



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

Fiscal Year 2022



Homeland  
Security

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

## Table of Contents

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Parts A Through D: Agency Identifying Information .....	3
Part E: Executive Summary .....	7
Part F: Certification and Signatures.....	34
Part G: Agency Self-Assessment Checklist.....	35
Part H: Agency EEO Plan to Attain the Essential Elements of a Model EEO Program .....	85
Part I: Agency EEO Plan to Eliminate Identified Barrier.....	97
Part J: Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities .....	106

**EEOC FORM**  
**U.S. Equal Employment Opportunity Commission**

**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

**MD-715**

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

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

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

**Part B - Total Employment**

Total Employment	Permanent Workforce	Temporary Workforce	Total Workforce
Number of Employees	194,345	21,273	215,618

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

Agency Leadership	Name	Title
Head of Agency	Alejandro N. Mayorkas	Secretary of DHS
Head of Agency Designee	Shoba Sivaprasad Wadhia	Officer for Civil Rights and Civil Liberties

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

EEO Program Staff	Name	Title	Occupational Series (xxxx)	Pay Plan and Grade (xx-xx)	Phone Number (xxx-xxx-xxxx)	Email Address
Principal EEO Director/Official	Veronica Venture	Deputy Officer, Office for Civil Rights and Civil Liberties (CRCL), and Director of Equal Employment Opportunity and Diversity	0260	ES-00	202-357-1270	<a href="mailto:veronica.venture@hq.dhs.gov">veronica.venture@hq.dhs.gov</a>

**EEOC FORM**  
**U.S. Equal Employment Opportunity Commission**

**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

<b>EEO Program Staff</b>	<b>Name</b>	<b>Title</b>	<b>Occupational Series (xxxx)</b>	<b>Pay Plan and Grade (xx-xx)</b>	<b>Phone Number (xxx-xxx-xxxx)</b>	<b>Email Address</b>
Title VII Affirmative EEO Program Official	Ambuja Bale	Director, Diversity Management Section (DMS), CRCL	0260	GS-15	202-695-1171	<a href="mailto:ambuja.bale@hq.dhs.gov">ambuja.bale@hq.dhs.gov</a>
Section 501 Affirmative Action Program Official	Laura Davis	Equal Employment Manager, DMS, CRCL	0260	GS-15	202-357-1264	<a href="mailto:laura.davis@hq.dhs.gov">laura.davis@hq.dhs.gov</a>
Complaint Processing Program Manager	Amelia Demopulos	Director, Complaints Management and Adjudication Section (CMAS), CRCL	0260	GS-15	202-357-1273	<a href="mailto:amelia.demopulos@hq.dhs.gov">amelia.demopulos@hq.dhs.gov</a>
EEO Staff Statistician	Greg Beatty	EEO Staff Statistician, DMS, CRCL	1530	GS-15	202-897-6984	<a href="mailto:greg.beatty@hq.dhs.gov">greg.beatty@hq.dhs.gov</a>
Special Emphasis Program Manager (SEPM)	Michelle McGriff	Equal Employment Manager, DMS, CRCL	0260	GS-15	202-357-1261	<a href="mailto:michelle.mcgriff@hq.dhs.gov">michelle.mcgriff@hq.dhs.gov</a>
Special Emphasis Program Manager (SEPM)	Conchetta Belgrave	Equal Employment Opportunity Manager, DMS, CRCL	0260	GS-14	202-357-1249	<a href="mailto:conchetta.belgrave@hq.dhs.gov">conchetta.belgrave@hq.dhs.gov</a>
Equal Opportunity Employment Specialist	Sara Fernandez	Equal Employment Opportunity Specialist, DMS, CRCL	0260	GS-13	202-357-1268	<a href="mailto:sara.fernandez@hq.dhs.gov">sara.fernandez@hq.dhs.gov</a>

**EEOC FORM**  
**U.S. Equal Employment Opportunity Commission**

**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

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

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

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

<b>Subordinate Component</b>	<b>City</b>	<b>State</b>	<b>Country (Optional)</b>	<b>Agency Code (xxxx)</b>	<b>FIPS Codes (xxxxx)</b>
U.S. Customs and Border Protection	Washington	DC		HSBD	7014
U.S. Citizenship and Immigration Services	Camp Springs	MD		HSAB	7003
U.S. Coast Guard	Washington	DC		HSAC	7008
Federal Emergency Management Agency	Washington	DC		HSCB	7022
Federal Law Enforcement Training Centers	Glynco	GA		HSBE	7015
U.S. Immigration and Customs Enforcement	Washington	DC		HSBB	7012
U.S. Secret Service	Washington	DC		HSAD	7009
Transportation Security Administration	Springfield	VA		HSBC	7013
Cybersecurity and Infrastructure Security Agency	Washington	DC		HSCA	7000
Headquarters - Office of the Secretary	Washington	DC		HSAA	7002
Headquarters - Office of the Inspector General	Washington	DC		HSAA	7004
Headquarters - Management Directorate	Washington	DC		HSAA	7050 & 7051
Headquarters - Science & Technology Directorate	Washington	DC		HSFA	7040 & 7041

**EEOC FORM**  
**U.S. Equal Employment Opportunity Commission**

**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

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

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

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

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

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

## Part E: Executive Summary

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

#### Introduction

This Equal Employment Opportunity Program Status Report for Fiscal Year 2022 (FY 2022) outlines the status of U.S. Department of Homeland Security (DHS or Department) Equal Employment Opportunity (EEO) Program activities undertaken pursuant to its EEO program responsibilities under Title VII of the Civil Rights Act of 1964, as amended. This report also describes DHS activities undertaken pursuant to its affirmative action obligations under the Rehabilitation Act of 1973, as amended, and as required by U.S. Equal Employment Opportunity Commission (EEOC) Management Directive (MD) 715.

This report highlights DHS's accomplishments in establishing and maintaining a model program by promoting equal employment opportunity for all employees and applicants for employment. The report also provides the FY 2023 plan to address any programmatic deficiencies that were identified during the year. In addition to this DHS Management Directive 715 report, each DHS Component submits its own report to the EEOC.

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

The mission of DHS is: *With honor and integrity, we will safeguard the American people, our homeland, and our values.* There are six related homeland security missions: 1) Counter Terrorism and Homeland Security Threats; 2) Secure U.S. Borders and Approaches; 3) Secure Cyberspace and Critical Infrastructure; 4) Preserve and Uphold the Nation's Prosperity and Economic Security; 5) Strengthen Preparedness and Resilience; and 6) Champion the DHS Workforce and Strengthen the Department.

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

The Office for Civil Rights and Civil Liberties (CRCL) supports the DHS mission to secure the Nation while preserving individual liberty, fairness, and equality under the law. CRCL is responsible for overseeing the integration of civil rights and civil liberties into all DHS activities. Among its many responsibilities, CRCL leads DHS's EEO programs and promotes workforce diversity and merit system principles. CRCL's EEO and Diversity (EEOD) Division includes the following organizational units: Diversity Management Section (DMS); EEO Complaints Management and Adjudication Section (CMAS); Alternative Dispute Resolution (ADR) Section; DHS Headquarters EEO Office (HQ EEO); and HQ Anti-Harassment Unit (AHU).



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

### Program Elements

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

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

The EEOC has established 156 specific measures that cover the essential elements. Each DHS Component reports to the EEOC on whether each measure is *met*, *unmet*, or *not applicable*. For this report, the Department issued a data call to all DHS Components to provide a draft list of measures indicating met/unmet/not applicable status. 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 this year and provided a draft list of measures for inclusion in this report. If CISA were excluded from the compliance rate comparison, compliance would have increased, from 95.4 percent in FY 2021 to 95.9 percent in FY 2022.

The scorecard below shows the percentage of measures met by DHS Components for each of the essential elements during FY 2021 and FY 2022. The percentages also include those measures reported at the Department level.

Model EEO Program Scorecard		
	FY 2021 % Met	FY 2022 % Met
Essential Element A: Demonstrated Commitment from Agency Leadership	97.7%	95.1%
Essential Element B: Integration of EEO into the Agency's Strategic Mission	92.8%	89.4%
Essential Element C: Management and Program Accountability	92.5%	93.0%
Essential Element D: Proactive Prevention of Unlawful Discrimination	93.7%	92.9%
Essential Element E: Efficiency	97.2%	94.9%
Essential Element F: Responsiveness and Legal Compliance	99.1%	98.3%
<b>Total</b>	<b>95.5%</b>	<b>93.9%</b>



A summary of highlights and FY 2022 accomplishments that correspond to each essential element is included below.

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

DHS Leadership is committed to ensuring that the Department fully integrates the principles of EEO in every action, program, and policy. The annual EEO and anti-discrimination statement was issued by the Secretary in October 2022 and reaffirmed his commitment to EEO. DHS Leadership have actively participated in all Departmental Special Emphasis Observances. For example, the DHS Deputy Secretary provided the keynote address for LGBTQI+ Awareness Month and has participated in furthering the Administration's equity Executive Orders developed to strengthen equal opportunity within the workforce and within our Nations' communities.

DHS leadership are also committed to supporting career advancement and have served as mentors and keynote speakers for two Departmental Mentoring programs, i.e., the DHS Women in Law Enforcement Mentoring Program and the DHS Disability Mentoring Program, developed and sponsored by CRCL DMS. In January 2022, to coincide with National Mentoring Month, the fourth cohort of the DHS Women in Law Enforcement (WLE) Mentoring Program was deployed, with 47 mentee and mentor pairings across several DHS Components, including U.S. Customs and Border Protection (CBP), U.S. Immigration and Customs Enforcement (ICE), the Transportation Security Administration (TSA), the Federal Protective Service (FPS) and the U.S. Secret Service (USSS). The program, created to promote career advancement and retention among DHS women law enforcement officers (LEOs), remains the only one of its kind in the Federal government. The Department continued to support this initiative in FY 2023, with the fifth cohort deploying in January 2023. In FY 2022, CRCL delayed the launch of the third cohort of the DHS Disability Mentoring Program due to staffing changes. The third cohort launched in October 2022, coinciding with National Disability Employment Awareness Month.

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

DHS has integrated EEO into the Agency's Strategic Mission, values, and priorities. The DHS Strategic Plan for FY 2020-2024 includes six strategic goals, one of which is to *Champion the DHS Workforce and Strengthen the Department*.

The Department's workforce strategy and priorities integrate diversity and equal employment opportunity:

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

Promote a culture of transparency, fairness, and equal employment opportunity throughout the DHS workforce, providing avenues of redress and leadership support in addressing and resolving workplace conflict via integrated conflict management and Alternative Dispute Resolution systems.

Organizational Advancement Priorities: Support and champion our workforce and advance a culture of excellence; Recruit, hire, and retain a world-class, diverse workforce to create an inclusive, representative, and trusted department.

The Department also actively involves the EEO Office (i.e., CRCL) in critical and impactful decisions. During FY 2022, CRCL continued its participation in recurring high-level strategic activities, including the Secretary's Bi-Weekly Component Heads' meetings; DHS Chiefs of Staff meetings (composed of all DHS Component Chiefs of Staff, or the equivalent); Human Capital Leadership Council (HCLC) meetings (chaired by the Chief Human Capital Officer and composed of all DHS Component Chief Human Capital Officers); the Human Resources Policy Council; the Workforce Planning Council, which shapes the workforce planning and workforce measurement programs for DHS; and the weekly Reconstitution/Return-to-Workplace Working Group meeting. Participation in these meetings allows inclusion of the EEO perspective and integration into the Agency's strategic priorities.

In addition, CRCL also coordinated training for managers and supervisors on EEO responsibilities to ensure that EEO is fully integrated across the Department. Examples of these trainings include:

- Quarterly EEO and reasonable accommodation training to all supervisors participating in OCHCO's HR Essentials Training programs.
- EEO and Dignity training to Science and Technology Directorate employees.
- *State of EEO* and Schedule A<sup>1</sup> training to Human Resource Management Services employees.
- EEO and Diversity training to HQ and CISA, as requested, at Supervisor Weekly Meetings; All-Staff meetings; and Town Halls for employees.
- Reasonable accommodation training sessions to DHS HQ supervisors, managers, and employees and three disability etiquette and awareness training sessions to HQ employees.

CRCL also works with the DHS Components to ensure that these trainings are delivered similarly across the Department to ensure that all managers and supervisors have increased awareness of their responsibilities to incorporate EEO into their office practices and work units.

### *Essential Element C – Management and Program Accountability*

DHS ensures management and program accountability by 1) conducting technical assistance sessions (e.g. internal audits), 2) having established procedures to address and prevent all forms

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<sup>1</sup> Schedule A is an excepted service appointing authority allowing for non-competitive hiring of individuals with severe disabilities. From OPM's website: Schedule A, 5 CFR 213.3102(u), for hiring people with severe physical disabilities, psychiatric disabilities, and intellectual disabilities. This excepted authority is used to appoint persons with severe physical disabilities, psychiatric disabilities, and intellectual disabilities. Such individuals may qualify for conversion to permanent status after two years of satisfactory service. Severe physical disabilities include but are not limited to blindness, deafness, paralysis, missing limbs, epilepsy, dwarfism, and more.  
<https://www.opm.gov/policy-data-oversight/disability-employment/hiring/#url=Schedule-A-Hiring-Authority>

of discrimination (e.g. effective anti-harassment program), 3) reviewing reasonable accommodation procedures to ensure compliance with EEOC enforcement guidance, 4) ensuring managers and supervisors are evaluated on their efforts to ensure equal employment opportunity, and 5) ensuring appropriate coordination between CRCL and the Office of the Chief Human Capital Officer (OCHCO). These efforts and accomplishments are described below.

### **Internal Audits – Technical Assistance Sessions**

DMS conducted technical assistance sessions and training for all DHS Components. Topics included an EEO Reports Update on MD-715 and a review of Affirmative Action Plans for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities. This technical assistance ensures that EEO services are being provided in accordance with federal regulations as enforced by the EEOC.

CRCL also coordinated regular meetings with DHS Components to advise them on the MD-715, Special Emphasis Programs, the EEO complaints process, and Anti-Harassment Programs. As part of these regular meetings, CRCL provided a briefing on the FY 2022 Mid-Year Review Report based on DHS-wide data provided to DHS Component special emphasis program managers (SEPMs) and MD-715 preparers. This DHS-wide report contained a review of Component self-assessments, program deficiencies, disability employment progress, and actions taken toward creating a model workplace. The mid-year report content was also made available to Components for their use when preparing their annual MD-715 reports.

The EEOD Director ensured that the Special Program Plan for the Recruitment, Hiring, and Advancement of Individuals with Disabilities continued as a major initiative in every DHS Component in FY 2022. To support these efforts, CRCL provided guidance, technical assistance, and feedback to all DHS components to ensure their progress in complying with the new personal assistance services (PAS) obligations outlined in 29 C.F.R. § 1614.203(d)(5). CRCL maintained a tracking mechanism to coordinate activities across the Department, managing and monitoring progress to ensure DHS's compliance with regulatory requirements.

### **EEO Anti-Discrimination and Anti-Harassment Programs**

DHS's EEO Program effectively and efficiently processes EEO complaints and notes an increased efficiency and compliance with providing Final Agency Decisions (FADs) over the past several fiscal years. These efforts are described further within Essential Element E - Efficiency of this section. DHS also has established a firewall between the EEO programs and its anti-harassment program.

DHS implements the Department's Anti-Harassment Directive by promptly and effectively addressing allegations of workplace harassment. Training across the Department is conducted that covers preventing and addressing harassment in the workplace, the Department's Anti-Harassment policy and reporting requirements, the Anti-Harassment Units' process when conducting inquiries into reports of harassment, and the role employee relations plays when addressing reports of harassment. The Department continues to make the *Preventing Workplace Harassment* training mandatory for all DHS employees.

## **Reasonable Accommodation Program**

CRCL continues to support Components to ensure that the Reasonable Accommodation Program is robust across the Department. During FY 2022, the average time frame for processing initial requests for reasonable accommodations was approximately 40.3 days, compared to 27.6 days in FY 2021. These metrics do not include the average processing time for reasonable accommodation requests at USCIS, which were unavailable at the time of reporting.<sup>2</sup> DHS continued its partnership with the Department of Defense's (DoD) Computer/Electronic Accommodation Program (CAP) to provide needs assessments for employees with disabilities in the reasonable accommodation process throughout DHS.<sup>3</sup>

In support of DHS's reasonable accommodation program, CRCL and Component-level subject matter experts (SMEs) collaborated with the Office of Accessible Systems and Technology (OAST) on the development and overall architectural design of an enhanced Accessibility Compliance Management System (ACMS 2.0) to manage, track, and report on all reasonable accommodation requests, consistent with Title 29 C.F.R § 1614.203(d)(3) and (5) and Executive Order (EO) 13164, *Establishing Procedures to Facilitate the Provision of Reasonable Accommodation*. These requests include, but are not limited to, requests for PPAS<sup>4</sup> and requests for religious accommodations. CRCL led efforts to provide technical guidance and resources to all DHS Components, to include the development of DHS Standard Operating Procedures for Processing Religious Accommodation Requests, DHS Religious and Medical Exemption forms, and Frequently Asked Questions (FAQs) designed for employees and managers.

Enhancements to ACMS 2.0 included the ability to receive requests from employees seeking a medical and/or religious accommodation due to COVID-related workplace safety protocols, including masking and testing. Supporting resources were also developed and deployed including an ACMS user guide, an exemption request dashboard for tracking and reporting, and additional fields for tracking and processing requests for reconsideration.

## **Evaluation of Managers and Supervisors to Ensure Equal Employment Opportunity**

Across DHS, managers and supervisors have an EEO performance element and are trained in EEO laws, regulations, procedures, and best practices specific to recruitment, hiring, and managing personnel within their work unit. High level managers and supervisors are involved in the workforce barrier analysis process supporting the action plans developed to address and eliminate identified barriers. One noted success is the increased representation of individuals with disabilities in GS-12 and higher positions. This is no longer considered a workforce trigger

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<sup>2</sup> USCIS did not submit its reasonable accommodation processing time for inclusion in this report due to data limitations. USCIS is exploring switching to an alternate data system that would provide accurate processing time data. TSA did not provide an update on reasonable accommodations at the time of reporting.

<sup>3</sup> Effective FY 2021, CAP ceased to provide assistive technology or adaptive equipment to non-DOD agencies. However, CAP continues to offer consultation services on assistive technology and accommodations, to include individualized assessments.

<sup>4</sup> PAS is assistance with performing activities of daily living that an individual would typically perform if he or she did not have a disability, and that is not otherwise required as reasonable accommodation, including, for example, assistance with putting on or removing clothing, eating, and using the restroom.

(area where workforce representation is a cause for concern) because leaders across the Department worked to increase awareness of recruitment and hiring flexibilities, approval of reasonable accommodations to ensure that individuals with disabilities may perform their essential job functions, and senior leaders served as mentors to individuals with disabilities through CRCL's Disability Mentoring Program.

Supervisors and managers are also participating in Special Emphasis observances to increase awareness of underrepresented groups in the workforce, as well as to expand outreach opportunities. Many of these accomplishments are discussed further in Essential Element D – Proactive Prevention.

### **Collaboration with OCHCO (Human Resources)**

CRCL regularly collaborates with OCHCO on initiatives and programs, including the strategic goals identified in the DHS Human Capital Annual Operational Plan for FY 2020-2024, and the DHS Inclusive Diversity Strategic Plan for FY 2021 - 2024.

The DHS Corporate Recruitment Council (CRC) brings together key recruiting personnel across DHS and develops an annual list of recruiting and outreach events that target diverse populations. In FY 2022, CRC members participated in seventeen Department-wide recruiting and outreach events which focused on targeted skillsets including but not limited to, Women in Law Enforcement, Cybersecurity, and Science, Technology, Engineering and Mathematics (STEM).

In October 2019, DHS deployed the Strategic Marketing, Outreach, and Recruitment Engagement (SMORE) enterprise system to simplify analysis of current and historical recruitment activities. In FY 2021, the Pathways and Student Program dashboard modules were added to SMORE to track hiring and participation in these programs in support of automating the Secretary's Honors Program reporting. As of FY 2022, SMORE has over 20,000 historical recruitment and outreach event records. This system has over thirty (40) built-in reports and dashboards that provide data visualizations to make data-driven decisions and strengthen micro-targeted recruitment efforts across the Departments, maximizing ROI and ensuring equitable practices in outreach and recruitment.

To bolster the Department's cybersecurity workforce, OCHCO oversees the prestigious Secretary's Honors Program for Cybersecurity which is designed to recruit, retain, and reward recent graduates from all segments of society for a career in the Department. In FY 2022, this program ran three classes, two focused on cyber and one focused on climate change with a total of 34 participants. In addition, OCHCO manages the Intelligence and Cybersecurity Diversity Fellowship (ICDF) which is designed to help DHS recruit, retain, and reward the best and brightest students in the fields of Intelligence and/or Cybersecurity, attending a Historically Black College and University (HBCU) or a Minority Serving Institution (MSI). Components have begun the security process and preparing to onboard students for the FY 2023 class. Components have committed 31 positions to the Intelligence and Cybersecurity Diversity Fellowship (ICDF) Program. Recruitment for the ICDF began in August 2022. Fellows are

expected to onboard mid-May 2023 for a twelve-week full-time internship. Additional dashboards are being developed to support the ICDF and the Joint Hiring Event module.

DHS also focused on outreach events targeting underrepresented demographics including, but not limited to, the Congressional Black Caucus, Bender Disability Career Fair, League of United Latin American Citizens, and the White House Initiative on Advancing Educational Equity, Excellence, and Economic Opportunity through Historically Black Colleges and Universities (WHI HBCU) Career Fair. In addition, OCHCO hosted eleven “DHS is Hiring” webinars to support recruiting and outreach efforts across the Department, (targeting students/recent graduates, veterans, and individuals with disabilities) with over 10,000 registrants and coordinated 12 recruiting and outreach activities for Components to increase awareness of our mission and current job opportunities.

During FY 2022, the DHS Office of Academic Engagement (OAE) continued to finalize Memoranda of Understanding (MOUs) with additional institutions of higher education and associations that address underserved communities. In partnership with OAE and the DHS Science and Technology Directorate (S&T), OCHCO hosted a two-part webinar series for faculty who are in the DHS MOU community. The webinar series provided information on available positions and programs for students and recent college graduates, as well as information on resume writing, DHS grants, current Centers of Excellence, and how to utilize USAJOBS.

DHS continues to recruit talent through 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 Program participants. Of these, 45.8 percent self-identified as minorities while 49.4 percent self-identified as women.

#### *Essential Element D – Proactive Prevention of Unlawful Discrimination*

DHS’s Special Emphasis Programs (SEPs) are designed to proactively prevent unlawful *discrimination*. *Proactive prevention of discrimination is integral to the Department’s efforts* to ensure diversity, inclusion, and equal opportunity in the workforce. SEPs are focused on workforce analysis to identify, address, and eliminate barriers, providing career development programs, outreach to minority serving institutions and underrepresented communities, and educating the workforce through Special Emphasis observances on the diversity of our workforce. The EEOD DMS staff distributes a DHS-wide listing of SEPs for each commemorative month. Throughout FY 2022, DMS staff promoted three significant SEP areas: workforce barrier analyses, special emphasis observances, and career development and outreach.

#### **Workforce Barrier Analyses**

DHS conducts a self-assessment on at least an annual basis on its obligation to prevent discrimination on the bases of race, color, national origin, religion, sex (including gender identity and sexual orientation), age, reprisal, genetic information, and disability. As part of this self-

assessment, workforce triggers are identified, and barrier analyses are conducted to identify where barriers may exist to potentially exclude certain groups. DHS develops action plans to eliminate the identified barriers based on race, sex, national origin, and disability. The workforce analysis described later in this report (Part E) describes the identified triggers in the workforce and how they were ascertained. Parts I and J identify the major triggers, barriers, and sources of information used to identify the barriers and monitor the progress in eliminating the barriers, and the actions plans developed to eliminate the barriers.

In FY 2021, CRCL initiated a 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 analysis included a review of survey and complaint data as well as Department-level and Component-specific 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 discussed recruitment and hiring; advancement opportunities including training and career development; retention and awards. CRCL intends to complete the third and final phase of the barrier analysis process by mid FY 2023.

In FY 2022, and consistent with EEOC benchmarks, DHS established Department-wide and Component-specific hiring goals of 12 percent for individuals with disabilities (IWDs) and 2 percent for individuals with targeted disabilities (IWTDs) in non-law enforcement and non-Transportation Security Officer (TSO) positions. The Department successfully met its IWD (12 percent) and IWTD (2 percent) new hire goals for the third year in a row. DHS ended the fiscal year with IWDs representing 14.75 percent of the total workforce. IWTDs represented 1.93 percent of the total workforce excluding law enforcement and TSO occupations.

DHS also reached its 2 percent Schedule A hiring goal for all new hires in non-law enforcement and non-TSO positions in FY 2022. Schedule A hires comprised 2.8 percent of all new hires in non-law enforcement and non-TSO positions, an increase of 0.3 percent from FY 2021.

### **Special Emphasis Observances**

In FY 2022, DHS sponsored or co-sponsored the following Special Emphasis Observances:

- Departmental sponsorship of the DHS National Women's History Month program, featuring keynote speaker Rear Admiral Aisha K. Mix, Assistant Surgeon General, Chief Nurse Officer, Commissioned Corps, U.S. Public Health Service. Admiral Mix spoke on the national theme, "*Women Providing Healing, Promoting Hope*."
- Departmental sponsorship of the National Asian American and Native Hawaiian Pacific Islander Heritage Month program, *Advancing Leaders Through Purpose-Driven Service*, with the DHS Asian American Pacific Islander Network employee association. The program



featured keynote speaker, Susan Tashiro, Assistant Administrator, Domestic Aviation Operations, Transportation Security Administration.

- Departmental co-sponsorship with DHS Pride and U.S. Customs and Border Protection (CBP) of the 2022 LGBTQI+ Pride Month program, *(re) United Stronger: Stronger Today, Stronger Together*, featuring then-CBP Commissioner Chris Magnus as the keynote speaker. Deputy Secretary Tien gave opening remarks and introduced the Commissioner Magnus. Following the keynote, EEOD DMS staff moderated a panel of past and present DHS employees in the LGBTQI+ community.
- Departmental co-sponsorship of the National Hispanic Heritage Month program with DHS Adelante (an employee association with an emphasis on Latin/Hispanic matters) with the theme, *Unidos: Inclusivity for a Stronger Nation*, featuring María Luján, Director of Public Engagement, U.S. Office of Personnel Management.
- Departmental sponsorship of the National Native American Heritage Month program, *Grounded in Tradition, Resilient in Spirit*. The guest speaker, Shawn Walker, Regional Coordinator, Federal Law Enforcement Training Centers (FLETC) spoke on the 2022 theme.

### **Career Development and Outreach**

CRCL also sponsored two Departmental Mentoring Programs: The Disability Mentoring Program and the Women in Law Enforcement Mentoring Program. These programs are described in more detail in Essential Element A – Demonstrated Commitment from Agency Leadership.

With respect to outreach and bringing awareness, in FY2022:

- CRCL supported the DHS Deaf and Hard of Hearing (HOH) employee association (EA), as they hosted their first virtual panel discussion. The event, open to all DHS employees, afforded panelists the opportunity to share their personal and professional stories on how they dealt with inclusion challenges during the emergence of COVID-19. The Deaf and HOH EA, in collaboration with CRCL, also led an initiative to make clear masks available for employees across the Department. This action was taken to mitigate communication challenges while also ensuring employees' safety during the COVID-19 pandemic.
- CRCL collaborated with the Pride in Federal Service Interagency Working Group, a forum for sharing resources and materials in support of lesbian, gay, bisexual, transgender, and gender nonconforming inclusion in federal employment.
- DHS engaged with HBCUs by supporting events sponsored by the Department of Education's White House Initiative on Advancing Educational Equity, Excellence, and Economic Opportunity through Historically Black Colleges and Universities (Initiative). In FY 2022, DMS staff served as the central point of contact for all Initiative-related programs, activities, and reports as a member of the Initiative's Federal Interagency

Working Group (IWG). As a result of this participation, increased outreach has taken place across DHS to HBCUs to bring awareness of DHS careers (details/internships), grants to support research in HBCUs, and funding opportunities.

- DMS staff represented the Department on the Federal Inter-Agency Holocaust Remembrance Committee Planning Team. The 29<sup>th</sup> Annual Federal Inter-Agency Holocaust Remembrance Program, held virtually, was titled, *Courage Facing Evil*, and featured two Holocaust survivors, Rae Goldfarb and Susan Warsinger. Dr. Edna Friedberg, Historian, United States Holocaust Memorial Museum, moderated the program.
- OCHCO hosted the 2022 Human Capital Symposium and Awards Ceremony on September 14-15, 2022. DHS Secretary Alejandro Mayorkas and OPM Director Kiran Ahuja were the keynote speakers and over 15 college and university representatives participated to provide information on their degree and certification programs, some with tuition discounts for DHS employees and eligible family members. The Department's Career Development Programs were featured including HR Academy, DHS Mentorship, Joint Duty, Joint Mission Fellows, rotation programs, and HR Training Sessions.
- In FY 2022, DHS had 13 department-wide Employee Associations (EAs) and many more that exist at the Component-level which supports the Department's goal of creating a workplace culture that values collaboration, creativity and innovation, high performance, fairness and respect, and an environment where employees believe they belong. The Department welcomed two new EAs during Fiscal Year 2022.
  - The DHS Disability Alliance Employee Association was founded on the belief that DHS benefits in creating a work environment that allows all employees to serve. Differences in experience and cognition can enrich an organization and increase its effectiveness and productivity. While DHS Disability Alliance recognizes both the challenges and social barriers disability presents to many employees, the organization aims to also focus on possibilities and the potential of each individual.
  - The DHS Veterans Resource Employee Association, which aims to coordinate a practical communication network to mentor and educate service members across the Department. This EA serves as a liaison to new Veterans employees to ensure they are well educated and connected to the services and resources that the Department has in place during their transition from military service.

### *Essential Element E - Efficiency*

DHS evaluates the efficiency of its EEO programs through compliance with annual training requirements for EEO counselors and EEO investigators, legal sufficiency of the EEO reports of investigation (ROI), use of Alternative Dispute Resolution (ADR), and monitoring of trends related to these areas.

## **EEO Complaints: Counseling, Investigations, and Reports of Investigation**

As is later noted in Part G of this report, DHS Components have reported that when contractor EEO counselings or EEO investigations are untimely, they have procedures in place to hold the contractor personnel accountable for noncompliance in these areas. Untimeliness due to EEO counselings or EEO investigations conducted by staff have been attributed to lack of resources and funding. DHS Components are working with Department leadership to ensure that appropriate staffing levels are approved so that EEO complaints may be consistently processed in an efficient manner. To ensure that the DHS EEO Counselors and EEO Investigators provide outstanding customer service to persons who require EEO services, the DHS EEO Directors Council (chaired by the Departmental EEO Director – CRCL) designed and delivered Annual EEO Counselor and Investigator Refresher training to counselors and investigators from across the Department.

During FY 2022, CMAS provided quarterly feedback to DHS Components on the quality of their Reports of Investigation (ROI) using the ROI Feedback Tool (Tool).<sup>5</sup> Specific areas where the quality of the ROIs is reviewed include legal sufficiency and readability of the investigation, and the quality review analysts develop numerical ratings and provide narrative information if needed. CMAS continued to disseminate aggregate information on the quality of contractor-produced ROIs within the DHS EEO program to all Components.

## **Alternative Dispute Resolution Program**

DHS has established a fair alternative dispute resolution (ADR) program. In FY 2022, there were 2,831 EEO counselings, and ADR was offered in 2,003 counseling cases (to 1,933 individuals) Department-wide. ADR was accepted in 1,231 counseling cases, or 61 percent of the time, which is above the 50 percent requirement established by the EEOC. To support use of ADR across the Department, DHS Components collectively recognized Conflict Resolution Month through various means including video vignettes, print media, and advertising using ADR to address workplace conflict on the Department's intranet site i.e., DHS Connect.

The DHS ADR program has a Shared Neutrals program of collateral duty mediators to support the Departmental ADR program. This program provides an opportunity for employees across DHS to be trained in ADR and perform mediations across the Department. The DHS ADR program also trains mediators on the DHS Shared Neutrals roster on an annual basis. In FY 2022, mediators on the DHS Shared Neutrals roster participated in two 90-minute refresher trainings offered by CRCL: 1) the EEO Process and 2) Drafting Settlement Agreement Terms. Mediators were also provided information about and the opportunity to participate in training offered by external public and private organizations.

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<sup>5</sup> The Tool, developed and launched by CMAS in FY 2016, allowed CMAS's Adjudication Analysts to assess and rate the quality of ROIs reviewed when preparing Final Agency Decisions (FADs) and has been recommended as a best practice for other federal agencies by the EEOC.

The DHS ADR Program also began a Department-level review of its ADR programs to identify best practices and areas of improvement. The results and any recommendations will be submitted to CRCL leadership in FY 2023.

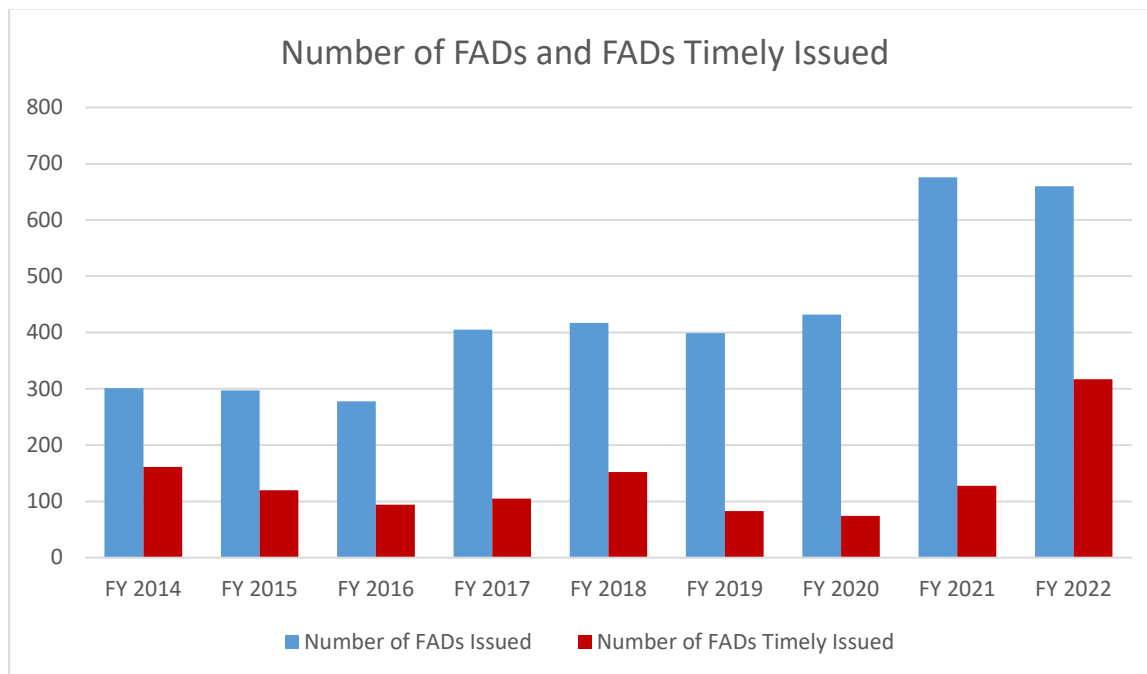
### *Essential Element F - Responsiveness and Legal Compliance*

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

The CMAS Compliance Program monitors Components' progress in the implementation of remedial relief following findings of discrimination and reports the Department's compliance progress to the EEOC for EEOC-issued decisions in which unlawful discrimination was found. CMAS continued its collaboration with the EEOC's Compliance Officer to effectively address the Department's oldest cases pending full implementation.

During FY 2022, CMAS continued to prioritize eliminating the Department's outstanding FAD backlog. CMAS issued or administratively closed 1,232 final merit-based actions, including 660 FADs. Sixteen (16) of these final actions were merit FAD findings. Seven (7) of the 16 implemented findings were rendered by EEOC administrative judges. 68 percent of the final actions were timely issued. 48 percent of the FADs were timely issued, a marked increase from FY 2021 when 19 percent of the FADs were timely issued.

CMAS's FAD workload decreased in FY 2022, with 525 FAD requests received in FY 2022, compared to the 567 requests received in FY 2021. CMAS also issued 129 procedural dismissal decisions and 22 settlement breach decisions. The high level of FAD issuances in FY 2021 and FY 2022 helped to eliminate the outstanding FAD backlog, from 178 at the end of FY 2021 to three at the end of FY 2022. The remaining three cases are expected to issue in early FY 2023.



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

### Workforce Profile and Trend Analysis

This section outlines the DHS workforce-trend analysis conducted on the permanent employee workforce. Temporary employees are not included because, by virtue of their predestined separation, their inclusion is less relevant to the analysis of employee movements through the human capital lifecycle.

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

Workforce trend analysis presumes that parity is the ideal outcome. In the tables below, parity would result if each row in the table contained essentially the same number across the board. For example, assuming Black males make up 7.5 percent of the permanent DHS workforce, at parity, they would constitute an equal percentage of workforce attrition, promotions, low pay grades, middle pay grades, and high pay grades. If this is not occurring, it constitutes a trigger, which may suggest a possible EEO barrier. Multiple years of data are provided to allow for an assessment of trends for each ethnicity, race, and gender group, and for employees who report a disability or a targeted disability.

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

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

The total permanent DHS workforce increased by 1,399 employees (0.73 percent) from 192,946<sup>6</sup> in FY 2021 to 194,345 in FY 2022.

DHS Permanent Workforce Trend for Hispanic or Latino Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY22	15.9%	13.8%	12.8%	13.6%	9.3%	14.1%	21.4%	11.1%	5.6%
FY21	15.8%	11.3%	12.1%	13.8%	9.4%	13.5%	21.6%	11.1%	6.1%
FY20	15.9%	10.0%	11.3%	14.3%	9.2%	13.5%	21.8%	11.1%	5.4%
FY19	16.0%	11.8%	12.7%	14.7%	9.5%	13.7%	21.9%	11.1%	5.6%
FY18	16.2%	14.4%	12.9%	14.5%	9.3%	14.1%	21.9%	11.2%	5.8%
Hispanic Males – 15.9% of DHS, 6.8% of National Civilian Labor Force, 6.0% of Relevant Civilian Labor Force									

The workforce participation rate for Hispanic males at DHS is significantly above the NCLF and RCLF rates. In FY 2022, new hires were above the NCLF and RCLF and attrition was below the workforce representation rate. However, the promotion rate for Hispanic males remained below the workforce participation rate. The representation of Hispanic males in Executive/Senior Leader pay grades remained significantly below the workforce participation rate.

Hispanic males constitute 30 percent of the Customs and Border Protection Officers (CBPOs) and over half of Border Patrol Agents. CBPOs and Border Patrol Agents require fluency in Spanish for initial placements along the southern border, Florida, and Puerto Rico, a requirement that is not present in the standard RCLF comparison. This job requirement, in conjunction with

<sup>6</sup> This figure varies from the 193,368-count reported in the prior year MD-715 report due to updates made to the workforce data during the fiscal year.

the high percentage of jobs located in the southwest Border States, greatly increases Hispanic male and female representation in these occupations.

DHS Permanent Workforce Trend for Hispanic or Latino Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY22	6.8%	9.2%	7.4%	7.6%	2.3%	10.7%	6.4%	4.1%	2.7%
FY21	6.6%	7.7%	6.4%	7.7%	2.2%	10.4%	6.2%	4.0%	2.1%
FY20	6.5%	7.0%	6.7%	8.1%	2.8%	10.0%	6.2%	3.9%	1.8%
FY19	6.5%	8.1%	7.3%	9.0%	2.6%	10.0%	6.1%	3.8%	1.7%
FY18	6.4%	9.8%	7.2%	8.0%	1.6%	10.3%	5.9%	3.7%	1.9%
Hispanic Females – 6.8% of DHS, 6.2% of National Civilian Labor Force, 4.6% of Relevant Civilian Labor Force									

The workforce participation rate for Hispanic females at DHS increased in FY 2022 and remains above the NCLF and RCLF participation rates. The hire rate increased and remained above the NCLF and RCLF. The attrition rate increased in FY 2022 and moved above the participation rate. The promotion rate decreased slightly but continued to exceed the workforce participation rate.

Hispanic females participated at a higher-than-expected rate at pay grades GS 5-9 and participated at a lower-than-expected rate at pay grades GS 10 to SES, when compared to their workforce participation rate. The participation rates in the higher grades increased in FY 2022.

DHS Permanent Workforce Trend for White Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY22	36.7%	28.0%	34.4%	38.4%	52.9%	25.1%	37.4%	44.5%	51.1%
FY21	37.5%	33.3%	36.5%	36.7%	51.7%	26.5%	37.7%	45.4%	53.8%
FY20	37.8%	37.5%	35.7%	36.2%	49.5%	27.5%	37.7%	46.0%	55.8%
FY19	37.7%	33.3%	34.4%	33.0%	49.9%	26.8%	38.1%	46.5%	55.3%
FY18	37.9%	29.4%	35.1%	34.3%	52.0%	25.7%	38.6%	47.1%	55.7%
White Males – 36.7% of DHS, 35.7% of National Civilian Labor Force, 39.6% of Relevant Civilian Labor Force									

The White male workforce participation rate at DHS decreased in FY 2022. It is above the NCLF rate but below the RCLF rate. The hiring rate decreased and remained below the NCLF and RCLF rates, while the promotion rate increased and moved above the workforce participation rate.



White males' participation rate was lower than the expected rate at the GS 5-9 pay grades and higher than the expected rate at the GS 13-15 and Executive/Senior Leader grades. The participation rate at grades GS 13-15 and Executive/Senior Leader grades has been trending downward for the White male group and continued to decrease FY 2022.

DHS Permanent Workforce Trend for White Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/Senior Leader
FY22	15.4%	14.8%	16.1%	18.0%	9.8%	16.2%	13.2%	17.9%	24.2%
FY21	15.5%	16.4%	17.8%	17.0%	10.6%	17.0%	13.3%	17.5%	21.9%
FY20	15.7%	18.9%	17.5%	17.3%	12.0%	17.4%	13.4%	17.3%	20.8%
FY19	15.6%	17.2%	16.9%	17.0%	12.3%	17.4%	13.2%	17.2%	22.0%
FY18	15.5%	16.2%	17.6%	17.3%	9.2%	17.5%	13.2%	17.1%	21.5%
White Females – 15.4% of DHS, 31.8% of National Civilian Labor Force, 31.2% of Relevant Civilian Labor Force									

The White female participation rate at DHS was significantly lower than the NCLF and RCLF rates. The hire rate was below the participation rate for the first time since FY 2018. The attrition rate decreased 1.7 percent in FY 2022 but remained above the participation rate. The White female promotion rate continued to be above the participation rate at 18.0 percent, with White females represented at higher-than-expected rates in the higher pay grades. Their participation rate was highest at the Executive/Senior Leader pay grades.

DHS Permanent Workforce Trend for Black or African American Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/Senior Leader
FY22	7.9%	10.1%	9.2%	7.0%	14.6%	9.8%	7.1%	7.0%	6.0%
FY21	7.7%	9.7%	8.7%	7.5%	13.8%	9.6%	6.9%	7.0%	6.4%
FY20	7.6%	7.5%	9.3%	7.3%	13.8%	9.3%	6.8%	6.9%	6.5%
FY19	7.7%	8.8%	9.4%	7.9%	15.0%	9.5%	6.8%	6.9%	6.1%
FY18	7.7%	9.1%	9.3%	8.3%	17.7%	9.8%	6.7%	6.8%	5.8%
Black Males – 7.9% of DHS, 5.7% of National Civilian Labor Force, 5.0% of Relevant Civilian Labor Force									

In FY 2022, the workforce participation rate and hire rate of Black males at DHS remained above the NCLF and RCLF participation rates, with the hire rate continuing to increase for the second year in a row. The attrition rate remains above the participation rate, as it has since 2010, and increased in 2022. Representation at higher grades GS 13-15 has remained below the overall representation rate. The promotion rate remains below the participation rate in FY 2022.

DHS Permanent Workforce Trend for Black or African American Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY22	8.7%	12.6%	12.0%	7.4%	5.7%	13.2%	6.6%	7.8%	3.9%
FY21	8.6%	11.4%	10.8%	8.4%	6.4%	13.1%	6.5%	7.6%	4.0%
FY20	8.6%	10.2%	11.7%	8.4%	7.1%	12.8%	6.5%	7.5%	4.2%
FY19	8.6%	11.2%	11.3%	9.8%	6.1%	13.1%	6.4%	7.4%	4.2%
FY18	8.6%	12.1%	10.2%	9.4%	5.7%	13.5%	6.2%	7.3%	4.0%
Black Females – 8.7% of DHS, 6.6% of National Civilian Labor Force, 5.7% of Relevant Civilian Labor Force									

The workforce participation rate of Black females at DHS has remained flat since FY 2018, above the NCLF and RCLF participation rates. This group was hired at a rate that was above the NCLF and RCLF and continued to increase in FY 2022. The promotion rate dipped below the representation in the workforce in both FY 2020 and FY 2021 and decreased again in FY 2022. Black females continue to have a higher-than-expected attrition rate that is increasing. This group also had lower than expected participation in higher-graded positions. However, the rate has steadily trended upward in GS 10-12 and GS 13-15 positions since FY 2018.

DHS Permanent Workforce Trend for Asian Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY22	4.0%	4.6%	3.6%	3.6%	2.8%	4.7%	4.0%	3.4%	2.5%
FY21	3.9%	4.3%	3.3%	4.0%	3.2%	4.4%	3.9%	3.4%	2.0%
FY20	3.8%	3.8%	3.5%	3.9%	3.7%	4.3%	3.9%	3.4%	2.0%
FY19	3.8%	4.3%	3.6%	3.9%	2.8%	4.2%	3.9%	3.3%	1.8%
FY18	3.7%	4.1%	3.7%	3.7%	2.2%	4.1%	3.9%	3.2%	2.0%
Asian Males – 4.0% of DHS, 2.2% of National Civilian Labor Force, 2.5% of Relevant Civilian Labor Force									

In FY 2022, Asian males were represented in the DHS permanent workforce at a rate above the NCLF and RCLF rates. The workforce participation rate for Asian males has gradually increased. Attrition remained below, while the promotion rate dropped below, the participation rate.

Asian males are participating at a lower-than-expected rate at the GS 13 and higher pay grades, and their participation in grades GS 13-15 was unchanged while increasing at the Executive/Senior Leader level in FY 2022.

DHS Permanent Workforce Trend for Asian Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY22	2.2%	2.9%	1.9%	2.4%	0.4%	2.7%	1.8%	2.4%	2.2%
FY21	2.1%	2.2%	1.8%	2.4%	0.8%	2.5%	1.8%	2.2%	2.2%
FY20	2.1%	2.4%	1.9%	2.4%	0.6%	2.5%	1.7%	2.2%	1.8%
FY19	2.0%	2.6%	1.8%	2.3%	0.4%	2.4%	1.7%	2.1%	1.6%
FY18	1.9%	2.1%	1.6%	2.2%	0.8%	2.2%	1.6%	2.1%	1.7%
Asian Females – 2.2% of DHS, 2.2% of National Civilian Labor Force, 2.5% of Relevant Civilian Labor Force									

The participation rate for Asian females increased in FY 2022 to meet the NCLF rate while remaining below the RCLF rate. The hire rate increased in FY 2022, exceeding both the NCLF and RCLF benchmarks. In FY 2022, attrition increased slightly, but remaining below the participation rate.

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

DHS Permanent Workforce Trend for Native Hawaiian or Other Pacific Islander Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY22	0.39%	0.67%	0.44%	0.32%	0.33%	0.55%	0.41%	0.21%	0.30%
FY21	0.37%	0.48%	0.39%	0.39%	0.22%	0.48%	0.41%	0.21%	0.30%
FY20	0.36%	0.30%	0.39%	0.31%	0.00%	0.48%	0.39%	0.21%	0.31%
FY19	0.37%	0.48%	0.28%	0.40%	0.00%	0.50%	0.37%	0.21%	0.32%
FY18	0.34%	0.41%	0.44%	0.36%	0.00%	0.47%	0.36%	0.20%	0.33%
Pacific Islander Males – 0.39% of DHS, 0.1% of National Civilian Labor Force, 0.09% of Relevant Civilian Labor Force									

Since FY 2018, Native Hawaiian/Pacific Islander males at DHS have been represented at over three times the NCLF rate. In FY 2022, the hire rate remained above the participation rate and continued to increase. The attrition rate increased and remained above the participation rate.

Native Hawaiian/Pacific Islander males' promotion rate dropped below their participation rate in FY 2022. Representation at grades 13-15 remained below the participation rate. Executive/Senior Leader representation has been trending slightly downward in recent years.

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

DHS Permanent Workforce Trend for Native Hawaiian or Other Pacific Islander Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY22	0.27%	0.50%	0.34%	0.24%	0.00%	0.57%	0.20%	0.11%	0.00%
FY21	0.26%	0.51%	0.33%	0.30%	0.11%	0.55%	0.18%	0.10%	0.00%
FY20	0.25%	0.26%	0.28%	0.21%	0.00%	0.52%	0.17%	0.09%	0.00%
FY19	0.25%	0.39%	0.35%	0.27%	0.00%	0.50%	0.18%	0.09%	0.00%
FY18	0.23%	0.36%	0.27%	0.24%	0.00%	0.49%	0.18%	0.08%	0.00%
Pacific Islander Females – 0.27% of DHS, 0.1% of National Civilian Labor Force, 0.07% of Relevant Civilian Labor Force									

Native Hawaiian/Pacific Islander females’ participation and hire rates continue to exceed the NCLF and RCLF rates in FY 2022. The attrition rate remains above the participation rate.

Native Hawaiian/Pacific Islander females were promoted below the participation rate in FY 2022. They continue to participate at a lower-than-expected rate in the higher pay grades.

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

DHS Permanent Workforce Trend for American Indian or Alaskan Native Males									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY22	0.62%	0.76%	0.84%	0.58%	0.44%	0.62%	0.60%	0.63%	1.09%
FY21	0.63%	0.88%	0.64%	0.57%	0.44%	0.58%	0.62%	0.66%	0.71%
FY20	0.60%	0.65%	0.58%	0.50%	0.48%	0.51%	0.62%	0.63%	0.83%
FY19	0.59%	0.51%	0.67%	0.53%	0.41%	0.51%	0.61%	0.63%	0.76%
FY18	0.61%	0.51%	0.59%	0.54%	0.67%	0.53%	0.62%	0.64%	0.87%
American Indian/Alaskan Native Males – 0.62% of DHS, 0.3% of National Civilian Labor Force, 0.3% of Relevant Civilian Labor Force									

The tabulation of the NCLF and RCLF rates using 2014-2018 American Community Survey data, per EEOC guidance, lowered the NCLF and RCLF rates for this group by 50 percent compared to the 2010 census data. As a result, American Indian/Alaskan Native males are substantially above the NCLF and RCLF participation rates. The hire rate is also well above the NCLF and RCLF rates. Attrition increased in FY 2022 while the promotion rate remained below the participation rate.

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

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

DHS Permanent Workforce Trend for Native American Indian or Alaskan Native Females									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY22	0.34%	0.58%	0.39%	0.36%	0.00%	0.51%	0.25%	0.30%	0.20%
FY21	0.32%	0.59%	0.44%	0.32%	0.11%	0.47%	0.27%	0.26%	0.20%
FY20	0.31%	0.63%	0.36%	0.34%	0.12%	0.45%	0.25%	0.25%	0.31%
FY19	0.30%	0.38%	0.36%	0.35%	0.14%	0.43%	0.24%	0.24%	0.11%
FY18	0.29%	0.41%	0.40%	0.32%	0.00%	0.45%	0.23%	0.23%	0.11%
American Indian/Alaskan Native Females – 0.34% of DHS, 0.3% of National Civilian Labor Force, 0.25% of Relevant Civilian Labor Force									

The tabulation of the NCLF and RCLF rates using 2014-2018 American Community Survey data, per EEOC guidance, lowered the NCLF and RCLF rates for this group by 50 percent compared to the 2010 census data. As a result, American Indian/Alaskan Native females are above the NCLF and RCLF participation rates. The hire rate exceeded the NCLF and RCLF rates in FY 2022 while the attrition rate continued to be higher than the participation rate. The promotion rate was on par with the workforce participation rate. American Indian/Alaskan Native females were overrepresented at Grades 5-9 and underrepresented at all other grade levels.

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

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

### Summary of Triggers Identified in Workforce Trend Tables (FY 2018- FY 2022)

Entries indicate a trigger; no entry indicates no trigger

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

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

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

Higher than expected attrition rates, especially for women, and lower than expected participation rates in the higher pay grades for almost all minority groups continued in FY 2022. Participation in higher grades has increased for several minority groups in recent years.

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

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

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

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



DHS Permanent Workforce Trend for Individuals with Disabilities									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY22	14.75%	14.99%	15.71%	14.15%	5.66%	11.32%	14.03%	18.51%	12.07%
FY21	14.22%	16.14%	16.93%	12.98%	5.56%	10.96%	13.78%	17.51%	12.45%
FY20	13.68%	15.69%	16.55%	14.23%	5.74%	10.77%	13.30%	16.71%	11.16%
FY19	13.03%	12.05%	13.79%	14.35%	7.71%	10.31%	12.71%	15.87%	10.61%
FY18	12.55%	12.24%	13.69%	14.46%	8.37%	10.41%	12.08%	14.88%	10.24%
Individuals with Disabilities – 14.75% of DHS, 21.14% excluding LEOs and TSA TSOs, 9.13% of the Federal government in 2019, <sup>7</sup> 12.0% EEOC Goal									

The representation of individuals with disabilities continued to climb in FY 2022, rising to 14.75 percent for the permanent workforce, and 21.14 percent when excluding law enforcement occupations and TSA Transportation Security Officers, who have physical entry requirements. These percentages include employees who have self-identified as having a disability, disabled veterans with a Department of Veterans Affairs (VA) certified disability, and employees appointed under a disability-based Schedule A hiring authority.

DHS employees with disabilities continued to separate at higher rates than their workforce participation rate in FY 2022, although the attrition percentage decreased from FY 2021. Hires decreased but remained above the 12.0% EEOC goal, while the promotion rate increased. Employees with disabilities are notably above parity in the GS 13-15 grades, with representation at these grades continuing to climb. Employees with disabilities are participating at a lower-than-expected rate at the Executive/Senior Leader level but exceed the 12.0% EEOC goal.

DHS Permanent Workforce Trend for Individuals with Targeted Disabilities									
Year	Onboard	Hires	Attrition	Promotions	GS 1-4	GS 5-9	GS 10-12	GS 13-15	Executive/ Senior Leader
FY22	1.27%	1.37%	1.49%	0.99%	1.31%	1.28%	1.09%	1.43%	1.09%
FY21	1.25%	1.44%	1.74%	0.88%	1.20%	1.26%	1.09%	1.39%	0.61%
FY20	1.25%	1.19%	1.77%	1.06%	1.56%	1.30%	1.08%	1.38%	0.63%
FY19	1.26%	1.08%	1.59%	1.14%	2.03%	1.31%	1.10%	1.35%	1.08%
FY18	1.28%	1.03%	1.57%	1.20%	2.16%	1.38%	1.11%	1.33%	1.20%
Individuals with Targeted Disabilities – 1.27% of DHS, 1.93% excluding LEOs and TSA TSOs, 1.80% of the Federal government in 2019, <sup>8</sup> 2.0% EEOC Goal									

<sup>7</sup> EEOC Annual Report on the Federal Workforce Fiscal Year 2018.

<sup>8</sup> EEOC Annual Report on the Federal Workforce Fiscal Year 2018.

The percentage of the DHS workforce that self-identifies as having a targeted disability is below both the Federal government workforce benchmark and the EEOC's goal of 2.0 percent. The participation rate dropped from FY 2018 to FY 2021 but increased in FY 2022. Excluding law enforcement officers and TSOs, the overall FY 2022 participation rate is 1.93 percent, .07 percent short of the 2.0 percent EEOC goal. Hires decreased in FY 2022 and remained below the 2.0 percent federal goal; however, when excluding law enforcement officers and TSOs, DHS exceeded the 2.0 percent goal, representing 2.62 percent of permanent hires. Further, Schedule A hires comprised 4.16 percent of permanent new hires in non-law enforcement and non-TSO positions. The attrition rate of IWTDs is above their participation rate but decreased in FY 2022.

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

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

Examination of FY 2022 exit survey data indicates that the top non-retirement reasons for exiting DHS were: 1) personal or family related, 2) supervisor/manager; and 3) lack of advancement opportunities. Unlike prior years, the 2022 FEVS did not include questions on work-life balance, but it did contain a newly added set of 13 questions related to Diversity, Equity, Inclusion, and Accessibility (DEIA).

The 2021 Best Places to Work in Federal Government rankings is the most current update as of the writing of this report. The Best Places to Work in Federal Government rankings, which are based on FEVS results, ranked DHS 17<sup>th</sup> out of 17 large agencies.<sup>9</sup> The overall score of 56.5 was based on three FEVS questions chosen for their ability to predict intent to remain in the organization. In 2021, 30.14 percent of DHS employees completed the FEVS.

In FY 2022, the employee engagement index (EEI) for DHS was at 64 percent and remained below the government-wide rate of 71 percent. The FY 2022 EEI is slightly lower than FY 2021 where the EEI was 65 percent. The overall DHS FEVS score is driven by its larger DHS Components, with TSA and CBP accounting for over 50 percent of DHS's completed surveys.

For the 2022 FEVS, women reported higher scores on the core survey questions (64.8 percent vs. 61.2 percent for males) but slightly lower overall on the new DEIA questions (64.0 percent vs. 63.2 percent for males). Black respondents answered more positively to the core questions (66.0 percent vs. 62.2 percent for White respondents), but Black and All Other Group respondents answered less positively on the DEIA questions (64.3 percent for White, 63.7 percent for Black, and 61.1 percent for All Others).

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<sup>9</sup> DHS's score lowered by 4.6 points from 2020 to 2021. The Best Places to Work score is based on responses to three FEVS questions: I recommend my organization as a good place to work.; Considering everything, how satisfied are you with your job?; and, Considering everything, how satisfied are you with your organization? The Partnership for Public Service uses a proprietary weighted formula for combining the results of these three questions.

## Women in Law Enforcement

Notably, DHS has the largest law enforcement population in the Federal government, but the lowest rate of participation by women. In FY 2022, women occupied approximately 9.80 percent of law enforcement positions at DHS, which represents a modest increase of 0.61 percent from FY 2021. However, the female participation rate remains substantially lower at DHS than the rate of women in law enforcement positions across the Federal government which is 13.7 percent.<sup>10</sup>

The participation rate of women in Criminal Investigator (series 1811) law enforcement positions at DHS is also lower than the occupational civilian labor force participation rate for investigators, which is 23.63 percent.<sup>11</sup> In FY 2021, the percentage of permanent DHS Criminal Investigators who were women was 13.15 percent. The percentage increased to 15.04 percent in FY 2022. In other law enforcement positions at DHS, women make up 10.85 percent of the General Inspection (1801) job series, 26.09 percent of the Customs and Border Protection Officer (1895) series, and 5.97 percent of the Border Patrol Agent (1896) job series.

DHS embarked on a hiring sprint starting in FY 2022 to increase recruiting and retention of women in law enforcement (WLE) occupations. Led by OCHCO, and with support from CRCL, the DHS Office of Public Affairs (OPA), and the DHS Office of Public Engagement (OPE), the sprint's objective was to increase the representation of newly hired women as law enforcement officers (LE) and in law enforcement-related (LE-R) occupations at DHS to 30 percent by 2023 (DHS 30x23). These FY 2022 efforts have, in part, led to the noted increases in representation of women across all DHS law enforcement positions and most notably a nearly 2 percent increase in women serving as DHS Criminal Investigators from FY 2021 to FY 2022.

## Data Sources

The workforce numbers used in this report were obtained using DHS's workforce data application, Tableau, and are based on data extracted from the National Finance Center (NFC) for FY 2022. DHS employees voluntarily submitted all race, national origin, gender, and disability data relied on in this report. To better capture the number of IWDs, DHS also identified employees who are disabled veterans with entitlement of preference points (as determined by the Veterans Administration) or who were hired under the Schedule A hiring authority and did not report a disability through the self-identification process. These individuals are counted in the workforce tables as having a non-targeted disability. In FY 2022, and in the data tables used for this report, DHS counted Veteran Preference Codes 3 and 4 in addition to Code 6, as was done in recent years. This change brought DHS's tabulation method in line with the procedure used by the EEOC. The trend table for individuals with disabilities included in

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<sup>10</sup> See Bureau of Justice Statistics, *Census of Federal Law Enforcement Officers*, 2019.

<sup>11</sup> Occupational Civilian Labor Force participation for series 1811 Criminal Investigators is based on 2010 Census civilian labor force data.

this report includes updated percentages for all prior years, in addition to FY 2022. Statistics on IWDs/IWTDs in the Federal government were obtained from the EEOC Annual Report on the Federal Workforce Fiscal Year 2019.

Applicant flow data presented in this report were extracted from USA Staffing, which is used by five of the ten DHS Components: CBP, CISA, ICE, USCIS, and DHS HQ. The remaining five DHS Components (FEMA, FLETC, TSA, USCG, and USCIS) use Monster Government Solutions or a proprietary system as their applicant flow management system. Note that USCIS used both USA Staffing and Monster Government Solutions in Fiscal Year 2022.

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

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

## Conclusion

DHS leadership is proud of its accomplishments in the areas of attracting, developing, and retaining an increasingly diverse workforce. DHS's overall increase in the representation of women, minorities, and individuals with disabilities is a significant accomplishment. This report identifies accomplishments, but also identifies several challenges requiring attention, including enhancing existing career development programs and other retention initiatives, addressing retention of women, and increasing the participation of individuals with targeted disabilities. The plans in Parts I and J address these issues.

## Part F: Certification and Signatures

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

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

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

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

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

Veronica Venture

May 5, 2023

Signature of Principal Equal Employment Opportunity  
Director/Official

Date

Veronica Venture

Deputy Officer, Office for Civil Rights and Civil Liberties  
Director, Equal Employment Opportunity and Diversity  
U.S. Department of Homeland Security

Certifies that this Federal Agency Annual Equal Employment  
Opportunity Program Status Report is in compliance with  
Management Directive 715

MAY 05 2023

Signature of Agency Head or Agency Head Designee

Date

John K. Tien

Deputy Secretary

U.S. Department of Homeland Security

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

## **Part G: Agency Self-Assessment Checklist**

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

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



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

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

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



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

<b>Essential Element A: Demonstrated Commitment from Agency Leadership</b> <b>This element requires the agency head to communicate a commitment to equal employment opportunity and a discrimination-free workplace.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met?</b> <b>(Yes/No/NA)</b>	<b>Comments</b>
<b>A.1.a</b>	<b>A.1 – The agency issues an effective, up-to-date EEO policy statement.</b>  Does the agency annually issue a signed and dated EEO policy statement on agency letterhead that clearly communicates the agency's commitment to EEO for all employees and applicants? If "yes," please provide the annual issuance date in the comments column. [see MD-715, II(A)]	Yes	<b>DHS</b> Issued 10/11/2022.  <b>CBP</b> Issued 12/01/2021.  <b>CISA</b> Issued 6/12/2022.  <b>FEMA</b> Issued 12/03/2021.  <b>FLETC</b> Issued 10/1/2021.  <b>HQ</b> Issued 10/11/2022.  <b>ICE</b> Issued 7/27/2022.  <b>TSA</b> Issued 3/15/2022.  <b>USCG</b> Issued 07/11/2022.  <b>USCIS</b> Issued 10/14/2022.
<b>A.1.b</b>	Does the EEO policy statement address all protected bases (age, color, disability, sex (including pregnancy, sexual orientation and gender identity), genetic information, national origin, race, religion, and reprisal) contained in the laws EEOC enforces? [see 29 C.F.R. § 1614.101(a)]	No CBP	<b>CBP</b> No additional bases covered this year. The current policy does not outline protected bases. The 2023 policy statement will address this deficiency.



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 Compliance Indicator  Measures	A.2 – The agency has communicated EEO policies and procedures to all employees.	Measure Met? (Yes/No/NA)	Comments
A.2.a	Does the agency disseminate the following policies and procedures to all employees?	Yes	
A.2.a.1	Anti-harassment policy? [See MD-715, II(A)]	Yes	
A.2.a.2	Reasonable accommodation procedures? [See 29 C.F.R § 1614.203(d)(3)]	No HQ	
A.2.b	Does the agency prominently post the following information throughout the workplace and on its public website?	Yes	
A.2.b.1	The business contact information for its EEO Counselors, EEO Officers, Special Emphasis Program Managers, and EEO Director? [See 29 C.F.R § 1614.102(b)(7)]	No CISA	
A.2.b.2	Written materials concerning the EEO program, laws, policy statements, and the operation of the EEO complaint process? [see 29 C.F.R § 1614.102(b)(5)]	No CISA	
A.2.b.3	Reasonable accommodation procedures? [see 29 C.F.R. § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.	No CISA, HQ, TSA	<p><b>DHS</b>  <a href="https://www.dhs.gov/reasonable-accommodations-dhs">https://www.dhs.gov/reasonable-accommodations-dhs</a></p> <p><b>CBP</b>  <a href="http://www.cbp.gov/about/eeo-diversity/reasonable-accommodation">www.cbp.gov/about/eeo-diversity/reasonable-accommodation</a></p> <p><b>FEMA</b>  <a href="https://www.fema.gov/about/offices/equal-rights">https://www.fema.gov/about/offices/equal-rights</a></p> <p><b>FLETC</b>  <a href="http://EqualEmploymentOpportunity FederalLawEnforcementTrainingCenters(fletc.gov)">Equal Employment Opportunity   Federal Law Enforcement Training Centers (fletc.gov)</a></p> <p><b>ICE</b>  <a href="http://OfficeofDiversityandCivilRights ICE">Office of Diversity and Civil Rights   ICE</a></p>

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FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

			<a href="https://icegov.sharepoint.com/sites/insight/director/dcr">https://icegov.sharepoint.com/sites/insight/director/dcr</a>  <b>TSA</b> <a href="#">TSA MANAGEMENT DIRECTIVE No. 1100.73-4 REASONABLE ACCOMMODATION PROGRAM</a>  <b>USCG</b> <a href="#">U.S. COAST GUARD CIVIL RIGHTS MANUAL, COMDTINST M5350.4E (uscg.mil)</a> (Pgs. 6.5-6.23)  <b>USCIS</b> <a href="https://www.uscis.gov/sites/default/files/document/legal/-docs/Disability-Accommodations-for-Employees-and-Job-Applicants-MD-256-006.pdf">https://www.uscis.gov/sites/default/files/document/legal/-docs/Disability-Accommodations-for-Employees-and-Job-Applicants-MD-256-006.pdf</a>  <b>USSS</b> <a href="https://www.secretservice.gov/join/diversity">https://www.secretservice.gov/join/diversity</a>
<b>A.2.c</b>	Does the agency inform its employees about the following topics:		
<b>A.2.c.1</b>	EEO complaint process? [See 29 C.F.R. §§ 1614.102(a)(12) and 1614.102(b)(5)] If "yes", please provide how often.	Yes	<b>CBP</b> Quarterly in pay stubs, posters are posted in duty stations, information and Frequently Asked Questions are posted prominently on cbp.gov and notice of EEO rights are identified in Action Letters.  <b>CISA</b> Provided bi-weekly during new employee orientation and bi-annually otherwise.  <b>FEMA</b> Provided on the intranet on an ongoing basis and annually during mandatory EEO employee course training and provided bi-weekly during new employee/supervisor orientation.

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			<p><b>FLETC</b> During new employee orientation, FLETC new supervisor training, and posted on both internet and intranet, EEO posters.</p> <p><b>HQ</b> During new employee orientation and when training is requested.</p> <p><b>ICE</b> Complaint process is on the intranet site, and is discussed bi-weekly during new employee orientation, during mandatory training for new managers and supervisors, during site visits, ad hoc requests for training including online training and notice of EEO rights are identified in action letters.</p> <p><b>TSA</b> Provided every two weeks during new employee orientation in addition to the biennial No FEAR Act training.</p> <p><b>USCG</b> The Civil Rights Awareness Training is provided twice a month one for supervisors and other for employees. The agency publishes a newsletter containing information on complaints.</p> <p><b>USCIS</b> Provided during the onboarding process.</p> <p><b>USSS</b></p> <ul style="list-style-type: none"> <li>•Anti-Harassment Training (Monthly)</li> <li>•Cornerstone Leadership Training (Monthly)</li> <li>•EEO Intake Process</li> <li>•EEO Posters</li> <li>•Internal and External Websites</li> <li>•New Employee Orientation</li> <li>•New Supervisors Training (Monthly)</li> <li>•Uniform Division Leadership Training (Monthly)</li> </ul>
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			<p>•Uniformed Division Introductory Training Course and Special Agent Introductory Training Course (twice per month).</p>
<b>A.2.c.2</b>	ADR process? [see MD-110, Ch. 3(II)(C)] If “yes”, please provide how often.	Yes	<p><b>CBP</b> At least annually in pay stubs, information and FAQs are posted prominently on <a href="http://www.cbp.gov">www.cbp.gov</a>, and complainants are notified during the complaint process.</p> <p><b>CISA</b> This is shared in EEO compliance training and on the OEDIA intranet site.</p> <p><b>FEMA</b> Provided on the intranet on an ongoing basis and annually during mandatory EEO employee course training and provided bi-weekly during new employee/supervisor orientation.</p> <p><b>FLETC</b> During new employee orientation, FLETC New Supervisor Training. Provided slide presentation to managers, and provided Virtual training sessions for employees and managers</p> <p><b>HQ</b> During new employee orientation and when training is requested.</p> <p><b>ICE</b> Policies are disseminated during the bi-weekly new employee orientation, and information is on the ODCR intranet page. New managers and supervisors are informed during mandatory training sessions and Complainants are notified during the complaint process.</p> <p><b>TSA</b> Provided at least once every two weeks/twenty-six times per year during new hires orientation in addition to our biennial No FEAR Act training.</p>

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**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

			<p><b>USCG</b> Provides Civil Rights training twice a month, one for supervisors and another for employees. Publishes ADR information in a monthly newsletter.</p> <p><b>USCIS</b> During bi-annual training for managers and on internal agency website.</p> <p><b>USSS</b></p> <ul style="list-style-type: none"> <li>•Anti-Harassment Training (Monthly)</li> <li>•Cornerstone Leadership Training (Monthly)</li> <li>•Early Dispute Resolution Policy (EDRP)</li> <li>•EEO Intake Process</li> <li>•EEO Posters</li> <li>•Internal and External Websites</li> <li>•New Employee Orientation</li> <li>•New Supervisors Training (Monthly)</li> <li>•Uniform Division Leadership Training (Monthly)</li> <li>•Uniformed Division Introductory Training Course and Special Agent Introductory Training Course (twice per month)</li> </ul>
<b>A.2.c.3</b>	Reasonable accommodation program? [See 29 C.F.R. § 1614.203(d)(7)(ii)(C)] If "yes", please provide how often.	Yes	<p><b>CBP</b> Employees are informed at least annually in pay stubs, on internal websites and complainants are notified during the complaint process.</p> <p><b>CISA</b> During Core Academy training and supervisory training.</p> <p><b>FEMA</b> Provided on the intranet on an ongoing basis and provided bi-weekly during new employee/supervisor orientation.</p> <p><b>FLETC</b> Initially at new employee orientation, FLETC new supervisor training, posted on</p>

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

			<p>both internet and intranet, during employee and supervisor training as needed and in the learning management system.</p> <p><b>HQ</b> During new employee orientation and when training is requested.</p> <p><b>ICE</b> Policies are disseminated during the bi-weekly new employee orientation, required training and on the ODCR intranet page.</p> <p><b>TSA</b> HR essentials module on reasonable accommodation presented via Adobe Connect twice per year.</p> <p><b>USCG</b> Employees are informed about the reasonable accommodation program through Civil Rights awareness training multiple times a year, at the Civil Rights Directorate (CRD) conference every two years, and at training for new employees at least three times a year.</p> <p><b>USCIS</b> Provided during semi-annual supervisor trainings and employee overviews.</p> <p><b>USSS</b></p> <ul style="list-style-type: none"> <li>•Agency-wide training (three-hour training including DEIA and etiquette training) (Quarterly)</li> <li>•Anti-Harassment training (Monthly)</li> <li>•Cornerstone leadership training (Monthly)</li> <li>•Internal and external websites</li> <li>•New employee orientation</li> <li>•New supervisors training (Monthly)</li> <li>•Reasonable accommodation policy EES-06(05)</li> <li>•Uniform Division leadership training (Monthly)</li> </ul>
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**EEOC FORM**  
*U.S. Equal Employment Opportunity Commission*  
**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**



			<p>•Uniformed Division introductory training course and Special Agent introductory training course (twice per month)</p>
<b>A.2.c.4</b>	<p>Anti-harassment program? [see EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1] If “yes”, please provide how often.</p>	Yes	<p><b>CBP</b> At least annually with issuance of anti-discrimination and anti-harassment policy statement; and ongoing EEO training.</p> <p><b>CISA</b> During Core Academy training and supervisory training.</p> <p><b>FEMA</b> Provided on the intranet on an ongoing basis.</p> <p><b>FLETC</b> During new employee orientation, FLETC new supervisor training, and posted on both internet and intranet.</p> <p><b>HQ</b> During new employee orientation and when training is requested.</p> <p><b>ICE</b> The anti-harassment policy is on the intranet site. ICE also provides AH policies and procedures biweekly during new employee orientation, required training in the learning management system, and during annual mandatory training for new managers and supervisors.</p> <p><b>TSA</b> Provides annual mandatory Online Learning Center (OLC) training. Additionally, the anti-harassment program partners with the Civil Rights, Diversity and Inclusion Division (CRDI) to provide virtual and onsite training to management teams upon request.</p> <p><b>USCG</b> The anti-harassment program and updated policy and procedures are communicated to employees and supervisors</p>

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

			<p>through monthly Civil Rights Awareness Training, and by providing information through the CRD's monthly employee newsletter.</p> <p><b>USCIS</b> Provided in the EEO policy statement and as a reminder in the newsletter.</p> <p><b>USSS</b></p> <ul style="list-style-type: none"> <li>•Anti-Harassment Training (Monthly)</li> <li>•Cornerstone leadership training (Monthly)</li> <li>•Internal website</li> <li>•New employee orientation</li> <li>•New supervisors training (Monthly)</li> <li>•RES-04 Prevention of Harassment in the Workplace</li> <li>•Uniform Division leadership training (Monthly)</li> <li>•Uniformed Division introductory training course and Special Agent introductory training course (twice per month)</li> </ul>
<b>A.2.c.5</b>	Behaviors that are inappropriate in the workplace and could result in disciplinary action? [5 29 C.F.R. § 2635.101(b)] If "yes", please provide how often.	Yes	<p><b>CBP</b> At least annually with issuance of anti-discrimination and anti-harassment policy statement; and ongoing EEO training.</p> <p><b>CISA</b> During Core Academy Training and supervisory training.</p> <p><b>FEMA</b> Provided on the intranet on an ongoing basis and provided annually during mandatory EEO employee course training and bi-weekly during employee/supervisor orientation.</p> <p><b>FLETC</b> During new employee orientation, FLETC new supervisor training, and posted on both internet and intranet.</p>



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

			<p><b>HQ</b> Anti-Harassment Program informs on all forms of harassment. Employee Relations handles all other inappropriate behavior within the agency, excluding EEO based complaints.</p> <p><b>ICE</b> Covered in the Anti-Harassment Program Policy letter that is disseminated, publicized on ICE intranet website, and covered in the code of conduct and the ICE Table of Offenses and Penalties.</p> <p><b>TSA</b> The Management Directive (MD) 1100.73.3, "Anti-Harassment Program," was revised and published on January 10, 2023November 25, 2021. It was then sent to all employees via a TSA broadcast message email. In addition, TSA provides new hire employee training every two weeks.</p> <p><b>USCG</b> Employees are required to complete the Preventing and Addressing Workplace Harassment annually. The content includes information on behaviors that could result in disciplinary actions.</p> <p><b>USCIS</b> Provided during the anti-harassment training required for all new hires, annually for all employees and included in the EEO policy statement.</p> <p><b>USSS</b> Information is continuously updated on the agency's website.</p>
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>A.3 – The agency assesses and ensures EEO principles are part of its culture.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>



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

<b>A.3.a</b>	Does the agency provide recognition to employees, supervisors, managers, and units demonstrating superior accomplishment in equal employment opportunity? [See 29 C.F.R. § 1614.102(a) (9)] If "yes," provide one or two examples in the comments section.	Yes	<p><b>CBP</b> Commissioner's EEO and Diversity Award was awarded to 19 members of the Laredo Field Office/Sector Diversity and Inclusion Program Committee.</p> <p>Commissioner's EEO and Diversity Award was awarded to 20 members of the Office of Trade, Diversity and Inclusion committee for championing the agency's commitment to a bias-free work environment and exemplifying EEO principles.</p> <p><b>CISA</b> In FY 2022, the "Champion of Equity, Diversity and Inclusion Award (Individual or Group)" award was added to CISA's recognition program.</p> <p><b>FEMA</b> The 2021 Administrator's Awards event was held on April 20, 2022. Four awards were given for diversity management and inclusion. Nominations for 2022 Administrator's Awards commenced January 2023.</p> <p><b>FLETC</b> Recognition on intranet and in staff meetings; management and staff are recognized through performance evaluations</p> <p><b>HQ</b> DHS Secretary has EEO-related categories in annual Secretary's Awards.</p> <p><b>ICE</b> Director's Outstanding Achievement in Diversity Management and Core Value Awards.</p> <p><b>TSA</b> The agency's Honorary Awards Program has an award category for Equal Employment Opportunity, Workforce Diversity and Cultural</p>
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**EEOC FORM**  
*U.S. Equal Employment Opportunity Commission*  
**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

			<p>Awareness. Awards granted by the Administrator can be given to both individuals and groups. TSA also participates in the DHS Civil Rights and Civil Liberties (CRCL) Awards Program.</p> <p><b>USCG</b> Federal Asian Pacific American Council (FAPAC) Military/Civilian Awards. Society of American Indian Government Employees (SAIGE) Meritorious Service Award.</p> <p><b>USCIS</b> issues two Director's Awards annually for EEO and Diversity Excellence. This recognition is for employees, supervisors, managers and teams who have demonstrated superior commitment to further the agency goals in the areas of advancement for EEO, workforce diversity and inclusive practices.</p> <p><b>USSS</b> The agency utilizes the Performance Appraisal process to provide Cash Awards, Time-off Awards, and Quality Step Increases to recognize the achievements and accomplishments of employees. Inculcated in the rating are employees support for EEO and Diversity principles.</p>
<b>A.3.b</b>	Does the agency utilize the Federal Employee Viewpoint Survey or other climate assessment tools to monitor the perception of EEO principles within the workforce? [See 5 29 C.F.R. Part 250]	Yes	

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

<b>Essential Element B: Integration of EEO into the Agency's Strategic Mission</b> <b>This element requires that the agency's EEO programs are structured to maintain a workplace that is free from discrimination and support the agency's strategic mission.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met?</b> <b>(Yes/No/NA)</b>	<b>Comments</b>
<b>B.1.a</b>	<b>B.1 - The reporting structure for the EEO program provides the principal EEO official with appropriate authority and resources to effectively carry out a successful EEO program.</b>  Is the agency head the immediate supervisor of the person ("EEO Director") who has day-to-day control over the EEO office? [See 29 C.F.R. §1614.102(b)(4)]	No DHS, CBP, CISA, FEMA, FLETC, HQ, USCIS	<b>ICE</b> Yes. EEO Director reports to the Director of ICE.  <b>TSA</b> Yes. EEO Director reports to the TSA Administrator.  <b>USCG</b> Yes. EEO Director reports to the Agency Head.  <b>USSS</b> Yes. EEO Director reports to Director of the Secret Service.
<b>B.1.a.1</b>	If the EEO Director does not report to the agency head, does the EEO Director report to the same agency head designee as the mission-related programmatic offices? If "yes," please provide the title of the agency head designee in the comments.	No DHS, CBP, HQ	<b>CBP</b> The EEO Director reports to the Executive Director, Privacy and Diversity Office (PDO). The agency is reviewing this deficiency and decision is pending.  <b>CISA</b> The EEO Director reports to the Deputy Director who reports directly to the Agency Head.  <b>FEMA</b> The EEO Director reports to the Chief of Staff.  <b>FLETC</b> The EEO Director reports to the Chief of Staff of FLETC and has unlimited access to the Director.  <b>HQ</b> The EEO Director reports to the Deputy Officer of the Office for Civil Rights and Civil Liberties, who has the delegated authority  <b>USCIS</b> The EEO Director reports to the Deputy Director.





**EEOC FORM**  
*U.S. Equal Employment Opportunity Commission*

**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

<b>B.1.a.2</b>	Does the agency's organizational chart clearly define the reporting structure for the EEO office? [See 29 C.F.R. §1614.102(b)(4)]	Yes	
<b>B.1.b</b>	Does the EEO Director have a regular and effective means of advising the agency head and other senior management officials of the effectiveness, efficiency, and legal compliance of the agency's EEO program? [See 29 C.F.R. §1614.102(c)(1); MD-715 Instructions, Sec. I]	Yes	
<b>B.1.c</b>	During this reporting period, did the EEO Director present to the head of the agency, and other senior management officials, the "State of the agency" briefing covering the six essential elements of the model EEO program and the status of the barrier analysis process? [See MD-715 Instructions, Sec. I] If "yes," please provide the date of the briefing in the comments column.	No CISA	<p><b>DHS</b> Presented 4/2022.</p> <p><b>CBP</b> Presented March 15, 2022.</p> <p><b>CISA</b> An MD-715 report was not prepared for FY 2021; CISA established the EEO Office in FY 2021 Q4.</p> <p><b>FEMA</b> Presented 11/8/2022.</p> <p><b>FLETC</b> Presented 1/31/2022.</p> <p><b>HQ</b> Provided briefings to various HQ Programs, and to Deputy Officer for CRCL – various dates during FY2022.</p> <p><b>ICE</b> Presented 2/3/2022.</p> <p><b>TSA</b> Presented 9/20/2022.</p> <p><b>USCG</b> Presented February 28, 2022.</p> <p><b>USCIS</b> Presented 09/27/2022.</p> <p><b>USSS</b> Date was not provided in time for this report.</p>
<b>B.1.d</b>	Does the EEO Director regularly participate in senior-level staff meetings concerning personnel, budget, technology, and other workforce issues? [See MD-715, II(B)]	No CBP	

EEOC FORM  
U.S. Equal Employment Opportunity Commission



FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.2 – The EEO Director controls all aspects of the EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.2.a</b>	Is the EEO Director responsible for the implementation of a continuing affirmative employment program to promote EEO and to identify and eliminate discriminatory policies, procedures, and practices? [See MD-110, Ch. 1(III)(A); 29 29 C.F.R. § 1614.102(c)]	Yes	
<b>B.2.b</b>	Is the EEO Director responsible for overseeing the completion of EEO counseling [See 29 29 C.F.R. § 1614.102(c)(4)]	No CISA	<b>CISA</b> Responsibility for this function remained with the HQ EEO Office as CISA continued to establish its EEO program.
<b>B.2.c</b>	Is the EEO Director responsible for overseeing the fair and thorough investigation of EEO complaints? [See 29 29 C.F.R. §1614.102(c)(5)] [This question may not be applicable for certain subordinate level Components.]	No CISA	<b>CISA</b> Responsibility for this function remained with the HQ EEO Office as CISA continued to establish its EEO program.
<b>B.2.d</b>	Is the EEO Director responsible for overseeing the timely issuance of final agency decisions? [See 29 29 C.F.R. §1614.102(c)(5)] [This question may not be applicable for certain subordinate level Components.]	Yes	Final Agency Decisions (FADs) are issued by DHS/CRCL for all Components.
<b>B.2.e</b>	Is the EEO Director responsible for ensuring compliance with EEOC orders? [See 29 C.F.R. § 1614.102(e); 1614.502]	Yes	
<b>B.2.f</b>	Is the EEO Director responsible for periodically evaluating the entire EEO program and providing recommendations for improvement to the agency head? [See 29 C.F.R. § 1614.102(c)(2)]	Yes	
<b>B.2.g</b>	If the agency has subordinate level Components, does the EEO Director provide effective guidance and coordination for the Components? [See 29 C.F.R. § 1614.102(c)(2) and (c)(3)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.3 - The EEO Director and other EEO professional staff are involved in, and consulted on, management/personnel actions.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.3.a</b>	Do EEO program officials participate in agency meetings regarding workforce changes that might impact EEO issues, including strategic planning, recruitment strategies, vacancy projections, succession	No CBP	

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

	planning, and selections for training/career development opportunities? [See MD-715, II(B)]		
<b>B.3.b</b>	Does the agency's current strategic plan reference EEO / diversity and inclusion principles? [See MD-715, II(B)] If "yes," please identify the EEO principles in the strategic plan in the comments column.	No CBP	<p><b>CISA</b> Diversity &amp; inclusion is referenced as one of CISA's core Principles, "Foster Belonging, Diversity, Inclusion, and Equality". Inclusion is emphasized as part of Goal 4 - Agency Unification).</p> <p><b>FEMA</b> Identified in Goal 1 Instill Equity as a Foundation of Emergency Management Objective 1.1 Cultivate a FEMA That Prioritizes and Harnesses a Diverse Workforce  <a href="https://www.fema.gov/about/strategic-plan">https://www.fema.gov/about/strategic-plan</a></p> <p><b>FLETC</b> Identified in: 3.1.2 Develop recruiting strategies that support FLETC's near- and long term-term staffing goals and 3.01.02.05 Foster a high performing, diverse, and inclusive workforce.</p> <p><b>HQ</b> Referenced in the strategic plan's objective in developing and maintaining a high performing workforce:</p> <p>Promote a culture of transparency, fairness, and equal employment opportunity throughout the DHS workforce, providing avenues of redress and leadership support in addressing and resolving workplace conflict via integrated conflict management and Alternative Dispute Resolution systems.</p> <p><b>ICE</b> ICE's FY 2022-2026 Strategic Plan Goal 2: Recruit, engage and retain a diverse talent pipeline  2.1: Promote and practice outreach efforts that builds internal and external awareness of ICE as an employer of choice for individuals of all backgrounds, experiences, and abilities.</p>

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

			<p><b>TSA</b> Commit to Our People: We will foster a diverse, inclusive, and transparent work environment, establishing TSA as a federal employer of choice.</p> <p><b>USCIS</b> Objective 1.1 of USCIS' strategic goal 1 is to recruit, develop, and retain a diverse, highly trained, and flexible workforce.</p> <p><b>USCG</b> The Agency Strategic Plan 2018-2022          1.1.1. Improve Support Programs for the Mission Ready Total Workforce.          • Foster positive work environments, embracing and leveraging the differences among us, while ensuring equal opportunity for all.</p> <p>1.1.3. Recruit and Retain an Inclusive and Diverse Workforce that Reflects the American Public We Serve.          • Enhance recruiting, hiring, and personnel management policies that advance inclusion and diversity.</p> <p><b>USSS</b> Goal 2: Grow and Support A Diverse Workforce.          Goal 3: Identify, Develop, and Empower Leaders.          Goal 4: Modernize Business Processes.          Goal 5: Increase Communication and Collaboration</p>
 <b>Compliance Indicator</b>  <b>Measures</b>	<p><b>B.4 - The agency has sufficient budget and staffing to support the success of its EEO program.</b></p>	<b>Measure Met?</b> <b>(Yes/No/NA)</b>	<b>Comments</b>
<b>B.4.a</b>	Pursuant to 29 C.F.R. § 1614.102(a)(1), has the agency allocated sufficient funding and qualified staffing to successfully implement the EEO program, for the following areas:		
<b>B.4.a.1</b>	To conduct a self-assessment of the agency for possible program deficiencies? [See MD-715, II(D)]	No CBP	





**EEOC FORM**  
*U.S. Equal Employment Opportunity Commission*

**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

<b>B.4.a.2</b>	To enable the agency to conduct a thorough barrier analysis of its workforce? [See MD-715, II(B)]	No CBP, CISA	
<b>B.4.a.3</b>	To timely, thoroughly, and fairly process EEO complaints, including EEO counseling, investigations, final agency decisions, and legal sufficiency reviews? [See 29 C.F.R. § 1614.102(c)(5) & 1614.105(b) – (f); MD-110, Ch. 1(IV)(D) & 5(IV); MD-715, II(E)]	No DHS, CBP, CISA, ICE	
<b>B.4.a.4</b>	To provide all supervisors and employees with training on the EEO program, including but not limited to retaliation, harassment, religious accommodations, disability accommodations, the EEO complaint process, and ADR? [See MD-715, II(B) and III(C)] If not, please identify the type(s) of training with insufficient funding in the comments column.	Yes	
<b>B.4.a.5</b>	To conduct thorough, accurate, and effective field audits of the EEO programs in Components and the field offices, if applicable? [See 29 C.F.R. § 1614.102(c)(2)]	Yes	
<b>B.4.a.6</b>	To publish and distribute EEO materials (e.g., harassment policies, EEO posters, reasonable accommodations procedures)? [See MD-715, II(B)]	Yes	
<b>B.4.a.7</b>	To maintain accurate data collection and tracking systems for the following types of data: complaint tracking, workforce demographics, and applicant flow data? [See MD-715, II(E)]. If not, please identify the systems with insufficient funding in the comments section.	No USCG	<b>USCG</b> The Coast Guard does not collect and maintain complete applicant flow data nor report its non-appropriated fund workforce demographics combined with appropriated fund personnel statistics as required by the EEOC.
<b>B.4.a.8</b>	To effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic Employment Program, and People with Disabilities Program Manager)? [5 U.S.C. § 7201; 38 U.S.C. § 4214; 5 C.F.R. § 720.204; 5 C.F.R. § 213.3102(t) and (u); 5 C.F.R. § 315.709]	No CISA	<b>CISA</b> has an Acting DPM and RA Coordinator. Billets were approved in FY22 Q4, CISA is planning to announce positions to permanently fill these roles.
<b>B.4.a.9</b>	To effectively manage its anti-harassment program? [See MD-715 Instructions, Sec. I); EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	No CBP, CISA	<b>CISA</b> approved billets in FY22 Q4 to establish its anti-harassment program in FY23.
<b>B.4.a.10</b>	To effectively manage its reasonable accommodation program? [See 29 C.F.R. § 1614.203(d)(4)(ii)]	No CBP, CISA	<b>CISA</b> has an Acting DPM and RA Coordinator. With billets approved in FY22 Q4, CISA is planning to announce positions to permanently fill these roles.
<b>B.4.a.11</b>	To ensure timely and complete compliance with EEOC orders? [See MD-715, II(E)]	Yes	.
<b>B.4.b</b>	Does the EEO office have a budget that is separate from other offices within the agency? [See 29 C.F.R. § 1614.102(a)(1)]	No CBP	<b>CBP</b> The EEO office is currently a part of PDO which is within the Office of the Commissioner. The five offices are within the PDO and include (D&EEO, D&EEO, D&EEO, D&EEO, D&EEO).



**EEOC FORM**  
*U.S. Equal Employment Opportunity Commission*

**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**



			Freedom of Information Act, Privacy, Custody Support and Compliance and Mission Support). These offices share a budget. The agency is reviewing this deficiency.
<b>B.4.c</b>	Are the duties and responsibilities of EEO officials clearly defined? [See MD-110, Ch. 1(III)(A), 2(III), & 6(III)]	Yes	
<b>B.4.d</b>	Does the agency ensure that all new counselors and investigators, including contractors and collateral duty employees, receive the required 32 hours of training, pursuant to Ch. 2(II)(A) of MD-110?	Yes	
<b>B.4.e</b>	Does the agency ensure that all experienced counselors and investigators, including contractors and collateral duty employees, receive the required 8 hours of annual refresher training, pursuant to Ch. 2(II)(C) of MD-110?	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.5 – The agency recruits, hires, develops, and retains supervisors and managers who have effective managerial, communications, and interpersonal skills.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.5.a</b>	Pursuant to 29 C.F.R. § 1614.102(a)(5), have all managers and supervisors received training on their responsibilities under the following areas under the agency EEO program:		
<b>B.5.a.1</b>	EEO Complaint Process? [See MD-715(II)(B)]	No CISA	
<b>B.5.a.2</b>	Reasonable Accommodation Procedures? [See 29 C.F.R. § 1614.102(d)(3)]	No CISA, HQ	
<b>B.5.a.3</b>	Anti-Harassment Policy? [See MD-715(II)(B)]	No CISA	
<b>B.5.a.4</b>	Supervisory, managerial, communication, and interpersonal skills in order to supervise most effectively in a workplace with diverse employees and avoid disputes arising from ineffective communications? [See MD-715, II(B)]	No CISA	
<b>B.5.a.5</b>	ADR, with emphasis on the Federal government's interest in encouraging mutual resolution of disputes and the benefits associated with utilizing ADR? [See MD-715(II)(E)]	No CISA	

EEOC FORM  
U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

 <b>Compliance Indicator</b>  <b>Measures</b>	<b>B.6 – The agency involves managers in the implementation of its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>B.6.a</b>	Are senior managers involved in the implementation of Special Emphasis Programs? [See MD-715 Instructions, Sec. I]	No HQ	
<b>B.6.b</b>	Do senior managers participate in the barrier analysis process? [see MD-715 Instructions, Sec. I]	No CBP, HQ	<b>CBP</b> The EEO office does not have funding to conduct barrier analysis beyond trigger identification. Funding has been requested but not yet approved. Once receive funding approval, the agency anticipates that managers will fully participate in the process.
<b>B.6.c</b>	When barriers are identified, do senior managers assist in developing agency EEO action plans (Part I, Part J, or the Executive Summary)? [See MD-715 Instructions, Sec. I]	No CBP, HQ	<b>CBP</b> The EEO office does not have funding to conduct barrier analysis beyond trigger identification. Funding has been requested but not yet approved. Once receive funding approval, the agency anticipate that managers will fully participate in the process.
<b>B.6.d</b>	Do senior managers successfully implement EEO Action Plans and incorporate the EEO Action Plan Objectives into agency strategic plans? [29 C.F.R. § 1614.102(a)(5)]	No CBP, HQ	<b>CBP</b> The EEO office does not have funding to conduct barrier analysis beyond trigger identification. Funding has been requested but not yet approved. Once receive funding approval, the agency anticipates that managers will fully participate in the process.



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

<b>Essential Element C: Management and Program Accountability</b> <b>This element requires the agency head to hold all managers, supervisors, and EEO officials responsible for the effective implementation of the agency's EEO Program and Plan.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met?</b> <b>(Yes/No/NA)</b>	<b>Comments</b>
<b>C.1.a</b>	<b>C.1 – The agency conducts regular internal audits of its Component and field offices.</b>  Does the agency regularly assess its Component and field offices for possible EEO program deficiencies? [See 29 C.F.R. § 1614.102(c)(2)] If “yes,” please provide the schedule for conducting audits in the comments section.	No CBP, HQ	<b>DHS</b> The Department collects mid-year Part G updates from Components and conducts one-on-one reviews and meetings with Components to discuss program deficiencies.  <b>CBP</b> EEO Office is not sufficiently staffed to perform this function. Resources have been requested and pending decision.  <b>CISA</b> Weekly assessments are performed for EEO cases by divisions and MEOs.  <b>FEMA</b> Does not have subordinate level components.  <b>FLETC</b> Annually.  <b>ICE</b> Annually.  <b>TSA</b> Does not have subordinate level components and has no EEO functions in field offices.  <b>USCG</b> Annually. All CG units are required to complete an EEO self-assessment of their commands by October 31.  <b>USCIS</b> Does not have field offices.  <b>USSS</b> The Agency assesses and enhances internal management accountability by conducting

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

			assessments of operations through an internal inspection process. The agency visually inspects field offices on a continuous basis to ensure in full compliance with Secret requirements.
<b>C.1.b</b>	Does the agency regularly assess its Component and field offices on their efforts to remove barriers from the workplace? [See 29 C.F.R. § 1614.102(c)(2)] If "yes," please provide the schedule for conducting audits in the comments section.	No CBP, HQ  NA CISA	<p><b>DHS</b> The Department annually conducts reviews of Component MD-715 reports including identification of triggers, identification of barriers, and action plans to remove identified barriers.</p> <p><b>CISA</b> Need to establish quarterly meetings with divisions and components to discuss diversity breakdown, retention survey data issues and Trends in EEO complaints</p> <p><b>FEMA</b> FEMA has no subordinate level components.</p> <p><b>FLETC</b> Annually.</p> <p><b>ICE</b> Annually.</p> <p><b>TSA</b> Does not have subordinate components and has no EEO functions in field offices.</p> <p><b>USCG</b> USCG Command develops plans to address deficiencies, if any, following the assessment.</p> <p><b>USCIS</b> Does not have field offices.</p> <p><b>USSS</b> The Agency assesses and enhances internal management accountability by conducting assessments of operations through an internal inspection process which reviews management and operational processes. The agency visually inspects in full compliance with the Secret Service requirements.</p>
<b>C.1.c</b>	Do the Component and field offices make reasonable efforts to comply with the recommendations of the field audit? [See MD-715, II(C)]	Yes	

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

 Compliance Indicator  Measures	C.2 – The agency has established procedures to prevent all forms of EEO discrimination.	Measure Met? (Yes/No/NA)	Comments
C.2.a	Has the agency established comprehensive anti-harassment policy and procedures that comply with EEOC's enforcement guidance? [See MD-715, II(C); Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	No CISA	<b>CISA</b> DHS HQ CRCL Anti-Harassment Unit has handled all CISA harassment complaints. OCSO will lead CISA's Anti-Harassment Program, which is currently underway.
C.2.a.1	Does the anti-harassment policy require corrective action to prevent or eliminate conduct before it rises to the level of unlawful harassment? [See EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.1]	No CISA	<b>CISA</b> DHS HQ CRCL Anti-Harassment Unit has handled all CISA harassment complaints. OCSO will lead CISA's Anti-Harassment Program, which is currently underway.
C.2.a.2	Has the agency established a firewall between the Anti-Harassment Coordinator and the EEO Director? [See EEOC Report, Model EEO Program Must Have an Effective Anti-Harassment Program (2006)]	Yes	
C.2.a.3	Does the agency have a separate procedure (outside the EEO complaint process) to address harassment allegations? [See Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (Enforcement Guidance), EEOC No. 915.002, § V.C.1 (June 18, 1999)]	Yes	
C.2.a.4	Does the agency ensure that the EEO office informs the anti-harassment program of all EEO counseling activity alleging harassment? [See Enforcement Guidance, V.C.]	No CISA, FEMA	<p><b>CISA</b> Handling of harassment complaints is in the process of being transitioned to CISA. The anti-harassment program is in development for FY23, and the EEO office will inform that program of EEO counseling alleging harassment.</p> <p><b>FEMA</b> The EEO Office does not currently inform OPR on issues raised during EEO counseling activity alleging harassment. The EEO Unit refers 100% of individuals to OPR who raised concerns during EEO counseling activity alleging harassment.</p>

**EEOC FORM**  
*U.S. Equal Employment Opportunity Commission*

**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

<b>C.2.a.5</b>	Does the agency conduct a prompt inquiry (beginning within 10 days of notification) of all harassment allegations, including those initially raised in the EEO complaint process? [see <u>Complainant v. Dept. of Veterans Affairs</u> , EEOC Appeal No. 0120123232 (May 21, 2015); <u>Complainant v. Dept. of Defense (Defense Commissary Agency)</u> , EEOC Appeal No. 0120130331 (May 29, 2015)] If “no”, please provide the percentage of timely-processed inquiries in the comments column.	No CISA, FEMA, HQ	<b>CISA</b> Handling of harassment complaints is in the process of being transitioned to CISA.  <b>FEMA</b> The EEO Office does not currently inform OPR on issues raised during EEO counseling activity alleging harassment. The EEO Unit refers 100% of individuals to OPR who raised concerns during EEO counseling activity alleging harassment.  <b>HQ</b> 0 percent compliance.  <b>TSA</b> 0 percent compliance.
<b>C.2.a.6</b>	Do the agency’s training materials on its anti-harassment policy include examples of disability-based harassment? [See 29 C.F.R. 1614.203(d)(2)]	No CISA	
<b>C.2.b</b>	Has the agency established disability reasonable accommodation procedures that comply with EEOC’s regulations and guidance? [See 29 C.F.R. 1614.203(d)(3)]	No CISA, FLETC, HQ	
<b>C.2.b.1</b>	Is there a designated agency official or other mechanism in place to coordinate or assist with processing requests for disability accommodations throughout the agency? [See 29 C.F.R. 1614.203(d)(3)(D)]	Yes	
<b>C.2.b.2</b>	Has the agency established a firewall between the Reasonable Accommodation Program Manager and the EEO Director? [See MD-110, Ch. 1(IV)(A)]	Yes	
<b>C.2.b.3</b>	Does the agency ensure that job applicants can request and receive reasonable accommodations during the application and placement processes? [See 29 C.F.R. 1614.203(d)(1)(ii)(B)]	Yes	
<b>C.2.b.4</b>	Do the reasonable accommodation procedures clearly state that the agency should process the request within a maximum amount of time (e.g., 20 business days), as established by the agency in its affirmative action plan? [See 29 C.F.R. 1614.203(d)(3)(i)(M)]	No CISA	
<b>C.2.b.5</b>	Does the agency process all accommodation requests within the time frame set forth in its reasonable accommodation procedures? [See MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests in the comments column.	No CBP, CISA, FEMA ICE, TSA, USCG, USCIS, USSS	<b>CBP</b> 29 percent of reasonable accommodation requests were timely processed.  <b>CISA</b> is awaiting tracking system updates by HQ RA Coordinator to assess timeliness.

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

			<p><b>FEMA</b> The Disability Unit increased the percentage of requests processed in the timeframes outlined in RA procedures from 25.0% (116 of 465) to 44.3% (185 of 417) from FY 2021 to FY 2022.</p> <p>Average processing days increased to process RA requests average 72 days from 25 days in FY 2021.</p> <p><b>ICE</b> Average processing time of 69 days.</p> <p><b>TSA</b> 69 percent of all reasonable accommodation request were timely processed.</p> <p><b>USCG</b> 77 percent of reasonable accommodation requests were timely processed. The other 23 percent were delayed due to searches for reassignments and/or the requestors' delay in submitting requested medical information.</p> <p><b>USCIS</b> The agency is unable to calculate processing time with the current system. A new tracking system will be developed and deployed in FY 2023.</p> <p><b>USSS</b> 95 percent of reasonable accommodation requests for employees have been processed timely. (Average 12 days). 100 percent of reasonable accommodation requests for applicants have been processed timely.</p>
<b>C.2.c</b>	Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [See 29 C.F.R. 1614.203(d)(6)]	No CISA, USCIS	<b>USCIS</b> The procedures were incorporated in the directive submitted to EEOC which was approved on 04/21/2022.
<b>C.2.c.1</b>	Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [See 29 C.F.R. § 1614.203(d)(5)(v)] If "yes," please provide the internet address in the comments column.	No CISA	<p><b>DHS</b>  <a href="https://www.dhs.gov/reasonable-accommodations-dhs">https://www.dhs.gov/reasonable-accommodations-dhs</a></p> <p><b>CBP</b></p>





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

		<a href="https://www.cbp.gov/about/eeo-diversity/reasonable-accommodation">https://www.cbp.gov/about/eeo-diversity/reasonable-accommodation</a>  <b>FEMA</b> <a href="https://www.fema.gov/about/offices/equal-rights/accommodation">https://www.fema.gov/about/offices/equal-rights/accommodation</a>  <b>FLETC</b> <a href="#">Equal Employment Opportunity   Federal Law Enforcement Training Centers (fletc.gov)</a>  <b>HQ</b> <a href="https://www.dhs.gov/reasonable-accommodations-dhs">https://www.dhs.gov/reasonable-accommodations-dhs</a>  <b>ICE</b> <a href="https://www.ice.gov/doclib/about/offices/dcr/icePASP.pdf">https://www.ice.gov/doclib/about/offices/dcr/icePASP.pdf</a>  <b>TSA</b> <a href="https://www.tsa.gov/about/jobs-at-tsa">https://www.tsa.gov/about/jobs-at-tsa</a>  <b>USCG</b> <a href="#">Frequently Asked Questions (uscg.mil)</a>  <a href="#">Request for Reasonable Accommodation, CG-6079</a>  <b>USCIS</b> <a href="https://www.uscis.gov/about-us/affirmative-action-plan-for-the-recruitment-hiring-advancement-and-retention-of-persons-with">https://www.uscis.gov/about-us/affirmative-action-plan-for-the-recruitment-hiring-advancement-and-retention-of-persons-with</a>  <b>USSS</b> <a href="https://www.secretservice.gov/diversity/">https://www.secretservice.gov/diversity/</a> overview: <a href="#">Diversity   United States Secret Service</a>
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EEOC FORM  
U.S. Equal Employment Opportunity Commission



FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

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



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

			current process in place for the EEO Director to review findings of discrimination and recommend discipline.
<b>C.3.d</b>	When the EEO Director recommends remedial or disciplinary actions, are the recommendations regularly implemented by the agency? [See 29 C.F.R. § 1614.102(c)(2)]	No CBP	<b>CBP</b> The EEO Director is not in decision making capacity outside of the EEO Office. These decisions are advised by Labor and Employee Relations are made by the relevant program office. There is no current process in place for the EEO Director to review findings of discrimination and recommend discipline.



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

 Compliance Indicator  Measures	C.4 – The agency ensures effective coordination between its EEO programs and Human Resources (HR) program.	Measure Met? (Yes/No/NA)	Comments
C.4.a	Do the HR Director and the EEO Director meet regularly to assess whether personnel programs, policies, and procedures conform to EEOC laws, instructions, and management directives? [See 29 C.F.R. §1614.102(a)(2)]	Yes	
C.4.b	Has the agency established timetables/schedules to review at regular intervals its merit promotion program, employee recognition awards program, employee development/training programs, and management/personnel policies, procedures, and practices for systemic barriers that may be impeding full participation in the program by all EEO groups? [See MD-715 Instructions, Sec. I]	Yes	
C.4.c	Does the EEO office have timely access to accurate and complete data (e.g., demographic data for workforce, applicants, training programs, etc.) required to prepare the MD-715 workforce data tables? [See 29 C.F.R. §1614.601(a)]	No USCG	<b>USCG</b> The Coast Guard does not collect and maintain complete applicant flow data nor report its non-appropriated fund workforce demographics combined with appropriated fund personnel statistics as required by the EEOC.
C.4.d	Does the HR office timely provide the EEO office with access to other data (e.g., exit interview data, climate assessment surveys, and grievance data), upon request? [See MD-715, II(C)]	Yes	
C.4.e	Pursuant to Section II(C) of MD-715, does the EEO office collaborate with the HR office to:		
C.4.e.1	Implement the Affirmative Action Plan for Individuals with Disabilities? [see 29 C.F.R. § 1614.203(d); MD-715, II(C)]	Yes	
C.4.e.2	Develop and/or conduct outreach and recruiting initiatives? [See MD-715, II(C)]	Yes	
C.4.e.3	Develop and/or provide training for managers and employees? [See MD-715, II(C)]	Yes	
C.4.e.4	Identify and remove barriers to equal opportunity in the workplace? [See MD-715, II(C)]	No HQ	
C.4.e.5	Assist in preparing the MD-715 report? [See MD-715, II(C)]	Yes	

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

 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.5 – Following a finding of discrimination, the agency explores whether it should take a disciplinary action.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.5.a</b>	Does the agency have a disciplinary policy and/or table of penalties that covers discriminatory conduct? [See 29 C.F.R. § 1614.102(a)(6); see also <u>Douglas v. Veterans Administration</u> , 5 MSPR 280 (1981)]	Yes	
<b>C.5.b</b>	When appropriate, does the agency discipline or sanction managers and employees for discriminatory conduct? [See 29 C.F.R. § 1614.102(a)(6)] If “yes”, please state the number of disciplined/sanctioned individuals during this reporting period in the comments.	Yes	<p><b>CBP</b> The CBP Review Board indicated no finding of any adverse actions that warranted discipline.</p> <p><b>CISA</b> One (1) finding of discrimination and the corrective actions were reasonable accommodation training and letter of counseling.</p> <p><b>FEMA</b> In FY22, no discipline cases involved findings of discriminatory conduct.</p> <p><b>FLETC</b> reports no findings of discriminatory conduct.</p> <p><b>HQ</b> Reports no findings of discriminatory conduct.</p> <p><b>ICE</b> One individual was referred to OHC for potential disciplinary action based on findings of discrimination.</p> <p><b>TSA</b> Prepared ten (10) actions, four employees resigned prior to the action being issued.</p> <p><b>USCG</b> The USCG was preparing to sanction one management official who retired prior to the implementation of any action. Therefore, the CG was unable to discipline the manager. However, the CG still fulfilled all the obligations to comply with the FAD.</p> <p><b>USCIS</b> The agency had five findings of discrimination. After assessing the circumstances, no individuals were disciplined or sanctioned.</p>





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

			<b>USSS</b> Even when there are no findings of discrimination, and management officials have been found to engage in inappropriate conduct, disciplinary actions are applied in accordance with ITG-04.
<b>C.5.c</b>	If the agency has a finding of discrimination (or settles cases in which a finding was likely), does the agency inform managers and supervisors about the discriminatory conduct? [See MD-715, II(C)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>C.6 – The EEO office advises managers/supervisors on EEO matters.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>C.6.a</b>	Does the EEO office provide management/supervisory officials with regular EEO updates on at least an annual basis, including EEO complaints, workforce demographics and data summaries, legal updates, barrier analysis plans, and special emphasis updates? [See MD-715 Instructions, Sec. I] If “yes,” please identify the frequency of the EEO updates in the comments column.	Yes	<p><b>CBP</b> Memoranda and other information is issued annually on EEO complaints, workforce data, legal updates and special emphasis programs.</p> <p><b>CISA</b> Workforce diversity data and special emphasis updates monthly; EEO complaints data updates weekly.</p> <p><b>FEMA</b> The EEO Office provides senior leadership updates annually through the agency's 462 Report and MD-715 Report.</p> <p><b>FLETC</b> Annually.</p> <p><b>HQ</b> Provides semi-annual or annual briefings, training, and updates to key HQ program areas. Also provide as requested updates at Town Halls or special Supervisor or Manager meetings.</p> <p><b>ICE</b> Annually.</p> <p><b>TSA</b> The TSA Civil Rights, Equity, Access, and Inclusion Division provided reports to include workforce demographics and complaint data to all</p>

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

			<p>airports and Federal Air Marshal Service field offices visited and those offices that requested reports throughout the fiscal year.</p> <p><b>USCG</b> Provided through triennial training, weekly meetings, No Fear act postings, and newsletters.</p> <p><b>USCIS</b> Provided annually through the State of EEO briefing to leadership. Other information is provided to leadership on an ad hoc basis, including workforce demographics and other information regarding the status of barrier analyses efforts, findings of discrimination, and other relevant program aspects.</p> <p><b>USSS</b> Annually.</p>
<b>C.6.b</b>	Are EEO officials readily available to answer managers' and supervisors' questions or concerns? [See MD-715 Instructions, Sec. I]	Yes	

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

<b>Essential Element D: Proactive Prevention</b> <b>This element requires that the agency head make early efforts to prevent discrimination and to identify and eliminate barriers to equal employment opportunity.</b>			
 <b>Compliance Indicator</b>  <b>Measures</b>		<b>Measure Met?</b> <b>(Yes/No/NA)</b>	<b>Comments</b>
<b>D.1.a</b>	<b>D.1 – The agency conducts a reasonable assessment to monitor progress towards achieving equal employment opportunity throughout the year.</b>  Does the agency have a process for identifying triggers in the workplace? [See MD-715 Instructions, Sec. I]	Yes	
<b>D.1.b</b>	Does the agency regularly use the following sources of information for trigger identification: workforce data; complaint/grievance data; exit surveys; employee climate surveys; focus groups; affinity groups; union; program evaluations; special emphasis programs; reasonable accommodation program; anti-harassment program; and/or external special interest groups? [See MD-715 Instructions, Sec. I]	Yes	
<b>D.1.c</b>	Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [See 29 C.F.R. 1614.203(d)(1)(iii)(C)]	No CBP	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.2 – The agency identifies areas where barriers may exclude EEO groups (reasonable basis to act.)</b>	<b>Measure Met?</b> <b>(Yes/No/NA)</b>	<b>Comments</b>
<b>D.2.a</b>	Does the agency have a process for analyzing the identified triggers to find possible barriers? [See MD-715, (II)(B)]	Yes	
<b>D.2.b</b>	Does the agency regularly examine the impact of management/personnel policies, procedures, and practices by race, national origin, sex, and disability? [See 29 C.F.R. § 1614.102(a)(3)]	No HQ	
<b>D.2.c</b>	Does the agency consider whether any group of employees or applicants might be negatively impacted prior to making human resource	No HQ	







**EEOC FORM**  
*U.S. Equal Employment Opportunity Commission*

**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

	decisions, such as re-organizations and realignments? [See 29 C.F.R. § 1614.102(a)(3)]		
<b>D.2.d</b>	Does the agency regularly review the following sources of information to find barriers: complaint/grievance data, exit surveys, employee climate surveys, focus groups, affinity groups, union, program evaluations, anti-harassment program, special emphasis programs, reasonable accommodation program; anti-harassment program; and/or external special interest groups? [See MD-715 Instructions, Sec. I] If “yes,” please identify the data sources in the comments column.	Yes	<p><b>CBP</b> Complaint data, exit surveys, program evaluations and special emphasis programs.</p> <p><b>CISA</b> Complaint data, FEVS, exit surveys, and input from SEPMs and employee association groups..</p> <p><b>FEMA</b> FEMA completed a root cause barrier analysis on the low participation rate of women at FEMA and on the low participation rate of women and minorities in field leadership in July 2022.</p> <p><b>FLETC</b> I-Complaints, NFC, complaint and grievance data, exit surveys, reasonable accommodation program, special emphasis programs.</p> <p><b>HQ</b> Reviews include complaint data, AH data, SEP, RA, input from Employee Associations, FEV, Exit Data.</p> <p><b>ICE</b> Complaint/grievance data; employee climate surveys; focus groups; site visits and evaluative data from the special emphasis programs.</p> <p><b>TSA</b> Complaint/grievance data, employee climate survey, reasonable accommodation program, workforce demographics, and the Barrier Analysis Recommendation report.</p> <p><b>USCG</b> Complaints/grievance, employee climate surveys, program evaluation (Command Checklist), anti-harassment program, reasonable accommodation program</p> <p><b>USCIS</b> EEO complaint data, exit survey, FEVS scores, climate survey, special emphasis programs, reasonable accommodation program, and annual</p>

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

			program assessment responses from program offices and directorates.  <b>USSS</b> Complaints, exit survey, reasonable accommodation program, anti-harassment program
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.3 – The agency establishes appropriate action plans to remove identified barriers.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>D.3.a</b>	Does the agency effectively tailor action plans to address the identified barriers, in particular policies, procedures, or practices? [See 29 C.F.R. § 1614.102(a)(3)]	No CISA, HQ	
<b>D.3.b</b>	If the agency identified one or more barriers during the reporting period, did the agency implement a plan in Part I, including meeting the target dates for the planned activities? [See MD-715, II(D)]	No HQ	
<b>D.3.c</b>	Does the agency periodically review the effectiveness of the plans? [See MD-715, II(D)]	No CISA, HQ	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>D.4 – The agency has an affirmative action plan for people with disabilities, including those with targeted disabilities.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>D.4.a</b>	Does the agency post its affirmative action plan on its public website? [See 29 C.F.R. 1614.203(d)(4)] Please provide the internet address in the comments.	No CISA	<b>DHS</b> <a href="#">Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities   Homeland Security (dhs.gov)</a>  <b>CBP</b> <a href="https://www.cbp.gov/about/eeo-diversity/diversity-inclusion">https://www.cbp.gov/about/eeo-diversity/diversity-inclusion</a>  <b>FEMA</b> <a href="https://www.fema.gov/about/offices/equal-rights">https://www.fema.gov/about/offices/equal-rights</a>



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

			<p><b>FLETC</b>  <a href="#">Affirmative Action Plan   Federal Law Enforcement Training Centers (fletc.gov)</a></p> <p><b>HQ</b>  <a href="https://www.dhs.gov/sites/default/files/2022-10/dhs-fy-2021-affirmative-action-plan.pdf">https://www.dhs.gov/sites/default/files/2022-10/dhs-fy-2021-affirmative-action-plan.pdf</a></p> <p><b>ICE</b>  <a href="https://www.ice.gov/leadership/dcr">https://www.ice.gov/leadership/dcr</a></p> <p><b>TSA</b>  <a href="https://www.tsa.gov/civil-rights-diversity-and-inclusion">https://www.tsa.gov/civil-rights-diversity-and-inclusion</a></p> <p><b>USCG</b>  <a href="https://www.uscg.mil/Resources/Civil-Rights/Reports-and-References/">https://www.uscg.mil/Resources/Civil-Rights/Reports-and-References/</a></p> <p><b>USCIS</b>  <a href="https://www.uscis.gov/about-us/affirmative-action-plan-for-the-recruitment-hiring-advancement-and-retention-of-persons-with">https://www.uscis.gov/about-us/affirmative-action-plan-for-the-recruitment-hiring-advancement-and-retention-of-persons-with</a></p> <p><b>USSS</b>  <a href="https://www.secretservice.gov/diversity/">https://www.secretservice.gov/diversity/</a> overview: <a href="#">Diversity   United States Secret Service</a></p>
<b>D.4.b</b>	Does the agency take specific steps to ensure qualified people with disabilities are aware of and encouraged to apply for job vacancies? [See 29 C.F.R. 1614.203(d)(1)(i)]	Yes	
<b>D.4.c</b>	Does the agency ensure that disability-related questions from members of the public are answered promptly and correctly? [See 29 C.F.R. 1614.203(d)(1)(ii)(A)]	No CISA	
<b>D.4.d</b>	Has the agency taken specific steps that are reasonably designed to increase the number of persons with disabilities or targeted disabilities employed at the agency until it meets the goals? [See 29 C.F.R. 1614.203(d)(7)(ii)]	Yes	

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**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

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

<b>Essential Element E: Efficiency</b> <b>This element requires the agency head to ensure that there are effective systems for evaluating the impact and effectiveness of the agency's EEO programs and an efficient and fair dispute resolution process.</b>			
 <b>Compliance Indicator</b>	<b>E.1 - The agency maintains an efficient, fair, and impartial complaint resolution process.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
 <b>Measures</b>			
<b>E.1.a</b>	Does the agency timely provide EEO counseling, pursuant to 29 C.F.R. § 1614.105?	Yes	
<b>E.1.b</b>	Does the agency provide written notification of rights and responsibilities in the EEO process during the initial counseling session, pursuant to 29 C.F.R. § 1614.105(b)(1)?	Yes	
<b>E.1.c</b>	Does the agency issue acknowledgment letters immediately upon receipt of a formal complaint, pursuant to MD-110, Ch. 5(I)?	Yes	
<b>E.1.d</b>	Does the agency issue acceptance letters/dismissal decisions within a reasonable time (e.g., 60 days) after receipt of the written EEO Counselor report, pursuant to MD-110, Ch. 5(I)? If so, please provide the average processing time in the comments.	No CBP, HQ	<b>CBP</b> Average time 394 days.  <b>CISA</b> Through HQ EEO until March 14, 2022, acceptance letters/dismissal decisions were timely.  <b>FEMA</b> In FY22, 152 out of 178 (85.4%) acceptance letters/dismissal decisions were issued within a reasonable time (e.g., 60 days) after receipt. 16 out of 178 (9.0%) acceptance letters/dismissal decisions exceeded the reasonable time (e.g., 60 days) threshold after receipt.  <b>FLETC</b> Average processing time was 11.5 days.  <b>HQ</b> Average processing time is 64 days.  <b>ICE</b> Average processing time was 79 days.  <b>TSA</b> Average processing time was 21 days.  <b>USCG</b> Average processing time was 30.7 days.

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*U.S. Equal Employment Opportunity Commission*



**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

			<p><b>USCIS</b> Average processing time was 52 days.</p> <p><b>USSS</b> Average processing time of issuing acceptance letters is 17 days.</p>
<b>E.1.e</b>	Does the agency ensure all employees fully cooperate with EEO counselors and EEO personnel in the EEO process, including granting routine access to personnel records related to an investigation, pursuant to 29 C.F.R. § 1614.102(b)(6)?	Yes	
<b>E.1.f</b>	Does the agency timely complete investigations, pursuant to 29 C.F.R. § 1614.108?	No CBP, CISA, FEMA, ICE	
<b>E.1.g</b>	If the agency does not timely complete investigations, does the agency notify complainants of the date by which the investigation will be completed and of their right to request a hearing or file a lawsuit, pursuant to 29 C.F.R. § 1614.108(g)?	Yes	
<b>E.1.h</b>	When the complainant does not request a hearing, does the agency timely issue the final agency decision, pursuant to 29 C.F.R. § 1614.110(b)?	No DHS	<b>DHS</b> Final agency decisions (FADs) are issued by DHS CRCL for all DHS Components.
<b>E.1.i</b>	Does the agency timely issue final actions following receipt of the hearing file and the administrative judge's decision, pursuant to 29 C.F.R. § 1614.110(a)?	No	<b>DHS</b> Final agency decisions (FADs) are issued by DHS CRCL for all DHS Components.
<b>E.1.j</b>	If the agency uses contractors to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays? [See MD-110, Ch. 5(V)(A)] If "yes," please describe how in the comments column.	Yes	<p><b>CBP</b> Feedback is provided during the annual review or completion of the contract.</p> <p><b>CISA</b> HQ EEO staff is currently used, but will hold contractors accountable for poor work product and/or delays.</p> <p><b>FEMA</b> The Office of Equal Rights has a process of holding contractors accountable for poor performance.</p> <p><b>FLETC</b> EEO Complaints Manager, along with the Procurement Office, immediately contacts contract investigative company to address any deficiencies.</p>

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

			<p><b>HQ</b> Contractors are held accountable in accordance with their statement of work.</p> <p><b>ICE</b> In accordance with the contractor's statement of work, the Agency may demand the removal of a contract investigator where it determines an investigator is ineffective (including untimeliness) or biased.</p> <p><b>TSA</b> Contracts have a penalty clause for poor work quality and/or delays.</p> <p><b>USCG</b> Performance issues with contract counselors/investigators are communicated to vendor and requests are made to remove contract personnel from working on EEO cases.</p> <p><b>USCIS</b> The processing timeframes and sufficiency standards are included as part of the statement of work in the contract. If timelines and sufficiency standards are not met the issue is initially addressed with the contracting firm. Should the issue continue, the agency may exercise the provisions associated with breach of contract.</p> <p><b>USSS</b> Works directly with Procurement Division to remove contractors who do not comply with the performance statement of work. Also, the Formal Complaints Program Manager monitors the work of contractors.</p>
<b>E.1.k</b>	If the agency uses employees to implement any stage of the EEO complaint process, does the agency hold them accountable for poor work product and/or delays during performance review? [See MD-110, Ch. 5(V)(A)]	Yes	
<b>E.1.l</b>	Does the agency submit complaint files and other documents in the proper format to EEOC through the Federal Sector EEO Portal (FedSEP)? [See 29 C.F.R. § 1614.403(g)]	Yes	

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



 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.2 – The agency has a neutral EEO process.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.2.a</b>	Has the agency established a clear separation between its EEO complaint program and its defensive function? [See MD-110, Ch. 1(IV)(D)]	Yes	<p><b>DHS</b> CRCL has two embedded attorneys who have no role in the agency's defensive function.</p> <p><b>CBP</b> The agency representative does not provide legal analyses during the processing of EEO complaints. The agency representative only conducts legal sufficiency reviews of settlement agreements.</p> <p><b>CISA</b> CISA's OEDIA office has qualified staff members, attorneys, and those with a legal background to conduct the legal sufficiency reviews.</p> <p><b>FEMA</b> There are attorneys in and assigned to OER. Attorneys assigned to or supporting the OER are separate and apart from the agency's defensive function. FEMA Directive 112-5 also provides OCC as the Agency source of legal advice.</p> <p><b>FLETC</b> EEO Officer.</p> <p><b>HQ</b> EEO Director is an attorney. Also, the office was staffed with two legal advisors from the Office of General Council (OGC) who are available to assist with legal sufficiency reviews, as needed.</p> <p><b>ICE</b> ODCR has one full-time embedded attorney from the Office of Principal Legal Advisor that review reports of investigation. They provide legal advice to various divisions within ODCR and do not represent the Agency in any other manner.</p> <p><b>TSA</b> Chief Counsel, Labor and Employment Advice Section.</p>



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



			<p><b>USCG</b> CRD has two Attorney Advisors within its division who conducts legal sufficiency reviews.</p> <p><b>USCIS</b> EEO staff who conduct sufficiency reviews are attorneys and the EEO complaint manager who supervises these individuals is an attorney.</p> <p><b>USSH</b> The attorney providing the legal sufficiency reviews is separate and distinct from other attorneys involved in the EEO Process.</p>
<b>E.2.b</b>	When seeking legal sufficiency reviews, does the EEO office have access to sufficient legal resources separate from the agency representative? [See MD-110, Ch. 1(IV)(D)] If "yes," please identify the source/location of the attorney who conducts the legal sufficiency review in the comments column.	Yes	<p><b>DHS</b> CRCL has two embedded attorneys who have no role in the agency's defensive function.</p> <p><b>CBP</b> The agency representative does not provide legal analyses during the processing of EEO complaints. The agency representative only conducts legal sufficiency reviews of settlement agreements.</p> <p><b>CISA</b> CISA's OEDIA office has qualified staff members, attorneys, and those with a legal background to conduct the legal sufficiency reviews.</p> <p><b>FEMA</b> There are attorneys in and assigned to OER. Attorneys assigned to or supporting the OER are separate and apart from the agency's defensive function. FEMA Directive 112-5 also provides OCC as the Agency source of legal advice.</p> <p><b>FLETC</b> EEO Officer.</p> <p><b>HQ</b> EEO Director is an attorney. Also, the office was staffed with two legal advisors from the Office of General Council (OGC) who are available to assist with legal sufficiency reviews, as needed.</p>

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

			<p><b>ICE</b> ODCR has one full-time embedded attorney from the Office of Principal Legal Advisor that review reports of investigation. They provide legal advice to various divisions within ODCR and do not represent the Agency in any other manner.</p> <p><b>TSA</b> Chief Counsel, Labor and Employment Advice Section.</p> <p><b>USCG</b> CRD has two Attorney Advisors within its division who conducts legal sufficiency reviews.</p> <p><b>USCIS</b> EEO staff who conduct sufficiency reviews are attorneys and the EEO complaint manager who supervises these individuals is an attorney.</p> <p><b>USSS</b> The attorney providing the legal sufficiency reviews is separate and distinct from other attorneys involved in the EEO Process.</p>
<b>E.2.c</b>	If the EEO office relies on the agency's defensive function to conduct the legal sufficiency review, is there a firewall between the reviewing attorney and the agency representative? [See MD-110, Ch. 1(IV)(D)]	Yes	
<b>E.2.d</b>	Does the agency ensure that its agency representative does not intrude upon EEO counseling, investigations, and final agency decisions? [See MD-110, Ch. 1(IV)(D)]	Yes	
<b>E.2.e</b>	If applicable, are processing time frames incorporated for the legal counsel's sufficiency review for timely processing of complaints? [See EEOC Report, <i>Attaining a Model Agency Program: Efficiency</i> (Dec. 1, 2004)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.3 - The agency has established and encouraged the widespread use of a fair alternative dispute resolution (ADR) program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.3.a</b>	Has the agency established an ADR program for use during both the pre-complaint and formal complaint stages of the EEO process? [See 29 C.F.R. § 1614.102(b)(2)]	No CISA	



**EEOC FORM**  
*U.S. Equal Employment Opportunity Commission*

**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

<b>E.3.b</b>	Does the agency require managers and supervisors to participate in ADR once it has been offered? [See MD-715, II(A)(1)]	Yes	
<b>E.3.c</b>	Does the agency encourage all employees to use ADR, where ADR is appropriate? [See MD-110, Ch. 3(IV)(C)]	Yes	
<b>E.3.d</b>	Does the agency ensure a management official with settlement authority is accessible during the dispute resolution process? [See MD-110, Ch. 3(III)(A)(9)]	Yes	
<b>E.3.e</b>	Does the agency prohibit the responsible management official named in the dispute from having settlement authority? [See MD-110, Ch. 3(I)]	Yes	
<b>E.3.f</b>	Does the agency annually evaluate the effectiveness of its ADR program? [See MD-110, Ch. 3(II)(D)]	Yes	
 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.4.a</b>	Does the agency have systems in place to accurately collect, monitor, and analyze the following data:		
<b>E.4.a.1</b>	Complaint activity, including the issues and bases of the complaints, the aggrieved individuals/complainants, and the involved management official? [See MD-715, II(E)]	Yes	
<b>E.4.a.2</b>	The race, national origin, sex, and disability status of agency employees? [See 29 C.F.R. § 1614.601(a)]	No DHS, USCIS	
<b>E.4.a.3</b>	Recruitment activities? [See MD-715, II(E)]	No CISA	
<b>E.4.a.4</b>	External and internal applicant flow data concerning the applicants' race, national origin, sex, and disability status? [See MD-715, II(E)]	No USCG, USCIS	
<b>E.4.a.5</b>	The processing of requests for reasonable accommodation? [29 C.F.R. § 1614.203(d)(4)]	Yes	
<b>E.4.a.6</b>	The processing of complaints for the anti-harassment program? [See EEOC Enforcement Guidance on Vicarious Employer Liability for Unlawful Harassment by Supervisors (1999), § V.C.2]	No CISA	
<b>E.4.b</b>	Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]	Yes	

EEOC FORM  
U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

 <b>Compliance Indicator</b>  <b>Measures</b>	<b>E.5 – The agency identifies and disseminates significant trends and best practices in its EEO program.</b>	<b>Measure Met? (Yes/No/NA)</b>	<b>Comments</b>
<b>E.5.a</b>	<p>Does the agency monitor trends in its EEO program to determine whether the agency is meeting its obligations under the statutes EEOC enforces? [See MD-715, II(E)] If “yes”, provide an example in the comments.</p>	<p>Yes</p>	<p><b>DHS</b> Monitors complaint trends and quarterly diversity dashboards.</p> <p><b>CBP</b> Conducts a trend analysis of EEO complaints as one of the regularly scheduled diversity reports (approximately every three years) and on an ad hoc basis.</p> <p><b>FEMA</b> Director’s Dashboard: data analysis is conducted on a weekly basis.</p> <p><b>FLETC</b> Established baseline in FY 2021 with trend analysis worksheets, will continue to monitor trends annually.</p> <p><b>HQ</b> Complaints program tracks trends for program offices (e.g. FPS, CISA, I&amp;A) by issues and bases over several fiscal years and provides aggregate results to the programs offices.</p> <p><b>ICE</b> The Office of Diversity and Civil Rights, Complaints and Resolution Division, provides monthly updates to ICE program office leadership regarding complaint activity and areas of concern identified in complaint data. Diversity data is provided to program offices annually.</p> <p><b>TSA</b> Program data is collected and reviewed on a weekly basis by the EEO Director or a designated representative. It includes complaint, ADR and training/outreach data.</p>

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

			<p><b>USCG</b> 462 Report; MD-715 CG Civil Rights Strategic Plan 2020-2025</p> <p><b>USCIS</b> Conducted a review of EEO complaints by ethnicity, racial identifier, gender, and disability status.</p> <p><b>USSS</b> Participates in a yearly assessment with DHS's Office for Civil Rights and Civil Liberties (CRCL) by producing a detailed, informational "QUAD Chart" that analyzes USSS's Strengths, Weaknesses, Opportunities and Threats (SWOT) as they relate to inclusive diversity.</p>
<b>E.5.b</b>	Does the agency review other agencies' best practices and adopt them, where appropriate, to improve the effectiveness of its EEO program? [See MD-715, II(E)] If "yes," provide an example in the comments.	No CISA	<p><b>DHS</b> Leads the DHS EEO Directors meeting, DHS Strategic Recruitment, Diversity, and Inclusion (SRDI) workgroup, and the DHS ADR Council.</p> <p><b>CBP</b> Participates in the DHS EEO Director's meeting, DHS SRDI workgroup and the ADR Council.</p> <p><b>FEMA</b> Routinely benchmarks with other agencies and attends compliance meetings held at DHS.</p> <p><b>FLETC</b> EEO staff participate in DHS Disability Employees Advisory Council; Quarterly DHS Complaints Managers Group; DHS EEO Directors' Meeting; DHS SRDI workgroup; Monthly DHS ADR Council; Quarterly DHS Anti-Harassment Group and Quarterly DHS Component Meetings</p> <p><b>HQ</b> DHS has six component-wide working groups for this purpose.</p> <p><b>ICE</b> Reviewed best practices across agencies to streamline processing of reasonable accommodation requests. Current reasonable</p>

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

			<p>accommodation procedures approved by EEOC July 13, 2022.</p> <p><b>TSA</b> The EEO Director or a designated representative meets with other DHS EEO directors on a monthly basis to discuss best practices.</p> <p><b>USCG</b> Annually, EEO personnel analyze the 462 performance elements against DHS components and the federal community. Staff uses this information to interact with those components who excel in some areas.</p> <p><b>USCIS</b> Benchmarked other agency organizations barrier analysis, exit surveys, means, methods and Special Emphasis Programs.</p> <p><b>USSS</b> Hosts quarterly Disability Employment Advisory Council meetings where agencies share best practices of their Disability Programs.</p>
<b>E.5.c</b>	Does the agency compare its performance in the EEO process to other federal agencies of similar size? [See MD-715, II(E)]	No CISA	



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U.S. Equal Employment Opportunity Commission

FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT

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

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*U.S. Equal Employment Opportunity Commission*

**FEDERAL AGENCY ANNUAL EEO PROGRAM STATUS REPORT**

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



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

H.1 listed below is new starting in the FY 2018 reporting cycle, which requires all Part G unmet measures to be represented in a Part H. Parts H.2 was closed out in prior years. H.3 was added back since temporary changes were made making DHS deficient in this area. H.4 and H.5 retain these numbers for continuity with prior year reports.

### Part H.1

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

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

### Statement of Model Program Essential Element Deficiency

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

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

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
10/1/2017	At the Department level, monitor Component activities and progress in correcting EEO program deficiencies. Take actions, such as sharing best practices, to assist Components in addressing deficiencies.	9/30/2019	9/30/2023	

## Responsible Official(s)

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

## Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
7/31/2019	Data call to all Components for mid-year update on all Part G measures and progress made on deficiencies	Yes	7/31/2023	
7/31/2019	CRCL/DMS staff meet one-on-one with each Component EEO staff and review program deficiencies, actions, accomplishments, and plans	Yes	7/31/2023	
12/1/2019	Data call to all Components for end-year Parts G, H and J, including progress made on deficiencies (Part H); Consolidate into Department Part G and compare to prior fiscal year Part G	Yes	12/1/2023	

## Report of Accomplishments

Fiscal Year	Accomplishments
FY 2022	<p>Since these are ongoing annual activities, DHS updated the Modified dates to 2023.</p> <p>The data call for the mid-year update on Part G measures and end of year for Parts G, H, and J was issued to all Components. The results were compiled by CRCL/DMS staff then shared with DHS Components.</p> <p>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</p>

	<p>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.</p>
FY 2021	<p>Since these are ongoing annual activities, DHS updated the Modified dates to 2022.</p> <p>The data call for the mid-year update on Part G measures was issued to all Components. The results were compiled by CRCL/DMS staff then shared with DHS Components and conducted one-on-one meetings with each Component EEO official during which they reviewed program deficiencies, actions, accomplishments, and plans.</p> <p>The data call to all Components for end-year Parts G, H, and J was issued. The overall compliance rate with the six essential elements for DHS increased from 94.0 percent in FY 2020 to 95.5 percent in FY 2021.</p>
FY 2020	<p>Since these are ongoing annual activities, DHS updated the Modified dates to 2021 even though the three activities were completed for the FY 2020 reporting year.</p> <p>The data call to all Components for the mid-year update on Part G measures was issued on 5/12/2020 then compiled by CRCL/DMS staff.</p> <p>CRCL/DMS staff conducted one-on-one meetings with each Component EEO official during which they reviewed program deficiencies, actions, accomplishments, and plans.</p> <p>The data call to all Components for end-year Parts G, H, and J was issued. The Component Part G input was consolidated into this Department level MD-715 report (see Executive Summary).</p>
FY 2019	<p>Since these are ongoing annual activities, DHS updated the Modified dates to 2020 although all three activities were completed for the FY 2019 reporting year.</p> <p>Issued data call to all Components for mid-year update on all Part G measures; tabulated results; presented results to all Components at CRCL/DMS Component Quarterly Meeting then facilitated discussion of how to address common unmet measures.</p> <p>Conducted one-on-one meetings with Components to review program deficiencies, actions, accomplishments, and plans.</p> <p>Issued data call to all Components for end-year Parts G and H, including progress made on deficiencies (Part H); Consolidated into Department Part G and compared to prior fiscal year Part G.</p>
FY 2018	<p>Issued data call to all Components for mid-year update on all Part G measures; tabulated results; presented results to all Components at CRCL/DMS Component Quarterly Meeting then facilitated discussion of how to address common unmet measures.</p> <p>Conducted one-on-one meetings with Components to review program deficiencies, actions, accomplishments, and plans.</p>

	Issued data call to all Components for end-year Parts G and H, including progress made on deficiencies (Part H); Consolidated into Department Part G and compared to prior fiscal year Part G.
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## MD-715 – Part H.3

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

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

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

#### Statement of Model Program Essential Element Deficiency

Type of Program Deficiency	Brief Description of Program Deficiency
Element E – Efficiency	<p>E.4 – The agency has effective and accurate data collection systems in place to evaluate its EEO program. E.4.a.2 - The race, national origin, sex, and disability status of agency employees? [See 29 C.F.R. § 1614.601(a)]</p> <p>Learning Management System (LMS) data with EEO demographic data elements is not available.</p>

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

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
3/30/2008	DHS is implementing a new LMS and the information technology team will work to link demographic data to the training data and make the data available to EEO for barrier analysis purposes.	3/30/2019	9/30/2023	

#### Responsible Official(s)

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

## Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
9/30/2019	1. Procure or develop and implement new LMS system at DHS.	Yes	9/30/2023	
9/30/2019	2. Link demographic data to LMS data and make data available in a secure form to the EEO office.	Yes	9/30/2023	

## Report of Accomplishments

Fiscal Year	Accomplishments
FY 2022	During FY 2022, DHS decommissioned the Department's learning management system (referred to as the Performance and Learning Management System or PALMS) and is embarking on implementing a new learning management system. DHS has implemented a new enterprise data system (Tableau) and the data model for this system includes the capability to extract employee training data from talent management systems. DHS will continue to work on obtaining training data that can be broken down by ERI, gender, and disability as the new learning management system is deployed.
FY 2021	DHS is implementing a new enterprise data system (Tableau) and the data model for this system includes the capability to extract employee training data from the talent management system (referred to as the Performance and Learning Management System or PALMS) and merge the data with diversity data elements (ERI, gender, disability status). DHS will continue to work on obtaining training data that can be broken down by ERI, gender, and disability as the new system is deployed in FY 2022.
FY 2020	DHS achieved full operational capability for its talent management system (referred to as the Performance and Learning Management System or PALMS) for most Components. DHS will continue to identify qualifying career development programs and related courses, as well as produce a report in compliance with MD-715, using data from our talent management system(s) to identify personnel who participated in those courses and data from the human resources systems to obtain personnel attributes.
FY 2019	In FY 2019, DHS reported participation and applicant flow counts and percentages for the SES Career Development Program (CDP), which is the only program managed at the Department level that leads to promotion without further competition. The SES CDP, announced in USAJobs and USAStaffing, was used to track applications, qualifications, referrals, and selections. The Department was able to obtain full applicant flow data for the SES CDP announced in FY 2019. The SES CDP program staff were able to provide data on participants.

	<p>DHS also reported applicant flow data for the Women in Law Enforcement pilot mentoring program. This program does not lead to promotion without further competition but is managed at the Department level.</p> <p>DHS achieved full operational capability for its talent management system (referred to as the Performance and Learning Management System, or PALMS) at six of the nine DHS Components in August 2017. OCHCO exempted FEMA, TSA, and USCG from adopting PALMS. In FY 2019, DHS planned to identify the solution set for follow-on capability, including reporting capability, such as that required for MD-715.</p> <p>DHS completed its collection of training course completion data from all Components in November 2019. In FY 2020, DHS will begin using this data with other data sets to determine our ability to produce the MD-715 report.</p> <p>DHS will continue to identify qualifying career development programs and courses that support those programs. Using data from our talent management system(s) to identify personnel who participated in those courses and data from the human resources systems to obtain personnel attributes, DHS will continue to produce a report in compliance with MD-715.</p>
FY 2018	<p>In FY 2018, DHS reported participation and applicant flow counts and percentages for the SES Career Development Program (CDP), which is the only program managed at the Department level that leads to promotion without further competition. The SES CDP, announced in USAJobs and USAStaffing, was used to track applications, qualifications, referrals, and selections. The Department was able to obtain full applicant flow data for the SES CDP announced in FY 2018. The SES CDP program staff were able to provide data on participants.</p> <p>DHS will identify qualifying career development programs at DHS and courses that support those programs. Using data from our talent management system(s) to identify personnel who participated in those courses and data from the human resources systems to obtain personnel attributes, DHS will produce a report in compliance with MD-715.</p> <p>DHS achieved full operational capability for its talent management system (referred to as the Performance and Learning Management System, or PALMS) at six of the nine DHS Components in August 2017. OCHCO exempted FEMA, TSA, and USCG from adopting PALMS. DHS plans to identify, in FY 2019, the solution set for follow-on capability, including reporting capability, such as that required for MD-715.</p>

## MD-715 – Part H.4

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

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

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

#### Statement of Model Program Essential Element Deficiency

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

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

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
3/30/2008	Expand and clarify the data collection process to allow DHS to perform accurate, comprehensive, and timely analyses in the future.	3/30/2019	9/30/2023	
3/30/2008	Issue final agency decisions within 60 days.	3/30/2019	9/30/2023	

#### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Deputy Officer & Director of Equal Employment Opportunity and Diversity	Veronica Venture	Yes
Director, Complaints Management and Adjudication Section	Amelia Demopulos	Yes



## Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
9/30/2019	1. Develop a multi-year plan to issue final agency decisions within 60 days in accordance with EEOC regulations.	Yes	9/30/2023	

## Report of Accomplishments

Fiscal Year	Accomplishments
FY 2022	<p>Throughout FY 2022, CMAS provided Components an objective assessment (i.e., legal sufficiency, organization, documentation, etc.) of their EEO Reports of Investigation (ROI) through the ROI Feedback Tool which was initially launched in FY 2016. Additionally, CMAS continued to disseminate aggregate information on the quality of contractor-produced ROIs within the DHS EEO program to all Components. This aggregate information continues to provide Components with a snapshot of CMAS' assessments of the quality of ROIs issued by all contract firms and allows Components to make strategic decisions regarding their future ROI contractual needs. CMAS also provided the Components with monthly reports on cases coming due for action to ensure that CMAS received timely FAD requests.</p> <p>CMAS issued a total of 1,232 final merit-based actions, including 660 final agency decisions (FAD). Sixteen of these final actions were merit FAD findings, and seven implemented findings made by EEOC Administrative Judges. 68 percent of the final actions were timely issued, and 48 percent of the FADs were timely issued, a marked increase from FY 2021 when 19 percent of the FADs were timely issued. CMAS's FAD workload decreased in FY 2022, with 525 requests for FADs received in FY 2022, compared to the 567 requests received in FY 2021. CMAS also issued 129 procedural dismissal decisions and 22 settlement breach decisions.</p>
FY 2021	<p>During FY 2021, CMAS provided quarterly feedback to DHS Components on the quality of their Reports of Investigation (ROI) using an ROI Feedback Tool (Tool). Analysts assigned numerical ratings for several criteria related to legal sufficiency and readability and provided narrative information if needed to further explain numerical ratings. Component EEO Offices use the feedback as an additional method to assess the quality of their ROIs. The tool has proven to be an effective way for CMAS to partner with Components to improve the quality of ROIs across DHS. Since the Tool's inception, DHS Component Complaint Managers have welcomed the thorough feedback and detailed comments and offered their own suggestions for improvement. The Complaint Managers share the feedback with their staff members and contractors as an objective improvement mechanism.</p> <p>During FY 2021, CMAS issued or administratively closed over 1,300 final agency actions, including 1,145 merit final actions. DHS had an internal</p>

	<p>performance measure goal to issue 49 percent of merit final actions by their regulatory due date. Notably, 52 percent (591 of 1,145) of these merit-based final actions were timely issued. Accordingly, CMAS exceeded its timely issuance goal.</p> <p>With respect to merit FADs, CMAS continued to strategically address its backlog inventory. CMAS utilized its in-house adjudication resources primarily for FADs that could have been issued within regulatory timeframes. CMAS assigned many of the older cases to contract vendors to draft FADs. By fiscal year end, 369 cases were assigned to the contractor, and 327 drafts had been received. The contract resources were invaluable in helping address the backlog FAD inventory. As a result, the backlog inventory decreased from 407 at the end of FY 2020, to 178 at the end of the FY 2021. Addressing backlog inventory will continue as a focus in FY 2022.</p>
FY 2020	<p>During FY 2020, CMAS issued or administratively closed over 1,100 final agency actions in EEO complaints, including 893 merit final actions. DHS had an internal performance measure goal to issue 47 percent of merit final actions by their regulatory due date. Notably, 49 percent (437 of 893) of these merit-based final actions were timely issued. Accordingly, CMAS exceeded its timely issuance goal.</p> <p>With respect to merit FADs, CMAS continued to strategically address its inventory. CMAS utilized its in-house adjudication resources primarily for FADs that could have been issued within regulatory timeframes and assigned many of the older cases to a contract vendor to draft FADs. By fiscal year end, 229 cases were assigned to the contractor and 206 drafts had been received. This contract resource was invaluable in helping address the CMAS FAD inventory. Nonetheless, due to resource shortages within CMAS and continued increased incoming requests for final action, the backlog inventory grew from 311 at the end of FY 2019, to 407 at the end of the FY 2020. Addressing backlog inventory will continue as a focus in FY 2021.</p>
FY 2019	<p>For FY 2019, CRCL issued 954 final agency actions, including 832 decisions that addressed the merits of allegations of discrimination. Notably, 51 percent (421 of 832) of these merit-based final actions were timely issued; accordingly, CMAS surpassed its timely issuance goal by 6 percent. Additionally, CMAS continued to strategically address its backlog of merit-based cases pending final agency decision (FAD). CMAS utilized its in-house adjudication resources primarily for FADs that could be prepared within regulatory timeframes and assigned many of the older cases to a contract vendor to draft FADs. By fiscal year end, 178 cases had been assigned to the contractor and 184 drafts had been received (some having been sent to the contractor the prior fiscal year). This contract resource was invaluable in helping address the CMAS FAD backlog; nonetheless, due to resource shortages within CMAS and increased incoming requests for final action, the backlog grew from 172 at the beginning of FY 2019, to 311 at the end of the fiscal year. Backlog reduction will continue to be a focus in FY 2020.</p>

## MD-715 – Part H.5

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

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

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

#### Statement of Model Program Essential Element Deficiency

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

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

Date Initiated (mm/dd/yyyy)	Objective	Target Date (mm/dd/yyyy)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
04/01/2020	Ensure sufficient budget and staffing to timely generate and issue final agency decisions in EEO complaints.	09/30/2021	09/30/2023	

#### Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Officer for Civil Rights and Civil Liberties	Shoba Wadhia	Yes
Deputy Officer, CRCL, Director EEO and Diversity	Veronica Venture	Yes

## Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Conduct staffing study to identify staffing/budget shortages in the Complaints Management and Adjudication Section (CMAS), which is responsible for issuing all of DHS's final agency decisions.	Yes		9/30/2020
12/13/2020	Based on the staffing study, prepare and submit justifications for staffing and related budget increases in CMAS.	Yes	3/31/2022	9/30/2022

## Report of Accomplishments

Fiscal Year	Accomplishments
FY 2022	CMAS was successful in obtaining additional staffing and budgetary resources. CMAS succeeded in essentially eliminating the case backlog by the end of FY 2022. DHS notes that while the rate of timeliness on merit FADs was 48 percent, this includes 175 FADs that were in backlog and could not be timely. With the backlog cleared, DHS anticipates having sufficient staff to meet timeliness goals in FY 2023.
FY 2021	CMAS submitted requests and justifications for additional staff and was successful in obtaining additional resources. CMAS hired a new CMAS Director, on-boarded one analyst, and hired two additional analysts (awaiting onboarding) in FY 2021. CMAS also obtained additional contract support that led to significant progress in reducing the case backlog from 407 at the beginning of FY 2021 to 178 at the end of FY 2021. DHS is not closing out this Part H at this time and will continue to pursue additional resources.
FY 2020	CRCL partnered with the Program Analysis and Evaluation Office, OCFO, and completed the CRCL staffing model. In addition to activities listed in this Part H, Component staffing models are also in progress. CRCL anticipates having the Component staffing models completed by 6/2021.  CRCL will have an opportunity to request the additional staff indicated as needed by the staffing model by 3/2021.
FY 2019	CRCL formed a partnership with the Program Analysis and Evaluation Office, OCFO, and has initiated a staffing needs study across CRCL, which includes CMAS. The results of the staffing study are expected to be received by CRCL by the end of FY 2020.

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

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

### Part I.3

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

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

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

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

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

EEO Group
All Men
All Women
Hispanic or Latino Males
Hispanic or Latina Females – Yes
White Males
White Females – Yes
Black or African American Males – Yes
Black or African American Females – Yes
Asian Males
Asian Females
Native Hawaiian or Other Pacific Islander Males – Yes
Native Hawaiian or Other Pacific Islander Females – Yes

<b>EEO Group</b>
American Indian or Alaska Native Males – Yes
American Indian or Alaska Native Females – Yes
Two or More Races Males
Two or More Races Females – Yes, trending down

## Barrier Analysis Process

<b>Sources of Data</b>	<b>Source Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	Table A1
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	FEVS multiple years
Exit Interview Data	Yes	DHS exit survey FY 2014 – FY 2022 data
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	No	

## Status of Barrier Analysis Process

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

## Statement of Identified Barrier(s)

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

## Objective(s) and Dates for EEO Plan

Objective	Date Initiated (mm/dd/yyyy)	Target Date (mm/dd/yyyy)	Sufficient Funding & Staffing? (Yes or No)	Modified Date (mm/dd/yyyy)	Date Completed (mm/dd/yyyy)
Investigate and identify specific opportunities to improve supervision/management, advancement opportunities, organizational response to personal/family related reasons, work/life programs, and alternate work schedules any trends in resignations and reduce the overall rates by improving employee satisfaction.	10/01/2011	9/30/2019	Yes	9/30/2023	

## Responsible Official(s)

Title	Name	Performance Standards Address the Plan? (Yes or No)
Deputy Officer & Director of Equal Employment Opportunity and Diversity	Veronica Venture	Yes
Director, Diversity Management Section (DMS), CRCL	Ambuja Bale	Yes
Chief Human Capital Officer, OCHCO	Roland Edwards	Yes
DHS Components	Component EEO Directors (see Component reports for current EEO Directors)	Yes

## Planned Activities Toward Completion of Objective

Target Date (mm/dd/yyyy)	Planned Activities	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
3/31/2011	1. Develop and Implement Exit Survey. (DHS Workforce Strategy Objectives 3.1 and 3.5: Use employee feedback to influence workplace policies and practices to improve employee satisfaction; Enhance employee recognition and work-life balance initiatives to improve employee satisfaction and retention.)  1.a. OCHCO will implement exit survey DHS-wide.		3/31/2011
6/30/2011	1.b. OCHCO will conduct preliminary review of results and continue in future years.		9/30/2012
12/30/2011	1.c. OCHCO will conduct first major review of results and continue in future years.		9/30/2012
3/31/2012	1.d. OCHCO will update or augment methods as needed and continue in future years.		3/31/2012
6/30/2012	1.e. OCHCO and CRCL will identify retention interventions and continue in future years.		6/30/2012
12/30/2012	1.f. OCHCO and CRCL will implement these interventions and continue in future years <ul style="list-style-type: none"> <li>• Track interventions through this plan quarterly</li> <li>• Evaluate as yearly data become available</li> <li>• Make any needed corrections</li> <li>• Conduct-in-depth analysis every second year</li> </ul>		12/30/2012
9/30/2013	2. Use Employee Viewpoint survey to identify changes needed to improve employee satisfaction.  2.a. Provide annual Federal Employee Viewpoint Survey (FEVS) results (and new yearly survey results as they become available) to DHS Components within two months of FEVS results publication annually.	9/30/2023	.
9/30/2013	2.b. OCHCO, CRCL and Components will work jointly to develop DHS Component Employment Engagement Action Plans.	9/30/2023	
6/30/2011	3. Review promotion data.		6/30/2011



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

## Report of Accomplishments

Fiscal Year	Accomplishments
FY 2022	<p><b>Activity #1</b> Currently TSA, CBP, ICE, USSS, CISA, USCIS, and USCG all maintain their own exit surveys while the other DHS Components continue to administer the DHS Exit Survey. Datasets are combined to look at overall trends. Aside from retirement and end of temporary appointment, the top reasons that separating non-SES employees listed for leaving DHS in FY 2022 were:</p> <ul style="list-style-type: none"> <li>• Personal/Family-Related</li> <li>• Supervisor/Management</li> <li>• Advancement Opportunities</li> </ul> <p>OCHCO is working with all Components in an effort to improve survey participation and content. Effective FY 2022, all Component POCs have been meeting quarterly via the Exit Survey Working Group to discuss challenges, updates, and share best practices.</p> <p><b>Activity#2</b> The 2022 FEVS results were provided to all DHS Components in October 2022. Overall DHS scores decreased slightly, with the Employee Engagement Index down one percentage point to 64 percent. In July 2022, OCHCO met with Components for mid-cycle action plan reviews, and in October, OCHCO provided action plan training for the 2023-2024 cycle. New draft 2-year plans are due to OCHCO in February 2023, and final signed plans are due in August 2023. OCHCO also worked with the new DHS-wide Employee Engagement Steering Committee to formulate an overarching DHS engagement action plan, which was finalized in October 2022.</p> <p><b>Activity #3</b> Part E covers the FY 2020 trigger analysis and information on Activity #3 b and c actions.</p> <p><b>Activity #4</b> The Department continues to offer various ways for employees to further their education goals. In FY 2022, 28 employees participated in the Department of Defense Senior Service School master's degree program, and eight employees attended the National Intelligence University in either 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:</p> <ul style="list-style-type: none"> <li>• DHS's Senior Executive Service Candidate Development Program (SES CDP) advertised both internally and externally to DHS;</li> <li>• DHS, in partnership with SkillSoft, offers nearly 40,000 online learning resources which can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills.</li> </ul>

	<p>These resources are aligned to support competencies, job roles or blended learning offerings; and</p> <ul style="list-style-type: none"> <li>• The DHS Leader Development Program, which establishes required and optional development activities throughout the year for new and seasoned leaders at all levels across DHS.</li> <li>• LDI delivered 25 tiered courses to 603 participants.</li> <li>• LDI delivered 46 On-Demand courses to 1453 participants.</li> </ul> <p><b>Activity #5</b> Advertising for the SES CDP occurs via email, the DHS website, and other avenues of communication. DHS will continue its outreach efforts to help ensure a diverse applicant pool for this program. DHS will also continue to advertise for the SES CDP through its Employee Associations as well as the Strategic Recruitment, Diversity and Inclusion Council.</p> <p><b>Activity #6</b> The DHS Mentoring Program is open to all DHS federal employees and was designed to build and retain a diverse, well-rounded cadre of employees. The program has helped participants develop numerous skills including managing change, communication, leadership, and time management. Mentees also learn more about DHS and how to effectively take on new challenges and responsibilities. Lastly, mentoring relationships benefit the mentee as well as the mentor and strengthens communications, trust, and collaboration across the DHS enterprise. The program is evaluated, and feedback is provided on its successes, along with areas requiring improvement. In FY 2022, the DHS Mentoring Program consisted of 404 mentors and 373 mentees with demographic information as follows:</p> <p>Gender Indicator (Mentors/Mentees)</p> <ul style="list-style-type: none"> <li>• Men = 430 (55.3%)</li> <li>• Women = 325 (41.8%)</li> <li>• Not identified = 22 (2.8%)</li> </ul> <p>Ethnicity/Race Indicators (Mentors/Mentees)</p> <ul style="list-style-type: none"> <li>• Hispanic or Latino = 91 (11.7%)</li> <li>• White = 446 (57.4%)</li> <li>• Black or African American = 147 (18.9%)</li> <li>• Asian = 57 (7.3%)</li> <li>• American Indian or Alaska Native = 7 (0.9%)</li> <li>• Two or More = 7 (0.9%)</li> <li>• Not identified = 22 (2.8%)</li> </ul> <p>Disability Indicators (Mentors/Mentees)</p> <ul style="list-style-type: none"> <li>• Do not self-identify as disabled = 669 (86.1%)</li> <li>• Self-identified as IWD = 73 (9.3%)</li> <li>• Self-identified as IWTB = 13 (1.6%)</li> <li>• Not identified = 22 (2.8%)</li> </ul>
FY2021	<p><b>Activity #1</b> The DHS Exit Survey is in the SurveyMonkey tool. Currently TSA, CBP, ICE, USSS, CISA, and USCIS continue to maintain their own exit surveys, and the other DHS Components continue to administer the DHS Exit Survey. Datasets are combined to look at overall trends.</p> <p>Aside from retirement, the top reasons that separating non-SES employees listed for leaving DHS in FY 2021 were:</p>

	<ul style="list-style-type: none"> <li>• Supervisor/Management</li> <li>• Personal/Family-Related</li> <li>• End of Temporary Position/Internship</li> </ul> <p>OCHCO is working with all Components to improve survey participation and content. Effective FY 2022, all Component POCs will meet quarterly via the Exit Survey Working Group to discuss challenges, updates, and share best practices.</p> <p><b>Activity #2</b> The 2020 FEVS results were provided to all DHS Components in January 2021. Overall DHS scores improved, with the Employee Engagement Index increasing three percentage points to 66 percent. In March 2021, OCHCO issued written guidance for the DHS Component employee engagement action planning process that included mechanisms for OCHCO to monitor Component implementation of the OPM action planning cycle. OCHCO met with Component staff to discuss and assess the plans, and final signed plans are due by the end of November 2021.</p> <p><b>Activity #3</b> Part E covers the FY 2020 trigger analysis and information on Activity #3 b and c actions.</p> <p><b>Activity #4</b> The Department continues to offer various ways for employees to further their education goals. In FY 2021, 27 employees participated in the Department of Defense Senior Service School master's degree program. Eleven employees attended the National Intelligence University in either a bachelor's or master's degree program. DHS also nominates employees to attend the Center for Homeland Defense and Security Masters, Emergence, and Executive Leaders Programs. DHS promotes the use of OPM's Federal Academic Alliance programs where employees can take advantage of various discounts from more than 15 different colleges/universities.</p> <p>DHS employees have, or will have, access to training/career development courses by means such as:</p> <ul style="list-style-type: none"> <li>• DHS's Senior Executive Service Candidate Development Program (SES CDP) advertised both internally and externally to DHS;</li> <li>• DHS, in partnership with SkillSoft, offers nearly 40,000 online learning resources which can be used as quick references, as practical job aids to gain in-depth knowledge, or to practice skills. These resources are aligned to support competencies, job roles or blended learning offerings; and</li> <li>• The DHS Leader Development Program, which establishes required and optional development activities throughout the year for new and seasoned leaders at all levels across DHS.</li> </ul> <p><b>Activity #5</b> Advertising for the SES CDP occurs via email, the DHS website, and other avenues of communication. DHS will continue its outreach efforts to help ensure a diverse applicant pool for this program. In addition, DHS is developing an SES Outreach Plan that will outline strategies to increase diversity in the SES cadre. In FY 2021 and beyond, DHS advertised and will continue to advertise for the SES CDP through its Employee</p>
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	<p>Associations as well as the Strategic Recruitment, Diversity and Inclusion Council.</p> <p><b>Activity #6</b></p> <p>The DHS Mentoring Program is a formal program that provides enriching experiences through reciprocal relationships and opportunities for personal and professional growth while sharing knowledge, leveraging skills, and cultivating talent. The DHS Mentoring Program is open to all DHS federal employees. The Under Secretary for Management announces the launch of this flagship mentoring opportunity, and training is provided to mentors. Types of mentoring include Speed Mentoring, Flash Mentoring, Situational Mentoring, Reverse Mentoring, Group Mentoring, and Peer Mentoring. The program is evaluated, and feedback is provided on its successes, along with areas requiring improvement.</p> <p>In FY 2021, the DHS Mentoring Program consisted of 388 mentors and mentees providing demographic information as follows:</p> <p>Gender Indicator (Mentors/Mentees)</p> <ul style="list-style-type: none"> <li>• Men = 408 (52.8%)</li> <li>• Women = 343 (44.4%)</li> <li>• Not identified = 21 (2.7%)</li> </ul> <p>Ethnicity/Race Indicators (Mentors/Mentees)</p> <ul style="list-style-type: none"> <li>• Hispanic or Latino = 98 (12.6%)</li> <li>• White = 441 (57.1%)</li> <li>• Black or African American = 140 (18.1%)</li> <li>• Asian = 56 (7.2%)</li> <li>• Native Hawaiian or Other Pacific Islander = 3 (0.3%)</li> <li>• American Indian or Alaska Native = 10 (1.2%)</li> <li>• Two or More = 3 (0.3%)</li> <li>• Not identified = 22 (2.7%)</li> </ul> <p>Disability Indicators (Mentors/Mentees)</p> <ul style="list-style-type: none"> <li>• Do not self-identify as having a disability = 665 (86.1%)</li> <li>• Self-identified as IWD = 66 (8.5%)</li> <li>• Self-identified as IWTB = 20 (2.5%)</li> <li>• Not identified = 21 (2.7%)</li> </ul>
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## Part J: Special Program Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plans for persons with disabilities (PWD<sup>12</sup>) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and EEOC MD-715 require agencies to describe how their plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities. All agencies, regardless of size, must complete this Part of the MD-715 report.

### Section I: Efforts to Reach Regulatory Goals

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

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

- |                                |   |  |
|--------------------------------|---|--|
| a. Cluster GS-1 to GS-10 (PWD) | Yes <input checked="" type="checkbox"/> | No                                     |
| b. Cluster GS-11 to SES (PWD)  | Yes                                     | No <input checked="" type="checkbox"/> |

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.

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

- |                                 |   |    |
|---------------------------------|---|----|
| a. Cluster GS-1 to GS-10 (PWTD) | Yes <input checked="" type="checkbox"/> | No |
| b. Cluster GS-11 to SES (PWTD)  | Yes <input checked="" type="checkbox"/> | No |

<sup>12</sup> In this report, persons with disabilities (PWD) and individuals with disabilities (IWD) are used interchangeably. Persons with targeted disabilities (PWTD) and individuals with targeted disabilities (IWTD) are also used interchangeably. Individuals without disabilities (IWOD) are also referenced in this section.

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.

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 PWTDs 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 programs; and oversee any other disability hiring and advancement program the agency has in place.

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

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

Yes **X** No

CRCL's Equal Employment Opportunity and Diversity Division has a full-time Departmental Disability Employment Program Manager who is responsible for implementing and maturing the DHS Disability Employment Program. Additionally, at the department level, OCHCO's Strategic 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.

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 job applications from PWD and PWTD.	22	84	30	Laura Davis, Disability Employment Program Manager, CRCL
Answering questions from the public about hiring authorities that take disability into account	30	84	28	Laura Davis, Disability Employment Program Manager, CRCL
Processing reasonable accommodation requests from applicants and employees	31	1	75	Laura Davis, Disability Employment Program Manager, CRCL; OCHCO – Department-wide Reassignment as a Reasonable Accommodation of Last Resort ( <a href="mailto:rraolrrequest@hq.dhs.gov">rraolrrequest@hq.dhs.gov</a> ) Darlene Avery for HQ requests; all other Component POCs are identified in their Component-level report.
Section 508 Compliance	52	3	5	Nicshan Floyd, Acting Executive Director, Office of Accessible Systems and Technology (OAST), Office of the Chief Information Officer



Architectural Barriers Act Compliance	8	17	4	William Bush, Executive Director, Facilities and Operational Support, MGMT/FOS
Special Emphasis Program for PWD and PWTD	13	1	124	Laura Davis, Disability Employment Program Manager, CRCL

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

Yes **X** No

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

- 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.

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

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

Yes **X** No

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: Plan to Recruit and Hire Individuals with Disabilities

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

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

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 department-wide 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.

#### **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.

Yes **X**                      No                      N/A

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

The Roadmap to Success training was updated during FY 2017 to include the provision of the Final Rule amending 29 C.F.R § 1614.203(d)(5), as well as other necessary revisions. CRCL awarded 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)**

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

If "yes", please describe the triggers below.

- |   |     |             |
|---|-----|-------------|
| a. New Hires for Permanent Workforce (PWD)  | Yes | No <b>X</b> |
| b. New Hires for Permanent Workforce (PWTD) | Yes | No <b>X</b> |

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.

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

- |                             |              |    |
|-----------------------------|--------------|----|
| a. New Hires for MCO (PWD)  | Yes <b>X</b> | No |
| b. New Hires for MCO (PWTD) | Yes <b>X</b> | No |

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.

- |                                       |     |    |              |
|---------------------------------------|-----|----|--------------|
| a. Qualified Applicants for MCO (PWD) | Yes | No | N/A <b>X</b> |
|---------------------------------------|-----|----|--------------|

b. Qualified Applicants for MCO (PWTD)	Yes	No	N/A <b>X</b>
--	-----	----	--------------

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

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

If “yes”, please describe the triggers below.

a. Promotions for MCO (PWD)	Yes <b>X</b>	No
b. Promotions for MCO (PWTD)	Yes <b>X</b>	No

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:

**PWDs: One out of Nine MCOs**

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

**PWTDs: 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 IV: Plan to Ensure Advancement Opportunities for Employees with Disabilities

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



## **A. ADVANCEMENT PROGRAM PLAN**

Describe the agency's plan to ensure PWDs, including PWTs, 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 PWTs.
- 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.  
[Collection begins with the FY 2018 MD-715 report, which is due on February 28, 2019.]

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs (Pathways Intern)		266		8.27%		1.8%
Fellowship Programs (Pathways Recent Graduates)		135		19.2%		2.2%
Presidential Management Fellows		12		16.6%		0.00
Mentoring Programs (DHS HQ Mentoring Program (777 (PWD = 73 PWTD = 13) participants)		777		9.30%		1.60%
Coaching Programs						
Training Programs						
Detail Programs						
Other Career Development Programs DHS SES CDP	492	44	3.46%	2.27%	1.22%	0.00

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.

a. Applicants (PWD)	Yes	No	N/A <b>X</b>
b. Selections (PWD)	Yes <b>X</b>	No	N/A

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

a. Applicants (PWTD)	Yes	No	N/A <b>X</b>
b. Selections (PWTD)	Yes <b>X</b>	No	N/A

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 (PWDs)  | Yes <b>X</b> | No |
| b. Awards, Bonuses, & Incentives (PWTDs) | Yes <b>X</b> | No |

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><u>PWDs</u></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><u>PWTDs</u></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 PWDs and/or PWTDS for quality step increases or performance-based pay increases? If “yes”, please describe the trigger(s) in the text box.

- |    |                       |     |          |          |
|----|-----------------------|-----|----------|----------|
| a. | Pay Increases (PWDs)  | Yes | No       | <b>X</b> |
| b. | Pay Increases (PWTDS) | Yes | <b>X</b> | No       |

Based on a review of MD-715 Table B9-1: Employee Recognition and Awards - Distribution by Disability, PWDs and PWTDS are exceeding the inclusion rate benchmark for quality step increases (QSI). 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 PWDs and/or PWTDS recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.

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

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

#### **D. PROMOTIONS**

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

a. SES

- |     |                                      |     |    |          |          |
|-----|--------------------------------------|-----|----|----------|----------|
| i.  | Qualified Internal Applicants (PWDs) | Yes | No | N/A      | <b>X</b> |
| ii. | Internal Selections (PWDs)           | Yes | No | <b>X</b> |          |

b. Grade GS-15

- |     |                                      |     |    |          |          |
|-----|--------------------------------------|-----|----|----------|----------|
| i.  | Qualified Internal Applicants (PWDs) | Yes | No | N/A      | <b>X</b> |
| ii. | Internal Selections (PWDs)           | Yes | No | <b>X</b> |          |

c. Grade GS-14

- |    |                                      |     |    |     |          |
|----|--------------------------------------|-----|----|-----|----------|
| i. | Qualified Internal Applicants (PWDs) | Yes | No | N/A | <b>X</b> |
|----|--------------------------------------|-----|----|-----|----------|

- ii. Internal Selections (PWDs) Yes No **X**
- d. Grade GS-13
  - i. Qualified Internal Applicants (PWDs) Yes No N/A **X**
  - ii. Internal Selections (PWDs) Yes No **X**

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

Qualified Internal Applicants by Senior Grade:		Relevant Applicant Pool by Senior Grade:	
SES:	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 PWTDs among the qualified *internal* applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

- a. SES
  - i. Qualified Internal Applicants (PWTDs) Yes No N/A **X**
  - ii. Internal Selections (PWTDs) Yes No **X** N/A
- b. Grade GS-15
  - i. Qualified Internal Applicants (PWTDs) Yes No N/A **X**
  - ii. Internal Selections (PWTDs) Yes **X** No N/A

c. Grade GS-14

- |  |              |    |              |
|--|--------------|----|--------------|
| i. Qualified Internal Applicants (PWTDS) | Yes          | No | N/A <b>X</b> |
| ii. Internal Selections (PWTDS)          | Yes <b>X</b> | No | N/A          |

d. Grade GS-13

- |  |     |             |              |
|--|-----|-------------|--------------|
| i. Qualified Internal Applicants (PWTDS) | Yes | No          | N/A <b>X</b> |
| ii. Internal Selections (PWTDS)          | Yes | No <b>X</b> | N/A          |

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:

SES:	1.25%
GS-15:	2.23%
GS-14:	1.61%
GS-13:	1.40%

Relevant Applicant Pool by Senior Grade:

N/A
N/A
N/A
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:

SES:	1.79%
GS-15:	1.05%
GS-14:	1.04%
GS-13:	1.34%

Qualified Internal Applicants by Senior Grade:

1.25%
2.23%
1.61%
1.40%

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

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

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 PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box.

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

Based on a review of MD-715 B7-1 Senior Grade Level (New Hires), DHS identified a trigger for PWTD 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.



- a. Executives
  - i. Qualified Internal Applicants (PWDs)    Yes                      No    N/A   **X**
  - ii. Internal Selections (PWDs)                      Yes                      No   **X**
- b. Managers
  - i. Qualified Internal Applicants (PWDs)    Yes                      No    N/A   **X**
  - ii. Internal Selections (PWDs)                      Yes                      No   **X**
- c. Supervisors
  - i. Qualified Internal Applicants (PWDs)    Yes                      No    N/A   **X**
  - ii. Internal Selections (PWDs)                      Yes                      No   **X**

Relevant applicant pool data is not available. Internal announcements often have an area of consideration that is broader than the announcing agency. 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 PWTDs among the qualified *internal* applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box.

- a. Executives
  - i. Qualified Internal Applicants (PWTDS) Yes No N/A **X**
  - ii. Internal Selections (PWTDS) Yes **X** No
- b. Managers
  - i. Qualified Internal Applicants (PWTDS) Yes No N/A **X**
  - ii. Internal Selections (PWTDS) Yes **X** No
- c. Supervisors
  - i. Qualified Internal Applicants (PWTDS) Yes No N/A **X**
  - ii. Internal Selections (PWTDS) Yes **X** No

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

When reviewing the internal selections and comparing to the two percent goal as an alternative comparator, triggers were identified for PWTDS in all categories.

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

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

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

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 PWTDs among the selectees for new hires to supervisory positions? If “yes”, describe the trigger(s) in the text box.

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

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 V: Plan to Improve Retention of Persons with Disabilities

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

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

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

Yes                      No **X**

During FY 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 PWDs among voluntary and involuntary separations exceed that of persons without disabilities?

If “yes”, describe the trigger below.

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

Based on a review of MD-715 Table B1: Total Workforce (Employee Losses) - Distribution by Disability, in DHS, PWDs in the permanent workforce are exceeding the inclusion rate benchmark for 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.

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

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

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

**Voluntary Separations:**

PWTDs Inclusion Rate: 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.

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

During FY 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:

1<sup>st</sup> Top Reason: Personal or Family Related (8 percent)

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

3<sup>rd</sup> 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:

- 1<sup>st</sup> Top Reason: Supervisor/Management (11 percent)
- 2<sup>nd</sup> Top Reason: Work Environment (8.8 percent)
- 2<sup>nd</sup> Top Reason: Personal/Family Related (8.8 percent)
- 3<sup>rd</sup> 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:

- 1<sup>st</sup> Top Reason: Supervisor/Management (23 percent)
- 2<sup>nd</sup> Top Reason: Salary/Pay (7 percent)
- 2<sup>nd</sup> Top Reason: Work Environment (7 percent)
- 2<sup>nd</sup> Top Reason: Geographic Location (7 percent)
- 2<sup>nd</sup> Top Reason: Health Related (7 percent)
- 3<sup>rd</sup> Top Reason: Personal/ Family Related (5.3 percent)
- 3<sup>rd</sup> Top Reason: Advancement Opportunities (5.3 percent)
- 3<sup>rd</sup> 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 qualified individuals with disabilities.	Agree 16.72%	Agree 14.17%	Agree 15.16%
		Strongly Agree 15.76%	Strongly Agree 10.48%	Strongly Agree 11.75%
		Neither Agree nor Disagree 11.58%	Neither Agree nor Disagree 10.48%	Neither Agree nor Disagree 9.96%
3	DHS proactively supported efforts to improve the RECRUITMENT of individuals with disabilities.	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	DHS proactively supported efforts to improve the HIRING of individuals with disabilities.	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	DHS proactively supported efforts to improve the ADVANCEMENT of individuals with disabilities.	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	DHS proactively supported efforts to improve the RETENTION of individuals with disabilities.	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 C.F.R. § 1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29

U.S.C. § 794 (b)) concerning the accessibility of agency technology and under the Architectural Barriers Act of 1968 (42 U.S.C. § 4151- 4157) concerning the accessibility of agency facilities, along with instructions on how to file complaints alleging violations of these accessibility requirements. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

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

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

Specifically, the website provides:

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 C.F.R. § 1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide PAS to employees in 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 VI: EEO Complaint and Findings Data

### A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWDs file a formal EEO complaint alleging harassment, as compared to the government-wide average?  
Yes                      No      **X**      N/A
2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?  
Yes **X**                      No                      N/A
3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

During FY 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 PWDs file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?  
Yes                      No      **X**      N/A

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

Yes **X**      No      N/A

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

During FY 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 VII: Identification and Removal of Barriers

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

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

Yes **X**      No

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

Yes **X**      No      N/A

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

See following plans for Triggers 1 through 4:

<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.	
Barrier(s)	Not Identified	
Objective(s)	Increase workforce participation rates of PWDs and PWTDs at all grade levels.	
Responsible Official(s)		Performance Standards Address the Plan? (Yes or No)
Laura Davis, CRCL Ginny Berry, OCHCO Nicshan Floyd, OAST		Yes Yes N/A
<b>Barrier Analysis Process Completed?</b> (Yes or No)		<b>Barrier(s) Identified?</b> (Yes or No)
No		No
Sources of Data	Sources Reviewed? (Yes or No)	Identify Information Collected
Workforce Data Tables	Yes	<p><b>FY 2022 Update:</b> B1 – Total Permanent Workforce DHS experienced an increase of 959 employees from FY 2021 to FY 2022 for PWDs, representing a total of 28,669 employees and 14.75 percent of the permanent workforce, with a total ratio increase of 0.39 percent, equal to employees without disabilities. PWTDs experienced an increase of 42 employees, representing 2,460 employees and 1.27 percent of the permanent workforce, with a ratio increase of 0.01 percent.</p> <p>DHS New Hires for PWDs represented 14.99 percent, exceeding the goal of 12 percent, and PWTDs represented 1.37 percent, below the two percent goal.</p> <p>DHS experienced decreases in Separation rates compared to FY 2021 for both PWDs and PWTDs. PWDs separated at a rate of 15.71 percent, compared to 16.93 percent in FY 2021, and PWTDs separated at 1.49 percent, compared to 1.78 percent in FY 2021.</p> <p>-----</p> <p><b>FY 2021 Update:</b> B1 – Total Permanent Workforce DHS experienced an increase of 1,089 employees from FY 2020 to FY 2021 for PWDs, representing 14.22 percent, and a ratio increase of 0.54 percent, the highest of every group. PWTDs experienced a slight decrease</p>

		<p>of -6 employees, representing 1.25 percent, and a ratio decrease of -0.01 percent.</p> <p>DHS New Hires for PWDs represented 16.19 percent, exceeding the goal of 12 percent, and PWTDS represented 1.44 percent, slightly below the two percent goal.</p> <p>DHS experienced an overall increase in Separation rates compared to FY 2020. PWDs separated at a rate of 16.93 percent, and PWTDS separated at a slightly higher rate of 1.78 percent, compared to 1.76 percent in FY 2020.</p> <p>-----</p> <p><b>Prior year summary analysis can be found in prior year reports...</b></p>
Complaint Data (Trends)	Yes	<p><b>FY 2022 Update</b></p> <p>462 – (Part IV) Bases and Issues Alleged in Complaints Filed: DHS experienced an increase from 84 in FY 2021 to 113 in FY 2022 (34.52 percent) in total number of complaints alleging failure to accommodate.</p> <p>DHS also experienced an increase from 159 in FY 2021 to 202 in FY 2022 (27.04 percent) in the total number of complaints alleging harassment based on disability.</p> <p>Complaints alleging discrimination based on disability has continued to increase in the last eight years (FY 2014 – FY 2022) from 13.60 percent of all complaints to 30.91 percent of all complaints in FY 2022. Disability discrimination was alleged in 506 complaints, which is a 52.8 percent increase over the prior year when discrimination based on disability was raised in 331 complaints.</p> <p>Considering complaints by issue, complaints based on “reasonable accommodation” ranked seventh out of twenty-four issues during FY 2022, compared to sixth in FY 2021, and complaints by issue “medical examination,” rose significantly, from 15 in FY 2021 to 199 in FY 2022, moving to the fifth most common issue raised.</p> <p>-----</p> <p><b>FY 2021 Update</b></p> <p>462 – (Part IV) Bases and Issues Alleged in Complaints Filed: DHS experienced a significant decrease from 118 in FY 2020 to 84 in FY 2021 in total number of complaints</p>



		<p>alleging failure to accommodate resulting in a percent change of -28.81 percent.</p> <p>DHS also experienced a significant decrease from 244 in FY 2020 to 159 in FY 2021 in the total number of complaints alleging harassment based on disability resulting in a percent change of -34.84 percent.</p> <p>No FEAR Act Report (FY 2021) – Complaints based on disability increased in the last seven years (FY 2014 – FY 2020) from 13.60 percent of all complaints to 32.45 percent of all complaints in FY 2020, then decreasing to 29.26 percent at the end of FY 2021. Disability discrimination was alleged in 328 complaints, which is a 3.19 percent decrease over the prior year when disability discrimination was raised in 418 complaints.</p> <p>Considering complaints by issue, complaints based on “reasonable accommodation” ranked sixth out of twenty-four issues during FY 2019 compared to seventh in FY 2018.</p> <p>DHS is also monitoring complaints by issue for “medical examinations,” which has also experienced a significant increase from eight in FY 2013 to 32 in FY 2019, none of which resulted in a finding of discrimination.</p> <p><b>Prior year summary analysis can be found in prior year reports...</b></p>
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	<p><b>FY 2022 462 Report Update</b> – DHS had an increase in the total number of settlements based on disability harassment, from 47 in FY 2021 to 52 in FY 2022.</p> <p>There was a slight decrease in the number of settlements based on failure to accommodate, with 39 in FY 2021 and 37 in FY 2022.</p> <p>During FY 2022, DHS had four findings based on disability harassment and one finding based on failure to accommodate. This was an increase in the total number of findings, from 2 in FY 2021 to five in FY 2022.</p> <p>DHS continues to remain under the government-wide average for both types of complaints filed by PWDs for the third year in a row.</p> <p>-----</p>

		<p><b>FY 2021 462 Report Update</b> – DHS had an increase in the total number of settlements based on disability harassment when compared to 37 in FY 2020 to 47 in FY 2021.</p> <p>There was no reported change in the number of settlements based on failure to accommodate, remaining the same, 39, in FY 2020 and FY 2021.</p> <p>During FY 2021, DHS had one finding based on disability harassment and one finding based on failure to accommodate. There was a decrease in the total number of findings from 10 in FY 2020 to two in FY 2021.</p> <p>DHS continues to remain under the government-wide average for both types of complaints filed by PWDs for the second year in a row.</p> <p><b>Prior year summary analysis can be found in prior year reports...</b></p>
Climate Assessment Survey (e.g., FEVS)	<b>No</b>	
Exit Interview Data	<b>Yes</b>	<p><b>FY 2022 Update – DHS Exit Survey</b> The DHS 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 for separating PWDs as the primary reason for leaving were: (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 for separating PWTDS 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 continued to include data on the six established disability program questions from hiring and recruitment to accommodations and accessibility. Details are provided in Section V: Plan to Improve Retention of Persons with Disabilities.</p>

		<p>-----</p> <p><b>FY 2021 Update – DHS Exit Survey</b>  The DHS Exit Survey results exclude TSA, USSS, CBP, CISA and ICE. Due to continued transition efforts, the exit survey process has resulted in increased decentralization of efforts. Component specific data can be gleaned from Component level reports. Aside from retirement, based on data available for FY 2021, the top three primary reasons for PWDs separating from DHS include: 1) Supervisor/Management; 2) Personal or Family Related; and 3) Advancement Opportunities.</p> <p>While not in the top three primary reasons, the percentage of separating PWD employees selecting “health reasons” increased slightly from 5.7 or two respondents in FY 2020, to 7.17 percent or four respondents in FY 2021 for PWDs. DHS will continue to monitor that cited reason. The Department surmises a direct correlation between “separation for health reasons” and “the high percentage of positions with medical and physical requirements.”</p> <p>FY 2021 Exit Survey results now include specific data on the newly established disability program questions. DHS used the FY 2020 responses to these questions as a baseline for its FY 2021 summary analysis. Details are provided in the FY 2021 Accomplishment section of Trigger # 5.</p>
Focus Groups	<b>No</b>	
Interviews	<b>No</b>	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	<b>No</b>	
Other (Please Describe)	<b>Yes</b>	<p><b>FY 2022 - Utilization Analysis by Grade Cluster (Perm)</b>  For the fourth consecutive year, DHS experienced an increase in both the GS-1- GS-10 and GS-11-SES Grade Clusters for PWDs when compared to the previous year as follows:  PWDs Grade Cluster 1-10: 10.69 percent (below 12 percent)  PWDs Grade Cluster 11-SES: 14.75 percent (above the 12 percent goal)</p> <p>A slight decrease was reported for PWTs in the GS-1- GS-10 cluster, and an increase in the GS-11-SES cluster, when compared to the previous year as follows:  PWTs Grade Cluster 1-10: 1.21 percent (below two percent)</p>

		<p>PWTDs Grade Cluster 11 – SES: 1.30 percent (below 2 percent)</p> <p>-----</p> <p><b>FY 2021 - Utilization Analysis by Grade Cluster (Perm)</b>  For the third consecutive year, DHS experienced an increase in both the GS-1- GS-10 and GS-11-SES Grade Clusters for PWDs as follows:  PWTDs Grade Cluster 1-10 10.47 percent (below 12 percent)  PWTDs Grade Cluster 11-SES 14.21 percent (above the 12 percent goal)</p> <p>PWTDs in the GS-1- GS-10 cluster and no change in the GS-11-SES cluster:  PWTDs Grade Cluster 1-10 1.22 percent (below two percent)  PWTDs Grade Cluster 11 – SES 1.27 percent (below 2 percent)</p>		
<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
12/30/2017	Issue Annual Hiring Goals for PWDs and PWTDs then socialize throughout DHS.	Yes		12/27/2017
09/30/2018	Update DHS Disability training module for managers and HR Professionals ( <i>Employment of People with Disability: A Roadmap to Success Training</i> )	Yes	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. § 1614.203(d)(5).	Yes		3/08/2018
09/30/2018	Collaborate with OCHCO to revise DHS's standard language on all vacancy announcements to encourage applicants with disabilities to apply, to clearly explain the Schedule A process, and provide information on requesting reasonable accommodations.	Yes	09/30/2019	4/18/2019
09/30/2018	Revise Reasonable Accommodation procedures to include procedures for providing Personal Assistance Services.	Yes	06/30/2021	03/23/2021
09/30/2018	Develop and post notice of rights for employees and applicants under Section 508 of the Rehabilitation Act	Yes		09/30/2018

	and the Architectural Barriers Act on the internal and external DHS websites.			
03/30/2018	Implement and post the Department's Affirmative Action plan for Individuals with Disabilities to the DHS website internally (DHS Connect) and externally (DHS.gov).	Yes	7/19/2018	07/19/2018
09/30/2020	Collaborate with OCHCO to explore the feasibility of considering disability status as a positive factor in hiring and promotions decisions to the extent permitted by law.	Yes	6/30/2023	
04/01/2019	Develop a bi-annual report to monitor Components' progress toward increasing the participation of PWDs and PWTDs in Mission Critical Occupations.	Yes	6/30/2021	9/30/2021
<b>Fiscal Year</b>	<b>Accomplishments</b>			
2017	N/A - Newly established.			
2018	<p><b>Hiring Goals:</b></p> <p>During FY 2018, DHS set a 12 percent hiring goal for Persons with Disabilities (PWDs) at all grade levels; a two percent hiring goal for Persons with Targeted Disabilities (PWTDs) at all grade levels, excluding law enforcement and transportation security officer occupations; and a 1.5 percent hiring goal for Schedule A hires excluding law enforcement and transportation security officer occupations.</p> <p>As a result of these goals, 10.4 percent of new hires were PWDs and 1.7 percent were PWTDs in non-law enforcement and non-TSO positions. While the Department did not meet the new hire goals listed above in these two areas, it should be noted that DHS ended FY 2018 with PWDs representing 10.5 percent of the total workforce and PWTDs representing 2.4 percent, both increases from FY 2017 (9.9 percent and 2.1 percent, respectively). In addition, Schedule A hires constituted 1.6 percent of all new hires in non-law enforcement and non-TSO positions, exceeding the goal and increasing by 35 percent from FY 2017.</p> <p>To support and expand DHS's outreach and recruitment, SRDI, in coordination with CRCL, began compiling a listserv of all disability organizations that will be maintained and distributed on an annual basis to all DHS Components. The listserv will be finalized in FY 2019 for distribution and will include disability organizations such as America Job Centers, Veteran's Vocational Rehabilitation and Employment Program, Centers for Independent Living and Employment Network providers.</p> <p><b>Disability Training:</b></p> <p>The Roadmap to Success training was updated during FY 2017 and FY 2018 to include the provision of amended 29 C.F.R. § 1614.203(d)(5), as well as</p>			

	<p>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. DHS (Department-level), U.S. Coast Guard, the Transportation Security Administration, and U.S. Secret Service submitted either a draft or their final revised procedures to the EEOC for review and approval pursuant to Executive Order 13164, during the reporting period. CRCL will continue to monitor and track the status and progress with the remaining Components in meeting this requirement. DHS's procedures require its Components to submit their updated reasonable accommodation procedures to CRCL for review prior to submission to EEOC.</p> <p><b>Develop and post notice of rights under Section 508 and the Architectural Barriers Act on the internal and external websites.</b> During FY 2018, DHS updated its web page, e.g., internal DHS Connect page (<a href="http://dhsconnect.dhs.gov/pages/accessibility.aspx">http://dhsconnect.dhs.gov/pages/accessibility.aspx</a>), for both accessibility and consistency to include a description of rights and how to file a complaint under Section 508.</p> <p><b>Implement and post FY 2017 Affirmative Action Report and FY 2018 Plan</b> As required, DHS posted its FY 2017 Affirmative Action Report and FY 2018 Plan on DHS' public facing website at the following location: <a href="http://www.dhs.gov/reports-office-civil-rights-and-civil-liberties">www.dhs.gov/reports-office-civil-rights-and-civil-liberties</a>. CRCL continues to collaborate with OCHCO and DHS Components to ensure effective implementation of the AAP on a regular basis.</p>
2019	<b>Disability Training:</b>

	<p>DHS continued its efforts to redevelop and expand its <i>DHS Roadmap to Success</i> training module. Modifications to the training include recent changes in disability employment law, Section 508 compliance, and the addition of Personal Assistance Services as a regulatory requirement in Title 29, Part 1614. CRCL developed and submitted a statement of objectives to support a request for proposal to OPM's USA Learning office. Based on the feedback received from OPM including the total estimated cost to redesign the training, CRCL decided to explore other options. As a result, CRCL consulted with OCHCO's Strategic Learning Development and Engagement's (SLDE) Learning Technology and Innovation (LTI) Division. DHS is certain that the services provided in-house by the SLDE-LTI will support CRCL's training development and implementation needs. The goal remains to deploy the revised <i>DHS Roadmap to Success</i> module before the end of FY 2020 with a roll-out in early FY 2021.</p> <p><b>Revise DHS Standard Language on All Vacancy Announcements:</b> As recommended by CRCL, in an alert, guidance to the DHS Human Capital Leadership Council (including all Component Chief Human Capital Officers and others) was issued on April 18, 2019, regarding updated "mandatory language for Job Opportunity Announcements – Disability Recruitment." The alert provided the required language that should be included in all competitive and excepted service job opportunity announcements. Specifically, the language encourages persons with disabilities to apply. This activity is closed.</p> <p><b>Revise Reasonable Accommodation and Personal Assistance Services Procedures:</b> In furtherance of DHS efforts to implement approved revised reasonable accommodation procedures to include procedures for processing personal assistance services consistent with the new obligations outlined in amended 29 C.F.R. § 1614.203(d)(5), CRCL continued to coordinate reviews during FY 2019. The Department's draft revision to Instruction Number 259-01-001, implementing DHS procedures for facilitating reasonable accommodation and personal assistance service requests is currently in the official DHS Directives System review process. CRCL has also conducted reviews of Component-level revised procedures and provided edits and comments prior to submission to EEOC for approval. As a result, DHS (Departmental), U.S. Coast Guard, the Transportation Security Administration, and U.S. Secret Service, Federal Law Enforcement Training Center, and U.S. Citizenship and Immigration Service have all submitted either draft or final revised procedures to EEOC for review and approval pursuant to Executive Order 13164, during the reporting period. CRCL will continue to monitor and track the status and progress with the remaining Components in meeting this requirement. DHS's procedures require all updated reasonable accommodation procedures to be submitted to CRCL for review prior to the Component's submission to EEOC.</p> <p><b>Develop a bi-annual Mission Critical Occupations report to monitor participation of PWDs and 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</p>
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	<p>framework for continued analysis and monitoring. DHS will use a similar format to mirror the 2.0 data table format (excluding the applicant flow data) to continue its efforts in monitoring DHS Priority MCOs during FY 2020 and beyond on a bi-annual basis. This report will be shared with Components as a resource and sample framework to support Component level monitoring efforts of the participation of PWDs and PWTDS in the DHS workforce.</p>
2020	<p><b>Disability Training:</b> DHS revised and expanded its DHS Roadmap to Success training module. CRCL secured funding and contracted with OPM 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 assistance service requests remain in the official DHS Directives System review process. CRCL anticipates fully approved and vetted procedures to be finalized by the end of second quarter in FY 2021. Upon finalization, DHS will resubmit revisions to EEOC as required and will develop a communication strategy to socialize the RA/PAS procedures to the workforce and public, posting on both internal and external DHS websites.</p> <p><b>Collaborate with OCHCO to explore the feasibility of considering disability status as a positive factor in hiring and promotions decisions to the extent permitted by law:</b> 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> </ul>



	<ul style="list-style-type: none"> <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 PWTs in Mission Critical Occupations:</b>  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 PWTs, representing, onboard, hires, and separations within the DHS workforce.</p>
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> </ul>

	<ul style="list-style-type: none"> <li>• Participate in outreach/recruitment events targeted to individuals with disabilities such as Career Expo for People with Disabilities for various positions across DHS Components.</li> <li>• Conduct continuous resume mining from OPM’s Agency Talent Portal (ATP) utilizing Schedule A hiring authority to hire individuals with disabilities and targeted disabilities.</li> </ul> <p><b>Develop a bi-annual report to monitor Components’ progress toward increasing the participation of PWDs and PWTDS in Mission Critical Occupations:</b> Completion 09/30/2021 CRCL developed a mission critical occupation by disability report and plans to monitor from the department level then distribute on a quarterly basis to all Components via the DEAC. The report will serve as an additional resource to support Component-level monitoring efforts of the participation of PWDs and PWTDS in DHS mission critical occupations.</p>
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> 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><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: (<i>modified targeted completion date</i>)</b></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> </ul>

	<ul style="list-style-type: none"> <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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Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

Nothing to report.

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

To be determined.

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

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

<b>Trigger 2</b>	Individuals with disabilities and targeted disabilities are receiving recognition and awards at rates lower than expected when compared to individuals without disabilities.	
<b>Barrier(s)</b>	Not Identified.	
<b>Objective(s)</b>	Collaborate with OCHCO to review recognition and awards policy, practices, and procedures, and determine next steps.	
<b>Responsible Official(s)</b>		<b>Performance Standards Address the Plan? (Yes or No)</b>
CRCL OCHCO		
<b>Barrier Analysis Process Completed? (Yes or No)</b>		<b>Barrier(s) Identified? (Yes or No)</b>
No		No
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	<p><b>FY 2022 Update:</b> 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). PWDs received awards at rates lower than expected in six of the thirteen (13) categories, and PWTDS received awards at lower-than-expected rates in seven of the categories, as follows:</p> <p>PWDs: Time-Off Awards 1 – 10 hours Time-Off Awards 21 – 30 hours Cash Awards \$500 and Under: Cash Awards \$501 - \$999 Cash Awards \$1,000 – \$1,999: Cash Awards \$2,000 - \$2,999:</p> <p>PWTDS: Time-Off Awards 1 – 10 hours Time-Off Awards 11 – 20 hours Time-Off Awards 21 – 30 hours Cash Awards \$500 and Under: Cash Awards \$501 - \$999 Cash Awards \$1,000 – \$1,999: Cash Awards \$2,000 - \$2,999:</p> <p>Section IV, C. Awards for detailed summary. -----</p> <p><b>FY 2021 Update:</b> 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</p>

		<p>corresponding inclusion rate of PWODs (self-reported as no disability) in four of the thirteen (13) categories, including:</p> <p>Time-Off Awards 11 – 20  Cash Awards \$500 and Under:  Cash Awards \$1,000 – \$1,999:  Cash Awards \$2,000 - \$2,999:</p> <p>Section IV, C. Awards for detailed summary.  -----</p>
Complaint Data (Trends)	Yes	<p>FY 2022 462 Report: DHS reported six out of 27 filed complaints; two out of 24 settlements were based on disability and awards during FY 2022, representing a significant increase compared to the prior year.  -----</p> <p>FY 2021 462 Report: DHS reported one out of 13 filed complaints; two out of three settlements were based on disability and awards during FY 2021, representing a significant decrease compared to the prior year.  -----</p> <p>FY 2020 462 Report: DHS reported six out of 22 filed complaints; four out of 10 settlements were based on disability and awards during FY 2020.  -----</p> <p>FY 2019 462 Report: DHS reported two out of 17 filed complaints; one out of five settlements were based on disability and awards during FY 2019.  -----</p> <p>FY 2018 462 Report:  DHS reported four out of 19 filed complaints and two out of four settlements were based on disability and awards during FY 2018.</p>
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	<p>FY 2022: DHS had no findings of disability discrimination based on awards.</p> <p>FY 2021: DHS had no findings of disability discrimination based on awards.</p> <p>FY 2020: DHS had no findings of disability discrimination based on awards.</p> <p>FY 2019: DHS had no findings of disability discrimination based on awards.</p>
Climate Assessment Survey (e.g., FEVS)	Yes	<p>2022 FEVS:</p> <p>The 2022 FEVS consisted of substantially different questions than earlier versions of the FEVS, so the differences in overall averages should be interpreted with caution. Compared to 2021, the PWD average on the core items dropped</p>

		<p>from 64.5 percent positive to 60.0 percent positive. As noted above, the 2022 FEVS differed substantially from the 2021 FEVS, with the notable addition of DEIA-specific questions, with respect to which PWDs report substantially lower percent positive ratings compared to PWODs.</p> <p>FEVS Survey Results</p> <p>Question 8, “I can disclose a suspected violation of any law, rule or regulation without fear of reprisal,” was rated 59.0 percent positive by PWDs in 2022, compared to 56.8 percent positive in 2021. While this represents an increase, PWDs reported nearly 5.3 percent lower than PWODs (64.3 percent).</p> <p>Question 16, “In my work unit, differences in performance are recognized in a meaningful way,” was rated by PWD 36.2 percent in 2022, compared to 44.3 percent positive in 2021.</p> <p>Question 42, “In my organization, arbitrary action, personal favoritism and/or political coercion are not tolerated,” was rated 38.6 percent positive by PWDs, compared to 41.0 percent positive by PWODs. No comparison to FY 21 is available for this question.</p> <p>Question 47, “My supervisor supports my need to balance work and other life issues,” was rated 76.4 percent positive by PWDs in 2022, compared to 76.6 percent positive in 2021.</p> <p>Question 49, “My supervisor treats me with respect,” was rated 81.0 percent positive by PWDs in 2022 and 80.1 percent positive in 2021.</p> <p>Question 53, “My supervisor provides me with constructive suggestions to improve my job performance,” was rated 65.4 percent positive by PWDs, compared to 68.2 percent positive by PWODs.</p> <p>Question 54, “My supervisor provides me with performance feedback throughout the year,” was rated 70.5 percent positive by PWDs, compared to 72.3 percent positive by PWODs.</p> <p>Question 68, “Considering everything, how satisfied are you with your job?”, was rated 56.9 percent positive by PWDs in 2022, down from 57.7 percent positive in 2021.</p>
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		<p>The Best Places to Work rating is based on answers to three FEVS questions:</p> <ul style="list-style-type: none"> <li>• I recommend my organization as a good place to work.</li> <li>• Considering everything, how satisfied are you with your job?</li> <li>• Considering everything, how satisfied are you with your organization?</li> </ul> <p>In 2021, PWDs rated these questions an average of 55.1 percent positive, and the average dropped in 2022 to 54.4 percent positive. PWODs rated these questions higher at 56.1 percent positive in 2022. The Governmentwide average (all employees) on these three questions in 2022 was 63.6 percent.</p> <p>Eleven questions were added in 2022 to address DEIA issues. PWDs rated these questions 62.4 percent positive, compared to 67.6 percent positive for PWODs. The Governmentwide average (all employees) was 71.9 percent.</p> <p>Three questions were added in 2022 related to accessibility needs. PWDs, who are the individuals most likely to need or seek accessibility services, rated these items 56.2 percent positive, compared to the Governmentwide average (all employees) of 66.9 percent.</p>
Exit Interview Data	Yes	<p>FY 2022 Update: Exit Survey: Review of the FY 22 Exit Survey revealed that 56 out of 1,115 respondents selected Salary/Pay as the primary reason for leaving the agency. Of the 56 respondents, PWDs represented 8.9 percent (5/56) and PWTs represented 7.1 percent (4/56). Salary/Pay was one of 3 top reasons for separating PWTs. No PWDs or PWTs selected “Recognition” as a primary reason for leaving, and additional review did not find any additional information based on Awards or Bonuses.</p> <p>-----</p> <p>FY 2021 Update: Exit Survey: Bonus was no longer an available option under reasons for leaving in the updated survey. Additional review was conducted based on key words to include bonuses and awards, with no significant information found. Additional review revealed that a very small number (3/71)</p>

		respondents with disabilities indicated that “Salary/Pay” was a primary reason for leaving. ----- Upon review of the Exit Survey, the reason for leaving associated with “bonus” was reported by 18 employees or 1.20 percent of all respondents. Of those responses, only one respondent, self-identified as having a disability.		
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	N/A			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2018	Collaborate with OCHCO to review recognition and awards policy, practices, and procedures, and determine next steps.	Yes	09/30/2020	09/30/2020
09/30/2021	Expand review of recognition and award practices across DHS. (new)	Yes	09/30/2023	
Fiscal Year	Accomplishments			
2017	N/A - Newly established.			
2018	During FY 2018, CRCL identified initial data sources and policies and procedures at the department level to begin review. As reported above, data sources reviewed include workforce data tables, complaint data, Federal Employment Viewpoint Survey responses, and the DHS Exit Interview Survey report.  The following DHS Directives and Instructions have been identified for further review in coordination with OCHCO during FY 2019:  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			
FY 2019	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			



	<p>Current (no changes are required and reissued as is with a “current as of” date listed). The Component Directives Manager is responsible for affirmatively indicating to the DHS Directives Manager what appropriate action is necessary to maintain the Directive or Instruction upon receipt of the notice from the DHS Directives Manager, that a two-year review is due.</p> <p>Based on this process, all policies and procedures identified are reviewed every two years by the Office of the Chief Human Capital Officer. To date, no potential barriers have been identified.</p> <p>CRCL will continue to coordinate and collaborate with OCHCO to ensure perceived or actual barriers that may be caused by DHS award policies or associated procedures are addressed.</p>
FY 2020	<p>Based on a completed review of the department’s policies and procedures previously identified and listed below, CRCL did not find any actual or perceived barriers. CRCL will continue to review data and resources both at the Department and Component levels to include “practices” as part of its individual with disabilities barrier analysis to be conducted in FY 2021.</p> <p>Policies and Procedures Reviewed:</p> <ul style="list-style-type: none"> <li>255-02 Employee Recognition</li> <li>255-02-001 Instruction guide on Employee Recognition</li> <li>255-03-001-01 Time-Off Awards</li> <li>255-01 Honorary Awards</li> <li>255-01-001 Instruction guide on Honorary Awards</li> <li>255-12 Approval of Monetary Awards over \$6,000</li> </ul>
FY 2021	<p>CRCL will continue to review data and resources both at the Department and Component levels to include “practices” as part of its individual with disabilities barrier analysis. To support our efforts, at the end of the third quarter, CRCL developed and issued a Human Resources Policies, Procedures, and Practices Questionnaire through Exec Sec to all DHS Components. The questionnaire was divided into six sections focused on policies, procedures, and practices related to: (I) Recruitment, (II) Hiring, (III) Training and Development Programs, (IV) Promotions, (V) Separations, and (VI) Retention. As part of our next steps, CRCL plans to conduct follow-up discussions with Components and plans to address award policies and practices to gain additional information. CRCL’s goal is to complete the analysis by mid-year FY 2022.</p>
FY2022	<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</p>

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

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

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

To be determined.

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

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

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

01/30/2018	Monitor Schedule A Conversions on a quarterly basis.	Yes		12/12/2018
09/30/2018	Coordinate efforts with OCHCO to develop DHS Schedule A guidance.	Yes	06/30/2023	
Fiscal Year	Accomplishments			
FY 2018	<p>During FY 2018, DHS converted a total of 157 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 55.28 percent conversion rate. Of those converted, 138 were converted non-competitively after two years of satisfactory service, 15 converted to career or career conditional before two years of service, and four were converted by other means. Overall, DHS experienced an increase in conversions when compared to 101, or 53 percent during FY 2017.</p> <p><b>Review and analyze current policies and procedures for excepted service appointments.</b> CRCL, in coordination with OCHCO/SRDI, began reviewing existing policies and procedures at the Department level during FY 2018. As a result, we identified several excepted service policies, and found that procedures for Schedule A, 5 C.F.R. § 213.3102(u), for hiring people with severe physical disabilities, psychiatric disabilities, and intellectual disabilities, are not included.</p> <p><b>Monitoring Schedule A Conversions on a quarterly basis.</b> CRCL has developed a Schedule A reporting and tracking tool to monitor DHS' Schedule A workforce by Components. The tracking tool provides a summary review of Schedule A employees by:</p> <ul style="list-style-type: none"> <li>• Total Eligible</li> <li>• Total Converted <ul style="list-style-type: none"> <li>○ Conversions to career or career conditional after 24 months</li> <li>○ Conversions to career or career conditional before 24 months</li> <li>○ Conversion Other</li> <li>○ Separated before conversion</li> </ul> </li> <li>• Total Separations</li> <li>• Eligible not Converted</li> <li>• No Longer Eligible at end of FY 2018 (<i>but was eligible at some point in the given year</i>)</li> <li>• Not Eligible for Conversion</li> </ul> <p>CRCL shares updated summary reports with all Components through the Disability Employment Advisory Council, which includes Component level Disability Program Managers and Selective Placement Program Coordinators. Upon request, CRCL provides detailed reports to support follow-up actions at the Component level as necessary and appropriate.</p> <p>This activity is complete. CRCL will continue to provide reports and monitor on a quarterly basis as a standard practice.</p> <p><b>Coordinate efforts with OCHCO to develop DHS Schedule A policy and procedures.</b> CRCL and SRDI began efforts to benchmark other federal agencies to identify Schedule A best practices. As a result, SRDI has drafted a proposed standard operating procedure which is currently in the review process.</p>			

FY 2019	<p>During FY 2019, DHS converted a total of 159 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 55.28 percent conversion rate. Of those converted, 129 were converted non-competitively after two years of satisfactory service, 27 converted to career or career conditional before two years of service, and three were converted by other means. Overall, DHS experienced an increase in conversions when compared to the 157 during FY 2018. In support of this effort, CRCL continues to monitor Schedule A conversions on a quarterly basis and shares Component-level reports for appropriate action. The reports provide a summary review of Schedule A employees by:</p> <ul style="list-style-type: none"> <li>• Total Schedule A Workforce</li> <li>• Total Eligible</li> <li>• Total Converted <ul style="list-style-type: none"> <li>○ Conversions to career or career conditional after 24 months</li> <li>○ Conversions to career or career conditional before 24 months</li> <li>○ Conversion Other</li> <li>○ Separated before conversion</li> </ul> </li> <li>• Total Separations</li> <li>• Eligible not Converted</li> <li>• No Longer Eligible at end of FY 2018 (but was eligible at some point in the given year)</li> <li>• Not Eligible for Conversion</li> </ul> <p><b>Coordinate efforts with OCHCO to develop DHS Schedule guidance.</b>  Modified planned activity description to change efforts from developing policy and procedures to developing Schedule A guidance and to update target date for completion until 9/30/2020. CRCL and OCHCO are continuing these efforts to develop and implement guidance with sound strategies and best practices for utilizing the Schedule A appointment authority for employment, retention, and career development opportunities. DHS plans to socialize and implement the final guidance by 2021.</p> <p>To support this effort, CRCL developed a DHS Schedule A Fact Sheet. The fact sheet is a high-level overview of the Schedule A Hiring Authority and provides prospective candidates with disabilities an overview on applying for positions within DHS utilizing Schedule A, along with a list of DHS Selective Placement Program Coordinators.</p> <p>Additionally, on Tuesday, July 30, 2019, DHS hosted a webinar on recruiting and hiring individuals with disabilities and targeted disabilities. Over 30 supervisors, hiring managers, recruiters, and human resources specialists participated to increase awareness of this topic. A post-webinar survey indicated 81 percent of the participants said they increased their knowledge of Schedule A direct hiring authority from 34 percent prior to the webinar. Fifty-eight percent of the participants indicated they increased knowledge of the Bender program from 17 percent prior to the webinar.</p>
FY 2020	<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><b>Coordinate efforts with OCHCO to develop DHS Schedule A guidance.</b> Due to unforeseen delays, efforts to develop and deploy DHS Schedule A Guidance were slightly delayed. OCHCO SRDI drafted a DHS Schedule A standard operating procedures document. The draft was forwarded to CRCL for review in November 2020. The target date for this activity has been modified to 06/30/2021 to provide additional time for review and coordination.</p> <p>Additionally, all DHS hiring officials (managers/supervisors) and human capital professionals are required to complete the People with Disabilities: A Roadmap to Success course within 60 days of appointment and then every two years thereafter. The Roadmap training is a comprehensive course on disability employment including the use of special hiring non-competitive authorities such as Schedule A and 30 percent or More Disabled Veteran appointments. As previously mentioned, because this training is a vital to support DHS' affirmative action program for individuals with disabilities and targeted disabilities, CRCL is currently in the process of developing a new training module with updated content consistent with current laws, regulations, initiatives, and Executive Orders.</p>
FY 2021	<p>During FY 2021, DHS converted a total of 225 Schedule A employees (Permanent and Temporary) to the Competitive Service, representing a 46.20 percent conversion rate and an increase of 55 conversions compared to FY 2020. Of those converted, 198 were converted non-competitively after two years of satisfactory service, 20 converted to career or career conditional before two years of service, with six converted by other means. As a result of quarterly tracking and monitoring, DHS Components continued efforts to sustain and experience incremental increases in conversions for the last five years, from 101 conversions in FY 2017 to 225 conversions in FY 2021.</p> <p>To support increases of Schedule A conversions, CRCL continues to monitor Schedule A conversions on a quarterly basis then share Component-level prepared reports for appropriate action. This report continues to be an effective tool for increasing coordination and tracking of conversions by offering a summary review of Schedule A employee eligibility status.</p> <p><b>Coordinate efforts with OCHCO to develop DHS Schedule A guidance.</b> The Department recognizes that while it has an established policy (DHS Directive) on administering the employment of veterans, it does not have a policy covering the Schedule A Appointment Authority for Individuals with Disabilities. During FY 2021, SRDI after consultation with the DHS Disability Employment Program, initiated coordination with the Human Capital Policy and Programs (HCPP), to explore options of implementing departmental guidance. Further coordination efforts will determine whether DHS guidance should be implemented in the form of standard operating procedures (SOPs), a new policy (DHS Directive) for Schedule A, or modifications to the existing Excepted Service Directive. DHS plans to determine a final approach to implement Schedule A guidance by the end of FY 2022.</p>
FY 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><b>Coordinate efforts with OCHCO to develop DHS Schedule A guidance.</b>  <b><i>Modified target date for completion to 2023 due to staffing changes and resources.</i></b>  The Department recognizes that while it has an established policy (DHS Directive) on administering the employment of veterans, it does not have a policy covering the Schedule A Appointment Authority for Individuals with Disabilities. During FY 2021, SRDI, after consultation with the DHS Disability Employment Program, initiated coordination with the Human Capital Policy and Programs (HCPP), to explore options of implementing departmental guidance. Further coordination efforts will determine whether DHS guidance should be implemented in the form of standard operating procedures (SOPs), a new policy (DHS Directive) for Schedule A, or modifications to the existing Excepted Service Directive. DHS plans to determine a final approach to implement Schedule A guidance by the end of FY 2023.</p>
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Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

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

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

To be determined.

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

DHS has modified the target date for completion to 06/30/2023.

<b>Trigger 4</b>	Higher than expected separation rates for individuals with disabilities.	
<b>Barrier(s)</b>		
<b>Objective(s)</b>	Increase retention rates of individuals with disabilities and targeted disabilities.	
<b>Responsible Official(s)</b>		<b>Performance Standards Address the Plan? (Yes or No)</b>
CRCL OCHCO		
<b>Barrier Analysis Process Completed? (Yes or No)</b>		<b>Barrier(s) Identified? (Yes or No)</b>
<b>No</b>		<b>No</b>
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	<p>FY 2022 Update: B1: Total Workforce Distribution by Disability/ Employee Loss indicates an increase when compared to FY 2021, representing 15.71 percent in FY 2022 compared to 14.43 percent in FY 2021. Separations for PWTDS during FY 2022 decreased compared to FY 2021, representing 1.49 percent compared to 1.76 percent in FY 2021.</p> <p>When comparing separation rates by the inclusion benchmarks, both groups are exceeding the rates of PWODs for both voluntary and involuntary separations.</p> <p>-----</p> <p>FY 2021 Update: B1: Total Workforce Distribution by Disability/ Employee Loss indicates an increase when compared to FY 2020, representing 16.31 percent in FY 2021 compared to 14.43 percent in FY 2020. Separations for PWTDS remained the same compared to FY 2020 holding at 1.76 percent.</p> <p>When comparing separation rates by the inclusion benchmarks, both groups are exceeding the rates of PWODs for both voluntary and involuntary separations.</p> <p>-----</p>
Complaint Data (Trends)	Yes	<p>FY 2022 Update:</p> <p>462 – (Part IV) Bases and Issues Alleged in Complaints Filed: DHS experienced an increase from 84 in FY 2021 to 113 in FY 2022 in total number of complaints alleging failure to accommodate resulting in a percent change of 34.52 percent.</p> <p>DHS also experienced an increase from 159 in FY 2021 to 202 in FY 2022 in the total number of complaints alleging</p>



		<p>harassment based on disability resulting in a percent change of 27.04 percent.</p> <p>No FEAR Act Report (FY 2022 4<sup>th</sup> Qtr.) Complaints filed based on disability continued to increase in the last eight years (FY 2014 – FY 2022) from 13.60 percent of all complaints to 30.91 percent of all complaints in FY 2022. Disability discrimination was alleged in 506 complaints, which is a 2.18 percent increase over the prior year when discrimination based on disability was raised in 331 complaints.</p> <p>Considering complaints by issue, complaints based on “reasonable accommodation” ranked seventh out of twenty-four issues during FY 2022 compared to sixth in FY 2021, and complaints by issue “medical examination,” rose significantly from 15 in FY 21 to 199 in FY 22, moving to the fifth most common issue raised.</p> <p>Further review found that 21 of the 34 Bases and Issues alleged in complaints were based on disability.</p> <p>-----</p> <p>FY 2021 Update:</p> <p>462 – (Part IV) Bases and Issues Alleged in Complaints Filed: DHS experienced a significant decrease from 118 in FY 2020 to 84 in FY 2021 in the total number of complaints alleging failure to accommodate resulting in a change of -28.81 percent.</p> <p>DHS also experienced a significant decrease from 244 in FY 2020 to 159 in FY 2021 in the total number of complaints alleging harassment based on disability resulting in a change of -34.84 percent.</p> <p>No FEAR Act Report (FY 2021) – Complaints based on disability increased in the last seven years (FY 2014 – FY 2020) from 13.60 percent of all complaints to 32.45 percent of all complaints in FY 2020, then decreasing to 29.26 percent at the end of FY 2021. Disability discrimination was alleged in 328 complaints, which is a 3.19 percent decrease over the prior year when disability discrimination was raised in 418 complaints.</p>
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	No	<p>2022 FEVS:</p> <p>The 2022 FEVS consisted of substantially different questions than earlier versions of the FEVS so the differences in overall averages should be interpreted with caution. Compared to 2021, the PWD average on the core items dropped from 64.5 percent positive to 60.0 percent positive. As noted above, the 2022 FEVS differed substantially from the 2021 FEVS with the notable addition of DEIA-specific questions, which</p>

	<p>PWD's report substantially lower percent positive ratings compared to non-PWDs.</p> <p>FEVS Survey Results</p> <p>Question 8, "I can disclose a suspected violation of any law, rule or regulation without fear of reprisal," was rated 59.0 percent positive by PWDs in 2022 compared to 56.8 percent positive in 2021. While this represents an increase, PWDs reported nearly 5.3 percent lower than PWODs (64.3 percent).</p> <p>Question 16, "In my work unit, differences in performance are recognized in a meaningful way," was rated 36.2 percent by PWDs in 2022 compared to 44.3 percent positive in 2021.</p> <p>Question 42, "In my organization, arbitrary action, personal favoritism and/or political coercion are not tolerated," was rated 38.6 percent positive by PWDs compared to 41.0 percent positive by PWODs. No comparison to FY 21 is available for this question.</p> <p>Question 47, "My supervisor supports my need to balance work and other life issues," was rated 76.4 percent positive by PWDs in 2022 compared to 76.6 percent positive in 2021.</p> <p>Question 49, "My supervisor treats me with respect," was rated 81.0 percent positive by PWDs in 2022 and 80.1 percent positive in 2021.</p> <p>Question 53, "My supervisor provides me with constructive suggestions to improve my job performance," was rated 65.4 percent positive by PWDs compared to 68.2 percent positive by PWODs.</p> <p>Question 54, "My supervisor provides me with performance feedback throughout the year," was rated 70.5 percent positive by PWDs compared to 72.3 percent positive by PWODs.</p> <p>Question 68, Considering everything, how satisfied are you with your job?, was rated 56.9 percent positive in 2022, down from 57.7 percent positive in 2021.</p> <p>The Best Places to Work rating is based on answers to three FEVS questions. In 2021, PWDs rated these questions an average of 55.1 percent positive and the average dropped in 2022 to 54.4 percent positive. PWODs rated these questions higher at 56.1 percent positive in 2022. The Governmentwide average (all employees) on these three questions in 2022 was 63.6 percent.</p> <p>Eleven questions were added to the FEVS in 2022 to address DEIA issues. PWDs rated these questions 62.4 percent positive compared to 67.6 percent positive for non-PWDs. The Governmentwide average (all employees) was 71.9 percent.</p>
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		Three questions were added to the FEVS in 2022 related to accessibility needs. PWDs, who are the individuals most likely to need or seek accessibility services, rated these items 56.2 percent positive compared to the Governmentwide average (all employees) of 66.9 percent.		
Exit Interview Data	No	See update under accomplishments.		
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	No			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
01/30/2018	Review and analyze exit surveys to identify barriers to retention. (annually)	Yes	12/30/2021	12/15/2021
01/30/2018	Monitor separations on a quarterly basis by disability distribution.	Yes		10/16/2018
06/30/2018	Collaborate with OCHCO to explore the feasibility of implementing new retention programs specifically for PWDs and PWTDS.	Yes	09/30/2022	9/30/2022
09/14/2018	Conduct study on reasonable accommodation requests and procedures for delayed and denied accommodations to identify potential correlations to high separations.	Yes	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, PWTDS experienced an increase for involuntary separations from 1.36 percent in FY 2017 to 2.11 percent in FY 2018, while voluntary separations for PWTDS decreased from 1.62 percent in FY 2017 to 1.51 percent in FY 2018.</p> <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 PWTDs.</b>  CRCL through coordinated efforts with OCHCO/SRDI will continue to identify strategies for increasing participation of employees with disabilities in existing DHS mentoring programs and career development programs. During FY 2018, CRCL requested that all Components advertise and encourage individuals with disabilities to consider applying to the DHS Headquarters Mentoring program and all other career development programs already in place throughout the Department to support our affirmative employment obligations.</p>
FY 2019	<p><b>Review and analyze exit surveys to identify barriers to retention.</b>  Modified target date due to the transitional period in FY 2019. Two additional Components implemented Component specific exit surveys, further decentralizing the exit survey program within DHS.  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>

		<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>Followed by an optional open-ended comment box</i>						
<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>						
		<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>Followed by an optional open-ended comment box</i>						
<b>3. DHS takes appropriate steps to ensure reasonable accommodation and/or Personal Assistance Services are provided to qualified individuals with disabilities.</b>						
		<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>					
<i>Followed by an optional open-ended comment box</i>						
<b>Explore feasibility of implementing new retention programs specifically for PWDs and PWTDs.</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.						
CRCL continues to promote the DHS Headquarters Mentoring program and all other career development programs including the recently launched Supervisory Leadership Bridges Self Development Program, which is open to employees with a minimum of one-year employment in DHS and who are in the GS-11 – GS-13 grade levels in the 1801, 1811, 0132, 0301, 0343, and 2210 occupational series. This program is an innovative approach to providing employees across the Department with a flexible developmental path that targets important aspects of supervisory leadership. This program addresses a curated set of essential leadership competencies and integrates virtual learning resources and experiential developmental activities to support affirmative employment obligations.						
FY 2020	<b>Review and analyze exit surveys to identify barriers to retention.</b> Modified target date due to ongoing transitions during FY 2020. As a result, the DHS exit survey platform migrated from a SharePoint platform to a survey tool (SurveyMonkey) to better manage and track responses. Additionally, more Components have moved on to Component specific exit survey processes, further decentralizing the exit survey program within DHS.					

	<p>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

	<p>disability as a condition to acceptance in the program. Mentor applicants were not required to self-identify as having a disability.</p> <p>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.</p>																																								
FY 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><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><td><b>FY22</b></td></tr><tr><td><b>PWOD</b></td><td><b>43.84%</b></td><td><b>34.04%</b></td><td><b>49.44%</b></td></tr><tr><td><b>PWD</b></td><td><b>65.71%</b></td><td><b>54.93%</b></td><td><b>64.91%</b></td></tr><tr><td><b>PWTD</b></td><td><b>43.75%</b></td><td><b>35.29%</b></td><td><b>63.16%</b></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><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><td><b>FY 22</b></td></tr><tr><td><b>PWOD</b></td><td><b>42.02%</b></td><td><b>33.64%</b></td><td><b>46.58%</b></td></tr><tr><td><b>PWD</b></td><td><b>48.57%</b></td><td><b>33.80%</b></td><td><b>64.04%</b></td></tr><tr><td><b>PWTD</b></td><td><b>43.75%</b></td><td><b>29.42%</b></td><td><b>59.65%</b></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><b>3. DHS proactively supported efforts to improve the RECRUITMENT of individuals with disabilities.</b></p> <table><tr><td></td><td><b>FY 20</b></td><td><b>FY 21</b></td><td><b>FY 22</b></td></tr><tr><td><b>PWOD</b></td><td><b>36.96%</b></td><td><b>28.29%</b></td><td><b>40.70%</b></td></tr></table>		<b>FY 20</b>	<b>FY 21</b>	<b>FY22</b>	<b>PWOD</b>	<b>43.84%</b>	<b>34.04%</b>	<b>49.44%</b>	<b>PWD</b>	<b>65.71%</b>	<b>54.93%</b>	<b>64.91%</b>	<b>PWTD</b>	<b>43.75%</b>	<b>35.29%</b>	<b>63.16%</b>		<b>FY 20</b>	<b>FY 21</b>	<b>FY 22</b>	<b>PWOD</b>	<b>42.02%</b>	<b>33.64%</b>	<b>46.58%</b>	<b>PWD</b>	<b>48.57%</b>	<b>33.80%</b>	<b>64.04%</b>	<b>PWTD</b>	<b>43.75%</b>	<b>29.42%</b>	<b>59.65%</b>		<b>FY 20</b>	<b>FY 21</b>	<b>FY 22</b>	<b>PWOD</b>	<b>36.96%</b>	<b>28.29%</b>	<b>40.70%</b>
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	<b>PWD</b>	<b>22.86%</b>	<b>23.89%</b>	<b>50.00%</b>
	<b>PWTD</b>	<b>43.75%</b>	<b>32.35%</b>	<b>47.37%</b>
<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><b>4. DHS proactively supported efforts to improve the <b>HIRING</b> of individuals with disabilities.</b></p>				
	<b>FY 20</b>	<b>FY 21</b>	<b>FY 22</b>	
<b>PWOD</b>	<b>25.73%</b>	<b>28.43%</b>	<b>39.90%</b>	
<b>PWD</b>	<b>57.32%</b>	<b>33.81%</b>	<b>50.00%</b>	
<b>PWTD</b>	<b>56.35%</b>	<b>32.35%</b>	<b>45.61%</b>	
<p>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.</p>				
<p><b>5. DHS proactively supported efforts to improve the <b>ADVANCEMENT</b> of individuals with disabilities.</b></p>				
	<b>FY 20</b>	<b>FY 21</b>	<b>FY 22</b>	
<b>PWOD</b>	<b>33.34%</b>	<b>28.56%</b>	<b>39.43%</b>	
<b>PWD</b>	<b>45.72%</b>	<b>32.39%</b>	<b>44.74%</b>	
<b>PWTD</b>	<b>18.75%</b>	<b>26.47%</b>	<b>45.61%</b>	
<p>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.</p>				
<p><b>6. DHS proactively supported efforts to improve the <b>RETENTION</b> of individuals with disabilities.</b></p>				
	<b>FY 20</b>	<b>FY 21</b>	<b>FY 22</b>	
<b>PWOD</b>	<b>32.24%</b>	<b>27.91%</b>	<b>38.63%</b>	
<b>PWD</b>	<b>17.14%</b>	<b>33.80%</b>	<b>44.74%</b>	
<b>PWTD</b>	<b>31.25%</b>	<b>26.47%</b>	<b>47.37%</b>	
<p>Favorable response rates increased from FY 2021 to FY 2022 for all groups. PWTD had a significantly higher rate than PWOD and PWD.</p>				
<p>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.</p>				
<p><b>Modified Planned Activity: Collaborate with OCHCO to explore the feasibility of implementing new retention programs specifically for PWDs and PWTDs.</b></p>				
<p>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.</p>				
<p>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</p>				

	implemented at the Component level. Accordingly, his planned activity at the Department level will be closed out.
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Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

Exit Surveys – Low response rate and reliable data. CRCL will continue to serve on the working group and provide recommendations and technical guidance.
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For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

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

DHS has modified the target date for completion during FY 2023.
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