



# U.S. Department of Homeland Security

## AFFIRMATIVE ACTION PLAN FOR THE RECRUITMENT, HIRING, ADVANCEMENT, AND RETENTION OF PERSONS WITH DISABILITIES

**Fiscal Year 2022**



**Homeland  
Security**

## Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

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

### Section I: Efforts to Reach Regulatory Goals

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

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

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

Answer Yes

b. Cluster GS-11 to SES (PWD)

Answer No

Persons with disabilities represent 14.75 percent (28,669/194,345) of the DHS total permanent workforce. Based on the FY 2022 MD-715 utilization analysis, combining employees by GS grade level and equivalent based on salaries, DHS is exceeding the 12 percent regulatory onboard goal for PWD in the GS 11 to SES Cluster, but falls short in the GS-1 to GS-10 Cluster:

a. Cluster GS-1 to GS-10 (PWD) 10.69%

b. Cluster GS-11 to SES (PWD) 17.05 %

When compared to the FY 2021 onboard representation of 10.47 percent in the GS-1 to GS-10 Cluster and 16.37 percent in the GS-11 to SES Cluster, DHS is continuing to see progress in both Clusters. 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.

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

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

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

Answer Yes

b. Cluster GS-11 to SES (PWTD)

Answer Yes

Persons with targeted disabilities represent 1.27 percent (2,460/194,345) of the DHS total permanent workforce. Based on the FY 2022 MD-715 utilization analysis, combining employees by GS grade level and equivalent based on salaries, DHS has a trigger in both Clusters:

a. Cluster GS-1 to GS-10 (PWTD) 1.21 %

b. Cluster GS-11 to SES (PWTD) 1.30 %

When compared to FY 2021, the percentage for PWTDs remained static, with only a slight increase, from 1.27 percent in FY 2021 to 1.30 percent in FY 2022, for the GS-11 to SES Cluster.

Grade Level Cluster (GS or Alternate Pay Plan)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	14,375	3,610	25.11%	443	3.08%
Grades GS-11 to SES	112,162	19,053	16.99%	1,455	1.30%

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 announced on an annual basis from DHS OCHCO to all DHS Components via the Human Capital Leadership Council (HCLC). Similarly, OCHCO issues annual hiring goals for Veterans and Veterans with Disabilities. The HCLC is comprised of the senior human capital officials in OCHCO, the DHS Components, and other lines of business. These goals are communicated to the Components' EEO and Diversity officials and staff, to be socialized and implemented throughout the Components via human resources, EEO, Diversity practitioners, and hiring officials.

During FY 2022, DHS maintained a 12 percent hiring goal based on all hires (permanent/temporary) for Individuals with Disabilities at all grade levels; a 2 percent hiring goal for Individuals with Targeted Disabilities at all grade levels, excluding Law Enforcement and Transportation Security Officer (TSO) occupations; and a 2 percent hiring goal for Schedule A hires, also excluding law enforcement and transportation security officer occupations. DHS also issued a 25 percent hiring goal for Veterans and a 10 percent goal for Veterans with disabilities.

In FY 2022, DHS exceeded hiring goals for PWDs at 15 percent and the hiring goal for PWTs at 2.3 percent, for all (permanent/temporary) new hires, when excluding law enforcement and transportation security officer occupations. In addition, Schedule A hires constituted 2.8 percent of all new hires in non-law enforcement and non-TSO positions, exceeding the DHS goal for four 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 program, and oversee any other disability hiring and advancement program the agency has in place.

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

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

Answer Yes

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 Talent Recruitment, Inclusive Diversity and Engagement (STRIDE) 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) reported by each Component (including HQ) are included in the counts provided in the following table.

2. 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 laura.davis@hq.dhs.gov
Answering questions from the public about hiring authorities that take disability into account	102	10	24	Laura Davis, Disability Employment Program Manager, CRCL laura.davis@hq.dhs.gov
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	Nicshan Floyd, Acting Executive Director, Office of Accessible Systems and Technology (OAST), 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

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

Answer Yes

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:

- Quarterly Disability Employment Advisory Council meetings to share program guidance, updates, and best practices across DHS Components.
- CRCL provided continuous guidance and training related to DHS disability employment trends, reasonable accommodation tools and resources, Accessibility (Section 508), recruitment and outreach, Schedule A hiring, and Service Animals and Section 504.

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.

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

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

Answer Yes

CRCL has sufficient funding and resources to support the Department-wide disability program.

Upon review of each Component’s response to compliance indicators and the associated eleven measures outlined by the EEOC in the Agency Self-Assessment, under B.4: “The agency has sufficient budget and staffing to support the success of its EEO program”, seven deficiencies were noted by the following Components:

B.4.a.1: CBP; B.4.a.2: CBP, and CISA; B.4.a.3: CBP, CISA, and ICE; B.4.a.7: USCG; B.4.a.8: CISA; B.4.a.9: CBP, and CISA; B.4.a.10: CBP, and CISA

In support of this measure, CRCL continues to provide Components 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 Fact Sheet on Personal Assistance Services
- 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

Please refer to individual Component FY 22 MD 715 reports for Component-level plans and details.

## Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	DHS COMPONENT DEFICIENCIES		
	<div>1. A.2.a.2. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)] (HQ)</div> <div>2. A.2.b.3. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.</div> <div>3. B.4.a.10. to effectively manage its reasonable accommodation program? [see 29 CFR §1614.203(d)(4)(ii)] (USCIS)</div> <div>4. B.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women’s Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 720.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709] (USCIS)</div> <div>5. C.2.a.6. Do the agency’s training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR §1614.203(d)(2)]</div> <div>6. C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC’s regulations and guidance? [see 29 CFR §1614.203(d)(3)] (HQ, USCIS)</div> <div>7. C.2.b.4. Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [see 29 CFR §1614.203(d)(3)(i)(M)] (FEMA)</div> <div>8. C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, 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, excluding ongoing interpretative services, in the comments column. (CBP, FLETC, FEMA, ICE, TSA, USCG, USCIS)</div> <div>9. C.2.c. Has the agency established procedures for processing requests for personal assistance services that comply with EEOC’s regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR §1614.203(d)(6)] (FEMA, HQ, USCIS)</div> <div>10. C.2.c.1. Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR §1614.203(d)(5)(v)] If “yes”, please provide the internet address in the comments column. (FEMA)</div> <div>11. D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1) (iii)(C)] (CBP)</div> <div>12. D.4.a. Does the agency post its affirmative action plan on its public website? [see 29 CFR §1614.203(d)(4)] If yes, please provide the internet address in the comments.</div>		
Objective	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.		
Target Date	Sep 30, 2022		
Completion Date			
Planned Activities	<div>Target Date</div> <div>Jul 31, 2023</div> <div>Jul 31, 2023</div> <div>Dec 1, 2023</div>	<div>Completion Date</div>	<div>Planned Activity</div> <div>CRCL/DMS staff meet one-on-one with each Component EEO function and review program deficiencies, actions, accomplishments, and plans</div> <div>Data call to all Components for mid-year update on all Part G measures and progress made on deficiencies</div> <div>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</div>
Accomplishments	<div>Fiscal Year</div> <div>2022</div>	<div>Accomplishment</div> <div>Since these are ongoing annual activities, DHS updated the Modified dates to 2023. The data call for the mid-year update on Part G measures and end of year for Parts G, H, and J was</div>	

		issued to all Components. The results were compiled by CRCL/DMS staff then shared with DHS Components. The overall compliance rate with the six essential elements for DHS decreased from 95.5 percent in FY 2021 to 93.9 percent in FY 2022. CISA, a recently created DHS Component, prepared their first MD-715 report for submission in FY 2022, and the EEO Office was established in Q4 of FY 2021. When CISA was excluded from the compliance rate comparison, compliance increased from 95.5 percent in FY 2021 to 95.9 percent in FY 2022.
	2021	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. 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. CRCL/DMS staff conducted one-on-one meetings with each Component EEO official during which they reviewed program deficiencies, actions, accomplishments, and plans. 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).
	2020	Since these are ongoing, annual activities, DHS updated the Modified dates to 2021 although all three activities were completed for the FY 2020 reporting year. The data call to all Components for the mid-year update on Part G measures was issued on 5/12/2020 and compiled by CRCL/DMS staff. CRCL/DMS staff conducted one-on-one meetings with each Component EEO function and review program deficiencies, actions, accomplishments, and plans. The data call to all Components for end-year Parts G, H, and J was issued and the Component Part G input was consolidated into this departmental MD-715 report (see Executive Summary).
	2019	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. 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; facilitated discussion of how to address common unmet measures. Conducted one-on-one meetings with Components to review program deficiencies, actions, accomplishments, and plans. Issued data call to all Components for end-year Parts G and H, including progress made on deficiencies (Part H); Consolidate into Department Part G and compare to prior fiscal year Part G.
	2018	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; facilitated discussion of how to address common unmet measures. Conducted one-on-one meetings with Components to review program deficiencies, actions, accomplishments, and plans. Issued data call to all Components for end-year Parts G and H, including progress made on deficiencies (Part H); Consolidate into Department Part G and compare to prior fiscal year Part G.

## Section IV: 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 APPLICATIONS WITH DISABILITIES

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

In addition to regular outreach efforts and coordinated by DHS Disability Employment Program Managers and Selective Placement Program Coordinators, DHS conducts enterprise-wide recruitment efforts led by OCHCO in the following ways:

**SMORE:** The Strategic Marketing, Outreach, and Recruitment Engagement (SMORE) enterprise system, launched for Department-wide use on October 1, 2019, simplified the way OCHCO reports and analyzes recruitment activities. With the addition of the Pathways and Student Programs module in FY 2021, the Strategic Talent Recruitment, Inclusive Diversity and Engagement (STRIDE) staff developed a new module in support of automating Secretary's Honors Program reporting. This module tracks hiring and participation in the program, replacing weekly manual reporting which captures each Component's respective hiring timeline and participant engagement. SMORE Power BI reports provide live results and complex visualizations with the capability to drill down further into the data. Dashboards are broken down into four functional areas: recruiting, outreach, Pathways and Student Programs, and Secretary's Honors Program, with 38 dynamic and complex dashboards – a 58 percent increase in visualizations from FY 2021. These dashboards document recruitment and outreach efforts across the Department. Additional dashboards are being developed to support the Intelligence and Cybersecurity Diversity Fellowship and the Joint Hiring Event module.

**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. In FY 2022, CRC members participated in seventeen departmentwide recruiting and outreach events which focused on targeted skillsets which includes but is not limited to, Women in Law Enforcement, Cybersecurity, and STEM.

**DHS Employee Associations:** DHS has both 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. Several of the EAs led listening sessions for their members, allies, and DHS Leadership to provide an open and trusted forum to share concerns and ideas on ways to support each other through difficult times and situations. The DHS Deaf and Hard of Hearing EA hosted its first virtual panel open to all DHS employees to share personal and professional stories on how they dealt with inclusion challenges as COVID-19 emerged. The Deaf and Hard of Hearing EA also led an initiative to have clear masks available across the Department to mitigate communication challenges. In FY 2023, the Department aims to finalize updates to the current DHS Directive and create Instructions to further support its EA Programs. The goal is to not only expand awareness of the programs, but to create an environment across the Department where staff at all levels understand the value EAs have in recruiting and retaining a diverse workforce. Also, during FY 2022, efforts were initiated to develop a new EA for employees with disabilities. The Department-wide Disability Alliance EA is expected to be fully operational in FY 2023.

**Pathways Programs:** DHS continues to use the Pathways Programs, the Federal Government's primary entrance point for students and recent graduates. In FY 2022, DHS hired 266 Pathways student interns, 135 recent graduates, and 12 Presidential Management Fellows, totaling 413 Pathways Programs participants. Of the 413 program participants, 12.11 percent were individuals with disabilities.

**Hiring Goals for Schedule A:** Since FY 2018, DHS has set a goal for Schedule A Hires at 2.0 percent of all new hires within each grade level in non-law enforcement and non-Transportation Security Officer (TSO) positions. In an annual IWD and IWTD Hiring Goal memo to the Department, DHS promotes the use of Schedule A Hiring Authority through the Workforce Recruitment Program (WRP). In FY 2022, Schedule A hires comprised 2.8 percent of all new hires in non-law enforcement related and non-TSO positions, a slight increase of 0.3 percent when compared to the 2.5 percent of Schedule A hires in FY 2021.



**Individuals with Disabilities Career Fairs:** DHS maintains strategic partnerships with national disability advocacy groups and provides Components with recruitment resources for IWDs/IWTDs. In FY 2022, 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 has attended over 360 unique events since 2017 in all states and U.S. Territories to attract candidates who identified as IWD/IWTD.

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

- Attended 27 recruiting and outreach events in FY 2022 specific to individuals with disabilities.
- Had a department-wide presence at the Bender Virtual Event in August 2022. DHS recruiters interacted with almost 200 individuals, and 25 resumes were collected for the Schedule A resume repository.
- Hosted a “DHS is Hiring” webinar in July 2022, 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 percent or more Disabled Veterans preference hiring authorities, effective resume writing, and how to create a profile on USAJOBS. This webinar had over 500 attendees.
- Conducted 25 phone interviews with National Technology Institute of the Deaf students for the fourth consecutive year. DHS reviewed their resumes and completed their interview notes in the Workforce Recruitment Program (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 WRP and the Department of Defense’s (DOD) Operation Warfighter Program.
- Supported and promoted the Workforce Recruitment Program and the Department of Defense Operation Warfighter Program.

**Disabled Veterans:**

DHS continues to maintain partnerships to assist with recruiting qualified disabled veterans, including: (1) collaboration with the Department of Veterans Affairs (VA) to effectively use their resources to advertise DHS job opportunities; (2) supporting VA programs such as the Non-Paid Work Experience (NPWE) program which provides the opportunity for veterans to gain valuable work experience through an internship with government agencies with the possibility for full time employment; (3) partnership with DOD’s Operation Warfighter Program, which allows DHS Components to train service members in various federal occupations and have the option of hiring them as permanent DHS employees; and (4) partnership with Transition Assistance Program (TAP), which allows DHS access to military installations nationwide to offer DHS opportunities to transitioning service members. Other DHS partnerships include DOD’s Hiring our Heroes initiative; Department of Labor Workforce Recruitment Program; U.S. Navy Safe Harbor Program; the Marine Corps Wounded Warrior Regiment; and college and university Reserve Officer Training Corps (ROTC) programs.

2. Pursuant to 29 C.F.R. §1614.203(a)(3), describe the agency's use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and 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 medal 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 2022, DHS hired 290 individuals with disabilities utilizing the Schedule A Hiring Authority, representing 2.80 percent of new hires, excluding Law Enforcement and Transportation Security Officer occupations, significantly exceeding the FY 2022 goal of 2 percent.

Further supporting its disability hiring efforts, DHS hired 1,697 veterans with disabilities, representing 7 percent of all new hires.

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

Each DHS Component utilizes 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, DHS's Strategic Recruitment, Diversity, and Inclusion (SRDI) Council, 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 department-wide strategy to implement Schedule A guidance by the end of FY 2023.

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.

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

Answer Yes

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 contract funding to develop the new curriculum which was originally scheduled to replace this training course by 2021. CRCL extended the contract agreement to further expand the new training module to include content related to E.O. 14035, Diversity, Equity, Inclusion, and Accessibility (DEIA) in the Federal Workforce, which issued in June 2021 and focuses on disability inclusion and accessibility, and expansion of hiring and retention strategies. The Department anticipates the new course will be ready for deployment on all DHS learning management systems by mid-year FY 2023.

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 success of each event, including attracting the right talent. This information also assists with benchmarking similar activities, providing a means to strengthen the Department's efforts to enhance outreach to applicants with disabilities and targeted disabilities.

DHS uses a consolidated disability organization listserv containing more than 550 organizations to conduct targeted recruiting by promoting participation in various recruitment activities and in Department-hosted webinars. The listserv is maintained and updated on a regular basis by CRCL as new organizations are identified, and partnerships are established. CRCL will continue efforts with members of the DEAC to ensure this valuable resource remains current.

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

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

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

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

During FY 2022, DHS hired 2,883 PWDs, representing 14.99 percent of all permanent hires, a decrease from 16.14 percent of the hires reported in FY 2021. DHS also experienced a slight decrease in FY 2022 for PWTDs, representing 1.37 percent of permanent hires compared to 1.44 percent in FY 2021.

However, due to regulatory and statutory medical and physical requirements, DHS excludes law enforcement and transportation security officer (TSO) occupations when determining whether triggers exist for PWTD. Using this approach, DHS exceeded the 2 percent hiring goal for PWTD, representing 2.62 percent of permanent hires (182/6,947).

Further, Schedule A hires comprised 4.16 percent of permanent new hires in non-law enforcement and non-TSO positions.

- DHS criteria used for counting the disability workforce is consistent with OPM and EEOC guidance.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%) <sup>1</sup>	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	146,386	2.69%		1.24%	
% of Qualified Applicants	73,590	2.90%		1.32%	
% of New Hires	15,245	7.12%		0.98%	

Applicant flow data and percent of new hires in the above chart (C.1) only includes applicants who self-identified as a PWD. Actual percentage of PWD permanent hires (including Veterans with a compensable service-connected disability and Schedule A hires) during FY 2021, represented 16.14%, far exceeding the 12% goal.

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

a. New Hires for MCO (PWD)

Answer Yes

b. New Hires for MCO (PWTD)

Answer Yes

Applicant flow data (AFD) and new hires for MCOs by disability for all DHS Components were reviewed (Table B6). 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**

0083 - Police (Uniformed Division Officer): 0.94 percent were Qualified compared to 0.00 percent for Selections

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

**PWTD: Four out of nine MCOs**

0083 - Police (Uniformed Division Officer): 0.50 percent were Qualified compared to 0.00 percent for Selections

1895 - Customs and Border Protection Officer: 0.44 percent were Qualified compared to 0.11 percent for Selections

1896 - Border Patrol Agent: 0.52 percent were Qualified compared to 0.18 percent for Selections

1811 - Criminal Investigator: 0.50 percent were Qualified compared to 0.00 percent for Selections

The mission-critical occupations listed above 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 AFD, AFD are only available for job announcements that are closed and fully audited. Because of this rule, certain MCO AFD was not available for analysis. AFD for FY 2022 does not include data for USCIS or hires for TSA Transportation Security Officers.

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

a. Qualified Applicants for MCO (PWD)

Answer N/A

b. Qualified Applicants for MCO (PWTD)

Answer N/A

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. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.

a. Promotions for MCO (PWD)

Answer Yes

b. Promotions for MCO (PWTD)

Answer Yes

A review of B6 Internal Competitive Promotions by MCO was conducted. AFD 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:

**PWD: One out of nine MCOs**

1811 - Criminal Investigator: Qualified 1.92 percent; Selections 1.28 percent

**Selections PWTD: Four out of nine MCOs**

1811 - Criminal Investigator: Qualified 0.93 percent; Selections 0.10 percent

1801 - General Inspection, Investigation & Compliance: Qualified 5.71 percent; Selections 1.66 percent

1895 - Customs and Border Protection Officer: Qualified 0.81 percent; Selections 0.10 percent

2210 - Information Technology Management: Qualified 3.99 percent; Selections 1.73 percent

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

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

### A. ADVANCEMENT PROGRAM PLAN

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

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 2022, CRCL delayed the launch of the 3rd Cohort of the DHS Disability Mentoring Program due to staffing changes, with plans to start the application period during October 2022, in coordination with National Disability Employment Awareness Month. The DHS Disability Mentoring Program is led and managed by the CRCL Equal Employment Opportunity Division's Diversity Management Section. CRCL will continue to collaborate with other DHS offices and Components in the development and deployment of the program.

### B. CAREER DEVELOPMENT OPPORTUNITIES

1. 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 and professional development goals. In FY 2022, 28 employees participated in the U.S. Department of Defense Senior Service School Master's Degree programs, and 8 employees attended the National Intelligence University and participated in a bachelor's or master's degree program. DHS also nominated employees to attend the Center for Homeland Defense and Security Masters (19), Emergence (15), Pacific Executive Leaders Program (2), and Executive Leaders Program (12). 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 means such as:

- The DHS Senior Executive Service Candidate Development Program (SES CDP) was advertised both internally and externally to DHS. 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. Beginning in FY 2021 DHS advertised the SES CDP through its Employee Associations and OCHCO's SRDI Council.
- DHS, in partnership with SkillSoft, offers nearly 40,000 online learning resources. 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 2022, DHS hired 266 Pathways student interns, 135 recent graduates, and 12 Presidential Management Fellows, totaling 413 Pathways Program participants. Of these, 12.11 percent identified as PWDs, and 1.94 percent were PWTd.

- The DHS Mentoring Program, open to all DHS federal employees, was designed to build and retain a diverse, well-rounded cadre of employees. The program has helped participants acquire and cultivate numerous skills including managing change, communication, leadership, and time management. Mentoring relationships benefit the mentee, as well as the mentor, and strengthens communications, trust, and collaboration across the DHS enterprise. In FY 2022, the DHS Mentoring Program consisted of 404 mentors and 373 mentees, totaling 777 participants. Of the participants, 9.3 percent self-identified as having a disability, with 1.6 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. Participants are matched across the department, providing a forum to gain insight and perspective on the various career opportunities DHS has to offer. The second cohort, launched in FY 2021, ended during the second quarter of FY 2022. The third cohort is scheduled to launch in October 2022 in observance of National Disability Employment Awareness Month.

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

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Other Career Development Programs	492	44	3.46	2.27	1.22	0.0
Detail Programs						
Coaching Programs						
Training Programs						
Internship Programs		266		8.27		1.8
Fellowship Programs		147		19.05		2.04
* Mentoring Programs		777		9.30		1.60

\* DHS HQ Mentoring Program (777 (PWD = 73 PWTD = 13) participants

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

a. Applicants (PWD)

Answer N/A

b. Selections (PWD)

Answer Yes



Detailed applicant flow data (AFD) for career development programs identified above, except for the SES CDP program, are not available at the Department level. DHS achieved full operational capability for its new talent management system for the majority of 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 the 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 include inclusive language in all career development programs to increase the participation of PWDs.

When comparing the number of selections of PWDs to the applicants in the SES CDP Program and the 12 percent goal in lieu of the relevant applicant pool benchmark for the other career development programs, triggers exist in the following programs:

PWD Selections:

- Internship Programs (Pathways Intern) (8.27 %)
- Mentoring Programs (DHS HQ Mentoring Program) (9.30%)
- DHS SES CDP (2.27%)

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

a. Applicants (PWTD)

Answer N/A

b. Selections (PWTD)

Answer Yes

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 2022, 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 applicants (SES CDP Program) and the 2 percent goal in lieu of the relevant applicant pool, triggers exist in the following programs:

PWTD Selections:

- Internship Programs (Pathways Intern) (1.80%)
- Fellowship Programs (Presidential Management Fellows) (2.20%)
- Mentoring Programs (DHS HQ Mentoring Program) (1.60%)
- DHS SES CDP (0.00%)

In the DHS SES CDP program, triggers exist for PWTD in the applicant pool when compared to the GS-15 or equivalent workforce benchmark (1.46 percent). (B7 Data Table)

**C. AWARDS**

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

a. Awards, Bonuses, & Incentives (PWD)

Answer Yes

b. Awards, Bonuses, & Incentives (PWTD)

Answer Yes

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

<b>PWDs</b>	<b>PWD Inclusion Rate</b>	<b>PWOD Inclusion Rate</b>
Time-Off Awards 1 – 10 Hours:	18.65%	22.49%
Time-Off Awards 21 – 30 Hours:	13.32%	21.55%
Cash Awards \$500 and Under:	39.11%	71.24%
Cash Awards \$501 and \$999:	29.05%	44.85%
Cash Awards \$1,000 – \$1,999:	36.36%	45.84%
Cash Awards \$2,000 - \$2,999:	14.53%	15.17%

<b>PWTDs</b>	<b>PWTD Inclusion Rate</b>	<b>PWOD Inclusion Rate</b>
Time-Off Awards 1 – 10 Hours:	2.45%	22.49%
Time-Off Awards 11 – 20 Hours:	11.67%	12.97%
Time-Off Awards 21 – 30 Hours:	10.08%	21.55%
Cash Awards \$500 and Under:	48.09%	71.24%
Cash Awards \$501 and \$999:	34.63%	44.85%
Cash Awards \$1,000 – \$1,999:	36.83%	45.84%
Cash Awards \$2,000 - \$2,999:	13.82%	15.17%

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

a. Pay Increases (PWD)

Answer No

b. Pay Increases (PWTD)

Answer Yes

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:	2.76%
PWOD Inclusion Rate:	3.48%

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

a. Other Types of Recognition (PWD)

Answer N/A

b. Other Types of Recognition (PWTD)

Answer N/A

DHS did not have any other types of recognition programs during FY 2022.
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## D. PROMOTIONS

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

a. SES

i. Qualified Internal Applicants (PWD)	Answer	N/A
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ii. Internal Selections (PWD)	Answer	No
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b. Grade GS-15

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

ii. Internal Selections (PWD)	Answer	No
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c. Grade GS-14

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

ii. Internal Selections (PWD)	Answer	No
-------------------------------	--------	----

d. Grade GS-13

i. Qualified Internal Applicants (PWD)	Answer	N/A
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ii. Internal Selections (PWD)	Answer	No
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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:	4.98%	N/A
GS-15:	4.93%	N/A
GS-14:	3.86%	N/A
GS-13:	3.35%	N/A

No triggers were identified for selections of PWDs in senior grade levels. 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:	9.82%	4.98%
GS-15:	14.29%	4.93%
GS-14:	16.10%	3.86%
GS-13:	17.25%	3.35%

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

a. SES

i. Qualified Internal Applicants (PWTD) Answer N/A

ii. Internal Selections (PWTD) Answer No

b. Grade GS-15

i. Qualified Internal Applicants (PWTD) Answer N/A

ii. Internal Selections (PWTD) Answer Yes

c. Grade GS-14

i. Qualified Internal Applicants (PWTD) Answer N/A

ii. Internal Selections (PWTD) Answer Yes

d. Grade GS-13

i. Qualified Internal Applicants (PWTD) Answer N/A

ii. Internal Selections (PWTD) Answer 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:	1.25%	N/A	
GS-15:	2.23%	N/A	
GS-14:	1.61%	N/A	
GS-13:	1.40%	N/A	

Triggers were identified for selections of PWTDS in senior grade levels GS-14 through GS-15 when comparing the participation rate of selections to the percentage of qualified internal applicants. *The difference in rate of selections compared to the rate of qualified applicants at the GS-13 level is less than .06 percent and therefore not considered statistically significant.*

Selections by Senior Grade:		Qualified Internal Applicants by Senior Grade:	
SES:	1.79%	1.25%	
GS-15:	1.05%	2.23%	
GS-14:	1.04%	1.61%	

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

a. New Hires to SES (PWD)	Answer	No
b. New Hires to GS-15 (PWD)	Answer	No
c. New Hires to GS-14 (PWD)	Answer	No
d. New Hires to GS-13 (PWD)	Answer	No

Compared to FY 2021, DHS has seen a significant increase in the percentage of new hires with disabilities in senior grade levels in FY 2022. Based on a review of MD-715 B7-1 Senior Grade Level (New Hires), no triggers were identified for PWD new hires in senior grade levels when compared to the qualified applicant pool.

	Hires	Qualified Applicant Pool
New Hires to SES	12.50%	4.09%
New Hires to GS-15	12.50%	4.78%
New Hires to GS-14	14.04%	5.47%
New Hires to GS-13	16.74%	5.00%

*New hires percentages only include those who self-identified as having a disability and does not include those appointment under authorities that take disability into account.*

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

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

Based on a review of MD-715 B7-1 Senior Grade Level (New Hires), DHS identified a trigger for PWTB hires at the GS-15 level when compared to the qualified applicant pool.

	Hires	Qualified Applicant Pool
New Hires to SES	5.00%	1.77%
New Hires to GS-15	1.14%	2.20%
New Hires to GS-14	2.58%	2.48%
New Hires to GS-13	3.24%	2.06%

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

a. Executives

- |  |        |     |
|--|--------|-----|
| i. Qualified Internal Applicants (PWD) | Answer | N/A |
| ii. Internal Selections (PWD)          | Answer | No  |

b. Managers

- |  |        |     |
|--|--------|-----|
| i. Qualified Internal Applicants (PWD) | Answer | N/A |
| ii. Internal Selections (PWD)          | Answer | No  |

c. Supervisors

- |  |        |     |
|--|--------|-----|
| i. Qualified Internal Applicants (PWD) | Answer | N/A |
| ii. Internal Selections (PWD)          | Answer | 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, no triggers were identified for supervisory positions.

PWD Executive Selections:	16.17%	PWD Goal:	12.00%
PWD Manager Selections:	17.56%	PWD Goal:	12.00%
PWD Supervisor Selections:	12.68%	PWD Goal:	12.00%

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

a. Executives

i. Qualified Internal Applicants (PWTB)

Answer N/A

ii. Internal Selections (PWTB)

Answer Yes

b. Managers

i. Qualified Internal Applicants (PWTB)

Answer N/A

ii. Internal Selections (PWTB)

Answer Yes

c. Supervisors

i. Qualified Internal Applicants (PWTB)

Answer N/A

ii. Internal Selections (PWTB)

Answer Yes

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 PWTBs in all categories.

PWTBs Executive Selections:	1.77%	PWTBs Goal:	2%
PWTBs Manager Selections:	1.04%	PWTBs Goal:	2%
PWTBs Supervisor Selections:	0.95%	PWTBs Goal:	2%

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

a. New Hires for Executives (PWD)

Answer No

b. New Hires for Managers (PWD)

Answer No

c. New Hires for Supervisors (PWD)

Answer No

Compared to FY 2021, DHS has seen a significant increase in the percentage of new hires for PWDs in supervisory positions in FY 2022. When reviewing the selections for PWDs compared to the qualified applicant pool benchmark, no triggers were identified for newly hired PWDs in supervisory positions.

PWDs Executive Selections:	31.03%	Qualified External Applicants:	4.84%
PWDs Manager Selections:	40.62%	Qualified External Applicants:	6.28%
PWDs Supervisor Selections:	12.06%	Qualified External Applicants:	5.34%

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

a. New Hires for Executives (PWTB)

Answer No

b. New Hires for Managers (PWTB)

Answer No

c. New Hires for Supervisors (PWTB)

Answer Yes

When reviewing the FY 2022 selections for PWTDS compared to the qualified applicant pool benchmark, triggers exist for selections in one of three categories (Supervisors), an overall improvement when compared to all categories during FY 2021.

PWTDS Executive Selections:	1.72%	Qualified External Applicants:	1.77%
PWTDS Manager Selections:	2.97%	Qualified External Applicants:	2.16%
PWTDS Supervisor Selections:	1.14%	Qualified External Applicants:	2.38%

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

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

### A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer No

During FY 2022, DHS converted a total of 313 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 55.89 percent conversion rate, an overall increase of nearly ten percent from FY 2021. 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, 283 were converted non-competitively after two years of satisfactory service, 19 converted to career or career conditional before two years of service, with 11 converted by other means. As a result of quarterly tracking and monitoring, DHS Components continued efforts have resulted in incremental increases in Schedule A conversions over the last five years.

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

a. Voluntary Separations (PWD)

Answer No

b. Involuntary Separations (PWD)

Answer Yes

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 involuntary separations when compared to PWODs.

Voluntary Separations:  
 PWDs Inclusion Rate: 7.32%  
 PWODs Inclusion Rate: 7.33%

Involuntary Separations:  
 PWDs Inclusion Rate: 2.94%  
 PWODs Inclusion Rate: 1.84%

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

Separations	Total #	Reportable Disability %	Without Reportable Disabilities
Permanent Workforce: Reduction in Force	5	0.00	0.00
Permanent Workforce: Removal	1211	0.52	0.57
Permanent Workforce: Resignation	8490	3.10	4.08



Permanent Workforce: Retirement	6179	3.55	2.75
Permanent Workforce: Other Separations	2844	2.15	1.18
Permanent Workforce: Total Separations	18729	9.31	8.58

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

- a. Voluntary Separations (PWTD) Answer Yes
- b. Involuntary Separations (PWTD) Answer Yes

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: 8.37%

PWODs Inclusion Rate: 7.33%

**Involuntary Separations:**

PWTDs Inclusion Rate: 2.97%

PWODs Inclusion Rate: 1.84%

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

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities
Permanent Workforce: Reduction in Force	5	0.00	0.00
Permanent Workforce: Removal	1211	0.56	0.56
Permanent Workforce: Resignation	8490	2.86	3.95
Permanent Workforce: Retirement	6179	4.41	2.85
Permanent Workforce: Other Separations	2844	2.01	1.31
Permanent Workforce: Total Separations	18729	9.84	8.67

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

During FY 2022, the DHS Exit Survey results were based on exiting employees from HQ, FEMA, FLETC, USCIS, and USCG. All other Components (USSS, TSA, CBP, ICE and CISA), continued to maintain their separate Component-specific exit survey programs. Results of exit surveys conducted by Components that did not utilize the DHS Exit Survey can be found in Component-level MD-715 reports or obtained from Components directly. The FY 2022 DHS Exit Survey yielded a 24 percent response rate. Of the 4,624 employees separating from service, 1,115 took the exit survey. Of the total respondents, 174, or 16 percent, did not provide a primary reason for leaving nor any other demographic information; 164, or 15 percent, of respondents indicated “Other” as a primary reason, and 96, or 9 percent, of respondents indicated retirement. (Of those who indicated “Other”, further review revealed eight respondents - I.e., five percent of the 164 respondents - left due to the Vaccine Mandate.) Aside from these three categories (Blank, Other and Retirement), and excluding “End of temporary position or internship,” the top three reasons separating non-SES employees listed for leaving DHS were:

1st Top Reason: Personal or Family Related (8 percent)

2nd Top Reason: Supervisory/Management (7 percent)

### 3rd Top Reason: Advancement Opportunities (5 percent)

Based on available data from the DHS Exit Survey, those self-reporting as PWD represented 114, or 10.2 percent, of the total survey respondents. Of the total PWD respondents, 30, or 26.3 percent, indicated Other as a primary reason for leaving and 5, or 4.4 percent, of respondents indicated retirement. Excluding these two categories (Other and Retirement), the top three categories cited by separating PWDs as the reason for leaving were:

1st Top Reason: Supervisor/Management (11 percent)

2nd Top Reason: Work Environment (8.8 percent)

2nd Top Reason: Personal/Family Related (8.8 percent)

3rd Top Reason: Health Reasons (7.9 percent).

Note: Two reasons, Work Environment and Personal/Family Related, both came in as the second most common reason for PWDs leaving.

During FY 2022, 57 respondents self-reported as a PWTD. This represented 5.11 percent of all respondents. Of the total PWTD respondents, 13, or 22.8 percent, indicated Other as a primary reason for leaving, and 2, or 3.5 percent, of respondents indicated retirement. Excluding these two categories (Other and Retirement), and excluding “End of temporary position or internship,” the top three categories cited by separating PWTDs as the reason for leaving were:

1st Top Reason: Supervisor/Management (23 percent)

2nd Top Reason: Salary/Pay (7 percent)

2nd Top Reason: Work Environment (7 percent)

2nd Top Reason: Geographic Location (7 percent)

2nd Top Reason: Health Related (7 percent)

3rd Top Reason: Personal/ Family Related (5.3 percent)

3rd Top Reason: Advancement Opportunities (5.3 percent)

3rd Top Reason: Diversity/Inclusion (5.3 percent)

Note: Four reasons all came in equally as the second most common reason for PWTDs leaving, and three reasons came in equally as the third most common reason for PWTDs leaving.

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. For the second year in a row, during FY 2022, DHS has experienced an increase in the number of respondents. The following chart provides a three-year trend analysis.

Disability Program Questions		All Respondents		
		FY 2020 (311 Respondents)	FY 2021 (840 Respondents)	FY 2022 (1115 Respondents)
1	DHS took appropriate steps to ensure accessibility (technology and facility) requirements were met for qualified individuals of disabilities.	Agree 18.97	Agree 15.12%	Agree 16.50%
		Strongly Agree 16.40	Strongly Agree 13.21%	Strongly Agree 12.65%
		Neither Agree nor Disagree 10.93%	Neither Agree nor Disagree 9.29%	Neither Agree nor Disagree 10.04%
2	DHS took appropriate steps to ensure reasonable accommodation and/or Personal Assistance Services were provided to	Agree 16.72%	Agree 14.17%	Agree 15.16%
		Strongly Agree 15.76%	Strongly Agree 10.48%	Strongly Agree 11.75%

	<b>qualified individuals with disabilities.</b>	Neither Agree nor Disagree 11.58%	Neither Agree nor Disagree 10.48%	Neither Agree nor Disagree 9.96%
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%	Neither Agree nor Disagree 13.36%
		Agree 11.58%	Agree 10.00%	Agree 10.67%
		Strongly Agree 9.00%	Strongly Agree 6.67%	Strongly Agree 7.53%
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%	Neither Agree nor Disagree 13.09%
		Agree 9.97%	Agree 10.48%	Agree 11.12%
		Strongly Agree 9.0%	Strongly Agree 5.95%	Strongly Agree 6.91%
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%	Neither Agree nor Disagree 14.08%
		Strongly Agree and Agree (same rate) 8.36%	Agree 9.05%	Agree 9.15%
		Strongly Disagree 4.18%	Strongly Disagree 3.10%	Strongly Agree 6.91%
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%	Neither Agree nor Disagree 14.35%
		Strongly Agree 8.36%	Agree 8.69%	Agree 9.42%
		Agree 7.07%	Strongly Disagree 3.33%	Strongly Agree 5.65%

Further review of the FY 2022 Exit Survey revealed overall increased positive responses from all respondents, when compared to FY 2021, but positive responses remained lower than in FY 2020. Additionally, when comparing responses from PWDs and PWTDs to respondents without disabilities, there continues to be a higher percentage of negative responses (Disagree and Strongly Disagree) among those with disabilities. Specifically, when reviewing all six questions, PWDs had a 14.30 percent average difference and PWTD had a 22.58 percent average difference of negative responses, when compared to PWOD respondents. DHS will continue to monitor and expand this analysis annually.

## B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

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

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

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:

The Department of Homeland Security (DHS) 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](#), as amended (29 U.S.C. 794d). Section 508 requires agencies, during the procurement, development, maintenance, or use of ICT, to make sure 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. The Section 508 standards are the technical requirements and criteria that are used to measure conformance with the law and incorporate the W3C Web Content Accessibility Guidelines (WCAG) 2.0.

More information on Section 508 and the technical standards can be found on [Section508.gov](#).

The Office of Accessible Systems & Technology (OAST) guides and supports all Department components in removing barriers to information access and employment of qualified individuals with disabilities in accord with the requirements of Section 508 of the Rehabilitation Act of 1973 (as amended). OAST is part of both the Office for Civil Rights and Civil Liberties and the Office of Chief Information Officer.

If you believe that the Information and Communication Technology (ICT) used by DHS does not comply with Section 508 of the Rehabilitation Act, you may file a 508 complaint by following the steps outlined on the Civil Rights and Civil Liberties Make a Civil Rights Complaint page, and by using the optional DHS Technology Accessibility Issue Reporting Form. For general inquiries please email [Accessibility@hq.dhs.gov](mailto:Accessibility@hq.dhs.gov). To make sure we respond in a manner most helpful to you, please share the nature of your accessibility problem, the best 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 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 US Access Board's website under 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](#).

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.

In 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 inquiry and complaint form.

The newly developed DHS Roadmap to Success training for manager, supervisors, human capital and EEO professionals, scheduled for deployment in FY 23, will include a section on Section 508 to support and promote awareness and improve accessibility of technology.

DHS did not receive any alleged complaints of inaccessible technology or facilities during 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 2022, the Department-wide average time frame for processing initial requests for reasonable accommodations was approximately 40.3 days, representing approximately a twelve-day increase in the average number of days for processing requests, when compared to FY 2021 (27.6 days). This data does not include the average processing days for USCIS or TSA.

The average number of days reported by DHS Components for FY 2022 are as follows:

CBP:	69.6 Days
CISA:	30 Days
USCIS:	<i>Unavailable – See Component report</i>
HQ:	35 Days
FEMA:	58 Days
FLETC:	11.34 Days
ICE:	69 Days
TSA:	68 Days
USCG:	10 Days
USSS:	12 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 timely and effective reasonable accommodations to employees and applicants with disabilities. The overall average processing time for reasonable accommodation requests during FY 2022 was 40.3 days, an increase in the average processing days by about twelve days. Note: The average number of processing days does not include USCIS and TSA, as their data was unavailable at the time of reporting. Additionally, DHS processed approximately 73 percent of all requests timely based on the frames set forth in Component reasonable accommodation procedures.

During FY 2022, all DHS Components continued to regularly provide reasonable accommodation training to managers and supervisors. 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 services (PAS) 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, as well as religious and medical exemption reasonable accommodation requests in connection with COVID-19 workplace safety protocols.

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, the Privacy Office, 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's enterprise-level reasonable accommodation management system, to handle the unique requirements associated with COVID-19 related exemption requests. CRCL also 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. CRCL's efforts continued 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 across the Department. Additional enhancements to ACMS were also underway to include development of an ACMS Exemption Process user-guide, reasonable accommodation exemption request dashboards for tracking and reporting, and additional fields for tracking and processing requests for reconsideration of reasonable accommodation determinations. In response to a nationwide injunction suspending enforcement of EO 14043 pending further litigation, DHS has paused the processing of exemption requests specific to the vaccine requirement, but stands ready to resume processing, should the injunction lift.

During FY 2022, CRCL awarded additional funding for a third option year to further develop the new training course automating a test-out and a post assessment that requires an 80 percent passing rate to receive course completion credit. As previously reported, this course replaces the DHS *Employment of People with Disabilities: A Roadmap to Success*. This training, the first of its kind in the federal sector, was used as a model for the OPM version, *A Roadmap to Success: Hiring, Retaining, and Including People with Disabilities*. The new course is scheduled to be fully deployed on all DHS learning management systems by the mid-year FY 2023. The slight delays are due to the retirement of the DHS Learning Management System in 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 continues to monitor Component efforts and provide guidance upon request. This is critical during the Component's implementation of their revised reasonable accommodation (RA) procedures which incorporate the provision of personal assistance services (PAS) as an affirmative action obligation. Six of the ten DHS Components have received approval of their RA/PAS procedures from the EEOC as of September 30, 2022.

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.

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

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

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

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 link to EEOC guidance that assists Federal agencies in carrying out their responsibility to provide personal assistance services (PAS). CRCL also developed and posted on its DHS Connect page a [Fact Sheet on Personal Assistance Services](#) to educate our workforce on this affirmative action requirement.

During FY 2022, only one request for PAS was reported Department wide.

## Section VII: EEO Complaint and Findings Data

### A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer No

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

Answer Yes

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 2022, DHS had a lower percentage of PWDs who filed a formal EEO Complaint (12.2 percent) alleging harassment based on disability, as compared to the government-wide average of 21.98 percent. This is a decrease of nearly 2 percent when compared to FY 2021. In FY 2022, DHS negotiated 52 settlement agreements and had four findings of harassment based on disability. Corrective measures taken include:

- Posting of notice
- Conduct EEO training
- Pay attorney's fees
- Pay compensatory damages
- Consider disciplinary action

DHS Components retain independent authority to discipline their respective employees, including individuals found to have engaged in discriminatory, retaliatory, or harassing conduct, as set forth in findings of discrimination. As part of any relief ordered, Components were required to consider disciplinary action against any individual found responsible for discriminatory actions or conduct. During FY 2022, while not specifically based on discrimination alleging harassment based on disability status, a total of 21 employees were disciplined because of findings of discriminatory, retaliatory, or harassing conduct. The disciplinary actions resulted from violations of Title VII.

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

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

Answer No

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

Answer Yes

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 2022, DHS had a lower percentage of PWDs who filed a formal EEO Complaint (12 percent) alleging failure to provide a reasonable accommodation compared to the government-wide average of 14.03 percent.

DHS negotiated 37 settlement agreements involving a failure to accommodate allegations and had one finding of failure to provide a reasonable accommodation based on disability during FY 2022. Corrective measures taken included:

- Posting of notice
- Conduct EEO training
- Pay attorney's fees
- Pay Compensatory damages
- Implement reasonable accommodation
- Consider discipline action

DHS Components retain independent authority to discipline their respective employees, including individuals found to have engaged in discriminatory, retaliatory, or harassing conduct, as set forth in findings of discrimination. As part of any relief ordered, Components were required to consider disciplinary action against any individual found responsible for discriminatory actions or conduct. During FY 2022, while not specifically based on discrimination alleging failure to provide a reasonable accommodation, a total of 21 employees were disciplined because of findings of discriminatory, retaliatory, or harassing conduct. The disciplinary actions resulted from violations of Title VII.

**Section VIII: Identification and Removal of Barriers**

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

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

Answer Yes

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

Answer Yes

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 4:



<b>Source of the Trigger:</b>	Workforce Data (if so identify the table)				
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B1				
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	<b>Trigger # 1:</b> Lower than expected participation for Persons with a Disability (PWD) in the grade cluster GS 1 –10 when compared to the regulatory goal of 12 percent and for Persons with a Targeted Disabilities (PWTD) in grade clusters GS-1 – GS-10 and GS-11 – SES when compared to the regulatory goal of 2 percent.				
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i>				
	People with Disabilities People with Targeted Disabilities				
<b>Barrier Analysis Process Completed?:</b>	N				
<b>Barrier(s) Identified?:</b>	N				
<b>STATEMENT OF IDENTIFIED BARRIER:</b>	<b>Barrier Name</b>	<b>Description of Policy, Procedure, or Practice</b>			
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	Not Identified	N/A			
<b>Objective(s) and Dates for EEO Plan</b>					
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>
10/01/2017	09/30/2021	Yes	10/30/2023		Increase workforce participation rates of PWDs and PWTDs at all grade levels.
<b>Responsible Official(s)</b>					
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>	
Departmental Disability Employment Program Manager		Laura Davis		Yes	
Supervisory D&I Advisor, OCHCO		Ginny Berry		Yes	
Executive Director		Nicshan Floyd, OAST		Yes	
<b>Planned Activities Toward Completion of Objective</b>					
<b>Target Date</b>	<b>Planned Activities</b>			<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>
12/30/2017	Issue Annual Hiring Goals for PWDs and PWTDs and socialize throughout DHS.			Yes	12/27/2017

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2018	Update DHS Disability training module for managers and HR Professionals (Employment of People with Disability: A Roadmap to Success Training)	Yes	09/30/2023	
03/30/2018	Develop mid-year reporting requirements to monitor Component progress with implementing the revised rule on 29 C.F.R 1614. § 1614.203(d)(5).	Yes		03/08/2018
09/30/2018	Collaborate with OCHCO to revise DHS standard language on all vacancy announcements to encourage applicants with disabilities to apply, and to clearly explain Schedule A process and requesting reasonable accommodations.	Yes	09/30/2019	04/18/2019
09/30/2018	Revise Reasonable Accommodation procedures to include procedures for providing Personal Assistance Services.	Yes	06/30/2021	03/23/2021
03/30/2018	Implement and post Affirmative Action plan for Individuals with Disabilities to the DHS website internally and externally.	Yes	07/19/2018	07/19/2018
09/30/2018	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	09/30/2023	
04/01/2019	Develop a bi-annual report to monitor Components progress toward increasing participation of PWDs and PWTDS within Mission Critical Occupations.	Yes	06/30/2021	09/30/2021

Report of Accomplishments	
Fiscal Year	Accomplishment
2018	<p><b>Hiring Goals:</b> During FY 2018, DHS set a 12 percent hiring goal for Persons with Disabilities (PWDs) at all grade levels; a 2 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. 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 related and non-TSO positions, exceeding the goal and increasing by 35 percent from FY 2017. 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.</p> <p><b>Disability Training:</b> The Roadmap to Success training was updated during FY 2017 and FY 2018 to include the provision of amended 29 C.F.R 1614. § 1614.203(d)(5), as well as other necessary revisions and updated resources. DHS plans to revise this training course by FY 2020.</p> <p><b>Mid-Year Reporting Requirements:</b> 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.</p> <p><b>Revise DHS Standard Language on All Vacancy Announcements:</b> 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.</p> <p><b>Revise Reasonable Accommodation and Personal Assistance Services Procedures:</b> 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. As a result, DHS (Departmental), U.S. Coast Guard, the Transportation Security Administration, and U.S. Secret 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 submission to EEOC.</p> <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 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 on a regular basis.</p>

Report of Accomplishments	
Fiscal Year	Accomplishment
2019	<p><b>Disability Training:</b> DHS continued its efforts to redevelop and expand its DHS Roadmap to Success 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 DHS Roadmap to Success 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. § 1614.203(d)(5), CRCL continued to coordinate reviews during FY 2019. The Department's draft revision to Instruction Number 259-01-001, which implements DHS procedures for facilitating reasonable accommodation and personal assistant service requests is currently in the official DHS Directives System review process. CRCL has also conducted 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 submission to EEOC.</p> <p><b>Develop a bi-annual Mission Critical Occupations report to monitor participation of PWDs and PWTs:</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.</p>

Report of Accomplishments	
Fiscal Year	Accomplishment
2020	<p><b>Disability Training:</b> DHS revised and expanded its DHS Roadmap to Success training module. CRCL secured funding and contracted with OPM USA Learning 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 assistant services requests continues 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 21. 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 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> 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. 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>

Report of Accomplishments	
Fiscal Year	Accomplishment
2021	<p><b>Disability Training:</b> 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 USA Learning. 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> 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> 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: Completion 09/30/2021</b> 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>

2022	<p><b>Modified Trigger Statement: For the third consecutive year PWDs are not below the 12 percent regulatory goal in the GS 11 – SES grade clusters.</b></p> <p><b>Disability Training: (<i>modified targeted completion date</i>)</b></p> <p>In FY 2022, the new Roadmap to Success curriculum was finalized and ready for implementation. However, due to the decommissioning of PALMS and the transitioning to a new learning management system (LMS), the training was not fully implemented. As a result of the lack of capabilities in the existing system, CRCL awarded additional funding for 2<sup>nd</sup> option-year agreement to enhance the newly developed curriculum with OPM USA-Learning. This option year agreement includes the development and programming of a randomized built-in “test-out” and “post assessment” evaluation into the training SCORM deliverable, to ensure all learning objectives are met. CRCL took this opportunity to exceed 508 accessibility standards to add additional enhancements to the training based on research conducted for neurodiverse learners. The updated training program is expected to be fully implemented during FY 2023 if the new DHS LMS is up and running. If not, CRCL will proceed with a phased approach with Components that are not affected by the LMS transition.</p> <p>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: (<i>modified targeted completion date</i>)</p> <p>The target date for this planned activity has been extended for another year. DHS will continue to seek guidance and explore best practices from EEOC and OPM, as well as other agencies on options available. 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>
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<b>Source of the Trigger:</b>	Workforce Data (if so identify the table)				
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B9				
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	<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>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i> People with Disabilities People with Targeted Disabilities				
<b>Barrier Analysis Process Completed?:</b>	N				
<b>Barrier(s) Identified?:</b>	N				
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b>		<b>Description of Policy, Procedure, or Practice</b>		
<b>Objective(s) and Dates for EEO Plan</b>					
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>
09/30/2018	09/30/2020	Yes	09/30/2022		Collaborate with OCHCO to review recognition and awards policy, practices and procedures, and determine next steps.
<b>Responsible Official(s)</b>					
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>	
CRCL		Laura Davis		Yes	
OCHCO		Ginny Berry		No	
<b>Planned Activities Toward Completion of Objective</b>					
<b>Target Date</b>	<b>Planned Activities</b>			<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>  <b>Completion Date</b>
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.			Yes	09/30/2023  



Report of Accomplishments	
Fiscal Year	Accomplishment
2018	<p>During FY 2018 CRCL identified initial data sources and policies and procedures at the departmental level to begin review. As indicated 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>
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 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, which is coordinated every two-years.</p> <p>Based on this outlining procedure, 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 on a regular basis to propose recommendations to ensure perceived or actual barriers that may be caused by DHS award policies or associated procedures are addressed.</p>
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> <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>
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>

2022	<p>Modified target date for completion.</p> <p>In FY 2021, CRCL initiated a focused barrier analysis of the DHS disability workforce at all grade levels. The first phase of the analysis included a focus on the FY 2020 workforce and a five-year trend comparison (FY 2015 - FY 2020). The review focused on survey and complaint data, and Department-level and Component specific policies, procedures, and practices. The analysis concentrated on the identification and eradication of barriers to equal employment opportunity for persons with disabilities, consistent with merit system principles and applicable personnel laws. Data collection 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. The areas of exploration included recruitment, hiring, training and development programs, promotions, separations, and retention. During FY 2022, in the second phase of analysis, the CRCL Disability Barrier Analysis Team held two focus groups with representatives from DHS HQ, component human capital offices, and disability programs. Each focus group session discussed recruitment and hiring; advancement opportunities including training and career development; retention and awards. PWDs and PWTDs receive recognition and awards at rates lower than individuals without disabilities. This is a challenge reported by most Components.</p> <p>Due to staffing changes and resources, CRCL has been delayed in completing its analysis of the data collected. In coordination with components, CRCL intends to complete the third and final phase of the barrier analysis process by mid FY 2023.</p>
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<b>Source of the Trigger:</b>	Other				
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B1				
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	<b>Trigger # 4:</b> Lower than expected conversion rates of eligible Schedule A employees into competitive service.				
<b>STATEMENT OF BARRIER GROUPS:</b>	<b>Barrier Group</b> People with Disabilities People with Targeted Disabilities				
<b>Barrier Analysis Process Completed?:</b>	N				
<b>Barrier(s) Identified?:</b>	N				
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b>		<b>Description of Policy, Procedure, or Practice</b>		
<b>Objective(s) and Dates for EEO Plan</b>					
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>
09/30/2018	09/30/2021	Yes	09/30/2023		Increase conversion rates of eligible Schedule A employees.
<b>Responsible Official(s)</b>					
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>	
Departmental Disability Employment Program Manager		Laura Davis		Yes	
OCHCO		N/A		No	
<b>Planned Activities Toward Completion of Objective</b>					
<b>Target Date</b>	<b>Planned Activities</b>			<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>
09/30/2018	Review and analyze current policies and procedures for excepted service appointments.			Yes	09/30/2018
01/30/2018	Monitoring Schedule A Conversions on a quarterly basis.			Yes	12/12/2018

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2018	Coordinate efforts with OCHCO to develop DHS Schedule A guidance.	Yes	09/30/2023	
Report of Accomplishments				
Fiscal Year	Accomplishment			
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>Review and analyze current policies and procedures for excepted service appointments.</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>Monitoring Schedule A Conversions on a quarterly basis.</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> </ul> </li> <li>• Separated before conversion</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>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 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>Coordinate efforts with OCHCO to develop DHS Schedule A policy and procedures.</p> <p>CRCL and SRDI began efforts to benchmark other federal agencies to identify best practices. As a result, SRDI has drafted a proposed standard operating procedure which is currently in the review process.</p>			

Report of Accomplishments	
Fiscal Year	Accomplishment
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>o Conversions to career or career conditional after 24 months</li> <li>o Conversions to career or career conditional before 24 months</li> <li>o Conversion Other</li> <li>o Separated before conversion</li> </ul> </li> <li>• Total Separations</li> <li>• Eligible not Converted</li> <li>• No Longer Eligible at end of FY 2019 (but was eligible at some point in the given year)</li> <li>• Not Eligible for Conversion</li> </ul> <p>Coordinate efforts with OCHCO to develop DHS Schedule guidance.  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 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>In support of 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 with an overview on applying for positions within DHS utilizing Schedule A, as well as a list of DHS Selective Placement Program Coordinators.</p> <p>Additionally, during FY 2019, DHS hosted a webinar on recruiting and hiring individuals with disabilities and targeted disabilities on Tuesday, July 30, 2019. 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 knowledge of Schedule A direct hiring authority from (34 percent prior to the webinar) and 58 percent of participants indicated they increased knowledge of the Bender program (17 percent prior to the webinar).</p>

Report of Accomplishments	
Fiscal Year	Accomplishment
2020	<p>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> <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>Coordinate efforts with OCHCO to develop DHS Schedule A guidance. 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>
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>Coordinate efforts with OCHCO to develop DHS Schedule A guidance. 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>

2022	<p>During FY 2022, DHS converted a total of 313 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 55.89 percent conversion rate and an increase of 88 conversions compared to FY 2021. Of those converted, 283 were converted non-competitively after two years of satisfactory service, 19 converted to career or career conditional before two years of service, with 11 converted by other means. As a result of quarterly tracking and monitoring, DHS Components continued efforts resulted in incremental increases in conversions for the last six years, from 101 conversions in FY 2017 to 313 conversions in FY 2022.</p> <p>To support increases of Schedule A conversions, CRCL continues to monitor Schedule A conversions on a quarterly basis and distributes Component-level 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>Coordinate efforts with OCHCO to develop DHS Schedule A guidance. Modified target date for completion to 2023 due to staffing changes and resources. 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 2023.</p>
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<b>Source of the Trigger:</b>	Workforce Data (if so identify the table)				
<b>Specific Workforce Data Table:</b>	Workforce Data Table - B1				
<b>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</b>  Provide a brief narrative describing the condition at issue.  How was the condition recognized as a potential barrier?	<b>Trigger # 5:</b> Higher than expected separation rates for individuals with disabilities.				
<b>STATEMENT OF BARRIER GROUPS:</b>	<i>Barrier Group</i> People with Disabilities People with Targeted Disabilities				
<b>Barrier Analysis Process Completed?:</b>	N				
<b>Barrier(s) Identified?:</b>	N				
<b>STATEMENT OF IDENTIFIED BARRIER:</b>  Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	<b>Barrier Name</b>		<b>Description of Policy, Procedure, or Practice</b>		
<b>Objective(s) and Dates for EEO Plan</b>					
<b>Date Initiated</b>	<b>Target Date</b>	<b>Sufficient Funding / Staffing?</b>	<b>Date Modified</b>	<b>Date Completed</b>	<b>Objective Description</b>
09/30/2017	09/14/2018	Yes	09/30/2023		Increase retention rates of individuals with disabilities and targeted disabilities.
<b>Responsible Official(s)</b>					
<b>Title</b>		<b>Name</b>		<b>Standards Address The Plan?</b>	
Departmental Disability Employment Program Manager		Laura Davis		Yes	
OCHCO		N/A		No	
<b>Planned Activities Toward Completion of Objective</b>					
<b>Target Date</b>	<b>Planned Activities</b>			<b>Sufficient Staffing &amp; Funding?</b>	<b>Modified Date</b>
01/30/2018	Review and analyze exit surveys to identify barriers to retention.			Yes	01/30/2021
01/30/2018	Monitor separations on a quarterly basis by disability distribution			Yes	10/16/2018



Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
06/30/2018	Collaborate with OCHCO to explore the feasibility of implementing new retention programs specifically for PWDs and PWTs.	Yes	09/30/2022	
09/30/2021	Conduct study on reasonable accommodation requests and procedures for delayed and denied accommodations to identify potential correlations to high separations.	Yes	06/30/2023	

Fiscal Year	Accomplishments
FY 2018	<p>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, PWTs experienced an increase for involuntary separations from 1.36 percent in FY 2017 to 2.11 percent in FY 2018, while voluntary separations for PWTs decreased from 1.62 percent in FY 2017 to 1.51 percent in FY 2018.</p> <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</p>

	Headquarters Mentoring program and all other career development programs already in place throughout the Department to support our affirmative employment obligations.																																																																		
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.  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 exit surveys. As a result of the coordinated efforts of CRCL and OCHCO, the questions now include:</p> <p><b>1. DHS proactively supports efforts to improve the recruitment, hiring, advancement, and retention of individuals with disabilities.</b>  <i>Matrix scale:</i></p> <table border="1"> <thead> <tr> <th></th><th><i>Strongly Disagree</i></th><th><i>Disagree</i></th><th><i>Neither Agree or Disagree</i></th><th><i>Agree</i></th><th><i>Strongly Agree</i></th></tr> </thead> <tbody> <tr> <td><i>Recruitment</i></td><td></td><td></td><td></td><td></td><td></td></tr> <tr> <td><i>Hiring</i></td><td></td><td></td><td></td><td></td><td></td></tr> <tr> <td><i>Advancement</i></td><td></td><td></td><td></td><td></td><td></td></tr> <tr> <td><i>Retention</i></td><td></td><td></td><td></td><td></td><td></td></tr> </tbody> </table> <p><i>Followed by an optional open-ended comment box</i></p> <p><b>2. DHS takes appropriate steps to ensure accessibility (technology and facility) requirements are met for qualified individuals with disabilities.</b>  <i>Matrix scale:</i></p> <table border="1"> <thead> <tr> <th></th><th><i>Strongly Disagree</i></th><th><i>Disagree</i></th><th><i>Neither Agree or Disagree</i></th><th><i>Agree</i></th><th><i>Strongly Agree</i></th></tr> </thead> <tbody> <tr> <td><i>Technology</i></td><td></td><td></td><td></td><td></td><td></td></tr> <tr> <td><i>Facility</i></td><td></td><td></td><td></td><td></td><td></td></tr> </tbody> </table> <p><i>Followed by an optional open-ended comment box</i></p> <p><b>3. DHS takes appropriate steps to ensure reasonable accommodation and/or Personal Assistance Services are provided to qualified individuals with disabilities.</b></p> <table border="1"> <thead> <tr> <th></th><th><i>Strongly Disagree</i></th><th><i>Disagree</i></th><th><i>Neither Agree or Disagree</i></th><th><i>Agree</i></th><th><i>Strongly Agree</i></th></tr> </thead> <tbody> <tr> <td><i>Reasonable Accommodations</i></td><td></td><td></td><td></td><td></td><td></td></tr> <tr> <td><i>Personal Assistance Services</i></td><td></td><td></td><td></td><td></td><td></td></tr> </tbody> </table> <p><i>Followed by an optional open-ended comment box</i></p> <p><b>Explore feasibility of implementing new retention programs specifically for PWDs and PWTs.</b>  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.</p> <p>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</p>		<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>							<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>							<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>					
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	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></p> <p>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></p> <p>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> <p>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.</p> <p><b>2. DHS took appropriate steps to ensure reasonable accommodation and/or Personal Assistance Services were provided to qualified individuals with 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>42.02 %</b></td><td><b>33.64%</b></td></tr><tr><td><b>PWD</b></td><td><b>48.57%</b></td><td><b>33.80%</b></td></tr><tr><td><b>PWTD</b></td><td><b>43.75%</b></td><td><b>29.42%</b></td></tr></table> <p>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.</p>		<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>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>
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**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.

**6. DHS proactively supported efforts to improve the RETENTION of individuals with disabilities.**

	<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.

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

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.																																																																
2022	<p><b>FY 2022 Update – DHS Exit Survey</b></p> <p>The DHS 2022 Exit Survey results exclude TSA, USSS, CBP, CISA, and ICE. Component-specific data can be gleaned from Component reports. Excluding two categories “Other and Retirement”, the top three categories cited by separating PWDs as primary reasons for leaving include: (1) Supervisor/Management (11 percent); (2) Work Environment &amp; Personal/Family Related (8.8 percent); and (3) Health Reasons (7.9 percent). The top three categories cited by separating PWTD included: (1) Supervisor/Management (23 percent); (2) Salary/Pay, Work Environment, Geographic Location and Health Related (7 percent); and (3) Personal/ Family Related, Advancement Opportunities, and Diversity/Inclusion (5.3 percent).</p> <p>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 2022 exit survey results now include specific data on the newly established disability program questions. Starting with the FY 2020 responses as a baseline, DHS now has a three-year trend to continue effort in monitoring responses to inform potential challenge areas. Based on the FY 2022 summary analysis, the following data summarizes the response rates and compares the total percent of favorable responses (Strongly Agree; Agree; and Neither Agree nor Disagree) to each of the six questions by PWOD respondents compared to PWD and PWTD:</p> <p>1. DHS took appropriate steps to ensure accessibility (technology and facility) requirements were met for qualified individuals of disabilities.</p> <table><tr><td></td><td>FY 20</td><td>FY 21</td><td>FY22</td></tr><tr><td>PWOD</td><td>43.84%</td><td>34.04%</td><td>49.44%</td></tr><tr><td>PWD</td><td>65.71%</td><td>54.93%</td><td>64.91%</td></tr><tr><td>PWTD</td><td>43.75%</td><td>35.29%</td><td>63.16%</td></tr></table> <p>Favorable response rates increased from FY 2021 to FY 2022 for all groups. PWD had the highest favorable response rate, with similar rates from both PWTD and PWOD.</p> <p>2. DHS took appropriate steps to ensure reasonable accommodation and/or Personal Assistance Services were provided to qualified individuals with disabilities.</p> <table><tr><td></td><td>FY 20</td><td>FY 21</td><td>FY 22</td></tr><tr><td>PWOD</td><td>42.02%</td><td>33.64%</td><td>46.58%</td></tr><tr><td>PWD</td><td>48.57%</td><td>33.80%</td><td>64.04%</td></tr><tr><td>PWTD</td><td>43.75%</td><td>29.42%</td><td>59.65%</td></tr></table> <p>Favorable response rates increased from FY 2021 to FY 2022 for all groups. PWD had the highest favorable response rate, with PWOD having the lowest favorable rate in FY 2022.</p> <p>3. DHS proactively supported efforts to improve the RECRUITMENT of individuals with disabilities.</p> <table><tr><td></td><td>FY 20</td><td>FY 21</td><td>FY 22</td></tr><tr><td>PWOD</td><td>36.96%</td><td>28.29%</td><td>40.70%</td></tr><tr><td>PWD</td><td>22.86%</td><td>23.89%</td><td>50.00%</td></tr><tr><td>PWTD</td><td>43.75%</td><td>32.35%</td><td>47.37%</td></tr></table> <p>Favorable response rates increased from FY 2021 to FY 2022 for all groups. PWD had the highest favorable response rate, with PWOD having the lowest favorable rate.</p> <p>4. DHS proactively supported efforts to improve the HIRING of individuals with disabilities.</p> <table><tr><td></td><td>FY 20</td><td>FY 21</td><td>FY 22</td></tr><tr><td>PWOD</td><td>25.73%</td><td>28.43%</td><td>39.90%</td></tr><tr><td>PWD</td><td>57.32%</td><td>33.81%</td><td>50.00%</td></tr><tr><td>PWTD</td><td>56.35%</td><td>32.35%</td><td>45.61%</td></tr></table>		FY 20	FY 21	FY22	PWOD	43.84%	34.04%	49.44%	PWD	65.71%	54.93%	64.91%	PWTD	43.75%	35.29%	63.16%		FY 20	FY 21	FY 22	PWOD	42.02%	33.64%	46.58%	PWD	48.57%	33.80%	64.04%	PWTD	43.75%	29.42%	59.65%		FY 20	FY 21	FY 22	PWOD	36.96%	28.29%	40.70%	PWD	22.86%	23.89%	50.00%	PWTD	43.75%	32.35%	47.37%		FY 20	FY 21	FY 22	PWOD	25.73%	28.43%	39.90%	PWD	57.32%	33.81%	50.00%	PWTD	56.35%	32.35%	45.61%
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Favorable response rates increased from FY 2021 to FY 2022 for all groups.  
Both PWD and PWTD had higher favorable response rates, when compared to PWOD for all three years.

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

	FY 20	FY 21	FY 22
PWOD	33.34%	28.56%	39.43%
PWD	45.72%	32.39%	44.74%
PWTD	18.75%	26.47%	45.61%

Favorable response rates increased from FY 2021 to FY 2022 for all groups.  
PWTD had the highest increase in favorable response rates, when compared to PWOD and PWD.

6. DHS proactively supported efforts to improve the RETENTION of individuals with disabilities.

	FY 20	FY 21	FY 22
PWOD	32.24%	27.91%	38.63%
PWD	17.14%	33.80%	44.74%
PWTD	31.25%	26.47%	47.37%

Favorable response rates increased from FY 2021 to FY 2022 for all groups. PWTD had a significantly higher rate than PWOD and PWD.

During FY 2022, DHS experienced a significant increase in favorable responses from all groups. However, questions covering recruitment, hiring, advancement and retention, all had favorable response rates at or below 50 percent. DHS will continue to monitor and will include a full summary of results and perspectives in the DHS Disability Barrier Analysis report in FY 2023.

Modified Planned Activity: Collaborate with OCHCO to explore the feasibility of implementing new retention programs specifically for PWDs and PWTDs.

During FY 2022, CRCL planned to launch the third cohort of the DHS Disability Mentoring Program during the month of October in observance of National Disability Employment Awareness Month.

After further review of the planned activity, CRCL will continue to support the DHS Disability Mentoring Program as a successful retention program. However, CRCL has re-evaluated and determined that further development and consideration of new retention programs need to be implemented at the Component level. Accordingly, his planned activity at the Department level will be closed out.

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

Trigger #1: Nothing to report

Trigger #2: N/A – DHS began planned activities during FY 2018 and concluded that additional time is necessary to effectively conduct a thorough review.

Trigger #3: N/A – DHS began planned activities during FY 2018 and concluded that additional time is necessary to effectively conduct a thorough review.

Trigger #4: Exit Surveys – Low response rate and reliable data. CRCL will continue to serve on the working group and provide recommendations and technical guidance.

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

Trigger #1: To be determined

Trigger #2: To be determined

Trigger #3: To be determined

Trigger #4: To be determined

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

Trigger #1: 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.

Trigger #2: DHS will continue to examine and conduct barrier analysis and will continue to focus on the completion of the planned activities outlined above.

Trigger #3: DHS has modified the target date for completion to 06/30/2023.

Trigger #4: DHS has modified the target date for completion during FY 2023.