-style-type: none"> <li>• DHS's Senior Executive Service Candidate Development Program (SES CDP), advertised both internally and externally to DHS;</li> <li>• DHS, in partnership with SkillSoft, offers nearly 40,000 online learning resources which can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills. These resources are aligned to support competencies, job roles or blended learning offerings.</li> <li>• The DHS Leader Development Program, which establishes required and optional development activities throughout the year for new and seasoned leaders at all levels across DHS.</li> </ul> <p><b>Activity #5</b></p> <p>Advertising for the SES CDP occurs via email, the DHS website, and other avenues of communication. DHS will continue its outreach efforts to help ensure a diverse applicant pool for this program. In addition, DHS is developing an SES Outreach Plan which will outline strategies to increase diversity in the SES cadre. In FY 2019 and beyond, DHS will also advertise for the SES CDP through its Employee Associations as well as the Strategic Recruitment, Diversity and Inclusion Council.</p> <p><b>Activity #6</b></p> <p>The DHS Mentoring Program is a formal program that provides enriching experiences through reciprocal relationships and opportunities for personal and professional growth while sharing knowledge, leveraging skills, and cultivating talent. The DHS Mentoring Program is open to all DHS federal employees. The Undersecretary for Management announces mentoring opportunities and training is provided to mentors. Types of mentoring include: Speed Mentoring, Flash Mentoring, Situational Mentoring, Reverse Mentoring, Group Mentoring, and Peer Mentoring. The program is evaluated, and feedback is provided on its successes, along with areas requiring improvement. The Mentoring Connection contract has been extended through March 31, 2019. In FY 2018, the DHS Mentoring programs coordinated 272 mentoring/mentee partnerships.</p> <p>492 Mentors/Mentees Total</p> <ul style="list-style-type: none"> <li>• 272 Mentees</li> <li>• 220 Mentors</li> </ul> <p>Gender Indicator (Mentors/Mentees)</p> <ul style="list-style-type: none"> <li>• Men = 54 percent</li> <li>• Women = 46 percent</li> </ul> <p>Ethnicity/Race Indicators</p> <ul style="list-style-type: none"> <li>• White = 61 percent</li> <li>• Black or African American = 18 percent</li> <li>• Asian = 3 percent</li> <li>• Hispanic or Latino = 12 percent</li> <li>• Native Hawaiian or Other Pacific Islander = 0.4 percent</li> </ul>
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	<ul style="list-style-type: none"> <li>American Indian or Alaska Native = 0.4 percent</li> <li>Two or More = 3 percent</li> <li>Unspecified = 2 percent</li> </ul> <p>The application period for the FY 2019 Mentoring Program commenced in October 2018 and closed on November 9, 2018.</p> <p><b>Activity #7</b> Participant/Selectee Highlights from the DHS SES CDP Cohort I - VII Analysis:</p> <ul style="list-style-type: none"> <li>For Black/African American participation, the trend is consistently fluctuating in every other year from Cohort I to Cohort VII; Asian American participation has similar results.</li> <li>Representation of White Females dropped significantly from Cohort III (25.5 percent) to 8.2 percent in Cohort IV, then back to an upward trend for the remaining Cohorts, ending in 34.5 percent in Cohort VII.</li> <li>Other ERI groups reflect nominal participation rates.</li> <li>Note that DHS is developing a SES Diversity Plan to address issues of underrepresentation in the SES cadres. The plan will be released in FY 2019.</li> </ul>
FY 2017	<p>Updates below include FY 2017 and prior years.</p> <p><b>Activity #1</b> DHS continued its usage of the DHS-wide web-based Exit Survey. The top reasons that separating non-SES employees (excluding those who were retiring) listed for leaving DHS, were the same as reasons given in prior years:</p> <ul style="list-style-type: none"> <li>Lack of advancement opportunities,</li> <li>Problems with supervisor/management, and</li> <li>Family related/personal reasons.</li> </ul> <p>Results are based on completed exit surveys. USSS and TSA do not participate in the DHS-wide survey.</p> <p><b>Activity #2</b> In FY 2015, OCHCO, with input from the EESC, developed an Employee Engagement Action Plan (Plan) for DHS. The major focus areas of the Plan are: (1) selecting and empowering high performing leaders; (2) developing excellent leaders at all levels; and (3) enhancing two-way communication and inclusion, utilizing labor management forums, diversity and inclusion councils, and ideation platforms. DHS Components developed their individual action plans. Components shared data and action plans, with CRCL. In FY 2016, OCHCO, in partnership with EESC, focused on two key areas: communication and leadership. In FY 2017, the EESC continued its monthly meetings, chaired by the Under Secretary for Management. Through the EESC, DHS recognized, and rewarded excellence, enhanced communication, and increased leadership accountability, awareness, and empowerment related to employee engagement. Results from the 2017 Federal Employee Viewpoint Survey indicated that DHS has made significant progress and has shown notable</p>

	<p>improvement in Employee Engagement. Of all Cabinet-level agencies, DHS showed the largest improvement.</p> <p><b>Activity #3</b> Part E covers the FY 2017 trigger analysis and information on Activity #3 b and c actions.</p> <p><b>Activity #4</b> In FY 2015, DHS established the Office of Academic Engagement to leverage relationships with the academic community and the Homeland Security Academic Advisory Council, which provides advice and recommendations to the Secretary and senior leadership relating to student and recent graduate recruitment; international students; academic research; campus and community resiliency, security, and preparedness; and faculty exchanges.</p> <p>DHS Components continued to promote participation in their career development programs, academic programs, and learning training programs sponsored by their organization and/or other government agencies. In addition, DHS employees have, or will have, access to training/career development courses by a variety of means:</p> <ul style="list-style-type: none"> <li>• DHS's Senior Executive Service Candidate Development Program, advertised both internally and externally to DHS;</li> <li>• DHS, in partnership with SkillSoft, offers almost 20,000 online learning resources. These online resources can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills. These resources are subject to mapping to support competencies, job roles or blended learning offerings.</li> <li>• The leadership Development Channel, which is a resource that includes videos with the most current ideas, information, and know-how on business and leadership topics to address the informal learning needs of an organization.</li> <li>• Eight of the nine DHS Components have formal career development programs.</li> </ul> <p><b>Activity #5</b> Advertising for Senior Executive Service Candidate Development Program occurs via email, the DHS website, and other avenues of communication. OCHCO Diversity and Inclusion will continue its outreach efforts to help ensure a diverse applicant pool for this program. The DHS Fellows Program has not been funded since FY 2014.</p> <p><b>Activity #6</b> Completed in FY 2013. Components continue to use their agency mentoring programs, as appropriate.</p> <p><b>Activity #7</b> Department-Level Actions: In FY 2017, DHS updated the Applicant Flow Data (AFD) Analysis Framework. This framework is important because it helps identify and address potential recruitment and outreach barriers. This framework continues to cover the following areas- how AFD works (Data Source,</p>
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	<p>Demographic Questions, DHS AFD System), Guidelines (User Access and Roles and Responsibilities), Reports, and Resources.</p> <p>Example of FY 2017 Applicant Flow Data Highlights</p> <p>Senior Executive Career Development Program (SES CDP) Cohort VI:</p> <ul style="list-style-type: none"> <li>• 558 applicants applied for this cohort;</li> <li>• 417 (75 percent) applicants were found minimally qualified;</li> <li>• 147 applicants (26 percent) were selected for Structured Telephone Interviews;</li> <li>• 115 (21 percent) applicants were referred to hiring managers for selection; and</li> <li>• 51 (nine percent) applicants were selected and ratified by the Executive Review Board (including three alternates), and 50 participated/are participating in the cohort (one selectee declined participation).</li> </ul> <p>The DHS AFD analysis included a breakdown of each part of the selection process by race, ethnicity, and gender to identify potential barriers.</p> <p>Applicant Flow Data Analysis:</p> <p>DHS received 69.6 percent (387 of 556) of the flow data records an increase from Cohort V (FY 2016); 381 (68.5 percent of the 556) applicant records included Race and/or Ethnicity data; and Black or African American participation rates are relatively constant until the AFD Referred stage, and participation rates for Hispanic or Latino decreased at the AFD Selected stage.</p> <p>Participant Applicant Flow Data (AFD) Analysis:</p> <ul style="list-style-type: none"> <li>• Black or African American participation rates increased since Cohort I, from 14 percent to 18 percent;</li> <li>• Women's participation rates increased from Cohort V to Cohort VI, from 23 percent to 34 percent;</li> <li>• Black Women's participation rates increased from four percent to 12 percent,</li> <li>• White Women's participation rates increased from 11 percent to 16 percent,</li> <li>• Latina Women's participation rates remained constant, and</li> <li>• African American men's participation rates have increased from Cohort V to Cohort VI, from four percent to six percent, respectively.</li> </ul> <p>In FY 2018, the DHS will:</p> <ul style="list-style-type: none"> <li>• Continue to foster partnerships with OPM and Monster Government Solutions;</li> <li>• Continue to inform DHS stakeholders on AFD capabilities, resources, roles, and responsibilities, etc.; and</li> <li>• Crosswalk the AFD systems (Monster Government Solutions and USA Staffing).</li> </ul>
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## Part J: Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plans for persons with disabilities (PWD<sup>14</sup>) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and EEOC MD-715 require agencies to describe how their plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

### Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 C.F.R. § 1614.203(d) (7)) require agencies to establish specific numerical goals for increasing the participation of persons with reportable and targeted disabilities in the Federal government.

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

- |                                |     |      |
|--------------------------------|-----|------|
| a. Cluster GS-1 to GS-10 (PWD) | Yes | No X |
| b. Cluster GS-11 to SES (PWD)  | Yes | No X |

Based on the FY 2021 MD-715 B4-1 Participation Rates for General Schedule (GS) Grades by Disability (Permanent) data table, DHS is exceeding the 12 percent regulatory onboard goal in both grade level clusters.

- |                                |         |
|--------------------------------|---------|
| a. Cluster GS-1 to GS-10 (PWD) | 24.57 % |
| b. Cluster GS-11 to SES (PWD)  | 16.29 % |

When compared to the FY 2020 onboard representation of 9.37 percent in the GS-1 to GS-10 grade cluster and 13.08 percent in the GS-11 to SES grade cluster, the significant increases for FY 2021 are primarily attributed to including the Veterans who were hired using appointment authorities that take disability into consideration.

Consistent with OPM and EEOC, DHS expanded the DHS disability workforce to include employees who self-report as having a disability, employees with Veterans Preference codes, 03, 04, and 06, and employees who were hired under the Schedule A authority, who do not otherwise self-report as having a disability.

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

- |                                 |       |      |
|---------------------------------|-------|------|
| a. Cluster GS-1 to GS-10 (PWTD) | Yes   | No X |
| b. Cluster GS-11 to SES (PWTD)  | Yes X | No   |

<sup>14</sup> In this report, persons with disabilities (PWD) and individuals with disabilities (IWD) are used interchangeably. Persons with targeted disabilities (PWTD) and individuals with targeted disabilities (IWTD) are also used interchangeably. Individuals without disabilities (IWOD) are also referenced in this section.

Based on the FY 2021 MD-715 B4-1 Participation Rates for General Schedule (GS) Grades by Disability (Permanent) data table, DHS no longer has a trigger in the GS-1 to GS 10 grade cluster but continues to have a trigger in the GS-11 to SES cluster.

- a. Cluster GS-1 to GS-10 (PWTB) 2.94 %
- b. Cluster GS-11 to SES (PWTB) 1.27 %

In FY 2021, the percentage for PWTBs more than doubled with 2.94 percent, compared to 1.24 percent reported in FY 2020, in the GS-1 to GS-10 grade cluster. Participation in the GS -11 to SES remained static, with only a slight increase from 1.26 percent in FY 2020 to 1.27 percent in FY 2021.

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

Numerical hiring goals are established for individuals with disabilities, targeted disabilities, and Schedule A hires, which are formally announced on an annual basis from the DHS OCHCO to all DHS Components via the Human Capital Leadership Council (HCLC). The HCLC is comprised of the senior human capital officials in OCHCO, the DHS Components, and other lines of business. These goals are further communicated to the Components' EEO and Diversity officials and staff, to be socialized and implemented throughout the Components via human resources, EEO, and Diversity practitioners, and hiring officials.

During FY 2021, DHS continued to maintain a 12 percent hiring goal for Individuals with Disabilities at all grade levels; a two percent hiring goal for Individuals with Targeted Disabilities at all grade levels, excluding Law Enforcement and Transportation Security Officer occupations; and a two percent hiring goal for Schedule A hires, also excluding law enforcement and transportation security officer occupations.

In FY 2021, DHS exceeded the 12 percent goal with 15.3 percent of all (permanent/temporary) new hires for PWDs and reached DHS' hiring goal of two percent for PWTBs, when excluding law enforcement and transportation security officer occupations. In addition, Schedule A hires constituted 2.6 percent of all new hires in non-law enforcement related and non-TSO positions, exceeding the DHS goal for three consecutive years.

## Section II: Model Disability Program

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

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

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

Yes **X** No

CRCL's Equal Employment Opportunity and Diversity Division, has a full-time Departmental Disability Employment Program Manager who is responsible for implementing and maturing the DHS Disability Employment Program. Additionally, at the department level, OCHCO's Strategic Recruitment Diversity and Inclusion (SRDI) team has assigned two employees to support disability recruitment, career development, and retention programs across DHS.

All DHS Components have identified sufficient personnel to support the following programs: Selective Placement Program, Disability Employment Program, Reasonable Accommodation Program, Operation Warfighter Program, and Section 508 Program.

Each Component maintains responsibility for servicing its workforce. Total Full Time Equivalent Employees (FTEs) are included in the counts provided in the following table.

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

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD.	100	10	28	Laura Davis, Disability Employment Program Manager, CRCL
Answering questions from the public about hiring authorities that take disability into account	102	10	24	Laura Davis, Disability Employment Program Manager, CRCL
Processing reasonable accommodation requests from applicants and employees	26	3	73	Laura Davis, Disability Employment Program Manager, CRCL; Darlene Avery for HQ requests; all other Component POCs are identified in their Component-level report.
Section 508 Compliance	51		5	Cynthia Clinton-Brown, Executive Director, Office of Accessible Systems and Technology, Office of the Chief Information Officer
Architectural Barriers Act Compliance	23		1	William Bush, Executive Director, Facilities and Operational Support, MGMT/FOS
Special Emphasis Program for PWD and PWTD	12	1	2	Laura Davis, Disability Employment Program Manager, CRCL

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

Yes X No

DHS CRCL/EEOD provided continuous training and guidance to all responsible staff to ensure they have the most up-to-date information and resources to effectively perform the duties of their positions to include:

- Leading quarterly Disability Employment Advisory Council meetings providing ongoing program guidance, updates, and sharing best practices across DHS Components.
- During FY 2021, CRCL provided continuous guidance and training relating to COVID – 19, the vaccination mandate, and procedures for handling religious and medical vaccine exemption requests.

DHS Component disability program staff regularly participate in the Federal Exchange on Employment & Disability (FEED) quarterly meetings. FEED is a federal interagency working group focused on information sharing, best practices, and collaborative partnerships designed to make the Federal government a model employer of people with disabilities.

## **PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM**

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

Yes X No

Upon review of each Component’s response to compliance indicators and associated measures outlined by the EEOC that are directly linked to the disability program in the Agency Self-Assessment, under B.4: “The agency has sufficient budget and staffing to support the success of its EEO program”, only two deficiencies were observed by one DHS Component. USCIS reported deficiencies with the following Measures: B.4.a.4 and B.4.a.8. CRCL will continue to monitor and provide guidance and support to assist Components in addressing reported deficiencies.

In support of this measure, CRCL provides the following resources:

- Accessibility Compliance Management System (ACMS) to manage and track reasonable accommodations.
- Quarterly Schedule A Conversion Eligible reports.
- DHS Fact Sheet on Disability Employment
- DHS Fact Sheet on Schedule A Hiring Authority
- DHS Disability Mentoring Program
- Annual technical assistance reviews with each Component covering MD-715, focusing on Part J
- MD-715 Data Tables and ad hoc data upon request
- Quarterly Disability Employment Advisory Council Meetings
- Quarterly Diversity Management Section and Component Meetings

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

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

#### **A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES**

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

DHS conducts outreach and recruiting led by OCHCO in the following ways:

**SMORE:** The Strategic Marketing, Outreach, and Recruitment Engagement (SMORE) enterprise system was launched for Department-wide use on October 1, 2019. SMORE has simplified the way OCHCO reports and analyzes recruitment activities. Over 23,000 Master Events are recorded in the system, allowing analysis to be performed on current and historical data. The SMORE system is supplemented by two additional SharePoint sites (Recruiters' Portal and Joint Hiring Event Portal) which provide maximum data capture of events across the Department. Within SMORE, there is also an upgraded capability on reporting out on Pathways and Student Programs goals and activities - an enhancement made in FY 2021. SMORE Power BI reports provide live results and complex visualizations with the capability to drill down further into the data. There are three dynamic and complex main dashboards that provide 20 unique dashboards documenting our recruitment and outreach efforts across the Department. Additional dashboards are being designed and developed to the support Pathways and Student Programs additions.

**The DHS Corporate Recruitment Council:** The DHS Corporate Recruitment Council (CRC) brings together key recruiting personnel from across DHS. The Council develops a "Top 25" list annually of recruiting and outreach events that target diverse populations and events; this includes events that are focused on individuals with disabilities. During FY 2021, the CRC focused on collaborating on recruitment strategies for cyber programs. The Secretary's Honors Program for Cyber (SHP-C) recruitment began in FY 2021. The Intelligence and Diversity Fellowship Program recruitment will begin in FY2022. In addition, the CRC reviewed the results of DHS Equity Assessments for "Learning about and Applying for Jobs at DHS" (initially pursuant to Executive Order (E.O.) 13985 and later shifted to E.O. 14035) and discussed potential barriers in the recruitment process and ways to advertise job opportunities to underserved communities, including applicants with disabilities and targeted disabilities.

**DHS Employee Associations:** DHS is committed to creating and maintaining a workplace culture that embraces Inclusive Diversity as a critical business imperative that cultivates a high-performing organization. DHS has Department-wide and Component-level Employee Associations (EA) that are recognized to advance inclusive diversity and improve communication between employees and management across the Department. An EA is an organization comprised of members who have a common set of interests and goals that partner with the agency to achieve mission-related and human capital goals. In FY 2021, the Department distributed the "DHS is Hiring" spread-the-word brochures to EAs to enhance outreach to their members and targeted constituents to bolster awareness and participation in the event. Examples of DHS-wide EAs include the DHS Asian American and Pacific Islander Network, DHS Employee Network, DHS PRIDE, Homeland Security Employee Association, DHS Deaf and Hard of Hearing Association, and the Middle Eastern Law Enforcement Officers Association.



**Pathways Programs:** DHS continues to use the Pathways Programs, the Federal Government’s primary entrance point for students and recent graduates. In FY 2021, DHS hired 169 Pathways student interns, 110 recent graduates, and 16 Presidential Management Fellows, totaling 295 Pathways Programs participants. Of the 295 program participants, 30.8 percent identified as members of a minority racial or ethnic group, 50.2 percent were women, and 4.7% were individuals with disabilities.

**Hiring Goals for Schedule A:** Since FY 2018, DHS has had a goal for Schedule A Hires at two percent of all new hires within each grade level in non-law enforcement and non-Transportation Security Officer (TSO) positions. In an annual PWD and PWTD Hiring Goal memo to the Department, DHS promotes the use of Schedule A Hiring Authority and promotes the use of [Workforce Recruitment Program \(WRP\)](#) as an effective resource. In FY 2021, Schedule A hires constituted 2.5 percent of all new hires in non-law enforcement related and non-TSO positions, a slight decrease of 0.1 percent when compared to the 2.6 percent of Schedule A hires in FY 2020.

**Individuals with Disabilities Career Fairs:** DHS maintains strategic partnerships with national disability advocacy groups and provides Components with recruitment resources for PWDs/PWTDs. In FY 2021, DHS attended recruiting events at Gallaudet University, University of North Florida, Villanova University, Little People of America Annual Conference, EOP Career Expo for People with Disabilities, and Bender Disability Virtual Career Fair. DHS attended 31 unique events with multiple DHS Components attending some events concurrently. DHS has attended over 331 unique events since 2017 in over 36 states and U.S. Territories to attract candidates who identified as a PWD/PWTD.

Specifically, pertaining to individuals with disabilities and targeted disabilities, DHS:

- Attended 73 recruiting and outreach events in FY 2021 specific to individuals with disabilities.
- Had a department-wide presence at the EOP Career Expo for People with Disabilities in July 2021. DHS recruiters interacted with almost 350 individuals. Of those, 37 resumes were collected in the Schedule A resume repository.
- Hosted a “DHS is Hiring” webinar in July 2021 with a targeted audience of individuals with disabilities and individuals with targeted disabilities regarding the Department’s mission, DHS career opportunities, Schedule A and 30% or more Disabled Veterans preference hiring authorities, effective resume writing, and how to create a profile on USAJOBS. This webinar had over 1,350 registrants, more than 530 Adobe Connect attendees and 380 Teleconference attendees.
- Participated in the CBP’s Disability Program as guest speakers as part of National Disability Employment Awareness Month recognition to discuss both the national theme and career experiences as a person with a disability.
- Conducted 25 phone interviews with National Technology Institute of the Deaf students for the third consecutive year. DHS reviewed their resumes and completed their interview notes in the WRP database for federal employers to recruit and hire based on their qualifications for internship or permanent career opportunities.
- Maintained strategic partnerships with national disability advocacy groups and provides Components with recruitment resources for individuals with disabilities/individuals with targeted disabilities. DHS attended recruiting events at Gallaudet University, California State Northridge, and National Technical Institute for the Deaf.
- Supported and promoted the Workforce Recruitment Program and the Department of Defense Operation Warfighter Program.

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

DHS uses the following hiring authorities to hire individuals with disabilities into temporary and permanent positions:

- Veteran's Recruitment Appointment Authority, as set forth at 5 C.F.R. part 307, including:
  - Veterans Preference Code 3 10-point/disability. Veteran is entitled to 10-point preference due to a service-connected disability (includes recipient of the Purple Heart who is not rated as having a compensable disability of 10 percent or more).
  - Veterans Preference Code 4 10-point/compensable. Veteran is entitled to 10-point preference due to a compensable service-connected disability of less than 30 percent.
- 30 percent or More Disabled Veteran (5 U.S.C. § 3112; 5 C.F.R. §§ 316.302, 316.402, and 315.707)
- Schedule A Appointing Authority (5 C.F.R. § 213.3102(u))
  - TSA has its own distinct non-competitive appointment authority for hiring individuals with disabilities, which is comparable with the Schedule A Hiring Authority (HCM POLICY NO. 300-28).

To increase and promote the use of these hiring authorities, goals are established annually for individuals with disabilities and targeted disabilities, Schedule A hires, and Veterans. In FY 2021, DHS hired 234 individuals with disabilities utilizing the Schedule A Hiring Authority, representing 2.50 percent of new hires excluding Law Enforcement and Transportation Security Officer occupations, significantly exceeding the FY 2021 goal of two percent.

Further supporting its disability hiring efforts, DHS hired 1,421 veterans with disabilities, representing eight percent of all new hires.

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

Each DHS Component utilizes both the Schedule A appointing authority (or equivalent for TSA), the 30 Percent or More Disabled Veteran authority, and other Veteran appointment authorities under VRA in which disability is a factor. Component Selective Placement Program Coordinators and Veterans Employment Program Managers are responsible for the coordination of applicants who qualify under non-competitive authorities.

The Department recognizes that while it has an established policy (DHS Directive) on administering the employment of veterans, it does not have a policy covering the Schedule A Appointment Authority for Individuals with Disabilities. During FY 2021, SRDI after consultation with the DHS Disability Employment Program, initiated coordination with the Human Capital Policy and Programs (HCPP), to explore options of implementing departmental guidance. Further coordination efforts will determine whether DHS guidance should be implemented in the form of standard operating procedures (SOPs), a new policy (DHS Directive) for Schedule A, or modifications to the existing Excepted Service Directive. DHS plans to identify a strategy to implement Schedule A guidance by the end of FY 2022. Please refer to each Component's MD-715 report for its procedures on processing applicants under Schedule A and the 30 percent or More Disabled Veteran Authority.

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

Yes ☒ No ☐ N/A ☐

DHS developed training for all hiring managers and human resources professionals entitled, “*Employment of People with Disabilities: A Roadmap to Success*.” The training includes information on Schedule A hiring authority and Veterans hiring authorities with disability-related criteria. The training is mandatory and must be taken within sixty (60) days from onboarding and every two years thereafter.

The Roadmap to Success training was updated during FY 2017 to include the provision of the Final Rule amending 29 C.F.R § 1614.203(d)(5), as well as other necessary revisions. CRCL awarded funding to develop the new curriculum which was originally scheduled to replace this training course by 2021. CRCL extended the contract agreement with USA Learning to further expand the new training module to include additional enhancements and topics to include E.O. 14035: Diversity, Equity, Inclusion, and Accessibility (DEIA) in the Federal Workforce, focusing on disability inclusion and accessibility, and expansion of hiring and retention strategies. The Department anticipates the new course will be ready for enterprise-wide deployment on all DHS learning management systems by mid-year FY 2022.

In addition, each DHS Component provides a variety of training covering disability employment and reasonable accommodations to its employees. Please refer to each Component’s MD-715 report for more details.

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

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

DHS Components continue to explore different avenues for reaching candidates with targeted disabilities. Feedback on targeted disability hiring and recruitment events continued to be captured within the SMORE providing valuable information on the overall experience and success of each event, including attracting the right talent. This information also assists with benchmarking with similar activities providing a means to strengthen the Department’s efforts to enhance outreach to applicants with disabilities and targeted disabilities.

DHS also uses a consolidated disability organization listserv representing more than 550 organizations to conduct targeted recruiting. The Department’s goal is to attract individuals with disabilities including those who are veterans. The listserv is maintained and updated on a regular basis in CRCL as new organizations are identified, and partnerships are established. Future efforts will include regular coordination with the members of the DEAC to ensure this valuable resource remains current. DHS used the listserv to promote participation in various recruitment activities and in Department-hosted webinars.

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

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

- |   |     |  |
|---|-----|--|
| a. New Hires for Permanent Workforce (PWD)  | Yes | No <input checked="" type="checkbox"/> |
| b. New Hires for Permanent Workforce (PWTD) | Yes | No <input checked="" type="checkbox"/> |

During FY 2021, DHS hired 2,161 PWDs, representing 16.14 percent of all permanent hires, an increase from 14.28 percent of the hires reported in FY 2020. DHS also experienced a slight increase in FY 2021 for PWTDs, representing 1.44 percent of permanent hires compared to 1.20 percent in FY 2020.

When excluding law enforcement and transportation security officer (TSO) occupations, DHS met the two percent hiring goal for PWTD, representing two percent.

Additionally, Schedule A hires comprised 2.5 percent of all new hires in non-law enforcement and non-TSO positions.

During FY 2021, DHS updated the criteria used for counting the disability workforce consistent with OPM and EEOC guidance. Disability data now includes (1) employees who self-identify as having a disability, and (2) employees appointed under hiring authorities that take disability into account, who do not otherwise self-identify as having a disability including:

- Veterans Preference Code 3, 10-point/disability. A veteran is entitled to 10-point preference due to a service-connected disability (includes recipient of the Purple Heart who is not rated as having a compensable disability of 10 percent or more).
- Veterans Preference Code 4, 10-point/compensable. A veteran is entitled to 10-point preference due to a compensable service-connected disability of less than 30 percent.
- 30 percent or More Disabled Veteran (5 U.S.C. § 3112; 5 C.F.R. §§ 316.302, 316.402, and 315.707)
- Schedule A Appointing Authority (5 C.F.R. § 213.3102(u))

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

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

A review of B6 New Hires by MCO, representing AFD from USA Staffing/Cognos and Monster Government Solutions and actual hires data from the National Finance Center via AXIS for all DHS Components was conducted. As a result, triggers existed for the following occupations out of the nine DHS priority mission-critical occupations for PWD and PWTD:

**PWD: Two out of nine MCOs**

1811 - Criminal Investigator: 4.93 percent were Qualified compared to 2.11 percent for Selections

0089 - Emergency Management Specialist: 23.70 percent were Qualified compared to 16.46 percent Selections

**PWTD: Six out of nine MCOs**

0083 - Police (Uniformed Division Officer): 1.82 percent were Qualified compared to 0.00 percent for Selections

1802 - Compliance Inspection and Support: 1.81 percent were Qualified compared to .70 percent for Selections

1895 - Customs and Border Protection Officer: .51 percent were Qualified compared to .05 percent for Selections

1896 - Border Patrol Agent: .44 percent were Qualified compared to .12 percent for Selections

2210 - Information Technology Management: 2.85 percent were Qualified compared to 0.00 percent for Selections

0089 - Emergency Management Specialist: 10.73 percent were Qualified compared to 7.59 percent for Selections

The mission-critical occupations listed above, except for 2210 and 0089, have physical and or medical requirements. These physical and or medical requirements cause lower than expected selection rates for PWTD when compared to the qualified applicant pool.

Note: Due to OPM restrictions on access to job applicant flow data, applicant flow data is only available for job announcements that are closed and fully audited. Because of this rule, certain MCO AFD was not available for analysis.

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

a. Qualified Applicants for MCO (PWD)	Yes	No	N/A	X
b. Qualified Applicants for MCO (PWTD)	Yes	No	N/A	X

Relevant applicant pool data is not available. Identifying which current DHS employees would qualify for a job series they are not currently in is a difficult undertaking. The Human Capital offices do not adjudicate applicant qualifications until an applicant applies for a specific position. The applicant may qualify based on experience obtained prior to entry into their current job series or DHS. DHS has not attempted to develop an estimate for job series-relevant applicant pools to date. Consistent with prior practice, DHS will not attempt to tabulate relevant applicant pools for this reporting cycle.

4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission-critical occupations (MCO)? If “yes”, please describe the triggers below.

A review of B6 Internal Competitive Promotions by MCO was conducted. The applicant flow data was derived from USA Staffing/Cognos and Monster Government Solutions and compared with the actual hires data from the National Finance Center via AXIS for all DHS Components. Triggers exist for the following occupations for PWDs and PWTDs when comparing the qualified applicant pool to the number of selections for promotions:

**PWDs: Four out of Nine MCOs**

0083 – Law Enforcement: Qualified 100 percent; Selections 0.00 percent

1811 - Criminal Investigator: 12.97 percent were Qualified compared to 7.78 percent for Selections

1802- Compliance Inspection and Support: Qualified 19.55 percent; Selections 5.61 percent

0089 - Emergency Management Specialist: Qualified 40.43 percent; Selections 10.64 percent

**PWTDs: Seven out of Nine MCOs**

1811 - Criminal Investigator: Qualified 0.61 percent; Selections 0.06 percent

0089 - Emergency Management Specialist: Qualified 17.55 percent; Selections 1.42 percent

1801 - General Inspection, Investigation & Compliance: 5.71 percent were Qualified compared to 1.66 percent for Selections

1802 - Compliance Inspection and Support: Qualified 10.53 percent; Selections 0.73 percent

1895 - Customs and Border Protection Officer: Qualified 0.36 percent; Selections 0.12 percent

1896 - Border Patrol Agent: Qualified .38 percent; Selections .15 percent

2210 - Information Technology Management: Qualified 5.63 percent; Selections 2.50 percent

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

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

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

### **A. ADVANCEMENT PROGRAM PLAN**

Describe the agency's plan to ensure PWDs, including PWTDs, have sufficient opportunities for advancement.

All managers and supervisors are encouraged to promote the career development of all employees, including individuals with disabilities and individuals with targeted disabilities. CRCL continued to promote opportunities through its Disability Employment Advisory Council. CRCL requested that each Component Disability Program Manager share and encourage its employees with disabilities to participate in career development and advancement programs.

In FY 2021, CRCL launched the 2<sup>nd</sup> Cohort of the DHS Disability Mentoring Program. The program announcement and application process were advertised on DHS Connect, the Department's intranet site, and distributed across DHS Components. As a result, 31 employees, 16 mentor-mentee pairs (with one mentor assigned to two mentees), from across the department were matched to participate in the six-month program. CRCL continues to collaborate with other DHS offices and Components in the development and deployment of the program. The DHS Disability Mentoring Program is led and managed by the CRCL Equal Employment Opportunity Division's Diversity Management Section.

## **B. CAREER DEVELOPMENT OPPORTUNITIES**

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

The Department continues to offer various ways for employees to further their educational goals. In FY 2021, 27 employees participated in the U.S. Department of Defense Senior Service School Master's Degree programs and 11 employees attended the National Intelligence University and participated in a bachelor's or master's degree program. DHS also nominates employees to attend the Center for Homeland Defense and Security (CHDS) Master's and Executive Leaders Programs. Additionally, DHS promotes the use of the U.S. Office of Personnel Management's Federal Academic Alliance which provides current Federal employees with the opportunity to pursue post-secondary education at reduced tuition rates. Federal employees can take advantage of this program at their own pace to pursue or enhance their higher academic education at 15 different colleges and universities. DHS employees have, or will have, access to training/career development courses by a variety of means:

- The DHS Senior Executive Service Candidate Development Program (SES CDP) was advertised both internally and externally to DHS. Advertising for the SES CDP occurs via email, the DHS website, and other avenues of communication. DHS will continue its outreach efforts to help ensure a diverse applicant pool for this program. DHS is also developing an SES Outreach Plan that will outline strategies to increase diversity in the SES cadre. In FY 2021 and beyond, DHS advertised the SES CDP through its Employee Associations and OCHCO's Strategic Recruitment, Diversity, and Inclusion Council.
- DHS, in partnership with SkillSoft, offers nearly 40,000 online learning resources that can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills. These resources are aligned to support competencies, job roles, or blended learning offerings.
- The DHS Leader Development Program establishes required and optional development activities throughout the year for new and seasoned leaders at all levels across DHS. DHS continues to use the Pathways Program the Federal government's primary entrance point for students and recent graduates. In FY 2021, DHS hired 169 Pathways student interns, 110 recent graduates, and 16 Presidential Management Fellows, totaling 295 Pathways participants. Of these, 7.46 percent identified as PWDs and one percent were PWTDs.
- The DHS Mentoring Program is a formal program that provides enriching experiences through reciprocal relationships and opportunities for personal and professional growth while sharing knowledge, leveraging skills, and cultivating talent. The DHS Mentoring Program is open to all DHS federal employees. The mentoring announcement is sent by the DHS Management Directorate to all DHS employees. Training is provided to mentor applicants. The types of mentoring offered include: Speed Mentoring, Flash Mentoring, Situational Mentoring, Reverse Mentoring, Group Mentoring, and Peer Mentoring. The program is evaluated with feedback provided on its successes and areas of improvement. In FY 2021, the DHS Mentoring programs consisted of 388 mentors and 384 mentees.

Of the participants, 8.5 percent self-identified as having a disability, with 2.5 percent self-identifying as having a targeted disability.

- The DHS Disability Mentoring Program launched in FY 2020 was developed to provide valuable career developmental opportunities for both mentors and mentees with disabilities. It also provides participants with the opportunity to learn from and network with colleagues across DHS. Participants are matched across the department, providing a forum to gain insight and perspective on the various career opportunities DHS has to offer. During FY 2021, CRCL selected 31 participants out of 33 applicants for the second cohort. Of the 31 mentee/mentor participants, 61.29 percent self-identified as having a disability, with 29.03 percent self-identifying as having a targeted disability. After further review, it was verified that 87.50 percent of the mentee participants self-identified as having a disability, with 37.50 percent self-identifying as having a targeted disability. Mentor applicants were not required to self-identify as having a disability. The second cohort program is scheduled to end in the second quarter of FY 2022.

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs (Pathways Intern)		169		4.7%		0.00%
Fellowship Programs (Pathways Recent Graduates)		110		11.80%		1.80%
Presidential Management Fellows		16		6.20%		6.20%
Mentoring Programs ( <i>DHS HQ Mentoring Program (772 (PWD = 66 PWTD = 19) participants) and DHS Disability Mentoring Program Pilot (31 participants)</i> )		803		10.59%		3.49%
Coaching Programs						
Training Programs						



Detail Programs						
Other Career Development Programs DHS SES CDP	58	31	4.71%	4.00%	1.18%	0.00%

Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

- |                     |     |    |       |
|---------------------|-----|----|-------|
| a. Applicants (PWD) | Yes | No | N/A X |
| b. Selections (PWD) | Yes | No | N/A X |

Detailed applicant flow data (AFD) for the career development programs identified above, except for the SES CDP program, are not available at the Department level. DHS CRCL will continue to coordinate efforts with OCHCO and OPM to acquire access to applicant flow data as identified in the planned activities.

DHS achieved full operational capability for its talent management system (referred to as the Performance and Learning Management System, or PALMS) at six of the nine DHS Components in August 2017. OCHCO exempted FEMA, TSA, and USCG from adopting PALMS. DHS continues to identify the solution set for follow-on capability, including reporting capability such as that required for MD-715.

- DHS is implementing a new enterprise data system (Tableau) and the data model for this system includes the capability to extract employee training data from the talent management system (referred to as the Performance and Learning Management System or PALMS) and merge the data with diversity data elements (ERI, gender, disability status). DHS will continue to work on obtaining training data that can be broken down by ERI, gender, and disability when the new system is deployed in FY 2022.
- DHS will continue to identify qualifying career development programs and courses that support those programs. Using data from its talent management system(s) to identify personnel who participated in those courses and data from the human resources systems to obtain personnel attributes, DHS will continue to produce a report that complies with MD-715.
- DHS will continue to include encouraging language in all career development programs to increase the participation of PWDs.

When comparing the number of selections for PWDs to the 12 percent goal, triggers exist in all career development programs. Selections for the Recent Graduates program for PWD was 11.80 percent with 1.82 percent for PWTD with both very close to reaching the 12 and two percent goals respectively.

Do triggers exist for PWTDs among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

- |               |        |       |    |       |
|---------------|--------|-------|----|-------|
| a. Applicants | (PWTD) | Yes   | No | N/A X |
| b. Selections | (PWTD) | Yes X | No | N/A X |

Detailed applicant flow data (AFD) for the career development programs identified above are not available at the DHS level. DHS CRCL will continue to coordinate efforts with OCHCO and OPM to acquire access to applicant flow data as identified in the planned activities.

During FY 2021, AFD data was not available to conduct an analysis of the applicants and selections for career development programs identified above by the required benchmarks. When comparing the number of selections for PWTDS to the two percent goal, DHS noted improvement in Pathways Recent Graduates and PMF programs compared to the prior year.

### C. AWARDS

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

- |  |   |                             |
|--|---|-----------------------------|
| a. Awards, Bonuses, & Incentives (PWDs)  | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| b. Awards, Bonuses, & Incentives (PWTDs) | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

Based on a review of MD-715 Table B9-1: Employee Recognition and Awards - Distribution by Disability, PWDs (PWDs) and PWTDs (PWTDs) are not receiving awards at the expected rates when compared to the corresponding inclusion rate of PWODs (self-reported as no disability) in four of the thirteen (13) categories, including:

<b>PWDs</b>	<b>Benchmark</b>
<b>Time-Off Awards 11 – 20 Hours</b> PWDs Inclusion Rate: 16.36%	PWODs Inclusion Rate: 17.54%
<b>Cash Awards \$500 and Under:</b> PWDs Inclusion Rate: 29.44%	PWODs Inclusion Rate: 45.69%
<b>Cash Awards \$1,000 – \$1,999:</b> PWDs Inclusion Rate: 30.38%	PWODs Inclusion Rate: 31.44%
<b>Cash Awards \$2,000 - \$2,999:</b> PWDs Inclusion Rate: 13.52%	PWODs Inclusion Rate: 17.38%
 <b>PWTDs</b>	 <b>Benchmark</b>
<b>Time-Off Awards 11 – 20 Hours</b> PWTDs Inclusion Rate: 10.69%	PWODs Inclusion Rate: 17.54%
<b>Cash Awards \$500 and Under:</b> PWTDs Inclusion Rate: 39.66%	PWODs Inclusion Rate: 45.69%
<b>Cash Awards \$1,000 – \$1,999</b> PWTDs Inclusion Rate: 25.28%	PWODs Inclusion Rate: 31.44%
<b>Cash Awards \$2,000 - \$2,999:</b> PWTDs Inclusion Rate: 12.10%	PWODs Inclusion Rate: 17.38%

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

a. Pay Increases (PWDs)	Yes	No X
b. Pay Increases (PWTDs)	Yes X	No

Based on a review of MD-715 Table B9-1: Employee Recognition and Awards - Distribution by Disability, PWDs and PWTDs are exceeding the inclusion rate benchmark for quality step increases (QSIs). When reviewing the inclusion rates for Performance Based Pay increases, there is a trigger for PWTDs.

**Performance Based Pay Increases:** PWTDs Inclusion Rate: 2.82% PWOD Inclusion Rate: 3.30%

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

a. Other Types of Recognition (PWDs)	Yes	No	N/A	X
b. Other Types of Recognition (PWTDS)	Yes	No	N/A	X

DHS did not have any other types of recognition programs during FY 2021.

#### **D. PROMOTIONS**

1. Does your agency have a trigger involving PWDs among the qualified *internal* applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

a. SES

i. Qualified Internal Applicants (PWDs)	Yes	No	N/A	X
ii. Internal Selections (PWDs)	Yes	X	No	

b. Grade GS-15

i. Qualified Internal Applicants (PWDs)	Yes	No	N/A	X
ii. Internal Selections (PWDs)	Yes	X	No	

c. Grade GS-14

i. Qualified Internal Applicants (PWDs)	Yes	No	N/A	X
ii. Internal Selections (PWDs)	Yes	No	X	

d. Grade GS-13

i. Qualified Internal Applicants (PWDs)	Yes	No	N/A	X
ii. Internal Selections (PWDs)	Yes	No	X	

Relevant applicant pool data is not available. Internal announcements often have an area of consideration that is broader than the announcing agency. They may be government-wide to expand the applicant pool and recruit the best talent into the agency. As a result, the current DHS workforce, or a subset of it (employees in an MCO, employees at next lower grade level, and so forth) is not a relevant applicant pool. Identifying which current DHS employees would qualify for a job series they are not currently in is a difficult undertaking. Human Capital offices do not adjudicate applicant qualifications until an applicant applies for a specific position. The applicant may qualify based on experience obtained prior to entry into their current job series or DHS. DHS has not attempted to develop estimated relevant applicant pools to date. Consistent with prior practice, DHS will not attempt to tabulate relevant applicant pools for this reporting cycle.

Qualified Internal Applicants by Senior Grade:		Relevant Applicant Pool by Senior Grade:
SES:	9.30%	N/A
GS-15:	4.31%	N/A
GS-14:	4.27%	N/A
GS-13:	4.47%	N/A

Triggers were identified for selections of PWDs within the SES and GS-15 levels. However, when reviewing selections for PWDs across all senior grades to include employees under appointment authorities that take disability into account, no triggers were identified:

Selections by Senior Grade:		Qualified Internal Applicants by Senior Grade:
SES:	2.04%	9.30%
GS-15:	3.60%	4.31%
GS-14:	5.60%	4.27%
GS-13:	5.64%	4.47%

2. Does your agency have a trigger involving PWTDs (PWTDs) among the qualified *internal* applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

a. SES

i. Qualified Internal Applicants (PWTDs)	Yes	No	N/A
ii. Internal Selections (PWTDs)	Yes	X	No

b. Grade GS-15

i. Qualified Internal Applicants (PWTDs)	Yes	No	N/A
ii. Internal Selections (PWTDs)	Yes	X	No

c. Grade GS-14

i. Qualified Internal Applicants (PWTDs)	Yes	No	N/A
ii. Internal Selections (PWTDs)	Yes	X	No

d. Grade GS-13

- |  |     |    |     |
|--|-----|----|-----|
| i. Qualified Internal Applicants (PWTDs) | Yes | No | N/A |
| ii. Internal Selections (PWTDs)          | Yes | X  | No  |

Relevant applicant pool data is not available. Internal announcements often have an area of consideration that is broader than the announcing agency. There may be a government-wide effort to expand the applicant pool and recruit the best talent into the agency. As a result, the current DHS workforce, or a subset of it (employees in an MCO, employees at next lower grade level, and so forth) is not a relevant applicant pool. Identifying which current DHS employees would qualify for a job series they are not currently in is a difficult undertaking. Human Capital offices do not adjudicate applicant qualifications until an applicant applies for a specific position. The applicant may qualify based on experience obtained prior to entry into their current job series or DHS. DHS has not attempted to develop estimated relevant applicant pools to date. Consistent with prior practice, DHS will not attempt to tabulate relevant applicant pools for this reporting cycle.

Qualified Internal Applicants by Senior Grade:		Relevant Applicant Pool by Senior
Grade:		
SES:	2.33%	N/A
GS-15:	1.73%	N/A
GS-14:	1.59%	N/A
GS-13:	1.90%	N/A

Triggers were identified for selections of PWTDs across all senior grade levels (SES through GS-13) when comparing the participation rate of selections to the percentage of qualified internal applicants.

Selections by Senior Grade:		Qualified Internal Applicants by Senior
Grade:		
SES:	0.68%	2.33%
GS-15:	0.68%	1.73%
GS-14:	0.93%	1.59%
GS-13:	0.96%	1.90%

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWDs among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

- |                              |     |   |      |
|------------------------------|-----|---|------|
| a. New Hires to SES (PWDs)   | Yes | X | No   |
| b. New Hires to GS-15 (PWDs) | Yes |   | No X |
| c. New Hires to GS-14 (PWDs) | Yes |   | No X |
| d. New Hires to GS-13 (PWDs) | Yes |   | No X |

Based on a review of MD-715 B7-1 Senior Grade Level (New Hires), DHS identified a trigger for PWD new hires at the SES level when compared to the qualified applicant pool.

	Hires	Qualified Applicant Pool
New Hires to SES	12.50%	14.87%

New Hires to GS-15	10.92%	4.31%
New Hires to GS-14	15.86%	5.78%
New Hires to GS-13	14.53%	7.53%

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

- |                              |       |      |
|------------------------------|-------|------|
| a. New Hires to SES (PWTD)   | Yes X | No   |
| b. New Hires to GS-15 (PWTD) | Yes   | No X |
| c. New Hires to GS-14 (PWTD) | Yes   | No X |
| d. New Hires to GS-13 (PWTD) | Yes X | No   |

Based on a review of MD-715 B7-1 Senior Grade Level (New Hires), DHS identified triggers for PWTD at all senior grade levels (SES, GS-15, GS-14, and GS-13).

	Hires	Qualified Applicant Pool
New Hires to SES	1.56%	18.27%
New Hires to GS-15	3.45%	1.73%
New Hires to GS-14	3.03%	2.59%
New Hires to GS-13	2.29%	3.26%

5. Does your agency have a trigger involving PWD among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

a. Executives

i. Qualified Internal Applicants (PWDs)	Yes	No	N/A
ii. Internal Selections (PWDs)	Yes	No	X

b. Managers

i. Qualified Internal Applicants (PWDs)	Yes	No	N/A
ii. Internal Selections (PWDs)	Yes	No	X

c. Supervisors

i. Qualified Internal Applicants (PWDs)	Yes	No	N/A
ii. Internal Selections (PWDs)	Yes	X	No

Relevant applicant pool data is not available. Internal announcements often have an area of consideration that is broader than the announcing agency. There may be a government-wide effort to expand the applicant pool and recruit the best talent into the agency. As a result, the current DHS workforce, or a subset of it (employees in an MCO, employees at next lower grade level, and so forth) is not a relevant applicant pool. Identifying which current DHS employees would qualify for a job series they are not currently in is a difficult undertaking. Human Capital offices do not adjudicate applicant qualifications until an applicant applies for a specific position. The applicant may qualify based on experience obtained prior to entry into their current job series or DHS. DHS has not attempted to develop estimated relevant applicant pools to date. Consistent with prior practice, DHS will not attempt to tabulate relevant applicant pools for this reporting cycle. When reviewing the internal selections and comparing to the 12 percent goal as an alternative comparator, triggers were identified for PWDs in the Supervisors (First-Level Grade 12 and Below positions) category.

PWD Executive Selections:	15.63%	PWD Goal:	12.00%
PWD Manager Selections:	13.88%	PWD Goal:	12.00%
PWD Supervisor Selections:	11.86%	PWD Goal:	12.00%

6. Does your agency have a trigger involving PWTDs among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.



a. Executives

i. Qualified Internal Applicants (PWTDs)	Yes	No	N/A
ii. Internal Selections (PWTDs)	Yes X	No	

b. Managers

i. Qualified Internal Applicants (PWTDs)	Yes	No	N/A
ii. Internal Selections (PWTDs)	Yes X	No	

c. Supervisors

i. Qualified Internal Applicants (PWTDs)	Yes	No	N/A
ii. Internal Selections (PWTDs)	Yes X	No	

Relevant applicant pool data is not available. Internal announcements often have an area of consideration that is broader than the announcing agency. There may be a government-wide effort to expand the applicant pool and recruit the best talent into the agency. As a result, the current DHS workforce, or a subset of it (employees in an MCO, employees at next lower grade level, and so forth) is not a relevant applicant pool. Identifying which current DHS employees would qualify for a job series they are not currently in is a difficult undertaking. Human Capital offices do not adjudicate applicant qualifications until an applicant applies for a specific position. The applicant may qualify based on experience obtained prior to entry into their current job series or DHS. DHS has not attempted to develop estimated relevant applicant pools to date. Consistent with prior practice, DHS will not attempt to tabulate relevant applicant pools for this reporting cycle. When reviewing the internal selections and comparing to the two percent goal as an alternative comparator, triggers were identified for PWTDs in all categories.

PWTDs Executive Selections: 0.89%	PWTDs Goal: 2%
PWTDs Manager Selections: 0.73%	PWTDs Goal: 2%
PWTDs Supervisor Selections: 0.95%	PWTDs Goal: 2%

7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWDs among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box.

- |                                     |       |      |
|-------------------------------------|-------|------|
| a. New Hires for Executives (PWDs)  | Yes   | No X |
| b. New Hires for Managers (PWDs)    | Yes   | No X |
| c. New Hires for Supervisors (PWDs) | Yes X | No   |

When reviewing the selections for PWDs compared to the qualified applicant pool benchmark, one trigger was identified for PWDs in the Supervisors (First-Level Grade 12 and Below positions) category.

PWDs Executive Selections:	19.84%	Qualified External Applicants:	6.96%
PWDs Manager Selections:	40.14%	Qualified External Applicants:	6.38%
PWDs Supervisor Selections:	12.94%	Qualified External Applicants:	18.85%

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTDs among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box.

- |                                      |       |      |
|--------------------------------------|-------|------|
| e. New Hires for Executives (PWTDs)  | Yes X | No   |
| f. New Hires for Managers (PWTDs)    | Yes   | No X |
| g. New Hires for Supervisors (PWTDs) | Yes X | No   |

When reviewing the selections for PWTDs compared to the qualified applicant pool benchmark, triggers exist in all categories.

PWTDs Executive Selections:	1.59%	Qualified External Applicants:	3.42%
PWTDs Manager Selections:	3.43%	Qualified External Applicants:	2.83%
PWTDs Supervisor Selections:	1.16%	Qualified External Applicants:	7.38%

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

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

### **A. VOLUNTARY AND INVOLUNTARY SEPARATIONS**

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

Yes No X

During FY 2021, DHS converted a total of 225 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 46.20 percent conversion rate. There are various reasons for not converting all eligible Schedule A employees, including lack of automated reporting, tracking, and monitoring capabilities, including notification systems at the Component level, as well as individual management discretion based on employee performance. Of those converted, 198 were converted non-competitively after two years of satisfactory service, 20 converted to career or career conditional before two years of service, with six converted by other means. As a result of quarterly tracking and monitoring, DHS Components continued efforts to sustain and experience incremental increases in conversions for the last five years.

2. Using the inclusion rate as the benchmark, did the percentage of PWDs among voluntary and involuntary separations exceed that of persons without disabilities?

If “yes”, describe the trigger below.

- |                                   |     |   |    |
|-----------------------------------|-----|---|----|
| a. Voluntary Separations (PWDs)   | Yes | X | No |
| b. Involuntary Separations (PWDs) | Yes | X | No |

Based on a review of MD-715 Table B1: Total Workforce (Employee Losses) - Distribution by Disability, in DHS, PWDs in the permanent workforce are exceeding the inclusion rate benchmark for both voluntary and involuntary separations when compared to PWODs.

Voluntary Separations:

PWDs Inclusion Rate: 5.71%

PWODs Inclusion Rate: 5.10%

Involuntary Separations:

PWDs Inclusion Rate: 2.76%

PWODs Inclusion Rate: 1.60%

For reporting purposes, resignation and retirement are counted as voluntary separations while reductions in force, removal, and other separations are counted as involuntary separations.

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

a. Voluntary Separations (PWTDs)	Yes	X	No
b. Involuntary Separations (PWTDs)	Yes	X	No

Based on a review of MD-715 Table B14: Separations by Type of Separation - Distribution by Disability, in DHS, PWTDs in the permanent workforce are exceeding the inclusion rate benchmark for both voluntary and involuntary separations.

Voluntary Separations:

PWTDs Inclusion Rate: 7.34%

PWODs Inclusion Rate: 5.10%

Involuntary Separations

PWTDs Inclusion Rate: 2.78%

PWODs Inclusion Rate: 1.60%

For reporting purposes, resignations and retirement are counted as voluntary separations. Reductions in force, removal, and other separations are counted as involuntary separations.

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

During FY 2021, the Department’s DHS Exit Survey Program continued to develop and transition. The program’s transition involved coordination and consideration of both content and administration changes, and migration from one platform to another. The DHS Exit Survey results were based on exiting employees from HQ, USCG, FLETC, FEMA and USCIS. All other Components (USSS, TSA, CBP, ICE and CISA), continued to maintain their separate Component-specific exit survey programs during FY 2021. Results of exit surveys conducted by Components that did not utilize the DHS Exit Survey can be found in Component MD-715 reports or obtained from Components directly. The FY 2021 DHS Exit Survey yielded a 14.7 percent response rate. Of the 5,695 employees separating from service, 840 took the exit survey. Aside from retirement, representing 170 or 20 percent of respondents, the top three reasons separating non-SES employees listed for leaving DHS were: Advancement Opportunities (9.09 percent); Supervisor/Management (10.83 percent) and Personal/Family Related (9.67 percent).

Based on available data from the DHS Exit Survey, those self-reporting as PWD were 71, or 8.5 percent, of the total survey respondents. Aside from retirement, the top three categories cited as the reason for leaving were: Supervisor/Management (17.86 percent); Personal/Family Related (10.71 percent) and Advancement Opportunities (8.93 percent).

During FY 2021, 34 respondents self-reported as an PWTD. This represented 4.67 percent of all respondents. Aside from retirement representing 6 or 17.65 percent of respondents, the top three categories cited as the reason for leaving were: Supervisor/Management (28.57 percent); Personal/Family Related (14.29 percent) and Moving to another DHS component/office (10.71 percent).

To assist in monitoring trends and possible triggers, DHS recommends that along with its decentralized exit survey program efforts, each Component (USSS, TSA, CBP, ICE and CISA) conduct an individualized assessment to identify any correlation to potential barriers for separating PWDs/PWTDs.

As of FY 2021, the DHS Exit Survey included responses to the newly established disability program related questions, with FY 2020 used as a baseline for analysis. During FY 2021, excluding the 217 (25.83%) respondents who did not respond combined with the average of 312 (37.14%) respondents who answered “No Basis to Judge” to the following six questions, the response rates were categorized into the top three trends:

Disability Program Questions		All Respondents	
		FY 20 (311 Respondents)	FY 21 (840 Respondents)
1	<b>DHS took appropriate steps to ensure accessibility (technology and facility) requirements were met for qualified individuals of disabilities.</b>	Agree 18.97	Agree 15.12%
		Strongly Agree 16.40	Strongly Agree 13.21%
		Neither Agree nor Disagree 10.93%	Neither Agree nor Disagree 9.29%
2	<b>DHS took appropriate steps to ensure reasonable accommodation and/or Personal Assistance Services were provided to qualified individuals with disabilities.</b>	Agree 16.72%	Agree 14.17%
		Strongly Agree 15.76%	Strongly Agree 10.48%
		Neither Agree nor Disagree 11.58%	Neither Agree nor Disagree 10.48%
3	<b>DHS proactively supported efforts to improve the RECRUITMENT of individuals with disabilities.</b>	Neither Agree nor Disagree 22.54%	Neither Agree nor Disagree 17.68%
		Agree 11.58%	Agree 10.00%
		Strongly Agree 9.00%	Strongly Agree 6.67%
4	<b>DHS proactively supported efforts to improve the HIRING of individuals with disabilities.</b>	Neither Agree nor Disagree 18.33%	Neither Agree nor Disagree 12.86%
		Agree 9.97%	Agree 10.48%
		Strongly Agree 9.0%	Strongly Agree 5.95%
5	<b>DHS proactively supported efforts to improve the ADVANCEMENT of individuals with disabilities.</b>	Neither Agree nor Disagree 18.65%	Neither Agree nor Disagree 14.64%
		Strongly Agree and Agree (same rate) 8.36%	Agree 9.05%
		Strongly Disagree 4.18%	Strongly Disagree 3.10%
6	<b>DHS proactively supported efforts to improve the RETENTION of individuals with disabilities.</b>	Neither Agree nor Disagree 18.65%	Neither Agree nor Disagree 14.64%
		Strongly Agree 8.36%	Agree 8.69%
		Agree 7.07%	Strongly Disagree 3.33%

Further review of the FY 2021 exit survey revealed overall increased negative responses (Disagree and Strongly Disagree) for PWD and PWTD compared to respondents without disabilities. DHS will continue to monitor and expand analysis annually.

## **B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES**

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

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

The DHS public facing website (<https://www.dhs.gov/accessibility>) notice explains Section 508 requirements to ensure Information and Communication Technology (ICT) is accessible to individuals with disabilities, including members of the public. A section on reporting accessibility issues and/or filing a formal complaint is also included.

Specifically, the website provides:

If you have feedback, questions, or concerns relating to the accessibility of any content that interferes with your ability to access the information on the Department of Homeland Security's website, please contact [Website Issues](#) for assistance.

If you believe that the Information and Communication Technology (ICT) used by the Department of Homeland Security does not comply with Section 508 of the Rehabilitation Act, you may file a 508 complaint by contacting [Accessibility@hq.dhs.gov](mailto:Accessibility@hq.dhs.gov). To enable us to respond in a manner most helpful to you, please indicate the nature of your accessibility problem, the preferred format in which to receive the material, the web address (URL) of the material with which you are having difficulty, and your contact information.

If you wish to file a civil rights and civil liberties complaint, please use the [CRCL complaint submission process](#). If you believe that a physical facility that is designed, built, altered, or leased with Federal funds by the Department of Homeland Security does not comply with the Architectural Barriers Act (ABA), refer to the U.S. Access Board's website under [ABA Enforcement – File a Complaint](#).

Similarly, the DHS intranet site (<http://dhsconnect.dhs.gov/pages/accessibility.aspx>) provides the following statement:

### Accessibility

The Department of Homeland Security is committed to providing accessible Information and Communication Technology (ICT) to individuals with disabilities, including members of the public and federal employees, by meeting or exceeding the requirements of Section 508 of the Rehabilitation Act of 1973. In addition, the Department is also committed to ensuring accessibility of our buildings and facilities as required by the Architectural Barriers Act, 42 U.S.C. §§ 4151 through 4157. [Section 508 of the Rehabilitation Act of 1973, as amended \(29 U.S.C. § 794d\)](#)

Section 508 of the Rehabilitation Act of 1973, as amended requires agencies, during the procurement, development, maintenance, or use of ICT, to ensure that individuals with disabilities have access to and use of ICT information and data comparable to the access and use afforded to individuals without disabilities (i.e., "ICT accessibility"), unless an undue burden would be imposed on the agency. More information on Section 508 and the technical standards can be found at [www.section508.gov](http://www.section508.gov).

If you have feedback, questions, or concerns relating to the accessibility of any content that interferes with your ability to access the information on the Department of Homeland Security's website, please contact [Website Issues](#) for assistance.

If you believe that the Information and Communication Technology (ICT) used by the Department of Homeland Security does not comply with Section 508 of the Rehabilitation Act, you may file a 508 complaint by contacting [Accessibility@hq.dhs.gov](mailto:Accessibility@hq.dhs.gov).

To enable us to respond in a manner most helpful to you, please indicate the nature of your accessibility problem, the preferred format in which to receive the material, the web address (URL) of the material with which you are having difficulty, and your contact information.

Additional information regarding compliance with 508 requirements is available at the [DHS Office of Accessible Systems and Technology](#).

#### [Architectural Barriers Act of 1968 \(42 U.S.C. §§ 4151--57\)](#)

The Architectural Barriers Act (ABA) requires access to facilities that are designed, built, altered, or leased with Federal funds. The Access Board is the federal agency responsible for enforcing the ABA. The Access Board's accessibility standards are available on their website at [www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards](http://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards), and information about filing a complaint may be found at [www.access-board.gov/aba-enforcement/file-a-complaint](http://www.access-board.gov/aba-enforcement/file-a-complaint).

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

The DHS public facing website (<https://www.dhs.gov/accessibility>) notice explains that if an individual believes that a physical facility designed, built, altered, or leased with Federal funds by the Department of Homeland Security does not comply with the Architectural Barriers Act (ABA), refer to the U.S. Access Board's website under [ABA Enforcement – File a Complaint](#).

Similarly, the DHS intranet site (<http://dhsconnect.dhs.gov/pages/accessibility.aspx>) provides the following statement:

#### [Architectural Barriers Act of 1968 \(42 U.S.C. § 4151--57\)](#)

The Architectural Barriers Act (ABA) requires access to facilities that are designed, built, altered, or leased with Federal funds. The U.S. Access Board is the federal agency responsible for enforcing the ABA. The Access Board's accessibility standards are available on their website at [www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards](http://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards), and information about filing a complaint may be found at [www.access-board.gov/aba-enforcement/file-a-complaint](http://www.access-board.gov/aba-enforcement/file-a-complaint).

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

During FY 2019, CRCL finalized the department-wide standard operating procedures for processing complaints of inaccessible ICT as required by Section 508 of the Rehabilitation Act. The new process and associated form were finalized on August 23, 2021 after completing the DHS Paperwork Reduction Act for the new DHS Section 508 Technology Accessibility Issue Report Form. As a result, CRCL updated its external page entitled Make a Civil Rights Complaint (<https://www.dhs.gov/file-civil-rights-complaint>), with the new description and associated form. DHS plans to ensure links to the form are cross-referenced from the DHS internal and external Accessibility pages by the end of 2<sup>nd</sup> quarter, FY 2022.

### **C. REASONABLE ACCOMMODATION PROGRAM**

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

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

During FY 2021, the overall average time frame for processing initial requests for reasonable accommodations was approximately 27.6 days, representing nearly a 10 day decrease in the average amount of days for processing requests, when compared to FY 2020 at 37.30 days. This does not include the average processing days for USCIS.

The average number of days reported by DHS Components for FY 2021 are as follows:

CBP: 42.81 Days  
USCIS: *Unavailable – See Component report*  
HQ: 28.5 Days  
FEMA: 25 Days  
FLETC: 16.44 Days  
ICE: 27.4 Days  
TSA: 66 Days  
USCG: 8.6 Days  
USSS: 7 Days



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

DHS is committed to providing effective reasonable accommodations to employees and applicants with disabilities. The overall average processing time for reasonable accommodation requests during FY 2021 was 27.6 days, a reduction in the average processing days by nearly ten days for the second year in a row. Note: The average number of processing days does not include USCIS as their data was unavailable at the time of reporting.

During FY 2021, all DHS Components continued to provide reasonable accommodation training to managers and supervisors regularly. Consistent with the new requirements outlined in EEOC's Final Rule implementing revisions to 29 C.F.R. § 1614.203(d)(5), DHS and its Components continue efforts to finalize and implement their revised reasonable accommodation and personal assistance service procedures.

In support of DHS's reasonable accommodation program, CRCL and Component-level subject matter experts continue to collaborate with OAST on developing the Accessibility Compliance Management System (ACMS). The enhanced system monitors trends and manages, tracks, and reports on all reasonable accommodation requests, including requests for PAS.

During FY 2021, in support of [Executive Order 14043](#) Requiring Coronavirus Disease 2019 Vaccination for Federal Employees to promote the health and safety of the Federal workforce and the efficiency of the civil service, CRCL in coordination with Office of General Counsel, Privacy OCHCO and OAST, developed a standardized process for responding to and adjudicating religious and medical exemption requests as a form of reasonable accommodation. In support of these efforts, CRCL in coordination with OAST retooled ACMS, DHS' enterprise-level reasonable accommodation management system, to handle the unique requirements for exemption requests. CRCL also lead efforts to provide technical guidance and resources to all DHS Components to include development of DHS Religious and Medical Exemption forms and FAQs designed for Employees and Managers. Efforts continue into FY 2022, to include providing several train-the-trainer sessions for Component level board members and other officials as well as training for Disability Program Managers, Reasonable Accommodation Program Managers and Medical Officials. Additional enhancements to ACMS were also underway to include development of ACMS Exemption Process user-guide, exemption request dashboards for tracking and reporting, and additional fields for tracking and processing requests for reconsideration.

During FY 2021, CRCL awarded additional funding to OPM's USA Learning to further develop a new training course to replace the DHS *Employment of People with Disabilities: A Roadmap to Success*. This training, which was the first of its kind in the Federal sector, was soon followed by OPM's version, *A Roadmap to Success: Hiring, Retaining, and Including People with Disabilities*. The new course is scheduled to be fully implemented and deployed on all DHS learning management systems by the mid-year FY 2022. The course, mandatory for all supervisors, hiring officials, human capital and EEO professionals, must be completed within sixty days of onboarding and every two years after appointment.

CRCL continued efforts to implement its revised reasonable accommodation procedures incorporating the provision of personal assistance services as an affirmative action obligation. The official DHS Directives System review process of the revised procedures was completed with full implementation of the procedures on both internal and external DHS websites on March 23, 2021.

Finally, DHS continued its partnership with the Department of Defense (DoD) Computer/Electronic Accommodation Program (CAP) to provide needs assessments to DHS employees throughout DHS. During FY 2021, CAP provided eleven needs assessments DHS-wide and seven accommodations, before the change in scope took effect, whereby CAP discontinued providing accommodations to non-DoD agencies. The CAP services provided to DHS resulted in a total cost savings during FY 21 of \$33,920.40. DHS' reasonable accommodation program experienced a cost savings of \$2,391,974.71 over the entire 21-year partnership.

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

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

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

In FY 2021, DHS updated the CRCL Connect Page (intranet) and public (internet) webpage at <https://www.dhs.gov/reasonable-accommodations-dhs>, with the revised procedures. In addition to posting the DHS procedures, DHS provides additional information to its employees including the EEOC link to its guide to assist Federal agencies along with a notice advising of its (a federal agency's) responsibility to provide personal assistance services (PAS).

During FY 2021, no requests for PAS were received.

### **Section VI: EEO Complaint and Findings Data**

#### **A. EEO COMPLAINT DATA INVOLVING HARASSMENT**

1. During the last fiscal year, did a higher percentage of PWDs file a formal EEO complaint alleging harassment, as compared to the government-wide average?  
                                     Yes                      No X                      N/A
2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?  
                                     Yes X                      No                      N/A

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

During FY 2021, DHS had a lower percentage of PWDs who filed a formal EEO Complaint (14.1 percent) alleging harassment, as compared to the government-wide average of 22.10 percent. In FY 2021, DHS had 47 settlement agreements and one finding of harassment based on disability. Corrective measures taken include:

- Posting of notice
- Conduct EEO training
- Back Pay
- Pay attorney's fees
- Pay compensatory damages
- Provide list of funded positions
- Consider disciplinary action

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

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

Yes                      No ☒                      N/A

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

Yes ☒                      No                      N/A

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

During FY 2021, DHS had a lower percentage of PWDs who filed a formal EEO Complaint (seven percent) alleging failure to provide a reasonable accommodation compared to the government-wide average of 14.33 percent.

DHS negotiated 31 settlement agreements involving a failure to accommodate allegations and had one finding of failure to provide a reasonable accommodation based on disability during FY 2021. Corrective measures taken included:

- Posting of notice
- Conduct EEO training
- Back Pay
- Pay attorney's fees
- Pay Compensatory damages

## Section VII: Identification and Removal of Barriers

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

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWDs and/or PWTDs?  
Yes X            No
2. Has the agency established a plan to correct the barrier(s) involving PWDs and/or PWTDs?  
Yes X            No            N/A
3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments.

See following plans for Triggers 1 through 5:

<b>Trigger 1</b>	Lower than expected participation for individuals with disability (PWD) and targeted disabilities (PWTDs) when compared to the regulatory goals of 12 percent for PWD and two percent for PWTD in grade clusters GS-1 – GS-10 and GS-11 – SES.	
Barrier(s)	Not Identified	
Objective(s)	Increase workforce participation rates of PWDs and PWTDs at all grade levels.	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
Laura Davis, CRCL Ginny Berry, OCHCO Cynthia Clinton-Brown OAST		Yes Yes N/A
<b>Barrier Analysis Process Completed?</b> (Yes or No)		<b>Barrier(s) Identified?</b> (Yes or No)
No		No
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	<p><b>FY 2021 Update:</b> B1 – Total Permanent Workforce DHS experienced an increase of 1,089 employees from FY 2020 to FY 2021 for PWDs, representing 14.22 percent, and a ratio increase of 0.54 percent, the highest of every group. PWTDs experienced a slight decrease of -6 employees, representing 1.25 percent, and a ratio decrease of -0.01 percent.</p> <p>DHS New Hires for PWDs represented 16.19 percent, exceeding the goal of 12 percent, and PWTDs represented 1.44 percent, slightly below the two percent goal.</p> <p>DHS experienced an overall increase in Separation rates compared to FY 2020. PWDs separated at a rate of 16.93 percent, and PWTDs separated at a slightly higher rate of 1.78 percent, compared to 1.76 percent in FY 2020.</p> <p>-----</p> <p><b>FY 2020 Update:</b> B1 – Total Permanent Workforce DHS experienced an increase of 1,447 employees from FY 2019 to FY 2020 for</p>

		<p>PWDs, representing 11.71 percent, an increase of 0.70 percent, the highest of every group. PWTDs experienced a slight decrease of -2 employees, representing 1.25 percent, a decrease of -0.01 percent.</p> <p>DHS New Hires for PWDs represented 14.43 percent, exceeding the goal of 12 percent, and PWTDs represented 1.20 percent, slightly below the two percent goal.</p> <p>DHS experienced an overall increase in Separation rates compared to FY 2019. PWDs separated at a rate of 14.43 percent, significantly above 11.87 percent in FY 2019, and PWTDs separated at a slightly higher rate of 1.76 percent, compared to 1.58 percent in FY 2019.</p> <p>-----</p> <p>FY 2019 Update:  B1 – Total Permanent Workforce (2.0 version)  DHS experienced an increase of 1,479 employees from FY 2018 to FY 2019 for PWDs, representing 11.01 percent, an increase of 0.55 percent, the highest of every group. PWTDs experienced a slight increase of 17 employees, however an overall decrease of -0.02 percent.</p> <p>Separation rates did not experience any significant changes. PWDs separated at a rate of 11.87 percent slightly above FY 2018, and PWTDs separated at the same rate of 1.58 percent as they did in FY 2018.</p> <p>-----</p> <p>FY 2018:  B1 – Total Permanent Workforce:  PWDs 10.46 percent below 12 percent Goal; Total Permanent Workforce PWTD 1.28 percent.</p> <p>B14 – Separations by Disability:  PWDs Separating at rates (11.67 percent) higher than expected  PWTDs Separating at rates (1.58 percent) higher than expected</p>
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Complaint Data (Trends)	Yes	<p><b>FY 2021 Update</b>  462 – (Part IV) Bases and Issues Alleged in Complaints Filed: DHS experienced a significant decrease from 118 in FY 2020 to 84 in FY 2021 in total number of complaints alleging failure to accommodate resulting in a percent change of -28.81 percent.</p> <p>DHS also experienced a significant decrease from 244 in FY 2020 to 159 in FY 2021 in the total number of complaints alleging harassment based on disability resulting in a percent change of -34.84 percent.</p> <p>No FEAR Act Report (FY 2021) – Complaints based on disability increased in the last seven years (FY 2014 – FY 2020) from 13.60 percent of all complaints to 32.45 percent of all complaints in FY 2020, then decreasing to 29.26% at the end of FY 2021. Disability discrimination was alleged in 328 complaints, which is a 3.19 percent decrease over the prior year when disability discrimination was raised in 418 complaints.</p> <p>Considering complaints by issue, complaints based on “reasonable accommodation” ranked sixth out of twenty-four issues during FY 2019 compared to seventh in FY 2018.</p> <p>DHS is also monitoring complaints by issue for “medical examinations,” which has also experienced a significant increase from eight in FY 2013 to 32 in FY 2019, none of which resulted in a finding of discrimination.</p> <p><b>FY 2020 Update</b>  462 – (Part IV) Bases and Issues Alleged in Complaints Filed: DHS experienced a slight decrease from 129 in FY 2019 to 118 in FY 2020 in total number of complaints alleging failure to accommodate resulting in a percent change of -8.53 percent.</p>

		<p>DHS experienced a slight increase from 209 in FY 2019 to 244 in FY 2020 in the total number of complaints alleging harassment based on disability resulting in a percent change of 16.75 percent.</p> <p><b>FY 2019 Update</b>  462 – (Part IV) Bases and Issues Alleged in Complaints Filed: Slight increase from 112 in FY 2018 to 129 in FY 2019 in total number of complaints alleging failure to accommodate resulting in a percent change of 15.18% percent. DHS continues to experience incremental increases.</p> <p>DHS experienced a decrease from 223 in FY 2018 to 209 in FY 2019 in the total number of complaints alleging harassment based on disability resulting in a percent change of -6.28 percent.</p> <p>No FEAR Act Report (FY 2019) – Complaints based on disability increased in the last six years (FY 2014 – FY 2019) from 13.60 percent of all complaints to 17.20 percent of all complaints in FY 2019. During FY 2019, for the first time, disability discrimination was the second-most alleged basis. Disability discrimination was alleged in 480 complaints, a six percent increase over the prior year when disability discrimination was alleged in 477 complaints.</p> <p>Considering complaints by issue, complaints based on “reasonable accommodation disability” ranked ninth (90/1,938 alleged issues) out of twenty-four issues during FY 2021 compared to eighth (125/2,363 alleged issues) in FY 2020.</p> <p>DHS is also monitoring complaints by issue for “medical examinations, and reassignment denied.” Over the last three years, DHS has experienced a decrease in alleged issues involving medical examinations, from 37 in FY 2019 to 15 in FY 2021, as well as with reassignment</p>
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		denied from 24 in FY 2019 to 16 in FY 2021. Neither resulted in a finding of discrimination.
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	<p><b>FY 2021 462 Report Update</b> – DHS had an increase in the total number of settlements based on disability harassment when compared to 37 in FY 2020 to 47 in FY 2021.</p> <p>There was no reported change in the number of settlements based on failure to accommodate, remaining the same, 39, in FY 2020 and FY 2021.</p> <p>During FY 2021, DHS had one finding based on disability harassment and one finding based on failure to accommodate. There was a decrease in the total number of findings from 10 in FY 2020 to two in FY 2021.</p> <p>DHS continues to remain under the government-wide average for both types of complaints filed by PWDs for the second year in a row.</p> <p>-----</p> <p><b>FY 2020 462 Report Update</b> – DHS had a slight increase in the total number of settlements based on disability harassment, 49 in FY 2020 compared to 47 in FY 2019.</p> <p>Similarly, the number of settlements based on failure to accommodate also experienced a slight increase, 39 in FY 2020 compared to 31 in FY 2019.</p> <p>In FY 2020, DHS had nine findings based on disability harassment and five findings based on failure to accommodate.</p> <p>DHS continues to remain under the government-wide average for both types of complaints filed by PWDs for the second year in a row.</p>

		<p><b>FY 2019 462 Report Update</b> – DHS had an overall decrease in the total number of settlements based on disability harassment, 63 in FY 2018, to 47 in FY 2019, and 34 in FY 2020.</p> <p>There was one finding in FY 2019 compared to eight reported in FY 2020.</p> <p>Similarly, the number of settlements based on failure to accommodate also decreased significantly, from 48 in FY 2018 to 31 during FY 2019, FY 2020. The number of findings increased by one, from two in FY 2018 to three in FY 2019 decreasing to two in FY 2020.</p> <p>DHS continues to remain under the government-wide average for both types of complaints filed by PWDs for the second year in a row.</p>
Climate Assessment Survey (e.g., FEVS)	<b>No</b>	
Exit Interview Data	<b>Yes</b>	<p><b>FY 2021 Update – DHS Exit Survey</b> The DHS Exit Survey results exclude TSA, USSS, CBP, CISA and ICE. Due to continued transition efforts, the exit survey process has resulted in increased decentralization of efforts. Component specific data can be gleaned from Component level reports. Aside from retirement, based on data available for FY 2021, the top three primary reasons for PWDs separating from DHS include: 1) Supervisor/Management; 2) Personal or Family Related; and 3) Advancement Opportunities.</p> <p>While not in the top three primary reasons, the percentage of separating PWD employees selecting “health reasons” increased slightly from 5.7 or two respondents in FY 2020, to 7.17 percent or four respondents in FY 2021 for PWDs. DHS will continue to monitor that cited reason. The Department surmises a direct correlation between “separation for health reasons” and “the high percentage of</p>

		<p>positions with medical and physical requirements.”</p> <p>FY 2021 Exit Survey results now include specific data on the newly established disability program questions. DHS used the FY 2020 responses to these questions as a baseline for its FY 2021 summary analysis. Details are provided in the FY 2021 Accomplishment section of Trigger # 5.</p> <p>-----</p> <p><b>FY 2020 Update DHS Exit Survey</b>  The DHS Exit Survey results exclude TSA, USSS, CBP, CISA and ICE. Due to continuing transition efforts, the exit survey process resulted in an increased decentralization of efforts. Upon completion of the migration of the DHS Exit Survey to a new platform, the Department anticipates it will be better positioned to consolidate FY 2021 exit survey data received from any source. Component specific data can be obtained from Component-level reports. Based on data available for FY 2020, covering April through September 2020, there was a slight deviation in the top three primary reasons for PWDs separating from DHS. The top three reasons cited were: 1) Health Reasons; 2) Personal or Family Related; and 3) Advancement Opportunities/Geographic Location/ and Supervisor/Management, all coming in 3<sup>rd</sup> place.</p> <p>With the addition of “health reasons” for both groups, PWDs and PWTDs, DHS will continue to monitor that cited reason. The Department surmises a direct correlation between “separation for health reasons” and “the high percentage of positions with medical and physical requirements.”</p> <p>FY 2020 exit survey results now include specific data on the newly established disability program questions. DHS will use the FY 2020 responses to these questions as a baseline for future analysis.</p>
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		<p><b>FY 2019 Update DHS Exit Survey – DHS (excluding TSA, USSS, CBP and ICE)</b> Due to transition changes further decentralizing exit survey procedures, the Department is recommending that Components continue to conduct individualized assessments to monitor trends. Based on available data, there was a slight deviation in the top three primary reasons for PWDs separating from DHS. The top three reasons cited were: 1. Health Reasons; 2. Personal or Family Related; and 3. Advancement Opportunities/Geographic Location/ and Supervisor/Management, all coming in 3<sup>rd</sup>. The Department surmises a direct correlation between “separation for health reasons” and “the high percentage of positions with medical and physical requirements.”</p> <p><b>FY 2018 DHS Exit Survey (excludes TSA and USSS)</b>  14.28 percent of respondents indicated they had a disability. Of these respondents the top three reasons for leaving include:  1. Supervision/Management –11.63 percent,  2. Advancement Opportunities – 11.63 percent and 3. Personal/Family Related – 8.84 percent  The top reasons mentioned above are the same as PWODs. When comparing leaving based on health-related reasons, PWDs indicated health-related reasons as the primary reason 5.58 percent of the time compared to 1.82 percent for PWODs.</p> <p>The data revealed a 4.18 percent response rate for employees self-identifying as having a targeted disability.  Of the respondents who indicated they had a targeted disability, the top three reasons for leaving included:</p> <ol style="list-style-type: none"> <li>1. Advancement Opportunities – 11.11 percent;</li> <li>2. Supervision/Management –11.11 percent; and</li> </ol>
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		<p>3. Geographic Location and Salary Pay (tied) – 9.52 percent</p> <p>Health-related reasons were cited by 6.35 percent of the PWTDS respondents.</p>
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	Yes	<p><b>FY 2021 - Utilization Analysis by Grade Cluster (Perm)</b>  For the third consecutive year, DHS experienced an increase in both the GS-1-GS-10 and GS-11-SES Grade Clusters for PWDs as follows:  PWDs Grade Cluster 1-10 24.57 percent (above 12 percent)  PWDs Grade Cluster 11-SES 16.29 percent (above the 12 percent goal)</p> <p>Increases were also reported for PWTDS in the GS-1- GS-10 cluster and no change in the GS-11-SES cluster:  PWDs Grade Cluster 1-10 2.94 percent (above two percent)  PWDs Grade Cluster 11 – SES 1.27 percent (below 2 percent)</p> <p>-----</p> <p><b>FY 2020 - Utilization Analysis by Grade Cluster (Perm)</b>  For the second consecutive year, DHS experienced an increase in both the GS-1-GS-10 and GS-11-SES Grade Clusters for PWDs as follows:  PWDs Grade Cluster 1-10 9.37 percent (below 12 percent)  PWDs Grade Cluster 11-SES 13.08 percent (above the 12 percent goal)</p> <p>Slight decreases were reported for PWTDS in the GS-1- GS-10 cluster and no change in the GS-11-SES cluster:  PWDs Grade Cluster 1-10 1.24 percent (below two percent)  PWDs Grade Cluster 11 – SES 1.26 percent (below two percent)</p>

		<p><b>FY 2019 - Utilization Analysis by Grade Cluster (Perm)</b>  DHS experienced an increase in both the GS-1- GS-10 and GS-11-SES Grade Clusters for PWDs as follows:  PWDs Grade Cluster 1-10 8.99 percent (below 12 percent)  PWDs Grade Cluster 11-SES 12.27 percent (above the 12 percent goal)</p> <p>Slight decreases were reported for PWTDS in both the GS-1- GS-10 and GS-11-SES PWTDS Grade Cluster 1-10 1.26 percent (below two percent)  PWTDS Grade Cluster 11 – SES 1.26 percent (below two percent)</p> <p>-----</p> <p><b>FY 2018</b>  Utilization Analysis by Grade Cluster (Perm)  PWDs Grade Cluster 1-10 8.73 percent (below 12 percent)  PWDs Grade Cluster 11-SES 11.55 percent (slightly below 12 percent)</p> <p>PWTDS Grade Cluster 1-10 1.29 percent (below two percent)  PWTDS Grade Cluster 11 – SES 1.27 percent (below two percent)</p>		
<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
12/30/2017	Issue Annual Hiring Goals for PWDs and PWTDS then socialize throughout DHS.	Yes		12/27/2017
09/30/2018	Update DHS Disability training module for managers and HR Professionals ( <i>Employment of People with Disability: A Roadmap to Success Training</i> )	Yes	08/30/2022	
03/30/2018	Develop mid-year reporting requirements to monitor Component progress with implementing the revised rule on 29 C.F.R. § 1614.203(d)(5).	Yes		3/08/2018
09/30/2018	Collaborate with OCHCO to revise DHS's standard language on all	Yes	09/30/2019	4/18/2019

	vacancy announcements to encourage applicants with disabilities to apply, to clearly explain the Schedule A process, and provide information on requesting reasonable accommodations.			
09/30/2018	Revise Reasonable Accommodation procedures to include procedures for providing Personal Assistance Services.	Yes	06/30/2021	03/23/2021
09/30/2018	Develop and post notice of rights for employees and applicants under Section 508 of the Rehabilitation Act and the Architectural Barriers Act on the internal and external DHS websites.	Yes		09/30/2018
03/30/2018	Implement and post the Department's Affirmative Action plan for Individuals with Disabilities to the DHS website internally (DHS Connect) and externally (DHS.gov).	Yes	7/19/2018	07/19/2018
09/30/2020	Collaborate with OCHCO to explore the feasibility of considering disability status as a positive factor in hiring and promotions decisions to the extent permitted by law.	Yes	6/20/2022	
04/01/2019	Develop a bi-annual report to monitor Components' progress toward increasing the participation of PWDs and PWTDs in Mission Critical Occupations.	Yes	6/30/2021	9/30/2021
<b>Fiscal Year</b>	<b>Accomplishments</b>			
2017	N/A - Newly established.			
2018	<p><b>Hiring Goals:</b></p> <p>During FY 2018, DHS set a 12 percent hiring goal for Persons with Disabilities (PWDs) at all grade levels; a two percent hiring goal for Persons with Targeted Disabilities (PWTDs) at all grade levels, excluding law enforcement and transportation security officer occupations; and a 1.5 percent hiring goal for Schedule A hires excluding law enforcement and transportation security officer occupations.</p> <p>As a result of these goals, 10.4 percent of new hires were PWDs and 1.7 percent were PWTDs in non-law enforcement and non-TSO positions. While the Department did not meet the new hire goals listed above in these two areas, it should be noted that DHS ended FY 2018 with PWDs representing 10.5 percent of the total workforce and PWTDs representing 2.4 percent, both increases from FY 2017 (9.9 percent and 2.1 percent, respectively). In addition, Schedule A hires constituted 1.6 percent of all new hires in non-law enforcement and non-TSO positions, exceeding the goal and increasing by 35 percent from FY 2017.</p>			

To support and expand DHS's outreach and recruitment, SRDI, in coordination with CRCL, began compiling a listserv of all disability organizations that will be maintained and distributed on an annual basis to all DHS Components. The listserv will be finalized in FY 2019 for distribution and will include disability organizations such as America Job Centers, Veteran's Vocational Rehabilitation and Employment Program, Centers for Independent Living and Employment Network providers.

**Disability Training:**

The Roadmap to Success training was updated during FY 2017 and FY 2018 to include the provision of amended 29 C.F.R. § 1614.203(d)(5), as well as other necessary revisions and updated resources. DHS plans to revise this training course by FY 2020.

**Mid-Year Reporting Requirements:**

CRCL issued a revised mid-year reporting requirement to all DHS Components to assist with monitoring and tracking progress in establishing a Model EEO Program. The revised reporting format was modeled after the revised Part G Agency Self-Assessment, essential element program measures and trigger identification based on Part J Special Program Plan for the Recruitment, Hiring, Advancement and Retention of Persons with Disabilities. CRCL reviewed and combined all Component responses then reported on EEO programs in a composite document providing additional technical guidance where necessary.

**Revise DHS Standard Language on All Vacancy Announcements:**

CRCL initiated coordination efforts with OCHCO Policy and Programs with the recommendation of adding standard language to vacancy announcements to encourage persons with disabilities to apply. During FY 2018, DHS updated template language that is still under review by OPM. DHS CRCL in partnership with OCHCO will continue efforts to ensure effective implementation by the end of FY 2019.

**Revise Reasonable Accommodation and Personal Assistance Services Procedures:**

During FY 2018, CRCL drafted revised reasonable accommodation procedures to include procedures for processing personal assistance services consistent with the new obligations outlined in Section 501 of the Rehabilitation Act. DHS (Department-level), U.S. Coast Guard, the Transportation Security Administration, and U.S. Secret Service submitted either a draft or their final revised procedures to the EEOC for review and approval pursuant to Executive Order 13164, during the reporting period. CRCL will continue to monitor and track the status and progress with the remaining Components in meeting this requirement. DHS's procedures require its Components to submit their updated reasonable accommodation procedures to CRCL for review prior to submission to EEOC.



	<p><b>Develop and post notice of rights under Section 508 and the Architectural Barriers Act on the internal and external websites.</b> During FY 2018, DHS updated its web page, e.g., internal DHS Connect page (<a href="http://dhsconnect.dhs.gov/pages/accessibility.aspx">http://dhsconnect.dhs.gov/pages/accessibility.aspx</a>), for both accessibility and consistency to include a description of rights and how to file a complaint under Section 508.</p> <p><b>Implement and post FY 2017 Affirmative Action Report and FY 2018 Plan</b> As required, DHS posted its FY 2017 Affirmative Action Report and FY 2018 Plan on DHS' public facing website at the following location: <a href="http://www.dhs.gov/reports-office-civil-rights-and-civil-liberties">www.dhs.gov/reports-office-civil-rights-and-civil-liberties</a>. CRCL continues to collaborate with OCHCO and DHS Components to ensure effective implementation of the AAP on a regular basis.</p>
2019	<p><b>Disability Training:</b> DHS continued its efforts to redevelop and expand its <i>DHS Roadmap to Success</i> training module. Modifications to the training include recent changes in disability employment law, Section 508 compliance, and the addition of Personal Assistance Services as a regulatory requirement in Title 29, Part 1614. CRCL developed and submitted a statement of objectives to support a request for proposal to OPM's USALearning office. Based on the feedback received from OPM including the total estimated cost to redesign the training, CRCL decided to explore other options. As a result, CRCL consulted with OCHCO's Strategic Learning Development and Engagement's (SLDE) Learning Technology and Innovation (LTI) Division. DHS is certain that the services provided in-house by the SLDE-LTI will support CRCL's training development and implementation needs. The goal remains to deploy the revised <i>DHS Roadmap to Success</i> module before the end of FY 2020 with a roll-out in early FY 2021.</p> <p><b>Revise DHS Standard Language on All Vacancy Announcements:</b> As recommended by CRCL, in an alert, guidance to the DHS Human Capital Leadership Council (including all Component Chief Human Capital Officers and others) was issued on April 18, 2019, regarding updated "mandatory language for Job Opportunity Announcements – Disability Recruitment." The alert provided the required language that should be included in all competitive and excepted service job opportunity announcements. Specifically, the language encourages persons with disabilities to apply. This activity is closed.</p> <p><b>Revise Reasonable Accommodation and Personal Assistance Services Procedures:</b> In furtherance of DHS efforts to implement approved revised reasonable accommodation procedures to include procedures for processing personal assistance services consistent with the new obligations outlined in amended 29 C.F.R. § 1614.203(d)(5), CRCL continued to coordinate reviews during FY 2019. The Department's draft revision to Instruction Number 259-01-001, implementing DHS procedures for facilitating reasonable accommodation and personal assistance service requests is currently in the official DHS Directives System review process. CRCL has also conducted</p>

	<p>reviews of Component-level revised procedures and provided edits and comments prior to submission to EEOC for approval. As a result, DHS (Departmental), U.S. Coast Guard, the Transportation Security Administration, and U.S. Secret Service, Federal Law Enforcement Training Center, and U.S. Citizenship and Immigration Service have all submitted either draft or final revised procedures to EEOC for review and approval pursuant to Executive Order 13164, during the reporting period. CRCL will continue to monitor and track the status and progress with the remaining Components in meeting this requirement. DHS's procedures require all updated reasonable accommodation procedures to be submitted to CRCL for review prior to the Component's submission to EEOC.</p> <p><b>Develop a bi-annual Mission Critical Occupations report to monitor participation of PWDs and PWTDs:</b> The revised 2.0 data tables now include a detailed report of participation rates by ERI/G and Disability (A/B-6) for MCOs that will serve as our framework for continued analysis and monitoring. DHS will use a similar format to mirror the 2.0 data table format (excluding the applicant flow data) to continue its efforts in monitoring DHS Priority MCOs during FY 2020 and beyond on a bi-annual basis. This report will be shared with Components as a resource and sample framework to support Component level monitoring efforts of the participation of PWDs and PWTDs in the DHS workforce.</p>
2020	<p><b>Disability Training:</b> DHS revised and expanded its DHS Roadmap to Success training module. CRCL secured funding and contracted with OPM USALearning to develop an e-learning course on creating, promoting, and sustaining a model disability employment program. Powertrain will support the development of a new disability training module to replace the DHS Roadmap to Success training. This training will be mandatory for all supervisors, managers, Human Capital and EEO professionals. The period of performance is from August 2020 to August 2021, with full implementation on all DHS learning management systems by September 30, 2021.</p> <p><b>Revise Reasonable Accommodation and Personal Assistance Services Procedures:</b> In furtherance of DHS efforts to implement approved revised reasonable accommodation procedures to include procedures for processing personal assistance services consistent with the new obligations outlined in amended 29 C.F.R. § 1614.203(d)(5), CRCL continued to coordinate and adjudicate Office of General Counsel's comments and reviews during FY 2020. The Department's draft revision to Instruction Number 259-01-001, which implements DHS procedures for facilitating reasonable accommodation and personal assistance service requests remain in the official DHS Directives System review process. CRCL anticipates fully approved and vetted procedures to be finalized by the end of second quarter in FY 2021. Upon finalization, DHS will resubmit revisions to EEOC as required and will develop a communication strategy to socialize the RA/PAS procedures to the workforce and public, posting on both internal and external DHS websites.</p>

	<p><b>Collaborate with OCHCO to explore the feasibility of considering disability status as a positive factor in hiring and promotions decisions to the extent permitted by law:</b></p> <p>The target date for this planned activity has been modified. DHS will seek additional guidance and explore best practices from OPM and other agencies on options available to support this effort during FY 2021. Until this is accomplished, OCHCO will:</p> <ul style="list-style-type: none"> <li>• Ensure that employees with disabilities are made aware of various leadership development programs and have an equal opportunity to compete for all programs, including managerial, executive, and other career-enhancing programs and initiatives.</li> <li>• Participate in outreach/recruitment events targeted to individuals with disabilities such as Career Expo for People with Disabilities for various positions across DHS Components.</li> <li>• Conduct continuous resume mining from OPM’s Agency Talent Portal (ATP) utilizing Schedule A hiring authority to hire individuals with disabilities and targeted disabilities.</li> </ul> <p><b>Develop a bi-annual report to monitor Components’ progress toward increasing the participation of PWDs and PWTDs in Mission Critical Occupations:</b></p> <p>Modified completion date to June 30, 2021.</p> <p>The mission critical occupations by disability report will be shared with Components as a resource and sample framework to support Component level monitoring efforts of the participation of PWDs and PWTDs, representing, onboard, hires, and separations within the DHS workforce.</p>
2021	<p><b>Disability Training:</b></p> <p>DHS revised and expanded its DHS Roadmap to Success training module. In FY 2021, CRCL awarded additional funding for an optional year agreement to expand the newly developed curriculum with OPM USALearning. The option year agreement enables DHS to further develop the Schedule A section and add learning objectives covering disability equity, inclusion and accessibility strategies based on the recently issued Executive Order 14035, Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce. This training will be mandatory for all supervisors, managers, Human Capital and EEO professionals. The new period of performance is from August 2021 to August 2022, with full implementation on all DHS learning management systems by September 2022.</p> <p><b>Revise Reasonable Accommodation and Personal Assistance Services Procedures:</b></p> <p>On March 23, 2021, DHS implemented and posted its revised reasonable accommodation procedures to include procedures for processing personal assistance services consistent with the new obligations outlined in amended 29 C.F.R. § 1614.203(d)(5).</p> <p><b>Collaborate with OCHCO to explore the feasibility of considering disability status as a positive factor in hiring and promotions decisions to the extent permitted by law:</b></p>

	<p>The target date for this planned activity has been extended. DHS will continue to seek guidance and explore best practices from OPM and other agencies on options available to support this effort during FY 2022. In support of DEIA efforts, CRCL recommended OPM provide additional guidance on implementing positive placement factors for hiring and promoting individuals with disabilities, in our submission of the promising practices survey. Until this activity is fully explored and consider, OCHCO will continue to:</p> <ul style="list-style-type: none"> <li>• Ensure that employees with disabilities are made aware of various leadership development programs and have an equal opportunity to compete for all programs, including managerial, executive, and other career-enhancing programs and initiatives.</li> <li>• Participate in outreach/recruitment events targeted to individuals with disabilities such as Career Expo for People with Disabilities for various positions across DHS Components.</li> <li>• Conduct continuous resume mining from OPM's Agency Talent Portal (ATP) utilizing Schedule A hiring authority to hire individuals with disabilities and targeted disabilities.</li> </ul> <p><b>Develop a bi-annual report to monitor Components' progress toward increasing the participation of PWDs and PWTDs in Mission Critical Occupations:</b>  Completion 09/30/2021  CRCL developed a mission critical occupation by disability report and plans to monitor from the department level then distribute on a quarterly basis to all Components via the DEAC. The report will serve as an additional resource to support Component-level monitoring efforts of the participation of PWDs and PWTDs in DHS mission critical occupations.</p>
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Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

Nothing to report.

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

To be determined.

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

DHS will continue to examine and conduct barrier analysis in collaboration with OCHCO and Components. Until a barrier(s) has been identified, DHS will continue to focus on the completion of the planned activities outlined above.

<b>Trigger 2</b>	Individuals with disabilities and targeted disabilities are receiving recognition and awards at rates lower than expected when compared to individuals without disabilities.	
<b>Barrier(s)</b>	Not Identified.	
<b>Objective(s)</b>	Collaborate with OCHCO to review recognition and awards policy, practices, and procedures, and determine next steps.	
<b>Responsible Official(s)</b>		<b>Performance Standards Address the Plan? (Yes or No)</b>
CRCL OCHCO		
<b>Barrier Analysis Process Completed? (Yes or No)</b>		<b>Barrier(s) Identified? (Yes or No)</b>
No		No
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	<p><b>FY 2021 Update:</b> Based on a review of MD-715 Table B9-1: Employee Recognition and Awards - Distribution by Disability, PWDs (PWDs) and PWTDS (PWTDS) are not receiving awards at the expected rates when compared to the corresponding inclusion rate of PWODs (self-reported as no disability) in Four of the thirteen (13) categories, including: Time-Off Awards 11 – 20 Cash Awards \$500 and Under: Cash Awards \$1,000 – \$1,999: Cash Awards \$2,000 - \$2,999: Section IV, C. Awards for detailed summary. -----</p> <p>FY 2020 Update: Based on a review of MD-715 Table B9-1: Employee Recognition and Awards - Distribution by Disability, PWDs (PWDs) and PWTDS (PWTDS) are not receiving awards at the expected rates when compared to the corresponding inclusion rate of PWODs (self-reported as no disability) in three of the thirteen (13) categories, including: Time-Off Awards 11 – 20 Hours Cash awards \$100 – \$500: Cash awards \$1,000 – \$1,999 Section IV, C. Awards for detailed summary. -----</p> <p>FY 2019 Update: B9-1 (2.0) Employee Recognition and Awards Distribution by Disability - Employees with disabilities</p>

		<p>(PWDs/PWTDs) continue to receive awards at rates comparable or above to their workforce participation rates in all categories except in the following new categories: Cash Awards \$3,000 - \$3,999, \$4,000 - \$4,999, \$5,000 or more and Quality Step Increase. Upon further review, both groups (PWDs/PWTDs) are receiving awards at lower rates than expected when using the inclusion rate as a benchmark, see Section IV, C. Awards for detailed summary.</p> <p>-----</p> <p>B13 Employee Recognition and Awards by Disability – Employees with disabilities (PWDs) are receiving awards at rates comparable to their workforce participation rate. However, when comparing the rates of awards received by employees with disabilities to the inclusion rate, they are significantly lower than expected.</p>
Complaint Data (Trends)	Yes	<p>FY 2021 462 Report: DHS reported one of 13 complaints were filed and two of three settlements were based on disability and awards during FY 2021, representing a significant decrease compared to the prior year.</p> <p>-----</p> <p>FY 2020 462 Report: DHS reported six of 22 complaints were filed and four of 10 settlements were based on disability and awards during FY 2020.</p> <p>-----</p> <p>FY 2019 462 Report: DHS reported two of 17 complaints were filed and one of five settlements were based on disability and awards during FY 2019.</p> <p>-----</p> <p>FY 2018 462 Report: DHS reported four out of 19 complaints were filed and two out of four settlements were based on disability and awards during FY 2018.</p>
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	<p>FY 2021: DHS had no findings of disability discrimination based on awards.</p> <p>FY 2020: DHS had no findings of disability discrimination based on awards.</p>

		FY 2019: DHS had no findings of disability discrimination based on awards.
Climate Assessment Survey (e.g., FEVS)	Yes	<p>2020 FEVS: Results for the FY 2020 FEVS were made available mid-FY 2021 and are the most recent results available. The FY 2020 FEVS consisted of substantially different questions than earlier versions of the FEVS so the overall averages are not comparable. FY 2020 data reveal a variance between PWDs (61.5 percent positive) and IWODs (63.3 percent positive). Question 38 from the FY 2019 survey, which asked about Prohibited Personnel Practices (for example, illegally discriminating for or against any employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements), was not included in the FY 2020 survey. Similarly, Question 25 – Awards in my work unit depend on how well employees perform their jobs – was not included on the FY 2020 survey. Question 19 on the FY 2020 survey asks about supervisor support of to balance work and life issues and PWD and IWODs respond the same at 79 percent positive. Question 23 asks about being treated with respect, and while the results for PWD and IWOD are very high, there is also a substantial difference in percent positive – 81.9 percent vs. 85.6%. Overall job satisfaction (Question 36) is lower for PWDs at 63.2% vs. 66.2% for IWODs.</p> <p>-----</p> <p>2019 FEVS: Upon review of the 2019 FEVS, DHS has seen positive progress. FY 2019 data reveals the largest variance between PWDs (56.3 percent positive, up from 53.9 percent in FY 2018) and PWODs (65.4 percent positive, up from 63.7 percent in FY 2018) is -9.1 percent (down from -9.7 percent in FY 2018), for Question 38 (Agency) - Prohibited Personnel Practices (for example, illegally discriminating for or against any employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements) are not tolerated. Further review of survey responses revealed a -0.70 percent variance</p>



		<p>(was -2 percent variance in FY 2018) for PWDs (39.7 percent positive, up from 37.2 percent in FY 2018) compared to PWODs (40.40 percent positive, up from 39.2 percent in FY 2018) for Question 25 – Awards in my work unit depend on how well employees perform their jobs.</p> <p>-----</p> <p>Upon review of the FY 2018 FEVS, the largest variance between PWDs (53.9 percent positive) and PWODs (63.7 percent) is -9.7 percent, for Question 38 (Agency) - Prohibited Personnel Practices (for example, illegally discriminating for or against any employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements) are not tolerated. Further review of survey responses revealed a -2 percent variance for PWDs (37.2 percent positive) compared to PWODs (39.2 percent positive) for Question 25 – Awards in my work unit depend on how well employees perform their jobs.</p>
Exit Interview Data	Yes	<p>FY 2021 Update: Exit Survey: Bonus was no longer an available option under reasons for leaving in the updated survey. Additional review was conducted based on key words to include bonuses and awards, with no significant information found. Additional review revealed that a very small number (3/71) respondents with disabilities indicated that “Salary/Pay” was a primary reason for leaving.</p> <p>-----</p> <p>Upon review of the Exit Survey, the reason for leaving associated with “bonus” was reported by 18 employees or 1.20 percent of all respondents. Of those responses, only one respondent, self-identified as having a disability.</p>
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	N/A	

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2018	Collaborate with OCHCO to review recognition and awards policy, practices, and procedures, and determine next steps.	Yes	09/30/2020	09/30/2020
09/30/2021	Expand review of recognition and award practices across DHS. (new)	Yes	09/30/2022	
Fiscal Year	Accomplishments			
2017	N/A - Newly established.			
2018	<p>During FY 2018, CRCL identified initial data sources and policies and procedures at the department level to begin review. As reported above, data sources reviewed include workforce data tables, complaint data, Federal Employment Viewpoint Survey responses, and the DHS Exit Interview Survey report.</p> <p>The following DHS Directives and Instructions have been identified for further review in coordination with OCHCO during FY 2019:</p> <p>255-02 Employee Recognition  255-02-001 Instruction guide on Employee Recognition  255-03-001-01 Time-Off Awards  255-01 Honorary Awards  255-01-001 Instruction guide on Honorary Awards  255-12 Approval of Monetary Awards over \$6,000</p>			
FY 2019	<p>The DHS Directives Instruction Manual describes the processes, procedures, and requirements for preparing, reviewing, approving, and issuing Directives (policies) and Instructions (procedures). The Manual also provides guidance on other implementing documents, such as manuals, guides, handbooks, reference books, standard operating procedures (SOPs), through the Department of Homeland Security (DHS) Directives System, as defined in DHS Directive 112-01. It also outlines the process by which Directives, Instructions, and/or other Implementing Documents issued under the Directives System are reviewed within two years, to determine if the Directive or Instruction should be (1) Revised; (2) Consolidated; (3) Canceled; or (4) Certified Current (no changes are required and reissued as is with a “current as of” date listed). The Component Directives Manager is responsible for affirmatively indicating to the DHS Directives Manager what appropriate action is necessary to maintain the Directive or Instruction upon receipt of the notice from the DHS Directives Manager, that a two-year review is due.</p> <p>Based on this process, all policies and procedures identified are reviewed every two years by the Office of the Chief Human Capital Officer. To date, no potential barriers have been identified.</p> <p>CRCL will continue to coordinate and collaborate with OCHCO to ensure perceived or actual barriers that may be caused by DHS award policies or associated procedures are addressed.</p>			

FY 2020	<p>Based on a completed review of the department's policies and procedures previously identified and listed below, CRCL did not find any actual or perceived barriers. CRCL will continue to review data and resources both at the Department and Component levels to include "practices" as part of its individual with disabilities barrier analysis to be conducted in FY 2021.</p> <p>Policies and Procedures Reviewed:</p> <ul style="list-style-type: none"> <li>255-02 Employee Recognition</li> <li>255-02-001 Instruction guide on Employee Recognition</li> <li>255-03-001-01 Time-Off Awards</li> <li>255-01 Honorary Awards</li> <li>255-01-001 Instruction guide on Honorary Awards</li> <li>255-12 Approval of Monetary Awards over \$6,000</li> </ul>
FY 2021	<p>CRCL will continue to review data and resources both at the Department and Component levels to include "practices" as part of its individual with disabilities barrier analysis. To support our efforts, at the end of the third quarter, CRCL developed and issued a Human Resources Policies, Procedures, and Practices Questionnaire through Exec Sec to all DHS Components. The questionnaire was divided into six sections focused on policies, procedures, and practices related to: (I) Recruitment, (II) Hiring, (III) Training and Development Programs, (IV) Promotions, (V) Separations, and (VI) Retention. As part of our next steps, CRCL plans to conduct follow-up discussions with Components and plans to address award policies and practices to gain additional information. CRCL's goal is to complete the analysis by mid-year FY 2022.</p>

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

N/A – DHS began planned activities during FY 2018 and concluded that additional time is necessary to effectively conduct a thorough review.

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

To be determined.

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

DHS has modified the target date for completion to 09/30/2021.

<b>Trigger 3</b>	Lower than expected conversion rates of eligible Schedule A employees into competitive service.			
<b>Barrier(s)</b>				
<b>Objective(s)</b>	Increase conversion rates of eligible Schedule A employees.			
<b>Responsible Official(s)</b>		<b>Performance Standards Address the Plan? (Yes or No)</b>		
CRCL OCHCO				
<b>Barrier Analysis Process Completed? (Yes or No)</b>		<b>Barrier(s) Identified? (Yes or No)</b>		
<b>No</b>		<b>No</b>		
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>		
Workforce Data Tables	Yes	Quarterly Conversion Ad-hoc reports		
Complaint Data (Trends)	No			
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	No			
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	Yes	Ad-hoc workforce data on conversions - not included in MD-715 data tables.		
<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
09/30/2018	Review and analyze current policies and procedures for excepted service appointments.	Yes		09/30/2018

01/30/2018	Monitor Schedule A Conversions on a quarterly basis.	Yes		12/12/2018
09/30/2018	Coordinate efforts with OCHCO to develop DHS Schedule A guidance.	Yes	06/30/2021	
<b>Fiscal Year</b>	<b>Accomplishments</b>			
FY 2018	<p>During FY 2018, DHS converted a total of 157 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 55.28 percent conversion rate. Of those converted, 138 were converted non-competitively after two years of satisfactory service, 15 converted to career or career conditional before two years of service, and four were converted by other means. Overall, DHS experienced an increase in conversions when compared to 101, or 53 percent during FY 2017.</p> <p><b>Review and analyze current policies and procedures for excepted service appointments.</b></p> <p>CRCL, in coordination with OCHCO/SRDI, began reviewing existing policies and procedures at the Department level during FY 2018. As a result, we identified several excepted service policies, and found that procedures for Schedule A, 5 C.F.R. § 213.3102(u), for hiring people with severe physical disabilities, psychiatric disabilities, and intellectual disabilities, are not included.</p> <p><b>Monitoring Schedule A Conversions on a quarterly basis.</b></p> <p>CRCL has developed a Schedule A reporting and tracking tool to monitor DHS' Schedule A workforce by Components. The tracking tool provides a summary review of Schedule A employees by:</p> <ul style="list-style-type: none"> <li>• Total Eligible</li> <li>• Total Converted <ul style="list-style-type: none"> <li>○ Conversions to career or career conditional after 24 months</li> <li>○ Conversions to career or career conditional before 24 months</li> <li>○ Conversion Other</li> <li>○ Separated before conversion</li> </ul> </li> <li>• Total Separations</li> <li>• Eligible not Converted</li> <li>• No Longer Eligible at end of FY 2018 (<i>but was eligible at some point in the given year</i>)</li> <li>• Not Eligible for Conversion</li> </ul> <p>CRCL shares updated summary reports with all Components through the Disability Employment Advisory Council, which includes Component level Disability Program Managers and Selective Placement Program Coordinators. Upon request, CRCL provides detailed reports to support follow-up actions at the Component level as necessary and appropriate.</p> <p>This activity is complete. CRCL will continue to provide reports and monitor on a quarterly basis as a standard practice.</p> <p><b>Coordinate efforts with OCHCO to develop DHS Schedule A policy and procedures.</b></p>			

	CRCL and SRDI began efforts to benchmark other federal agencies to identify Schedule A best practices. As a result, SRDI has drafted a proposed standard operating procedure which is currently in the review process.
FY 2019	<p>During FY 2019, DHS converted a total of 159 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 55.28 percent conversion rate. Of those converted, 129 were converted non-competitively after two years of satisfactory service, 27 converted to career or career conditional before two years of service, and three were converted by other means. Overall, DHS experienced an increase in conversions when compared to the 157 during FY 2018. In support of this effort, CRCL continues to monitor Schedule A conversions on a quarterly basis and shares Component-level reports for appropriate action. The reports provide a summary review of Schedule A employees by:</p> <ul style="list-style-type: none"> <li>• Total Schedule A Workforce</li> <li>• Total Eligible</li> <li>• Total Converted <ul style="list-style-type: none"> <li>○ Conversions to career or career conditional after 24 months</li> <li>○ Conversions to career or career conditional before 24 months</li> <li>○ Conversion Other</li> <li>○ Separated before conversion</li> </ul> </li> <li>• Total Separations</li> <li>• Eligible not Converted</li> <li>• No Longer Eligible at end of FY 2018 (but was eligible at some point in the given year)</li> <li>• Not Eligible for Conversion</li> </ul> <p><b>Coordinate efforts with OCHCO to develop DHS Schedule guidance.</b>  Modified planned activity description to change efforts from developing policy and procedures to developing Schedule A guidance and to update target date for completion until 9/30/2020. CRCL and OCHCO are continuing these efforts to develop and implement guidance with sound strategies and best practices for utilizing the Schedule A appointment authority for employment, retention, and career development opportunities. DHS plans to socialize and implement the final guidance by 2021.</p> <p>To support this effort, CRCL developed a DHS Schedule A Factsheet. The factsheet is a high-level overview of the Schedule A Hiring Authority and provides prospective candidates with disabilities an overview on applying for positions within DHS utilizing Schedule A, along with a list of DHS Selective Placement Program Coordinators.</p> <p>Additionally, on Tuesday, July 30, 2019, DHS hosted a webinar on recruiting and hiring individuals with disabilities and targeted disabilities. Over 30 supervisors, hiring managers, recruiters, and human resources specialists participated to increase awareness of this topic. A post-webinar survey indicated 81 percent of the participants said they increased their knowledge of Schedule A direct hiring authority from 34 percent prior to the webinar. Fifty-eight percent of the participants indicated they increased knowledge of the Bender program from 17 percent prior to the webinar.</p>
FY 2020	During FY 2020, DHS converted a total of 170 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 45.21 percent conversion rate and an increase compared to 11 conversions in FY 2019. Of those converted, 146 were converted non-competitively after two years of satisfactory service; 19 converted to career or career conditional before two years of service, and five were converted by other means. As a result of quarterly tracking and monitoring, DHS Components continued efforts to sustain and experience incremental increases in Schedule A conversions for the last four years.

	<p>To support increased use of Schedule A conversions, CRCL continues to monitor Schedule A conversions on a quarterly basis then share Component-level prepared reports for appropriate action. This report continues to be an effective tool for increasing coordination and tracking of conversions by offering a summary review of Schedule A employee eligibility status.</p> <p><b>Coordinate efforts with OCHCO to develop DHS Schedule A guidance.</b> Due to unforeseen delays, efforts to develop and deploy DHS Schedule A Guidance were slightly delayed. OCHCO SRDI drafted a DHS Schedule A standard operating procedures document. The draft was forwarded to CRCL for review in November 2020. The target date for this activity has been modified to 06/30/2021 to provide additional time for review and coordination.</p> <p>Additionally, all DHS hiring officials (managers/supervisors) and human capital professionals are required to complete the People with Disabilities: A Roadmap to Success course within 60 days of appointment and then every two years thereafter. The Roadmap training is a comprehensive course on disability employment including the use of special hiring non-competitive authorities such as Schedule A and 30% or More Disabled Veteran appointments. As previously mentioned, because this training is a vital to support DHS' affirmative action program for individuals with disabilities and targeted disabilities, CRCL is currently in the process of developing a new training module with updated content consistent with current laws, regulations, initiatives, and Executive Orders.</p>
FY 2021	<p>During FY 2021, DHS converted a total of 225 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 46.20 percent conversion rate and an increase of 55 conversions compared to FY 2020. Of those converted, 198 were converted non-competitively after two years of satisfactory service, 20 converted to career or career conditional before two years of service, with six converted by other means. As a result of quarterly tracking and monitoring, DHS Components continued efforts to sustain and experience incremental increases in conversions for the last five years, from 101 conversions in FY 2017 to 225 conversions in FY 2021.</p> <p>To support increases of Schedule A conversions, CRCL continues to monitor Schedule A conversions on a quarterly basis then share Component-level prepared reports for appropriate action. This report continues to be an effective tool for increasing coordination and tracking of conversions by offering a summary review of Schedule A employee eligibility status.</p> <p><b>Coordinate efforts with OCHCO to develop DHS Schedule A guidance.</b> The Department recognizes that while it has an established policy (DHS Directive) on administering the employment of veterans, it does not have a policy covering the Schedule A Appointment Authority for Individuals with Disabilities. During FY 2021, SRDI after consultation with the DHS Disability Employment Program, initiated coordination with the Human Capital Policy and Programs (HCPP), to explore options of implementing departmental guidance. Further coordination efforts will determine whether DHS guidance should be implemented in the form of standard operating procedures (SOPs), a new policy (DHS Directive) for Schedule A, or modifications to the existing Excepted Service Directive. DHS plans to determine a final approach to implement Schedule A guidance by the end of FY 2022.</p>

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

N/A – DHS began planned activities during FY 2018 and concluded that additional time is necessary to effectively conduct a thorough review.

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

To be determined.

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

DHS has modified the target date for completion to 06/30/2021.



<b>Trigger 4</b>	Higher than expected separation rates for individuals with disabilities.	
<b>Barrier(s)</b>		
<b>Objective(s)</b>	Increase retention rates of individuals with disabilities and targeted disabilities.	
<b>Responsible Official(s)</b>		<b>Performance Standards Address the Plan? (Yes or No)</b>
CRCL OCHCO		
<b>Barrier Analysis Process Completed? (Yes or No)</b>		<b>Barrier(s) Identified? (Yes or No)</b>
<b>No</b>		<b>No</b>
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	<p>FY 2021 Update: B1: Total Workforce Distribution by Disability/ Employee Loss indicates an increase when compared to FY 2020, representing 16.31 percent in FY 2021 compared to 14.43 percent in FY 2020. Separations for PWTs remained the same compared to FY 2020 holding at 1.76 percent.</p> <p>When comparing separation rates by the inclusion benchmarks, both groups are exceeding the rates of PWODs for both voluntary and involuntary separations.</p> <p>-----</p> <p>FY 2020 Update: B1: Total Workforce Distribution by Disability/ Employee Loss indicates an increase when compared to FY 2019, representing 14.43 percent in FY 2020 compared to 11.87 percent in FY 2019. PWTs also experienced an increase when compared to FY 2019, representing 1.76 percent compared to 1.58 in FY 2019.</p> <p>When comparing separation rates by the inclusion benchmarks, both groups are exceeding the rates of PWODs for both voluntary and involuntary separations.</p> <p>-----</p> <p>FY 2019: B1: Total Workforce Distribution by Disability/ Employee Loss indicates a slight increase when compared to FY 2018, representing 11.87 percent in FY 2019. PWTs separated at a rate of 1.58 percent, which represents no change compared to FY 2018.</p> <p>When comparing separation rates by the inclusion benchmarks, both groups are exceeding the rates of PWODs for both voluntary and involuntary separations.</p>

		<p>-----</p> <p>FY 2018: B14 – The employees with disabilities separation rate of 11.7 percent is higher than their overall workforce participation rate of 10.5 percent. Employees with disabilities experienced a 0.6 percent increase when compared to FY 2017.</p>
Complaint Data (Trends)	Yes	<p>FY 2021 Update:</p> <p>462 – (Part IV) Bases and Issues Alleged in Complaints Filed: DHS experienced a significant decrease from 118 in FY 2020 to 84 in FY 2021 in the total number of complaints alleging failure to accommodate resulting in a change of -28.81 percent.</p> <p>DHS also experienced a significant decrease from 244 in FY 2020 to 159 in FY 2021 in the total number of complaints alleging harassment based on disability resulting in a change of -34.84 percent.</p> <p>No FEAR Act Report (FY 2021) – Complaints based on disability increased in the last seven years (FY 2014 – FY 2020) from 13.60 percent of all complaints to 32.45 percent of all complaints in FY 2020, then decreasing to 29.26% at the end of FY 2021. Disability discrimination was alleged in 328 complaints, which is a 3.19 percent decrease over the prior year when disability discrimination was raised in 418 complaints.</p> <p>FY 2020 Update</p> <p>462 – (Part IV) Bases and Issues Alleged in Complaints Filed: DHS experienced a slight decrease from 129 in FY 2019 to 118 in FY 2020 in total number of complaints alleging failure to accommodate resulting in a change of -8.53 percent.</p> <p>DHS experienced a slight increase from 209 in FY 2019 to 244 in FY 2020 in the total number of complaints alleging harassment based on disability resulting in a change of 16.75 percent.</p> <p>FY 2019 Update:</p> <p>462 – (Part IV) Bases and Issues Alleged in Complaints Filed: Slight increase from 112 in FY 2018 to 129 in FY 2019 in total number of complaints alleging failure to accommodate resulting in a change of 15.18% percent. DHS continues to experience incremental increases.</p> <p>DHS experienced a decrease from 223 in FY 2018 to 209 in FY 2019 in the total number of complaints alleging harassment based on disability resulting in a change of -6.28 percent.</p> <p>DHS continues to monitor complaint activity by issue for “medical examinations. Of the 32 alleged complaints during FY 2019 based on “medical examination,” 30 were based on disability (mental/physical). Of the 30 complaints, six resulted in settlements. There were no findings reported during FY 2019.</p> <p>No FEAR Act – FY 2020 Report not available at the time of reporting. DHS will continue to review every two years.</p>

		<p>FY 2018</p> <p>462 – (Part IV) Bases and Issues Alleged in Complaints Filed: Slight increase from 106 in FY 2017 to 118 in FY 2018 in total number of complaints alleging failure to accommodate resulting in a change of 11.32 percent.</p> <p>Increase from 164 in FY 2017 to 223 in FY 2018 in total number of complaints alleging harassment based on disability resulting in a change of 35.98 percent.</p> <p>No FEAR Act Report (as of 4th Qtr. FY 2018) – Complaints based on disability increased in the last six years from 10.23 percent of all complaints to 12.54 percent of all complaints in FY 2018. Trend data revealed for the first time, complaints filed based on disability rose from fifth to fourth ranking out of twelve bases, since 2013.</p> <p>Complaints by issue, reveals complaints based on “reasonable accommodation” ranked seventh out of thirty-one issues during FY 2018 as of 4th Qtr. FY 2018 compared to tenth in FY 2013.</p> <p>DHS is also monitoring complaints by issue for “medical examinations,” which has also experienced a significant increase from eight in FY 2013 to 33 in FY 2018.</p>
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	<p>2020 FEVS:</p> <p>Results for the FY2020 FEVS were made available mid-FY21 and are the most recent results available. The FY 2020 FEVS consisted of substantially different questions than earlier versions of the FEVS so the overall averages are not comparable. FY 2020 data reveal a variance between PWDs (61.5 percent positive) and IWODs (63.3 percent positive). Question 38 from the FY 2019 survey, which asked about Prohibited Personnel Practices (for example, illegally discriminating for or against any employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements), was not included in the FY 2020 survey. Similarly, Question 25 – Awards in my work unit depend on how well employees perform their jobs – was not included on the FY 2020 survey. Question 19 on the FY 2020 survey asks about supervisor support of to balance work and life issues and PWD and IWODs respond the same at 79 percent positive. Question 23 asks about being treated with respect, and while the results for PWD and IWOD are very high, there is also a substantial difference in percent positive – 81.9 percent vs. 85.6%. Overall job satisfaction (Question 36) is lower for PWDs at 63.2% vs. 66.2% for IWODs.</p> <p>-----</p> <p>FY 2019: DHS reported 11.5 percent were respondents who reported to have a disability during the 2019 FEVS (less than the 12 percent goal of PWDs).</p>

		Further review of three questions used in the Best Places to Work report based on the FY 2019 FEVS, indicates an employee’s intent to remain with an agency, reveals PWDs responded more favorably to two of the questions when compared to Individuals without disabilities. See following summary:																												
		<table><tr><th>Item</th><th>Item Text</th><th>Gov</th><th>DHS</th><th>Non-PWDs</th><th>PWDs</th><th>Diff</th></tr><tr><td>Q. 40</td><td>I recommend my organization as a good place to work.</td><td>67.2%</td><td>56.3%</td><td>56.3%</td><td>56.8%</td><td>0.5%</td></tr><tr><td>Q. 69</td><td>Considering everything, how satisfied are you with your job?</td><td>68.9%</td><td>60.6%</td><td>60.8%</td><td>59.1%</td><td>-1.7%</td></tr><tr><td>Q. 71</td><td>Considering everything, how satisfied are you with your organization?</td><td>61.4%</td><td>51.3%</td><td>51.3%</td><td>51.4%</td><td>0.1%</td></tr></table>	Item	Item Text	Gov	DHS	Non-PWDs	PWDs	Diff	Q. 40	I recommend my organization as a good place to work.	67.2%	56.3%	56.3%	56.8%	0.5%	Q. 69	Considering everything, how satisfied are you with your job?	68.9%	60.6%	60.8%	59.1%	-1.7%	Q. 71	Considering everything, how satisfied are you with your organization?	61.4%	51.3%	51.3%	51.4%	0.1%
Item	Item Text	Gov	DHS	Non-PWDs	PWDs	Diff																								
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Q. 71	Considering everything, how satisfied are you with your organization?	61.4%	51.3%	51.3%	51.4%	0.1%																								
		<p>-----</p> <p>FY 2018: DHS reported 8,648 out of 68,780 or 12.57 percent were respondents who reported to have a disability during the 2018 FEVS (more than the 12 percent goal of PWDs).</p> <p>The largest variance between PWDs (53.9 percent positive) and persons without disabilities (63.7 percent) is -9.7 percent, for Q. 38 (Agency) - Prohibited Personnel Practices (for example, illegally discriminating for or against any employee/applicant, obstructing a person's right to compete for employment, knowingly violating veterans' preference requirements) are not tolerated. Satisfaction with training received (Q. 68) had the second highest variance of -6.5 percent, and Opportunity to demonstrate leadership skills (Q. 43) had the third highest variance of -6.1 percent when compared to employees without disabilities.</p> <p>Further review of three questions used in the Best Places to Work report based on the FY 2018 FEVS, indicates an employee’s intent to remain with an agency, reveals PWDs responded less favorably (combined difference of -6.2 percent) when compared to Individuals without disabilities. See following summary:</p>																												
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Q. 69	Considering everything, how satisfied	68.3%	60.4%	61.1%	58.0%	-3.1%																								

			are you with					
			organization?					
Exit Interview Data		No	See update under accomplishments.					
Focus Groups		No						
Interviews		No						
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)		No						
Other (Please Describe)		No						
<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding (Yes or No)</b>		<b>Modified Date (mm/dd/yyyy)</b>		<b>Completion Date (mm/dd/yyyy)</b>		
01/30/2018	Review and analyze exit surveys to identify barriers to retention.	Yes		12/30/2021		12/15/2021		
01/30/2018	Monitor separations on a quarterly basis by disability distribution.	Yes				10/16/2018		
06/30/2018	Collaborate with OCHCO to explore the feasibility of implementing new retention programs specifically for PWDs and PWTDS.	Yes		09/30/2022				
09/14/2018	Conduct study on reasonable accommodation requests and procedures for delayed and denied accommodations to identify potential correlations to high separations.	Yes		03/30/2022				
<b>Fiscal Year</b>	<b>Accomplishments</b>							
FY 2018	Upon review PWDs continue to separate voluntarily and involuntarily at a higher rate when compared to employees without disabilities. The overall percentage of separations for PWDs increased from 10.05 percent in FY 2017 to 11.67 percent in FY 2018. Similarly, PWTDS experienced an increase for involuntary separations from 1.36 percent in FY 2017 to 2.11 percent in FY 2018, while voluntary separations for PWTDS decreased from 1.62 percent in FY 2017 to 1.51 percent in FY 2018.							

	<p><b>Review and analyze exit surveys to identify barriers to retention.</b> CRCL reviewed and analyzed data from the FY 2018 exit survey. Data revealed approximately 18 percent of all employees voluntarily separating indicated their primary reason for leaving resulting in 1,506 responses. Of those responses, 215 or 14.2 percent of the respondents reported having a disability.</p> <p>Of the respondents who indicated they had a disability, the top three reasons for leaving other than Retirement, Moving to Another DHS Component, or Other were the same for respondents without disabilities, including:</p> <p>Supervision/Management – 11.63 percent Advancement Opportunities – 11.63 percent Personal/Family Related – 8.84 percent</p> <p>CRCL also noted, when comparing leaving based on health-related reasons, respondents with disabilities indicated health-related reasons as the primary reason 5.58 percent of the time compared to 1.82 percent for respondents without disabilities.</p> <p>In September 2018, DHS OCHCO convened an exit survey working group to examine the low participation rates overall. The working group led by the DHS Engagement Team Lead, Chief Learning and Engagement Office, OCHCO consists of representatives from all DHS Components including representatives from CRCL. The initial goal of the working group was to review current DHS Exit Survey and Component Exit Surveys and provide recommended changes to the DHS survey to improve participation and usefulness of the data. The working group was tasked to also review off-boarding practices related to the exit survey to determine best practices for improving participation. CRCL representatives ensured consideration of disability-related questions and sought their inclusion in the final submission of established core questions. The working group planned to achieve the goals outlined above and to begin implementation by April 2019.</p> <p>The target date for completion on this activity was scheduled to be extended for two years to allow DHS to obtain reliable data to determine why employees with disabilities were leaving at a higher rate than employees without disabilities based on the inclusion benchmark.</p> <p><b>Monitor separations on a quarterly basis by disability distribution.</b> CRCL developed a quarterly dashboard to monitor workforce demographics including separations by disability. CRCL will continue to monitor separations on a quarterly basis as a standard practice.</p> <p><b>Explore feasibility of implementing new retention programs specifically for PWDs and PWTs.</b> CRCL through coordinated efforts with OCHCO/SRDI will continue to identify strategies for increasing participation of employees with disabilities in existing DHS mentoring programs and career development programs. During FY 2018, CRCL requested that all Components advertise and encourage individuals with disabilities to consider applying to the DHS Headquarters Mentoring program and all other career development programs already in place throughout the Department to support our affirmative employment obligations.</p>
FY 2019	<p><b>Review and analyze exit surveys to identify barriers to retention.</b> Modified target date due to the transitional period in FY 2019. Two additional Components implemented Component specific exit surveys, further decentralizing the exit survey program within DHS.</p> <p>Additional efforts during FY 2019 included adding three additional disability-related questions to the DHS Survey. The same questions were shared with the Components who administer their own</p>

exit surveys. As a result of the coordinated efforts of CRCL and OCHCO, the questions now include:

**1. DHS proactively supports efforts to improve the recruitment, hiring, advancement, and retention of individuals with disabilities.**

*Matrix scale:*

	<i>Strongly Disagree</i>	<i>Disagree</i>	<i>Neither Agree or Disagree</i>	<i>Agree</i>	<i>Strongly Agree</i>
<i>Recruitment</i>					
<i>Hiring</i>					
<i>Advancement</i>					
<i>Retention</i>					

*Followed by an optional open-ended comment box*

**2. DHS takes appropriate steps to ensure accessibility (technology and facility) requirements are met for qualified individuals with disabilities.**

*Matrix scale:*

	<i>Strongly Disagree</i>	<i>Disagree</i>	<i>Neither Agree or Disagree</i>	<i>Agree</i>	<i>Strongly Agree</i>
<i>Technology</i>					
<i>Facility</i>					

*Followed by an optional open-ended comment box*

**3. DHS takes appropriate steps to ensure reasonable accommodation and/or Personal Assistance Services are provided to qualified individuals with disabilities.**

	<i>Strongly Disagree</i>	<i>Disagree</i>	<i>Neither Agree or Disagree</i>	<i>Agree</i>	<i>Strongly Agree</i>
<i>Reasonable Accommodations</i>					
<i>Personal Assistance Services</i>					

*Followed by an optional open-ended comment box*

**Explore feasibility of implementing new retention programs specifically for PWDs and PWTDs.**

CRCL developed a plan to implement a DHS Disability Mentoring Program. Current plans are to implement a six-month program pilot during FY 2020, that will be modeled upon the CRCL DHS Women in Law Enforcement Mentoring Program launched in 2019.

CRCL continues to promote the DHS Headquarters Mentoring program and all other career development programs including the recently launched Supervisory Leadership Bridges Self Development Program, which is open to employees with a minimum of one-year employment in DHS and who are in the GS-11 – GS-13 grade levels in the 1801, 1811, 0132, 0301, 0343, and 2210 occupational series. This program is an innovative approach to providing employees across the Department with a flexible developmental path that targets important aspects of supervisory leadership. This program addresses a curated set of essential leadership competencies and integrates

	virtual learning resources and experiential developmental activities to support affirmative employment obligations.												
FY 2020	<p><b>Review and analyze exit surveys to identify barriers to retention.</b> Modified target date due to ongoing transitions during FY 2020. As a result, the DHS exit survey platform migrated from a SharePoint platform to a survey tool (SurveyMonkey) to better manage and track responses. Additionally, more Components have moved on to Component specific exit survey processes, further decentralizing the exit survey program within DHS.</p> <p>DHS Department-wide Exit Survey participating Components as of September 30, 2020 includes:</p> <ul style="list-style-type: none"><li>• DHS HQ (Includes S&amp;T, OS, and I&amp;A)</li><li>• USCG</li><li>• FLETC</li><li>• FEMA</li><li>• USCIS</li></ul> <p>Components using separate exit survey tools now includes:</p> <ul style="list-style-type: none"><li>• USSS</li><li>• TSA</li><li>• CBP</li><li>• ICE</li><li>• CISA</li></ul> <p>As of FY 2020, DHS-wide exit survey results now include specific data on the newly established disability program questions. DHS will use the FY 2020 responses to these questions as a baseline for future analysis</p>												
FY 2021	<p><b>FY 2021 Update – DHS Exit Survey</b> The DHS Exit Survey results exclude TSA, USSS, CBP, CISA and ICE. Due to continued transition efforts, the exit survey process has resulted in increased decentralization of efforts. Component specific data can be gleaned from Component level reports. Aside from retirement, based on data available for FY 2021, the top three primary reasons for PWDs separating from DHS include: 1) Supervisor/Management; 2) Personal or Family Related; and 3) Advancement Opportunities.</p> <p>FY 2021 exit survey results now include specific data on the newly established disability program questions. DHS use the FY 2020 responses to these questions as a baseline comparison in the FY 2021 summary analysis. The following data summarizes the top three response rates and compares the total percent of favorable responses (Strongly Agree; Agree; and Neither Agree nor Disagree) for each of the six questions by respondents without a disability (PWOD) compared to PWD and PWTD:</p> <p><b>1. DHS took appropriate steps to ensure accessibility (technology and facility) requirements were met for qualified individuals of disabilities.</b></p> <table><tr><td></td><td><b>FY 20</b></td><td><b>FY 21</b></td></tr><tr><td><b>PWOD</b></td><td><b>43.84 %</b></td><td><b>34.04%</b></td></tr><tr><td><b>PWD</b></td><td><b>65.71%</b></td><td><b>54.93%</b></td></tr><tr><td><b>PWTD</b></td><td><b>43.75%</b></td><td><b>35.29%</b></td></tr></table>		<b>FY 20</b>	<b>FY 21</b>	<b>PWOD</b>	<b>43.84 %</b>	<b>34.04%</b>	<b>PWD</b>	<b>65.71%</b>	<b>54.93%</b>	<b>PWTD</b>	<b>43.75%</b>	<b>35.29%</b>
	<b>FY 20</b>	<b>FY 21</b>											
<b>PWOD</b>	<b>43.84 %</b>	<b>34.04%</b>											
<b>PWD</b>	<b>65.71%</b>	<b>54.93%</b>											
<b>PWTD</b>	<b>43.75%</b>	<b>35.29%</b>											



Favorable response rates declined from FY 2020 to FY 2021 for all groups. PWD had the highest favorable response rate, with similar rates from both PWTD and PWOD.

**2. DHS took appropriate steps to ensure reasonable accommodation and/or Personal Assistance Services were provided to qualified individuals with disabilities.**

	<b>FY 20</b>	<b>FY 21</b>
<b>PWOD</b>	<b>42.02 %</b>	<b>33.64%</b>
<b>PWD</b>	<b>48.57%</b>	<b>33.80%</b>
<b>PWTD</b>	<b>43.75%</b>	<b>29.42%</b>

Favorable response rates declined from FY 2020 to FY 2021 for all groups. PWD had the highest favorable response rate, with PWTD having the lowest favorable rate in FY 2021.

**3. DHS proactively supported efforts to improve the RECRUITMENT of individuals with disabilities.**

	<b>FY 20</b>	<b>FY 21</b>
<b>PWOD</b>	<b>36.96 %</b>	<b>28.29%</b>
<b>PWD</b>	<b>22.86%</b>	<b>23.89%</b>
<b>PWTD</b>	<b>43.75%</b>	<b>32.35%</b>

Favorable response rates declined from FY 2020 to FY 2021 for all groups. PWTD had the highest favorable response rate, with PWD having the lowest favorable rate during both years.

**4. DHS proactively supported efforts to improve the HIRING of individuals with disabilities.**

	<b>FY 20</b>	<b>FY 21</b>
<b>PWOD</b>	<b>25.73 %</b>	<b>28.43%</b>
<b>PWD</b>	<b>57.32%</b>	<b>33.81%</b>
<b>PWTD</b>	<b>56.35%</b>	<b>32.35%</b>

Favorable response rates declined from FY 2020 to FY 2021 for PWD and PWTD. Both PWD and PWTD had higher favorable response rates, when compared to PWOD during both years.

**5. DHS proactively supported efforts to improve the ADVANCEMENT of individuals with disabilities.**

	<b>FY 20</b>	<b>FY 21</b>
<b>PWOD</b>	<b>33.34 %</b>	<b>28.56%</b>
<b>PWD</b>	<b>45.72%</b>	<b>32.39%</b>
<b>PWTD</b>	<b>18.75%</b>	<b>26.47%</b>

Favorable response rates declined from FY 2020 to FY 2021 for PWOD and PWD. PWTD had the lowest favorable response rates, when compared to PWOD and PWD during both years.

	<b>6. DHS proactively supported efforts to improve the RETENTION of individuals with disabilities.</b>		
	<b>FY 20</b>	<b>FY 21</b>	
	<b>PWOD</b>	<b>32.24 %</b>	<b>27.91%</b>
	<b>PWD</b>	<b>17.14%</b>	<b>33.80%</b>
	<b>PWTD</b>	<b>31.25%</b>	<b>26.47%</b>
	Favorable response rates declined from FY 2020 to FY 2021 for PWOD and PWTD, while rates increased significantly for PWD.		
	DHS will continue to review and monitor exit survey results and will include a full summary of results and perspectives in the DHD Disability Barrier Analysis report in FY 2022.		
	<b>Explore feasibility of implementing new retention programs specifically for PWDs and PWTDs.</b>		
	During FY 2021, the second cohort of the DHS Disability Mentoring Program was launched. This program provides valuable career development opportunities for both mentors and mentees with disabilities. It also provided participants with the opportunity to learn from and network with colleagues across DHS. The program matched participants from across the Department and provided a forum to gain insight and perspective on the various career opportunities DHS had to offer. Mentee applicants were required to self-identify as having a disability as a condition to acceptance in the program. Mentor applicants were not required to self-identify as having a disability.		
Due to the continuing challenges of COVID and other priorities, OCHCO has not considered or implemented any additional disability specific retention programs. However, DHS continues to promote the DHS Headquarters Mentoring program and all other career development programs including the Supervisory Leadership Bridges Self Development Program.			

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

Exit Surveys – Low response rate and reliable data. CRCL will continue to serve on the working group and provide recommendations and technical guidance.

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

To be determined.

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

DHS has modified the target date for completion to 09/30/2021.